The background of the cover features a photograph of a student in a classroom setting, holding up a project. The student is wearing a grey and purple patterned sweater. The project she is holding has a title that reads "The Power of the Imagination" and includes a drawing of a house. The photograph is partially obscured by a large, abstract geometric graphic in the bottom right corner, composed of overlapping triangles in shades of blue and orange. The bottom left corner of the cover is a solid blue triangle.

A TALE OF TWO CITIES: State Evaluation Systems of Teacher Preparation Programs

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Executive Summary

This landscape analysis report about state evaluation systems of TPPs (teacher preparation programs) includes a state-by-state summary of the evaluation system components (that is, states' systems for TPP provider and program authorization, review, and approval) and presents a brief analysis of similarities and differences between and among states. Section 1 of this report provides an overview of traditional, alternative route, institution of higher education (IHE-based), and alternative route (not IHE-based) providers, programs, students, and completers. Section 2 provides a summary and analysis of state evaluation criteria for TPPs and providers, as articulated in state statutes and regulations.

The information and data contained in this report result from five sources delineated in the methodology section of this report. The data, information, and perspectives presented in this report lead to at least five overarching findings.

1. Traditional and alternative route TPPs and providers are different in each state, highly idiosyncratic, subject to change (via a state's legislative process), and deeply reflective of each state's policy context—so much so that it is extremely difficult to sufficiently capture all the nuances in surveys, interviews, or political modeling.

To review state statutes governing TPP programs and providers for each of the 50 states and Washington, DC, [click here](#).

2. Alternative route (not IHE-based) program providers are growing and spawning new provider types.
3. Alternative program graduates have a higher probability than traditional program graduates of teaching in schools serving students of color, students experiencing poverty, and students with disabilities.
4. The practice of disproportionate placement of alternative route teachers-in-training with the

mentioned groups of students does harm to these students by depriving them of the right to a profession-ready, fully credentialed teacher.

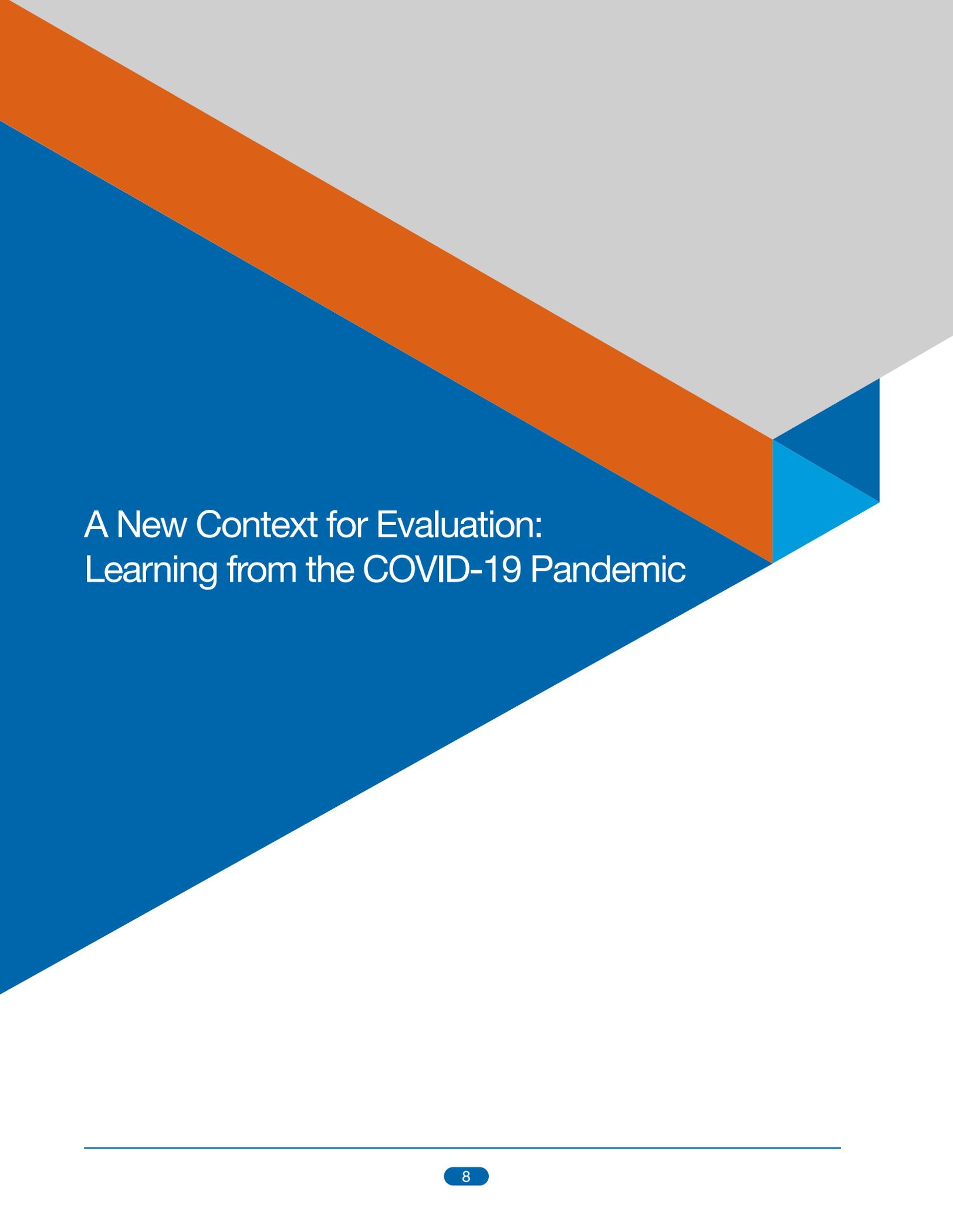
5. For a variety of reasons that appear to be related to the nuances of states' legislative processes, rule-making, and changes in external factors, many states do not post up-to-date and accurate teacher preparation program and provider review, approval and authorization requirements. In these cases, the public-facing information can be inaccurate.

