We’re All Mad Here:  
A Response to the US Department of Education’s Proposed Regulations for Teacher Preparation  
from the Chair of the Conference on English Education (CEE)

On Dec. 3, 2014, the United States’ Department of Education (DOE) released a document proposing new regulations for teacher preparation programs, citing the need for greater accountability for teacher preparation programs, as well as the development and distribution of data focused on the quality of those programs. The public was then invited to comment on the regulations, with the comment period closing on Feb. 2, 2015.

Note, however, that the Office of Management & Budget “is required to make a decision regarding the collection of information contained in the proposed regulations between 30 and 60 days after publication of the proposed regulations.” For full consideration of the public’s response, therefore, comments should be submitted by Jan. 2, 2015.

As the Chair of the Conference on English Education (CEE), I urge our membership, as well as teachers, parents and students, to make use of this public comment period to respond to the proposed regulations – ideally by Jan. 2. These regulations are disingenuous at best, hypocritical at worst, in their misrepresentation of and approach to quality teacher education.

Therefore, we must state clearly and forcefully – to the DOE, as well as to US senators, state representatives, university presidents, state superintendents, school principals, teachers, students, neighbors and the public at large – that the proposed regulations will do more harm than good. Whether online, through the media or in person, we must speak against the misguided beliefs driving such regulation: that teacher performance can be equated to student performance; that standardized tests provide meaningful evidence of learning; that student learning occurs in a vacuum; that there is one set approach that works with all students.

We have been invited to speak, and we must accept the invitation – although it feels a bit like being invited to the Mad Hatter’s tea party, doesn’t it?

“But I don’t want to go among mad people,” Alice remarked. “Oh, you can't help that,” said the Cat: “we’re all mad here. I'm mad. You're mad.” “How do you know I'm mad?” said Alice. “You must be,” said the Cat, “or you wouldn't have come here.”

Despite very little evidence to support its efficacy for student learning, standardized testing has claimed our classrooms. “Objective” data drives decision-making rather than the “subjective” issues that affect the children we seek to educate. Teachers are constantly labeled as ineffective, uncaring, unprepared. Patently unqualified corporations, millionaires and for-profit businesses are invited to “solve” educational issues while patently qualified teachers, teacher educators and educational researchers are excluded from the discussion.

1 The document is found at http://www.regulations.gov/#/documentDetail;D=ED-2014-OPE-0057-0001
2 To do so, visit http://www.regulations.gov/#/submitComment;D=ED-2014-OPE-0057-0001
3 For additional information, view Jane West’s webinar: http://ceedar.education.ufl.edu/wp-content/uploads/2014/12/Teacher-Preparation-Regulations-for-CEEDAR.pdf
4 For an excellent example, see Anne Elrod Whitney’s piece Proposed Regulations Bad for Kids, Teachers, and Schools: http://writerswhocare.wordpress.com/2014/12/08/proposed-regulations-bad-for-kids-teachers-and-schools/
And now, teacher education programs have moved into the line of fire. If the proposed regulations are to be believed, teacher preparation currently functions with little accountability, producing poor quality candidates whose abilities are not properly assessed. The evidence for such claims consists of flawed measures and unreliable research from questionable sources. Yet, the answer to this (unproven) assumption is to increase assessment and accountability measures, despite no evidence that these measures have been beneficial as implemented in the public schools.

Madness.

Teacher preparation programs are, indeed, held accountable; they undergo assessment; they use data to inform their decision-making processes. As the professional organization for English teacher education, CEE created the Standards for Initial Preparation of Teachers of Secondary English Language Arts 7-12; revised in 2012, these standards delineate the required competencies of knowledge, skills and dispositions connected to content, pedagogy, learners and professionalism. The Council for the Accreditation of Educator Preparation (CAEP) uses these standards to assess and recognize the abilities of English teacher education programs to prepare quality secondary English teachers. To meet these standards, programs must gather, analyze and report a wide range of data from both the program and the candidates. This external accountability is in addition to the internal accountability of the programs themselves. In-house, as it were, teacher preparation programs must remain cognizant of and respond to the internal and external pressures driving education in order to prepare teachers for the classroom.

Do some teacher education programs fail in this endeavor? Admittedly, yes. The way to improve our teacher education programs, however, is not with more assessment and accountability, measures in and of themselves that are already present and valued in higher education. Could these measures be improved? Certainly, as any educator knows. Teacher education programs recognize the need to improve our efforts to gather better data from and about our graduates; we are constantly revising our means of candidate assessment in order to respond to our needs and the requirements of an outside accrediting body. What we don’t do is expect the test scores of our graduates’ students to provide a worthwhile measure of their teacher’s efficacy.

