



National Association for Gifted Children
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June 8, 2009

Angela C. Arrington
Director, Information Collections Clearance Division
Office of Management and Budget
Washington, DC 20503

RE: Proposed HEOA Title II Reporting Forms on Teacher Quality and Preparation

Dear Director Arrington,

On behalf of the National Association for Gifted Children (NAGC), the largest national organization dedicated to training teachers, encouraging parents, and educating administrators and policymakers on how to develop and support gifted children, and on behalf of the deans of 12 schools and colleges of education, we submit the comments below in response to the April 7, 2009, *Federal Register* Notice of Proposed Information Collection Requests. Our comments address how the Department of Education can enhance the quality, utility, and clarity of the information to be collected.

The appropriateness and effectiveness of federal data collection tools pertaining to teacher preparation program quality is a crucial issue in education policy today. There is tremendous value in collecting data and reporting results. These critical tools have the potential to drive true reform in teacher preparation as intended by the U.S. Congress in the Higher Education Opportunity Act of 2008 (HEOA). The changes to Title II of HEOA, which focus on teachers' ability to meet the learning needs of students from diverse backgrounds and those with special educational needs, including students with disabilities, students who are limited English proficient, students with low literacy levels, and students who are gifted and talented, will require, in some cases, significant teacher preparation program reform.

We strongly believe that the state and institutional reporting requirements are vital to the success of HEOA. We respectfully request that the U.S. Department of Education make the following modifications to the proposed data collection instruments to better align them with the intent of Congress.

State Report Card

The Congress modified the state report card section of HEOA (Sec. 205(b)(1)(F)), requiring additional data and other information to be reported to the U.S. Department of Education. As a result, the state report card data collection form has been changed substantially, but does not effectively communicate that the new criteria are required.

We propose adding an introductory statement to *Section VII: Criteria for assessing the performance of teacher preparation programs in each State* that would clarify that states must address each indicator within the section.

Proposed language:

Section 205(b) of HEOA requires all states to have criteria for assessing teacher preparation programs, including indicators of candidates' teaching skills (detailed in item 7 below). This section of the report card collects those criteria.

Institutional and Program Report Card

Section 206(b)(4) of HEOA requires that institutions of higher education (IHEs) provide assurances that general education teachers receive training in providing instruction to diverse populations of children. We believe that the Congress intends that the definition of "diverse populations" include gifted and talented students, and as such, gifted students should be included within the assurances required of IHEs in their annual report cards.

As the list of diverse populations in section 206(b)(4) is not exhaustive, we believe that Congress intended to include in the assurances section each of the diverse populations of learners, including gifted and talented students, that are addressed throughout Title II of HEOA. We base this assertion on the following:

1. The gifted and talented student population is *specifically* included, for the first time, in several key places in Title II, including:
 - in the definition of "teaching skills," which explicates what teachers are expected to know and be able to do (Sec. 200(23));
 - in the teacher quality grant program, the preeminent teaching preparation initiative that strongly focuses on program reform to ensure that all teacher candidates are able to meet the educational needs of gifted students (Sec. 202(d)(1)(B)(IV)); and
 - as one of the specific areas in which states assess the performance of teacher preparation programs (Sec. 205(b)(1)(F)).
2. A leading Senator, who negotiated the final, bipartisan version of HEOA, made a statement on the Senate floor during consideration of HEOA that gifted and talented students are included among the diverse populations that teachers would be trained to teach if the amendment under consideration was adopted. Senator Enzi said, "Today's teachers need training to meet the needs for diverse student populations—ranging from students with disabilities to English language learners to gifted and talented students" (Congressional Record, July 23, 2007, p. S9744). The amendment was included in HEOA as section 206(b)(4).

Finally, alignment is critical. In other words, it follows that IHEs should address the same diverse populations of children in their reporting requirements as the Higher Education Act requires states to evaluate them on. Now that states will be evaluating teacher training programs on whether teacher candidates are able to identify and meet the educational needs of gifted and talented students, requiring IHEs to provide public assurances that their teacher preparation programs likewise are providing candidates with the training to develop the required knowledge and skills will help states complete the evaluation process.

We propose inserting the following language to the institutional and program report card:

Proposed language:

- Insert the following to the list of ASSURANCES in Section II (Goals and assurances):

General education teachers receive training in identification of students who are gifted and talented, and the tailoring of academic instruction to such needs.
- Insert a response to the first question in Section VI (Teacher Training):

(D) teach students who are gifted and talented effectively.

If included, these amendments will help bring about vital improvements to teacher preparation practice. In recognition of Congress' focus on the entire spectrum of diverse learners, teacher candidates soon will

be better prepared to effectively and appropriately educate the range of learners in their classrooms, including our most gifted and talented students.

Thank you for considering these comments; we look forward to working with you.

Sincerely,

Del Siegle, President
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