Six policy recommendations emerged from this landscape analysis about how states evaluate teacher preparation providers and programs:

1. Enforce, through federal and state regulations, the 9th Circuit Court of Appeals decision, *Renee v. Duncan* (2012), that found that disproportionately placing uncertified teachers, teachers in training, or teacher interns in classrooms serving poor and minority students is “discriminatory” and “does harm” and “results in a poorer quality education than [the aggrieved PK–12 students] would otherwise have received.” Enforcement would entail ceasing the practice of placing teachers in training as teachers of record.
2. Incentivize states to approve only those providers and programs that meet national accreditation standards.
3. Incentivize states to work with districts to develop plans that equitably distribute fully certified, profession-ready teachers.
4. Require states to maintain public-facing websites and/or portals that present up-to-date and accurate teacher preparation program and provider review, approval, and authorization regulations.
5. Incentivize states to remove barriers to the profession (such as entrance licensure

examinations) that (disproportionately) and negatively impact the pipeline for teachers of color.

6. Increase federal and foundation funding to Historically Black Colleges and Universities (HBCUs) to strengthen the pipeline of Black teachers. HBCUs constitute 3% of the nation's colleges and universities, yet these institutions prepare 50% of the nation's Black teachers. Increased fiscal resources could further expand these institutions' recruitment, preparation, and graduation efforts and outcomes. Without these strong engines, the nation is not likely to reach its educator workforce diversity goals.



A New Context for Evaluation: Learning from the COVID-19 Pandemic

At the writing of this report, the world is grappling with a pandemic caused by a novel coronavirus (COVID-19) that has disrupted and stressed to capacity nearly every aspect of our social, political, and economic order. In an attempt to quell outbreaks and reduce infection rates, the United States has implemented measures utilized by other countries that experienced COVID-19 outbreaks prior to the United States (AACTE, 2020, n.d.). Governors and other elected officials have followed guidance from the U.S. president, the Centers for Disease Control and Prevention (CDC), and public health officials to enforce stay-at-home orders, social distancing, and, in most jurisdictions, the mandatory wearing of face masks. Due to the pandemic and the threat of uncontrollable outbreaks, for the first time in the nation's history nearly all K-12 schools and colleges and universities were closed beginning in March/April of 2020; most began attempting to deliver education online. In the months that followed, most businesses were closed except for those deemed essential, such as banks, grocery stores, and pharmacies. These mandated closures of business and industry, government offices, schools and universities, and other institutions created record unemployment rates and profoundly impacted the economy worldwide.

A few weeks into the pandemic, the nation was rocked by massive protests in response to the murders of innocent Black people: George Floyd (Minneapolis, MN), a laid-off truck driver and bar bouncer; Breonna Taylor (Louisville, KY), an EMT and emergency room technician; and Ahmaud Arbery (Satilla, GA), an avid jogger. The protests, which continued for months, were inspired by the Black Lives Matter (BLM) movement and focused on White male police brutality, vigilante White men with ties to local police forces hunting and killing innocent Black men, and a U.S. judicial system unresponsive to Black victims of police brutality.

Protests against police brutality continue to gain momentum not only in the United States, but worldwide, spurring an international discourse about systemic racism and the contemporary sequelae of the enslavement of Blacks, especially in the United States.

The pandemic has exacerbated and ripped away the thin veneer that attempts to hide pervasive and harmful educational inequality in the PK-12 education system—a system where the majority are students of color and from families experiencing poverty. The nation's poorest students, Black and Latinx students, and students with disabilities have been the most negatively impacted by school closings necessitated by the pandemic. Black students in high-poverty schools have been especially hard hit because of the racialized, historic, and ongoing disinvestment in the education of Black children and youth. Additionally, BLM protests have placed structural racism front and center, reinvigorating discussions about diversity in the teacher workforce; curriculum reform, particularly the need to change curriculum content imagery and authorship so that it is not exclusively White; and equitable assignment of teachers so that more students have access to profession-ready teachers.

In short, the majority of the nation's public schoolchildren and youth are suffering due to the (removable) causes of poverty and structural racism. The pandemic and racial unrest have revealed just how much further the nation has to go in order to fulfill children's constitutional right to equal educational opportunity—a right that states define as a democratic imperative, fundamental value, and paramount duty (NAACP, 2017).

Even prior to the pandemic and racial injustice protests, there was an expanding policy focus on teacher quality as one of the most significant factors affecting students' academic achievement and

attainment. For this reason and others, TPPs and providers have been subject to growing scrutiny about their quality and rigor, including the standards used by states and accrediting bodies to evaluate their performance (Southern Regional Education Board, 2018; American Institutes for Research, 2017; Education Commission of the States, 2016, n.d.; National Council of State Legislatures, 2016; Government Accountability Office, 2015; National Comprehensive Center for Teacher Quality, 2012).

How will states and TPP providers produce sufficient numbers of profession-ready teachers (who on Day 1 of their teaching assignment are fully certified and credentialed to teach the grade level and subject area they are assigned to teach)? How will states ensure that TPPs meet rigorous and relevant standards? These questions undergird this report's examination about how states authorize, review, and approve TPPs and providers.



Purpose of the Report

There is significant diversity in teacher preparation providers and programs as well as variability in how states evaluate (authorize, review, and approve) both. The most recent reports about how states evaluate their TPPs and providers are outdated, and many do not include a review of all 50 states and Washington, DC. The last report on the subject from the National Academy of Education (NAEd) was published in 2013. Therefore, the NAEd partnered with the American Association of Colleges for Teacher Education (AACTE) to produce a landscape analysis report of 50 states' and Washington,

DC's evaluation systems of TPPs. This landscape analysis report presents information and data about state evaluation standards for TPPs and providers. Specifically, the program and provider approval processes and standards are listed by state (as defined by the state statute), along with an analysis of the similarities and differences between traditional, alternative route (IHE-based), and alternative route (not IHE-based) programs and providers.

In an effort to frame the issue, Section 1 of this report provides an overview of traditional, alternative route (IHE-based), and alternative route (not IHE-based) providers, programs, students and completers. Section 2 provides a summary