Value added measurement (VAM) has little support among those with the ability to understand the nuances of assessment, much less those of teaching and learning. Parents certainly do not support the current over-testing of their children; teachers know that reliance on externally developed high-stakes tests offers a distorted view of a child’s abilities; teacher educators recognize that assessment is a nuanced process that requires multiple measures over time. We know that assessing teachers’ worth on the test scores of the complex human beings they teach is a deeply flawed measure of ability, with no recognition of the many factors influencing both teaching and learning. Rather than admit this and seek better ways to determine quality teaching, however, the US Department of Education now proposes to assess the teachers of the teachers’ worth on those same test scores.

Madness.

Alice laughed. “There's no use trying,” she said: “one can't believe impossible things.” “I daresay you haven't had much practice,” said the Queen. “When I was your age, I always did it for half-an-hour a day. Why, sometimes I've believed as many as six impossible things before breakfast.”

These regulations promulgate beliefs that those in education know to be false: that there is one right measure of learning, that there is one right method of teaching, that there is one right type of teacher, that there is one right way to prepare teachers. Teaching is a complex, complicated, challenging, often contentious, endeavor because those we seek to teach – and the subjects we seek to teach them – are complex and complicated and challenging and, often, contentious. We understand, though, that teacher education creates the foundation that our students build on for the rest of their teaching career rather than hubristically assuming that we can boil teaching down to a set of “one size fits all” approaches that will serve in any situation.

5 For more on those nuances, see the American Statistical Association’s Statement on Using Value-Added Models for Educational Assessment: http://www.amstat.org/policy/pdfs/ASA_VAM_Statement.pdf
Teacher education programs educate prospective teachers to understand, examine and respond to issues of content, pedagogy, learners and learning. It isn’t an easy job – hence the diversity of approaches and the ongoing assessment of those approaches in teacher education programs around the country. While the foundational principles of education may remain the same, English education programs in New York City are not – and should not be – the same as those in Cheyenne. What my students in West Lafayette, Indiana need to know in order to teach a largely rural population differs from what my colleague’s students in Tampa, Florida need to know in order to teach a largely urban population. Yet, every day, we in teacher education embrace this difficult task of preparing young men and woman to respond as experienced professionals to every possible combination of factors they will meet in their future classrooms.

These regulations trade on the common complaint that many beginning teachers feel unprepared when they first enter the classroom, pointing back to a lack of preparation from their teacher education programs. Solidifying such unproven cause and effect into ill-suited regulation belies the many factors that shape a teacher’s entry into the classroom: the type of school, the level of support, the number of resources, the diversity of student issues in addition to the teacher’s individual abilities, understandings and personality. Assuming that this one factor – how teachers are prepared – contributes to the high rate of teacher turnover is yet another unproven cause and effect.

Teachers don’t leave simply because they aren’t prepared well. They leave because political, social and rhetorical conditions in this country destroy their will to teach. And those conditions are now poised to destroy teacher education.

Has it occurred to no one (except educators) that one reason teachers leave the classroom is because many schools have become unpleasant places to be? This has less to do with their preparation – teacher education programs cannot control the factors their students will meet upon entering the classroom – and everything to do with the current climate in this country surrounding teachers and education. Why would anyone want to enter a profession that is continuously attacked, denigrated and demeaned in every public avenue?

And, yet, I have students in my college classrooms wanting to do just that. These bright young women and men are cognizant that their choice of career is held in little regard; they understand that they will work long hours for little external reward; they accept that the public will disregard their intelligence, their ability and their commitment in seeking to become English teachers. They want to teach, however, because they want to do something meaningful with their brains and their bodies. These young college graduates willingly take on an astounding level of responsibility from their very first day in the classroom because, as one of my students wrote recently, “How are we, as future teachers, supposed to challenge our students if we never challenge ourselves?”

“Take some more tea,” the March Hare said to Alice, very earnestly. “I’ve had nothing yet,” Alice replied in an offended tone, “so I can’t take more.” “You mean you can’t take LESS,” said the Hatter: “it’s very easy to take MORE than nothing.”

At this point in our country’s history, teachers and teacher educators are doing their best with more of nothing: no public support for their work, no understanding of their professionalism, no recognition of the contributory factors to student learning. That extends to the teacher education programs that prepare them. We work against the fallacy that teacher education at the college level is of little benefit, that six-week boot camps can prepare anyone for the classroom, that those with no understanding of or background in education are better suited to do our work.

The US DOE regulations of teacher education programs cost more time and more money – millions, in fact – while implementing an assessment system in higher education that has proven seriously flawed in the public schools. They assume a reductive approach to teacher preparation that belies the complex factors teacher education programs must navigate to educate their candidates. They dismiss the solid work happening in teacher education programs every day throughout the country in favor of pushing an agenda that neither conforms to reality nor recognizes expertise.
Like Alice, we need to push away from our seat at this table by clearly speaking against the misguided beliefs propelling these regulations. We need to publicly proclaim this party for the madness it is, opposing those who lead it and shaking those who slumber while it happens. We know better, as teacher educators. Every day, we do better, as teacher educators. It’s time we spoke up, as teacher educators, and established that we are better at assessing our students’ abilities as teachers than the measures proffered by these fundamentally flawed regulations.

Respectfully submitted,

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