

Shelley Helton
ISBE Rules Coordinator
rules@isbe.net

September 30, 2014

Dear Ms. Helton,

The Council of Chicago Area Deans of Education (CCADE) and the Illinois Association of Deans of Public Colleges of Education (IADPCE), whose membership comprises the unit heads from colleges and universities in the greater Chicago area and across the state that offer educator preparation programs approved for licensure by ISBE, support rigorous, evidence-based assessments in teacher education. However, the members of CCADE and IADPCE request a change to Administrative Rule 25.720 (e) Teacher Performance Assessment (TPA).

This request is being made in accordance with:

Section 5000.115, Consideration of Public Requests for Rulemaking in Subpart B: (Rulemaking) of Title 2 (Governmental Organization), Subtitle F (Education Agencies), Chapter I (State Board of Education):

Pursuant to Section 5-145 of the Illinois Administrative Procedure Act [5 ILCS 100/5-45], any interested person may request an agency to adopt, amend, or repeal a rule.

A) The rule in question:

Section 25.720: Applicability of Testing Requirement and Scores

e) Teacher Performance Assessment (TPA)

Beginning September 1, 2015, each candidate completing an educator preparation program in a teaching field shall be required to pass the TPA (see Section 21B-30(f) of the School Code).

105 ILCS 5/Article 21B-30: EDUCATOR TESTING

(f) Beginning on September 1, 2015, all candidates completing teacher preparation programs in this State are required to pass an evidence-based assessment of teacher effectiveness approved by the State Board of Education, in consultation with the State Educator Preparation and Licensure Board. All recognized institutions offering approved teacher preparation programs must begin phasing in the approved teacher performance assessment no later than July 1, 2013 (text from P.A. 98-361)

B) Description of the problem created by the text of the current rule:

The Teacher Performance Assessment approved by the State Board of Education is the edTPA, whose trademarks are owned by the Board of Trustees of Stanford University. Its limited history and use as a consequential assessment, now mandated in Illinois' the primary source of evidence-based impact on student learning in the capstone experience and required by Public Act 90-361, potentially could have serious negative consequences for candidates for the first several years of use without adequate and comprehensive testing, preparation, and research to ensure a fair and equitable outcome. We have the following concerns created by the current rule of using the edTPA as a single, consequential, high stakes, one-time assessment at the end of a program that can trump all other evidence of satisfactory or exemplary performance:

1. The establishment of cut scores for the edTPA and the plan for transitioning to the national cut-score over a multi-year period without sufficient time to study the results of the pilot tests or the effect of those cut scores on new teacher pipeline in Illinois,
2. Concerns about validity and reliability due to the wide variation of contexts for student teaching placements and the lack of research studies about these concerns,
3. Concerns about the availability of materials (i.e., handbooks, templates) for all areas of licensure,
4. Unexpected and uncontrollable variation in the administration, and student teaching placement site's support, of the edTPA, especially as it relates to the videotaping aspect of the assessment and the ability of institutions to work with cooperating teachers around appropriate implementation in the student teaching classroom,
5. Inappropriate assignments of assessors to pilot edTPA submissions and concerns about the availability of adequate licensure-specific scorers when the edTPA moves to scale,
6. Lack of planning for how the edTPA will accommodate remediation of students who do not pass, possibly increasing the costs of additional tuition by many thousands of dollars for students who fail (see also, #12),
7. Concerns about Pearson's capacity to score the influx of assessments submitted by teacher candidates in a timely and effective manner (see also, #11),
8. The lack of data on the effect of the edTPA on teacher candidates from states currently using the edTPA as a consequential assessment. The data that are available indicate problems worthy of note, New York being the most recent example of what can happen without sufficient time to transition.
9. Variation in scores across disciplines on pilots currently suggests that a single cut score may not be a valid measure for all disciplines,
10. Concerns about the capacity of Pearson to train faculty as edTPA scorers, and the limiting of scoring protocols to trained scorers. Additionally, as of 10/1/14, Pearson is requiring all trained scorers to score 2 portfolios per week (5+ hours per portfolio), a situation that will further limit the pool of assessors,
11. The lack of narrative feedback/citation of evidence on scored edTPA portfolios means that programs will need to do comprehensive analysis of trends in successful and unsuccessful portfolios prior to developing remediation plans. Institutions do not yet have enough data to do this in an individually consequential context, and
12. The lack of data regarding the performance of some subgroups (e.g., less than 2% of candidates in the 2013 pilot were non-native English speakers). Additional data is necessary to ensure validity across teacher candidates regardless of ethnicity and native-language.

The CCADE and IADPCE deans would like to collaborate with ISBE in ensuring the successful implementation of the edTPA. We believe that because of the concerns and issues stated above, a pilot, phase-in period that removes the high-stakes nature of the licensure decision for a limited period of time, is necessary to provide for the success of edTPA in Illinois.

C) Proposed amendments to the text of the rule:

We propose a hearing be held to discuss these proposed change to the rule:

e. Teacher Performance Assessment (edTPA)

Beginning on September 1, 2015, each candidate completing an educator preparation program shall be required to complete the edTPA and submit it for scoring by Pearson. For the period September 1, 2015-August 30, 2016 and September 1, 2016-August 30, 2017, the scores will be

used by ISBE and all recognized institutions offering approved teacher preparation programs for the purpose of establishing validity and reliability, ensuring non-bias assessment procedures and results, and designing remedial plans and protocols. No licensure decisions will be made based on the scores during this period.

Beginning on September 1, 2017, each candidate completing an educator preparation program in a teaching field shall be required to pass the edTPA as a licensure requirement.

D) This request for a rules change is submitted on behalf of CCADE by:

Dr. Maureen Gillette and Dr. Pamela Jessee
CCADE Co-Chairs, 2014-2016
Deans of Education at Northeastern Illinois University and Lewis University (respectively)

Dr. Maureen Gillette and Dr. LaVonne Neal
IADPCE Co-Chairs, 2014-2015
Dean of Education at Northeastern Illinois University and Northern Illinois University

E) The address to which the agency should direct its reply:

Maureen D. Gillette
Dean, College of Education, Northeastern Illinois University
5500 N. St. Louis Ave
Chicago, IL 60625
m-gillette@neiu.edu

Sincerely,

Maureen Gillette, Pamela Jessee, and LaVonne Neal
CCADE and IADPCE Co-Chairs