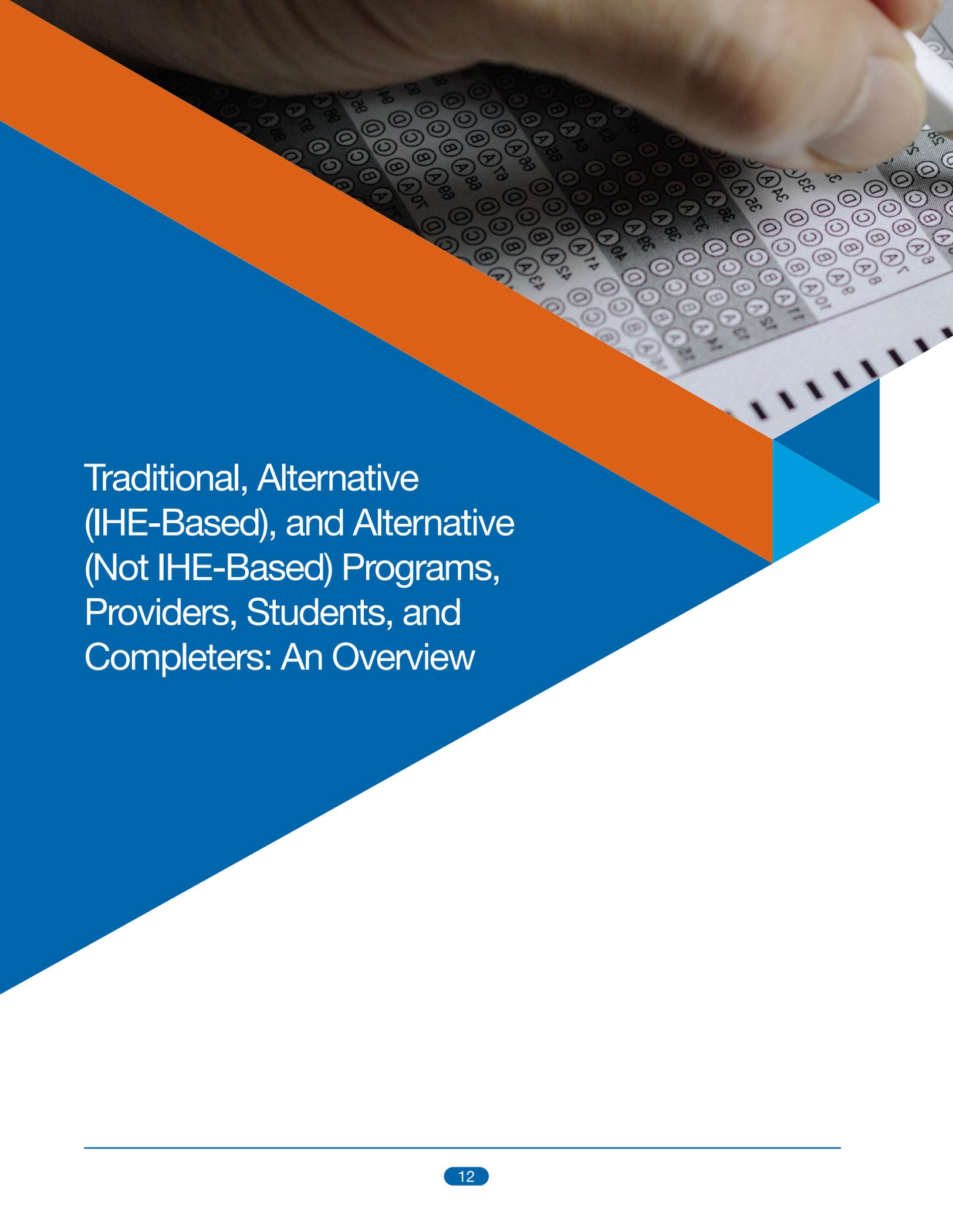
and analysis of state evaluation criteria for TPPs and providers, as articulated in state statutes and regulations. This report concludes with five policy recommendations.

Summary of Methodology

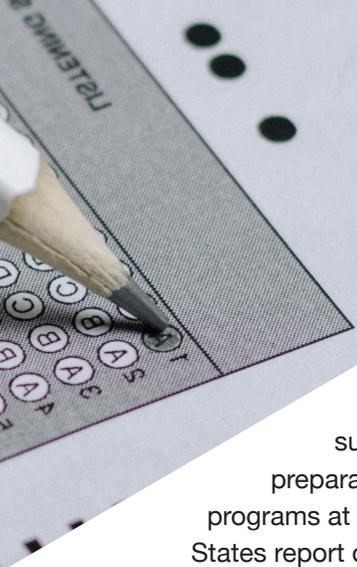
The information and data contained in this report emerge from five sources:

1. The 50 states' and Washington, DC's websites containing information about TPP and provider authorization, review, and approval requirements. This state-by-state information was condensed by the researcher into a summary chart that provides a full exposition of state approval requirements (as articulated by the state governing body and/or state statute), program evaluation components, internship requirements, and a synopsis statement for each state.

To view and use the interactive state map, [click states of interest here.](#)
2. A survey of the 50 state officials who provide oversight for program review and approval. The survey sought to confirm the following: the state office or other entity that conducts program review and approval, the number of university-based and non-university based programs in each state, and whether there are different review and approval standards for traditional IHE-based programs and alternative route programs that are IHE-based and not IHE-based. The survey yielded a 46% response rate.
3. Interviews with key teacher preparation policy stakeholders, including the Council for the Accreditation of Educator Preparation (CAEP), National Association of State Directors of Teacher Education and Certification (NASDTEC), Title II directors, and the AACTE Advisory Council of State Representative (ASCR).
4. The 2020 Title II Reports on the Quality of Teacher Preparation and States' Requirements and Assessments for Initial Credentials.
5. Reviews of state statutes and regulations regarding TPPs and providers via LegiScan, the National Council for State Legislators (NCSL) education legislation and bill tracker, and Congress.gov's state legislative websites.



Traditional, Alternative
(IHE-Based), and Alternative
(Not IHE-Based) Programs,
Providers, Students, and
Completers: An Overview

