



December 17, 2014

To Whom It May Concern,

I am writing today to share comments from the Florida Association of Colleges for Teacher Education regarding the proposed Rule 6A-5.066 (based on draft available on November 10, 2014).

- We are pleased to see that all providers, including ITP, EPI, District-based Professional Training Option, and private provider, will be under the same umbrella for program approval. For years we have asked that all providers including private providers be held to the same standard and we see this as a move in that direction. We look forward to continuing to work with the FDOE and our legislators to ensure a truly level playing field for all providers.
- We appreciate that the new rule includes definitions of the vocabulary. In particular we appreciate the specificity around school safety. There is one definition we believe needs further clarification:
  - *Qualified Private Provider*: We encourage this definition to clearly include all alternate providers if completion of their program can result in professional certification. This should include programs such as Teach for America and the American Board. These equivalent providers should be held to the same standards as ITPs as outlined in the remaining section of rule.
- We understand the need to gather placement data related to our programs. We do not feel that these data are appropriate for ranking or rating our programs because they do not represent signs of researched-based curricular quality. They should be reported only. However, under current state law we recognize that they will be used for rating. As written, five are criterion referenced. We encourage changing the sixth item (placement) to a criterion-referenced measure as well. As currently proposed, the placement rate will be determined using a confidence interval of "all equivalent programs." However, based on our calculations more than 50% of approved programs in the state are unique and would not have equivalent programs for comparison. Therefore, it would not be possible to calculate a confidence interval. In other cases, because of low numbers of equivalent programs confidence intervals would be very narrow and have little meaning in making comparisons. We ask that the Department of Education determine an acceptable average across three years of completers.
- We are concerned that the proposed rule will rate programs based on performance of PK-12 students statewide assessments using results of student learning growth formula. At this time, the new assessment has not been field tested in Florida with Florida students and there are no data to support that it is reliable and valid for our

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populations. We believe that prior to using these data to evaluate our programs, there needs to be evidence that these tests are appropriate to assess teacher preparation, are reliable and valid for that purpose, and have evidence that the assessments are instructionally sensitive (that scores will change as the result of teacher performance). In addition, under the current rule, programs are encouraged to gather data on completer impact on PK-12 students in areas that are not covered by statewide assessments or to use as a supplement to areas that are covered by statewide assessments. As written, this portion of the proposed rule would no longer allow for the inclusion of these data, which are critical for programs preparing teachers for non-tested areas or for programs with small numbers of completers.

- We strongly encourage the state to retain a seven-year cycle, rather than moving to a five-year cycle. A seven-year cycle aligns with our national accrediting body. The move away from an aligned cycle could have a negative impact on the availability of faculty to participate in a peer-reviewed process because they will be always be preparing for either a national or state program visit. We believe the peer-reviewed process is critical for program approval and, therefore, believe a synchronous cycle is critical. In addition we are concerned about the stress on FDOE and institutional staff and resources a shortened cycle will create.
- We strongly believe that the site visit, as a peer-reviewed process, is the right venue to judge the quality of programs. We would like to see the APPR used only for reporting and not for evaluation. However, if it is to be used for evaluation we believe the peer-review team should incorporate its evaluation of the APPR into their report and that this evaluation be used as a minor portion of the continued approval process. This is particularly important because many aspects of the proposed APPR have not been studied to ensure they are reliable and valid ways to measure teacher quality.
- Section 8(2)(c) (p. 4) establishes a process for the FDOE to review electronic folios submitted for initial approval. In the past this has been a peer-review process. We ask that a peer-review process be ensured in the language used in this portion of the rule. We suggest, “The Department shall convene *a peer-review team* to conduct a review of the electronic folio submitted in support of the request for initial approval within 90 days of receipt.”
- Section 8 (p. 8) of the proposed rule states that a site visit will be conducted at the end of the approval period. However, there is no language that the site visit will be a peer-reviewed process. We recommend amending the language to state, “...during the final year of the program approval period, the Department shall conduct a continued approval site visit *with a peer-review team* that will include a review of each approved program.”

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- The proposed rule does not make mention of a body similar to the Program Approval Board that will allow a process for institutions to submit additional information or to respond to the site-visit team's report and to have that information reviewed by peers. We are committed to a peer-reviewed process and believe this board, or one of similar make-up, needs to be part of the process.
- We are concerned about the requirement in the new Initial Approval Standards, Section 1.2 (4). It states that there must a description of the "Final summative evaluation used to determine each program completer has demonstrated the required knowledge, skills, and professional behaviors in p-12 classroom setting using a state-approved performance evaluation system that is aligned with the partnering school district(s)' evidence-based framework." This requirement implies that ITPs will be expected to use district-based forms, rather than the forms developed by the ITP. Most ITPs partner with several districts. Requiring the use of several different forms would not lead to reliable and valid results when these are aggregated to create program-level assessment data. As there is no basis for this in state statute or rule, we recommend that this be removed.

Should you have any questions about the comments included here, please feel free to contact me by phone (352-588-8417) or email ([trish.parrish@saintleo.edu](mailto:trish.parrish@saintleo.edu)). We look forward to continued discussion regarding the proposed rule and its impact on increasing teacher quality in Florida.

Sincerely,

*Trish Parrish*

Patricia A. Parrish  
President

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