June 18, 2013

Kate Walsh National Council on Teacher Quality 1420 New York Ave, NW, Suite 800 Washington, DC 20005

Dear Ms. Walsh:

This letter is written on behalf of the Texas Association of Colleges for Teacher Education (TACTE). Our organization is comprised of deans of education at both public and private universities throughout the State of Texas. The primary goal of the TACTE is to promote effective teaching and quality education through research based efforts to improve teacher education, the teaching profession, and schools. TACTE member institutions work in harmony with the objectives of the American Association of Colleges for Teacher Education (AACTE) and the standards of teacher preparation as they apply in and for the State of Texas.

The members of TACTE embrace strong accountability measures based on regulatory, empirical and best practice (theory) standards. Teacher preparation programs in Texas have Teacher Preparation Advisory Councils or Committees which include in their membership constituents from the public, employers, and school districts which are regularly informed about and provide input into requirements, standards and conduct of teacher education. In addition, member institutions regularly contribute faculty and others to various state and other efforts to address issues of delivery and assessment as well as accountability and routinely adopt practices and policies which exceed state minimum standards. Finally, individually and collectively we engage in and consume valid research and technical reports based on or utilizing empirical methods and founded on or contextualized by sound theoretic frameworks to improve the quality of our teacher preparation programs.

This NCTQ study is marred by inaccurate criteria, incomplete and indefensible data collection, flawed research methodology and untenable and unsupportable determination of criteria and standards with which we mostly disagree. The results of the NCTQ study do not accurately describe and can't measure the quality of the teacher preparation programs since this "study" does not consider the most basic measure of accountability—the academic achievement of our graduates. Consequently, the report and rankings are misleading, exaggerated or quite often completely wrong.

Our concerns with the NCTQ report as it currently exists are:

- a. The standards and criteria used by NCTQ to evaluate and rank teacher preparation programs are not aligned with our state and national standards. These state and national standards include outcomes data, not just input.
- b. There is no meta-research base linking NCTQ criteria to improving teaching and learning outcomes.
- c. NCTQ is focused on measuring program inputs through public document reviews rather than measuring the actual outputs of programs through sound research methods. Reviewing course syllabi, admission standards, textbooks and handbooks will not reveal data sufficient to make judgments concerning the quality of programs.
- d. Program quality judgments are being made even though there are so many unresolved issues surrounding the reliability and accuracy of data collected by NCTQ and the validity of inferences they draw from the data.

NCTQ was created in 2000 in opposition to traditional teacher training and its report reflects its strong bias against higher-education based teacher preparation. There are too many unanswered questions around the NCTQ report related to its efficacy, methodology and accuracy. This is exemplified most recently by the manner in which it proposes that errors of fact and findings will be addressed after publication. It is clearly obvious that any corrections will not have the impact or influence of the initial publication of findings. Why would NCTQ allow erroneous information to be published in the first place without taking easy measures to prevent it? TACTE repudiates the NCTQ report and its rankings.

Sincerely,

Dr. Denise Staudt University of the Incarnate Word TACTE President