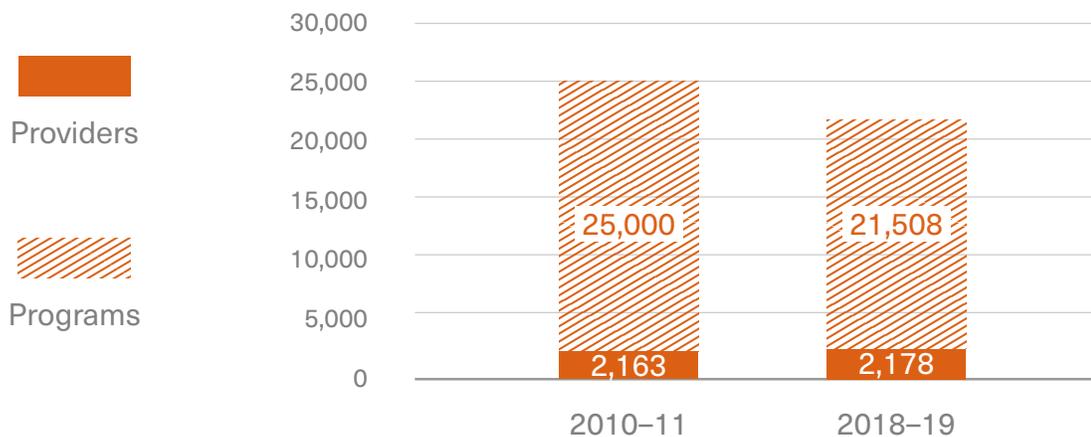


Under Title II of the Higher Education Act, states annually submit report cards on teacher preparation programs (TPPs), including programs at IHEs and entities outside of IHEs. States report on three types of teacher preparation programs: traditional programs, alternative route programs based at IHEs, and alternative route programs not based at IHEs. For this report, traditional route programs are defined as those in which teacher candidates pursue a bachelor's degree or a master's degree and are awarded a standard, beginning-level teaching certificate prior to gaining appointment and serving as the teacher-of-record in a classroom. Also, traditional route programs involve a internship or residency placement prior to program completion and licensure. Alternative route teacher preparation programs (those that are IHE-based and those that are not IHE-based) are defined as those in which teacher candidates are appointed as the teacher-of-record in a classroom without initial training completed, or minimal training, and while enrolled in a TPP. In some cases, these teachers-of-record may

have an initial training period (typically, 5–6 weeks or less than 6 months). Those who are trained through alternative routes usually complete their preparation programs while employed as teachers, often through an induction and mentoring program with minimal coursework. Alternative route programs are primarily, but not exclusively, post-baccalaureate programs and may or may not confer a degree.

Figures 1 and 2 show that, according to the U.S. Department of Education Title II Report (2020), states reported that in the 2018–2019 academic year, a total of 2,178 teacher preparation providers offered 21,508 state-approved TPPs in the United States, enrolled 560,500 students, and produced 150,385 program completers. These numbers are up from the 2017–18 academic year, but lower than a decade ago in the 2010–11 academic year, when states reported that slightly fewer providers (2,163) delivered nearly 4,000 more programs (25,000), enrolled 61,000 more students (622,401), and produced 53,000 more program completers (204,076). In sum, by 2018–2019, there were slightly more providers offering fewer programs to fewer students and producing fewer program completers.

Figure 1. Total Number of TPP Providers and Programs, 2010–11 and 2018–19



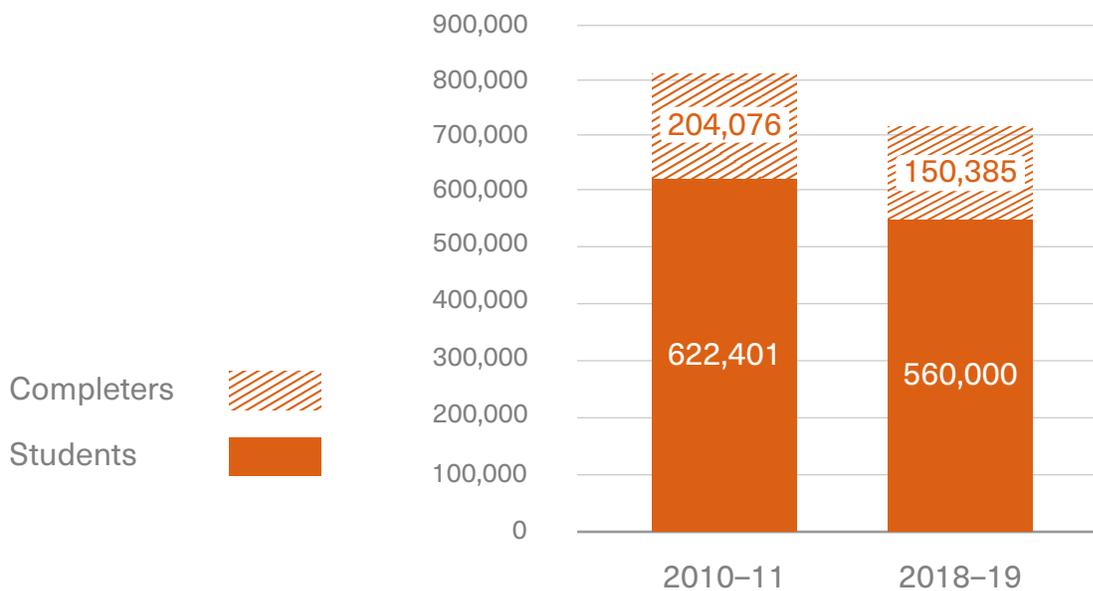
Data extracted from the 2020 Title II Report Card, National Teacher Preparation Data for AY 2018–19

The U.S. Department of Education requires that states report providers and their programs that are low-performing and at risk of closure based on an inability to meet state standards. According to the 2020 Title II Report, 16.7% of traditional route and 34% of alternative route programs are low-performing and at risk. Texas tops the 50 states and Washington, DC with the largest number of low-performing and at-risk providers and programs followed by California, Indiana, South Carolina, and Georgia. A disproportionate share of low-performing and at-risk providers are Regional Education Service Agencies (RESAs), nonprofits, and in Texas, school districts.

At present, about 70% of TPPs are traditional university-based programs. The remaining are alternative route programs—20% are IHE-based alternative route programs and 10% are non IHE-based alternative route programs. Those that are not IHE-based tend to fall into one of seven sponsorship categories: (1) local public school districts, (2) public and for-profit charter schools, (3) State Departments/Offices of Education and RESAs, (4) collaboratives representing partnerships

between two or more entities, sometimes partnered with IHEs, (5) Local Education Authority (LEA)-based residency programs, (6) community college systems and community college foundations, and (7) nonprofit programs, most of which operate in multiple states. One notable finding here is that sponsorship categories are continuing to grow and overlap, producing new breeds of sponsoring organizations and programs that claim to deliver teacher preparation. **Table 1** presents each sponsorship category and an attendant example.

