



August 1, 2016

The Honorable John B. King Jr.
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Notice of Proposed Rulemaking Docket ID ED-2016-OESE-0032, Elementary and Secondary Education Act of 1965, as Amended by the Every Student Succeeds Act—Accountability and State Plans

Dear Secretary King:

The Coalition for Teaching Quality (Coalition) appreciates the opportunity to provide comments in response to the U.S. Department of Education (ED) notice of proposed rulemaking on accountability and state plans under the Every Student Succeeds Act (ESSA). The Coalition consists of more than 100 national, state, and local organizations committed to the principle that federal policy must ensure that all students have access to teachers and school leaders who enter the profession well-prepared to succeed and who prove themselves effective once there. Together, we represent a diverse membership of civil rights, disability, parent, student, community, educator, and education policy organizations.

ESSA is a continued opportunity for States and districts to ensure that all students have access to well-prepared and effective teaching. Research makes clear that teachers, together with principals and other school leaders, are the most important school-based influences on student learning. Unfortunately, many high-need schools serving predominately traditionally underserved students, specifically students from low-income families, students of color, students with disabilities, and English Language Learners, often do not provide the access to well-prepared and effective educators.

To address this disparity, the Coalition strongly recommends that the final regulations include the following:

1. Define “inexperienced teachers” as teachers with less than three years of teaching experience, which is aligned with current research. Many research studies show that teachers become significantly more effective after three years, suggesting that

inexperienced would ideally be defined as teachers in their first, second, or third years of teaching.¹

2. Define “out-of-field teacher” as any teacher who is not fully certified by the state to teach the subject area, grade level, or student population for which they are assigned.
3. Encourage states and districts to base determinations of “effectiveness” on multiple measures that reflect the varying degrees of effectiveness rather than a binary approach to categorizing teachers as follows:
 - A. For “inexperienced teachers” (whose classroom performance cannot be fully evaluated for a period of time), on the extent to which they have successfully and fully completed their preparation program and other measures of promising practice including successful performance on robust, field-specific teacher performance assessments that validly and reliably measure whether a teacher can successfully teach diverse students in the classroom.
 - B. For “experienced teachers” (those with three or more years of teaching experience), on the basis of professional teaching standards, their joint efforts to improve learning within the school, and appropriate and multifaceted evidence of their contributions to student learning over multiple years (e.g. a minimum of two years).
4. Clarify under section 1111(e)(1)(A)(i), the Parent Right-to-Know provision, that parents need to be notified if a student is not taught by a fully-certified teacher in order to ensure effective and consistent implementation of the provision. In addition, clarify that the term “certification,” as applied to teachers, principals and other leaders means having met “full-certification requirements,” as defined by the state to allow for meaningful differentiation regarding certification status.
5. The proposed regulations indicate that States may expand their reporting on student access to experienced, in-field, and effective teachers to “students represented by any other key terms.” (Section 299.18(c)(2)(vi)). The Coalition recommends that the final regulations specifically indicate to states that they have the flexibility to extend this provision to students with disabilities, English Language Learners, and students in rural areas, to ensure that all students have equitable access to effective, in-field, and experienced teachers.
6. The Coalition supports Section 299.18’s encouragement that States take a comprehensive approach to educator development and support by requiring that States describe their “system of professional growth and improvement for educators that addresses induction, development, compensation, and advancement.” This language is aligned with the Coalition’s recent consensus policy papers supporting a [continuum of teaching and principal excellence](#), including:
 - A. [strengthening the teacher and principal pipeline](#);

¹ Kini, T. and Podolsky, A. (2016). [Does Teaching Experience Increase Teacher Effectiveness: A Review of the Research](#), Learning Policy Institute.

- B. [diversifying the teacher and principal workforce;](#)
- C. [ensuring that the next generation of educators are profession-ready;](#)
- D. [creating opportunities for professional learning and growth;](#) and
- E. [providing pathways for teacher and principal leadership.](#)

Thank you for your consideration. We look forward to working with you to ensure successful implementation of this law.

Sincerely,

Coalition for Teaching Quality

Participating Organizations

National Organizations

Alliance for Excellent Education
Alliance for Multilingual Multicultural Education
American Association of Colleges for Teacher Education
American Association of People with Disabilities
American Association of State Colleges and Universities
American Council for School Social Work
American Council on Rural Special Education
The Arc
ASPIRA Association
Autistic Self Advocacy Network
Autism National Committee
Center for Teaching Quality
Citizen Action of New York
Citizens for Effective Schools
Coalition for Community Schools
Communities for Excellent Public Schools
Council for Exceptional Children
Council of Parent Attorneys and Advocates
Disability Rights Education and Defense Fund Inc.
Easter Seals
Education Law Center
Educators Rising
FairTest, The National Center for Fair & Open Testing
First Focus Campaign for Children
Gamaliel Foundation
Helen Keller National Center
Higher Education Consortium for Special Education
Hispanic Association of Colleges and Universities
Lawyers' Committee for Civil Rights Under Law

Leadership for the Common Good
Learning Disabilities Association of America
Movement Strategy Center
NAACP
National Alliance of Black School Educators
National Association for the Education of Young Children
National Association of Councils on Developmental Disabilities
National Association of Elementary School Principals
National Association of School Psychologists
National Association of Secondary School Principals
National Association of State Directors of Special Education
National Board for Professional Teaching Standards
National Center for Learning Disabilities
National Center on Deaf-Blindness
National Commission on Teaching & America's Future
National Council for Educating Black Children
National Council of Teachers of English
National Council of Teachers of Mathematics
National Disability Rights Network
National Down Syndrome Congress
National Down Syndrome Society
National Education Association
National Latino Education Research & Policy Project
National Network of State Teachers of the Year
National Opportunity to Learn Campaign
New Teacher Center
National Urban League
Opportunity Action
Phi Delta Kappa International
Parents Across America
Partnership for 21st Century Skills
Progressive States Action
Public Advocacy for Kids
Public Advocates Inc.
Rural School and Community Trust
School Social Work Association of America
South East Asia Resource Action Center
TASH - Equity, Opportunity, and Inclusion for People with Disabilities
Teacher Education Division of the Council for Exceptional Children
TESOL International Association
United Cerebral Palsy
United Church of Christ Justice & Witness Ministries

State and Local Organizations

Abbott Leadership Institute – Newark, New Jersey
Action Now – Illinois

Action Now– North Carolina
ACTION United
Alliance for Quality Education (AQE)
Alliance of Californians for Community Empowerment (ACCE)
Arkansas Community Organizations
Bay Area Parent Leadership Action Network
Brighton Park Neighborhood Council – Chicago
California Association for Bilingual Education
California Latino School Boards Association
Californians for Justice
Californians Together
Campaign for Quality Education
Center for the Future of Teaching and Learning Coalition for Educational Justice
Citizen Action of New York
Delawareans for Social and Economic Justice
Educate Our State
Education Voters Pennsylvania
Grow Your Own Illinois
Inner City Struggle
Justice Matters
Legal Advocates for Children and Youth
Montgomery County Education Forum
Parent-U-Turn
Parents for Unity
RYSE Center
San Francisco Teacher Residency
Texas Association of Chicanos in Higher Education
Young Voices-Providence, Rhode Island
Youth On Board – Somerville, Massachusetts
Youth Together