

August 25, 2017

California State Board of Education
1430 N Street
Sacramento, California 95814-5901

Dear California State Board of Education Members,

With only 48% of California students meeting or exceeding grade-level standard in English Language Arts on the 2016 CAASP, now is not the time for the State Board of Education to fixate on credential type as a proxy for teacher effectiveness. Yet, in the August 11, 2017, draft of California's ESSA plan the California Department of Education defines an ineffective teacher as one that is misassigned or "*teaching without a full credential.*" **The undersigned organizations take issue with the use of the phrase "full credential," as it will result in the arbitrary labeling of thousands of intern credentialed teachers as ineffective.**

We urge the Department to refrain from using credential type to define ineffective teacher. Effectiveness should be defined by measures of teacher impact on student performance. We encourage the California Department of Education to utilize student outcomes and to more accurately measure and define teacher effectiveness/ineffectiveness. Additionally, if the CDE does not remove the use of teacher credentialing status as a proxy for teacher effectiveness, we would urge the Department to change the definition of "ineffective teacher" to:

Ineffective teacher: A teacher who: (a) is misassigned (placed in a position for which the employee does not hold a legally recognized certificate or credential or a certificated employee placed in a teaching or services position in which the employee is not otherwise authorized by statute to serve) or (b) has an unsatisfactory performance rating on their most recent evaluation.

We know that effective classroom teaching is the single most important factor in student learning and growth. California needs to maximize the number of effective and highly effective instructors in all of our classrooms, regardless of their credentialing pathway. We believe an ineffective teacher is one whose instructional practices do not result in student learning and growth. According to [the Education Trust](#), "Teacher effectiveness is best defined as the practical outputs of teaching. Measures of teacher effectiveness should be based on student learning – the difference between how much students knew before they began a course and how much they knew after they finished it."

Multiple studies have shown that there is no correlation between teacher preparation pathway and educator effectiveness. A Stanford University study published in [Educational Evaluation and Policy Analysis](#) found few significant differences in effectiveness of teachers prepared through alternative or traditional pathways. The study went on to conclude that, "The distinction between alternative and traditional pathways is often not helpful in this policy debate [measuring teacher effectiveness] because of the great variety of programs within each group and the overlap of many features between programs of different types." Teacher credentialing status is not an adequate proxy to measure teacher effectiveness or impact on students. The 2009 study, [An Evaluation of Teachers Trained Through Different Routes of Study](#), prepared for the Institute of Education Science had similar findings.

The purpose of the equity plan is to understand and expose practices that result in a sub-par educational experience for California's P-12 students. In defining effectiveness, therefore, we must ensure that our focus remains on those factors shown to impact student learning. Such factors include student growth,

chronic teacher absenteeism, teacher evaluation by peers and supervisors, student surveys, and other classroom outputs, all of which would serve as a better indicator or proxy for ineffective. One [Harvard University](#) study found that, “the advantage of being the student of a teacher in the top quarter of effectiveness rather than the bottom quarter is roughly three times the advantage of being taught by an experienced teacher rather than a novice, and more than ten times any advantage created by teacher certification.”

None of the factors shown to impact effectiveness include a teacher’s pathway into the classroom. Nevertheless, the draft ESSA plan has defined a teacher’s effectiveness solely by their pathway into the classroom and whether or not the teacher possess a “full credential,” which as proposed, would unfairly label intern candidates as “ineffective” while deeming preliminary credentials and residency candidates as effective. This is an illogical leap, particularly in light of the paucity of evidence to support the conclusion that a “full” credential results in greater student learning and growth. Recognizing this, every other state, with the exception of Vermont, which has already submitted their plan to the Federal government, has linked effectiveness to teacher evaluation.

Moreover, the racial and socio-economic diversity of the intern credential pathway has a significant impact on the demographics of the profession and the experiences of California’s students of color. According to findings by the CTC, intern credential programs recruit individuals into the classroom that otherwise may not have the means, opportunity, or access to enter the teaching profession. This includes under-represented minorities, professionals changing fields, and low income Californians. The CTC [reports](#) that, “California’s intern programs continue to bring proportionally more underrepresented minorities (49%) into teaching compared to approximately 34% of the current teacher workforce in California.”

We know students achieve greater academic and personal growth when they have a shared identity with a teacher. A recent [Johns Hopkins University study](#) found that when a Black student has at least one Black teacher in grades 3-5, the likelihood of that student dropping out of high school decreases by 39% and the student’s interest in pursuing college increases by 29%. Ensuring California maintains and supports a diverse teacher preparation pipeline will only further state efforts in providing an excellent education for every student. Intern credentialed teachers are critical to supporting diversity within the California teaching profession and we believe that arbitrarily labeling all intern teachers ineffective will disproportionately impact students, prospective, and intern teachers in communities of color.

The current draft of California’s ESSA plan does a disservice to the thousands of intern credentialed teachers impacting students every day. By arbitrarily lumping all intern credentialed teachers into the category of “ineffective” without considering any measures of impact in the classroom the Department is sending a clear message to teachers and LEAs about the perceived worth of this exceptionally diverse talent pool. This mislabeling is neither required by ESSA, nor is there evidence that intern credentialed teachers are less effective than other new teachers.

As organizations dedicated to equity in education, we know that maintaining and supporting a diverse teacher pipeline is critical to ensuring our students are receiving an excellent education. We appreciate your attention to this important matter and look forward to working together to ensure California’s students have access to effective educators who are measured by their direct impact on student outcomes.

In Partnership,



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President & Chief Executive Officer
California Charter School Association



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cc:

The Honorable Edmund Brown Jr.
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