Figure 2. Total Number of Teacher Preparation Program Students and Completers, 2010–11 and 2018–19



Data extracted from the 2020 Title II Report Card, National Teacher Preparation Data for AY 2018–19

Table 1. Sponsorship Types and Examples of Alternative Route Programs (Not IHE-Based)

Sponsoring Organization	Examples
School District	West Virginia has 27 alternative route programs that are not IHE-based, all sponsored by local school districts.
Public and For-Profit Charter Schools	Arkansas offers online alternative route programs through eSTEM Public Charter Schools. In Colorado, The Pinnacle Charter School offers an alternative TPP. In Massachusetts, Francis W. Parker Charter Essential School partners with the Theodore R. Sizer Teachers Center via the New Teachers Collaborative (NTC) to deliver a TPP.
State Departments or Offices of Education Regional Education Services Agencies (RESAs)	The New Hampshire Department of Education and the Utah Office of Education deliver at least 1 alternative route program each. Georgia and Texas operate at least 8 and 20 alternative route programs, respectively, through RESAs.
Collaboratives	In Colorado, the Public Education Business Collaborative (PEBC) offers two alternative route programs in collaboration with state IHEs.
LEA-based Residency Programs	Kansas, Massachusetts, Missouri, and Washington, DC are among the many states offering residency-based programs such as Kansas Teacher Residency, Boston Teacher Residency, St. Louis Teacher Residency, and Inspired Teaching Residency, respectively.
Community College Foundations and Community College System	The Mississippi Community College Foundation offers an alternative route program through Mississippi Alternate Path to Quality Teachers (MAPQT). EducateVA is an alternative program offered by the Community College Workforce Alliance (CCWA) in cooperation with Virginia's Community College System.
Nonprofits and For-Profits Operating in Multiple States	The New Teachers Project (TNTP) operates in 3 states. iTEACH operates in 7 states. American Board for Certification of Teaching Excellence (ABCTE) operates in 14 states. Teach for America (TFA) operates in 37 states.

Data extracted from U.S. Department of Education, Title II Report, 2020

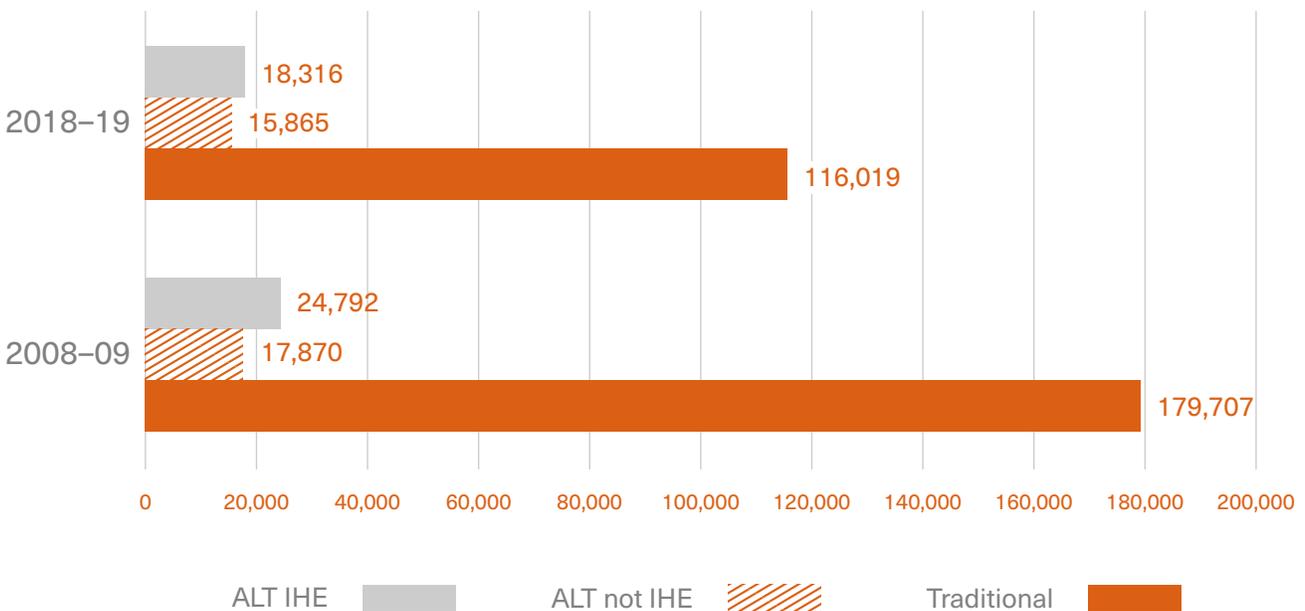
Figure 3 shows that IHE-based alternative route program completers declined from 24,792 to 18,316 students over the last decade. Completers in alternative route programs that are not IHE-based declined from 17,870 to 15,586. Traditional route programs also experienced a completers decline of nearly 63,000 students. Although traditional route programs prepare the lion’s share of teachers, the percentage of students completing these programs has declined slightly, from 80.8% in 2008–09 to 77.2% in 2018–19. The percentage of students completing alternative route programs (IHE- and not IHE-based) rose from 23.7% in 2008–09 to 29.4% in 2018–19.

In nine states, the number of alternative route providers (IHE- and not IHE-based) outnumber the number of traditional route providers: Arkansas, Colorado, Hawaii, Idaho, Louisiana, Mississippi, Nevada, New Mexico, and Texas (outlined in blue within **Figure 4**). Texas has the most alternative route programs, at 105.

As **Figure 5** shows, 10 states top the list with the highest combined number (IHE- and not IHE-based) alternative route providers: Texas (105), California (70), Indiana (33), Pennsylvania (31), Tennessee (30), Louisiana (28), North Carolina (28), West Virginia (27), Florida (25), and Georgia (22). Five states top the list with alternative route providers that are not IHE-based: Texas, with 41 nonprofits, for-profits, and RESAs; West Virginia, with 27 school districts; Georgia, with 22 school districts and RESAs; Colorado, with 16 charter schools, nonprofits, and collaboratives; and California, with 12 school districts, charter schools, and nonprofits.

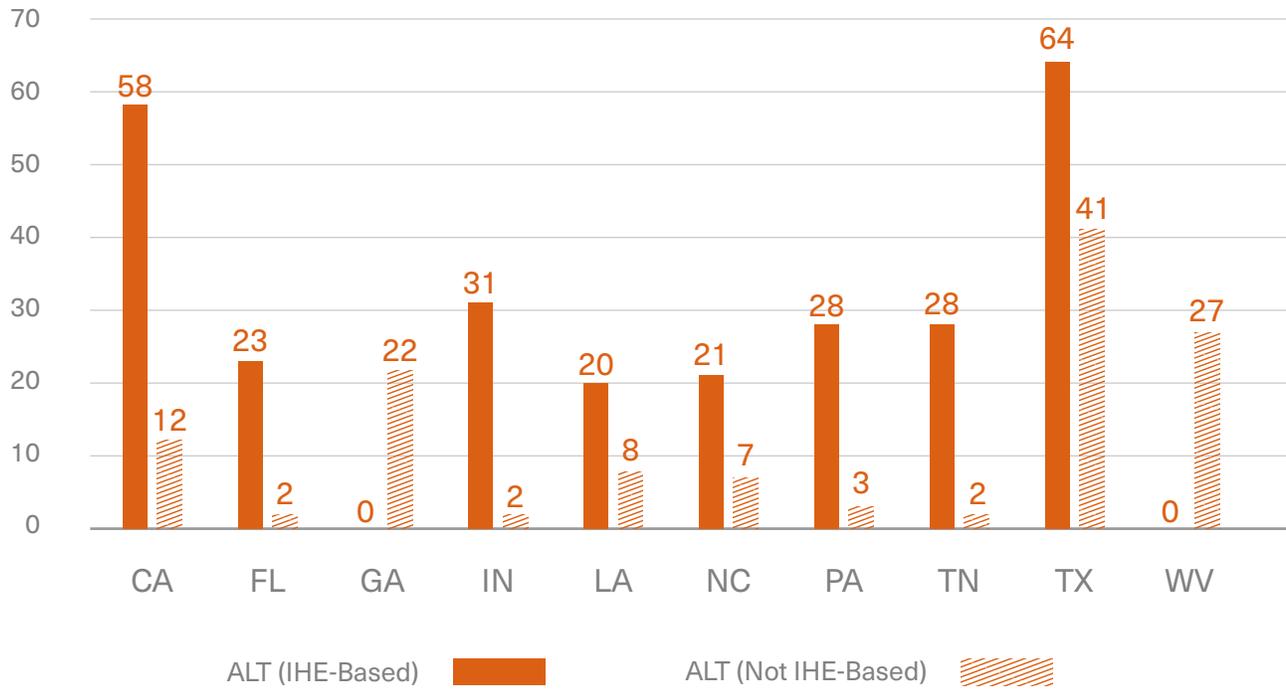
Ten states offer only one or no alternative route programs: Alaska, Maine, Minnesota, Nebraska, North Dakota, Oklahoma, Oregon, Rhode Island, South Dakota, and Wyoming.

Figure 3. Completers, Traditional, Alternative Route IHE-Based, and Alternative Route (Not IHE-Based), 2008–09 and 2018–19



Data extracted from the 2020 Title II Report Card, National Teacher Preparation Data for AY 2018–19

Figure 5. States with Highest Combined Number of Alternative Route Providers (IHE- and Not IHE-Based)



Data extracted from the 2020 Title II Report Card, National Teacher Preparation Data for AY 2018–19

Table 2. States Offering 0–1 Alternative Route Programs

State	Number of Alternative Route Teacher Preparation Programs
Alaska	0
Maine	0
North Dakota	0
Oklahoma	0
Oregon	0
South Dakota	0
Wyoming	0
Minnesota	1, IHE-based
Nebraska	1, IHE-based
Rhode Island	1, not IHE-based

Data extracted from U.S. Department of Education, Title II Report, 2020

Similarities and Differences in State Evaluations of TPPs and Providers

A variety of state offices exercise responsibility for TPP and provider authorization, review, and approval. A review of the 50 states and Washington, DC indicates that responsibility resides in one of four state government offices: State Department of Education (25), State Board of Education (12), and Board of Regents (5). In 8 states, the responsibility resides in an entity unique to the state or state governance mechanism.

Thirty-nine states require TPP review and approval by a national accrediting body—36 require CAEP and 3 (HI, NY, OR) require either CAEP or the Association for Advancing Quality in Educator Preparation (AAQEP). Two states (MD, WY) require the use of discipline-specific Specialized Professional Associations (SPAs) and/or Interstate New Teacher Assessment and Support Consortium (INTASC) guidelines for their state-based review and approval process. Seven states (NM, NV, PA, TX, VT, WI, WY) have unique state-based review and approval guidelines. Seven states (CO, IA, IL, MN, PA, UT, VT) require or encourage approval by regional accrediting bodies. **Figure 6 and Appendix 1 (pp. 32–33)** summarize variations in program review and approval requirements, licensure examination requirements, and program approval agencies by state.

Whether or not states utilize national, regional accreditation, or unique state-based standards, each state articulates program standards that cluster eight program input and four program output measures. In all cases, there are at least two to four metrics associated with each component. According to Feuer et al. (2013), the 50 states and Washington, DC utilize the following input and output measures to evaluate their programs. There is tremendous variability in how these program measures are applied to traditional and alternative route programs. Mainly, traditional route programs reflect the program attributes listed in **Table 3**. According to the Congressional Record Service

(2018), the most common criteria used by states to evaluate program quality includes teaching skill (46 states), pass rates on state credentialing assessments (41 states), professional development opportunities (25 states), and increasing the percentage of highly qualified teachers (23 states).

All 50 states' various statutes, regulations, and guidelines indicate that all providers and programs must meet the same standards. Not only is this language evident in all state statutes, all but two state directors of TPP evaluation who responded to AACTE's survey confirmed this fact. However, in practice, all states are not requiring that all providers and programs meet the same standards, even in states that have an agreement with a national accrediting body.

Table 3. Typical Program Input and Output Measures

Program Input Measures	Program Output Measures
Candidate quality, recruitment, and selectivity	Licensure examination pass rates
Program faculty qualifications and practice	Candidate impact on PK–12 learning
Content and pedagogical knowledge	Program graduates and employees perceptions
Cultural diversity, equity, and inclusion	Quality assurance and continuous improvement
Assessment/data driven practice	
Ethics/professional practice and responsibilities	
Partnerships and clinical practice	
Program resources and governance	

As revealed in **Table 4**, at least three practices provide a “loophole” for alternative route (not IHE-based) providers and their programs to skirt rigorous standards and accountability. In these cases, the state offers various routes to provider and program review and approval as described:

1. The state statute or regulation is bifurcated, requiring traditional IHE-based programs to meet national accreditation standards (which are aligned with state standards) and alternative route/not IHE-based to meet state standards as they are delineated in the state statute/regulations, but not national accreditation standards.
2. The state allows programs two options: either to meet state standards or to meet state standards and national accreditation standards.
3. The state offers provisional approval to providers, enabling them to offer programs for up to 3 years without having to meet the same standards imposed on traditional program providers. After the 3-year period, provisionally approved providers are required to show evidence that they are meeting state standards or making progress toward completing the application for eligibility for national accreditation.

In practice, how states treat alternative route, not IHE-providers and programs is so nuanced that it is difficult to capture the variations. Furthermore, all states have one or more of the nuances described above. Given this reality, **Table 5** presents five vignettes to illustrate the variations. These vignettes emerged from interviews with state directors of TPP evaluation and AACTE’s Advisory Council of State Representatives (ACSR). Rhode Island, Washington, DC, New Jersey, Indiana, and Texas are profiled because they differ in terms of the number of alternative route providers and programs, national accrediting body agreement status, use of Specialized Professional Association (SPA) standards, and oversight and governance structure.

It is important to note that since its inception, the CAEP has provided accreditation to traditional and alternative route providers and programs, including alternative providers and programs that are not IHE-based.

A review in **Table 6** of the typical requirements for traditional and alternative (not IHE-based) program admission, matriculation, and completion reveals just how different these requirements are in the “amount and substance of coursework requisites, quantity of field experience obligations, length of time spent student teaching,” (Ludlow, 2011, p. 441) and time devoted to reflective and supervised practice under a fully certified and prepared PK–12 teacher (usually with at least three years of successful teaching experience) and university faculty member. It is clear that these two routes are not producing similar calibers of teachers and, even if it were so, the alternative route program places an undue burden on the PK–12 students who are assigned a teacher-in-training/intern as their full-time teacher of record.

A common refrain heard from state officials and ACSRs concerned the significant politicization of teacher preparation program and provider authorization, review and approval, and teacher credentialing. The parameters for evaluation of teacher preparation providers and programs are first set in state legislatures. By necessity then, State Departments of Education (SDOE) are required to live with and implement the policy parameters set by state legislatures. In those cases where the State Board of Education (rather than the SDOE) provides implementation oversight, the Board is often comprised of one elected official (a Superintendent of Public Instruction) and several gubernatorial appointees. These political relationships lead to a variety of authorization, review, and approval outcomes on an increasingly shifting terrain.

Table 4. Comparison of Typical Traditional and Alternative Route Provider and Program Approval Processes and Standards

Traditional	Alternative (Not IHE-Based)
<p>Admissions criteria</p> <ul style="list-style-type: none"> • GPA of incoming class • Average licensure/entrance exam scores 	<p>Admission and recruitment criteria</p> <ul style="list-style-type: none"> • Bachelor’s degree from an accredited institution • Average licensure/entrance exam scores • Target cohort size and a plan for recruiting candidates
<p>Institutional mission, vision, goals, conceptual framework</p> <ul style="list-style-type: none"> • Narrative evidence of alignment of unit conceptual framework with institutional mission, vision, and goals 	<p>Ownership, governance, and physical location/ address</p> <p>Budget and revenue sources</p>
<p>Quality and substance of instruction</p> <ul style="list-style-type: none"> • Coursework and syllabi aligned with CAEP/state standards with special emphasis on diversity, equity, and inclusion and assessment/data driven instructional decision making • Planned program of study with required course content and hours • Student and program rubrics, assessments, and data aligned with standards 	<p>Coursework</p> <ul style="list-style-type: none"> • Description of instructional modules (typically online modules) aligned with targeted categories of certificates • Description of how students are evaluated
<p>Quality of student teaching experience</p> <ul style="list-style-type: none"> • Fieldwork policies, including requisite hours in handbook • Qualifications of fieldwork supervisor and mentor teacher • Record of regularly scheduled observations of student teaching by university supervisor 	<p>Clinical training</p> <ul style="list-style-type: none"> • Evidence of support during training, clinical teaching, internship, and practicum • Description of support and communication between students, cooperating teachers, and the alternative certification program • Description of conditions under which clinical teaching may be implemented
<p>Faculty qualifications and orientation</p> <ul style="list-style-type: none"> • Percentage of faculty with advanced degrees and PK–12 teaching experience • Percentage of full-time, part-time, and adjunct faculty • Profile of clinical and internship partner schools • University orientation for university supervisor, adjunct faculty, and cooperating teachers 	<p>Selection criteria for supervisors and cooperating teachers</p> <ul style="list-style-type: none"> • Selection criteria for clinical supervisors • Selection criteria for cooperating teachers • Code of professional conduct of staff and students

Traditional	Alternative (Not IHE-Based)
<p>Effectiveness in preparing new teachers who are employable and stay in the field</p> <ul style="list-style-type: none"> • Pass rates on licensure exams • Hiring and retention data 	<p>Assessment and evaluation of candidates for certification and TPP improvement</p>
<p>Success in preparing high quality teachers</p> <ul style="list-style-type: none"> • Teacher performance assessments administered near end of program • Ratings of graduates by principals/employers • Program completers' self-assessment of knowledge, skills, and dispositions • Impact on PK–12 learning outcomes 	<p>Certification procedures</p>
<p>Quality assurances</p>	<p>Complaint procedures</p>
<p>Typically 5- to 7-year cycle</p>	<p>Typical 3-year cycle, can range up to 7 years</p>

The data, information, and perspectives presented in this report lead to at least four overarching conclusions. First, traditional and alternative route TPPs and providers are different in each state, highly idiosyncratic, subject to change (via a state’s legislative process), and deeply reflective of each state’s policy context – so much so that it is extremely difficult to sufficiently capture all the nuances in surveys, interviews, or political modeling.

Second, alternative route (not IHE-based) program providers are growing and spawning new provider types.

Third, alternative program graduates have a higher probability than traditional program graduates of teaching in schools serving students of color, students experiencing poverty, and students with disabilities. In fact, teachers who stay in high poverty schools tend to be less qualified than teachers who stay in low poverty schools (Garcia and Weiss, 2019). Also, 37% of completers from alternative route programs and 16.2 % of traditional route program completers are in special education (U.S. Department of Education, 2020). Special education has more teachers-in-training as teachers of record than any other subject area field.

And fourth, the practice of disproportionate placement of alternative route teachers-in-training with students of color, students with disabilities, and those experiencing poverty does harm to them by depriving them of the right to a profession-ready, fully credentialed teacher.

Table 5. Alternative Route Provider and Program Approval Vignettes

State	Number of Alternative Route (Not IHE-Based) Programs	Vignette
Rhode Island	1	Only One: There is only one state approved alternative route provider in Rhode Island, Teach for America (TFA). TFA-Rhode Island does not hold CAEP accreditation, but TFA-Hawaii does. Rhode Island is beginning a reexamination of its provider/program approval processes to determine how these processes can better advance the essential end goal of educational equity.
Washington, DC	7	With Mayoral Control a New Door Opened for TPPs That Are Not IHE-Based: The Public Education Reform Amendment Act (PERAA) was enacted in 2008 and established a new office, Office of the State Superintendent (OSSE). PERAA simultaneously enacted mayoral control of Washington, DC Public Schools (DCPS), enabled charter school legislation and charter school proliferation, and provided a structure through which alternative route TPPs that were not IHE-based could seek and gain state approval. Prior to PERAA, TPPs were evaluated by DCPS. After PERAA, there was a bifurcated system of provider/program evaluation. Today, OSSE is developing regulations that will govern the TPP approval process for all TPPs in Washington, DC.
New Jersey	16	Two Years Working Toward Parity: AACTE’s Advisory Council State Representatives (ACSRs) led the charge in New Jersey to have the state statute and regulations changed to ensure that all TPPs are held to the same standard. The state grants provisional approval to providers and also utilizes two levels of program approval that IHE-based providers assert subjects them to more accountability than alternative (not IHE-based) providers. While all IHE-based providers hold CAEP accreditation/SPA approval, alternative route (not IHE-based) providers have been given until 2022 to attain CAEP accreditation/SPA approval.
Indiana	33	Avoiding Pathways without Accountability: In an effort to avoid “pathways without accountability,” Indiana requires that all providers seek national accreditation through CAEP and that all programs attain SPA approval. New providers can operate in the state for up to 3 years without CAEP accreditation and SPA approval but must provide evidence that they are completing the application for CAEP. Due to the COVID-19 pandemic, the 3-year limit has been relaxed.
Texas	41	More Than 100 Options: Texas’ state statutes and regulations provide the broadest opportunity of any of the states for provider and program proliferation. Online and multi-state operators dominate in this state. Texas also tops the 50 states with the most providers rated as low-performing and at-risk.

Table 6. Comparison of Typical Traditional and Alternative (Not IHE-Based) Route Program Admission, Matriculation and Completion Requirements

Traditional	Alternative (Not IHE-Based)
Apply to school/college/division of education	Hold a bachelor’s degree or higher from an accredited IHE
Meet minimum GPA requirements	Submit official college or university transcripts
Meet minimum SAT/ACT requirement	
Pass initial licensure exam	
Take and pass at least 60 semester hours of requisite content and pedagogical coursework	Pass a standard background check
Complete requisite field experience/observational requirements typically at least 200 classroom hours requiring reflective journaling (organized around CAEP/ inTASC/state standards)	Pass initial licensure examination
Complete course/program specific performance-based assessments	Obtain appointment as a teacher of record and serve for at least 1 year
Compile evidence-based e-portfolio aligned with CAEP/state standards	Pass grade level/subject area specific module(s)
Complete requisite internship/student teaching hours, typically 12 consecutive weeks of placement (40 hrs/ week) under the supervision of a fully certified teacher with at least 3 years of experience and university faculty member as supervisor	Complete 5 weeks (typically) of pre-service training that addresses the unique needs of the certificate areas and prepares individuals to begin serving as the educator of record, including, but not limited to, instruction in grade-level appropriate pedagogy, classroom management, and the statutes and regulations governing public education and students’ rights
Pass a criminal background check as a pre-requisite to entering the field to do clinical field experiences and student teaching internship	The pre-service experience must also include opportunities for candidates to apply knowledge and skills
Pass grade level/subject area specific licensure examination	Pass grade level/subject area specific licensure examination



Conclusions and Recommendations

All of us—educators, researchers, policymakers, legislators, and regular folks—know that this practice of placing uncertified “teachers” almost exclusively (and certainly disproportionately) in urban schools that serve Black, Latinx, poor, and students with disabilities is wrong. We need not go down a rabbit hole of endless research and analysis to know this is wrong.

Even if we wished to avoid the hot reality of a commonsense conclusion—all children deserve a good teacher who is profession-ready and appropriately credentialed—we should not discount the 9th Circuit Court of Appeals decision in *Renee v. Duncan* (2012). On this matter, nearly a decade ago, the court found that the practice of disproportionately placing uncertified teachers, teachers in training, or teacher interns in classrooms serving poor and minority students is “discriminatory” and “does harm.” Further, the court indicated that the appellants in the case provided evidence that 41% of interns in California taught in 25% of schools with the highest concentration of students of color. Further, 61% of California’s teacher interns taught in the state’s poorest schools. The court starkly stated: “We conclude that the Appellants established injury in fact. This disproportionate distribution of interns...results in a poorer quality education than Appellants would otherwise have received” (*Renee v. Duncan*, 686 F.3d 1002, 1012–13, 9th Cir. 2012). Not only are a disproportionate share of students of color saddled with teachers in training as their teacher, remarkably nearly 40% of special education teachers are coming from alternative preparation routes.

Nearly 30 years of research shows that in schools serving students of color where 50% or more are on free/reduced lunch (one indicator of poverty status), students are 70% more likely to have a teacher who is not certified or does not have

a college major or minor in the subject area being taught (Fenwick, 2016; Irvine and Fenwick, 2011). This finding holds true across four subject areas—mathematics, English, social studies, and science. This condition is ill-matched to another reality—approximately 84% of African American students (who are disproportionately poor) live in states that require high-stakes high school graduation tests, while only 66% of White students are in such states. How can we continue to educationally malnourish our students, raise the bar on what they are expected to know and demonstrate on standardized tests, and lower the standards for the adults who teach them?

Teacher quality is clearly tied to opportunity to learn: the quality of resources, school conditions, curriculum, and teaching that students experience. Yet the data about each of these opportunity-to-learn categories reveal alarming trends. According to the Schott Foundation (2011), taken together, Native American, Black, and Latinx students have just over half the opportunity to learn, compared to White non-Latinx students in the nation’s best supported and best performing schools. Additionally, the Schott study found that low-income students of any race/ethnicity also have just over half of the opportunity to learn, compared to the average White, non-Latinx student. Therefore, the availability and placement of profession-ready, caring and effective teachers for students of color and poor students is especially acute.

Thus, six policy recommendations emerge from this report about how states evaluate teacher preparation providers and programs:

1. Enforce, through federal and state regulations, the 9th Circuit Court of Appeals decision, *Renee v. Duncan* (2012), that found that disproportionately placing uncertified teachers, teachers in training, or teacher interns in

classrooms serving poor and minority students is “discriminatory” and “does harm” and “results in a poorer quality education than [the aggrieved PK–12 students] would otherwise have received.” Enforcement would entail ceasing the practice of placing teachers in training as teachers of record. Incentivize states to approve only those providers and programs that meet national accreditation standards.

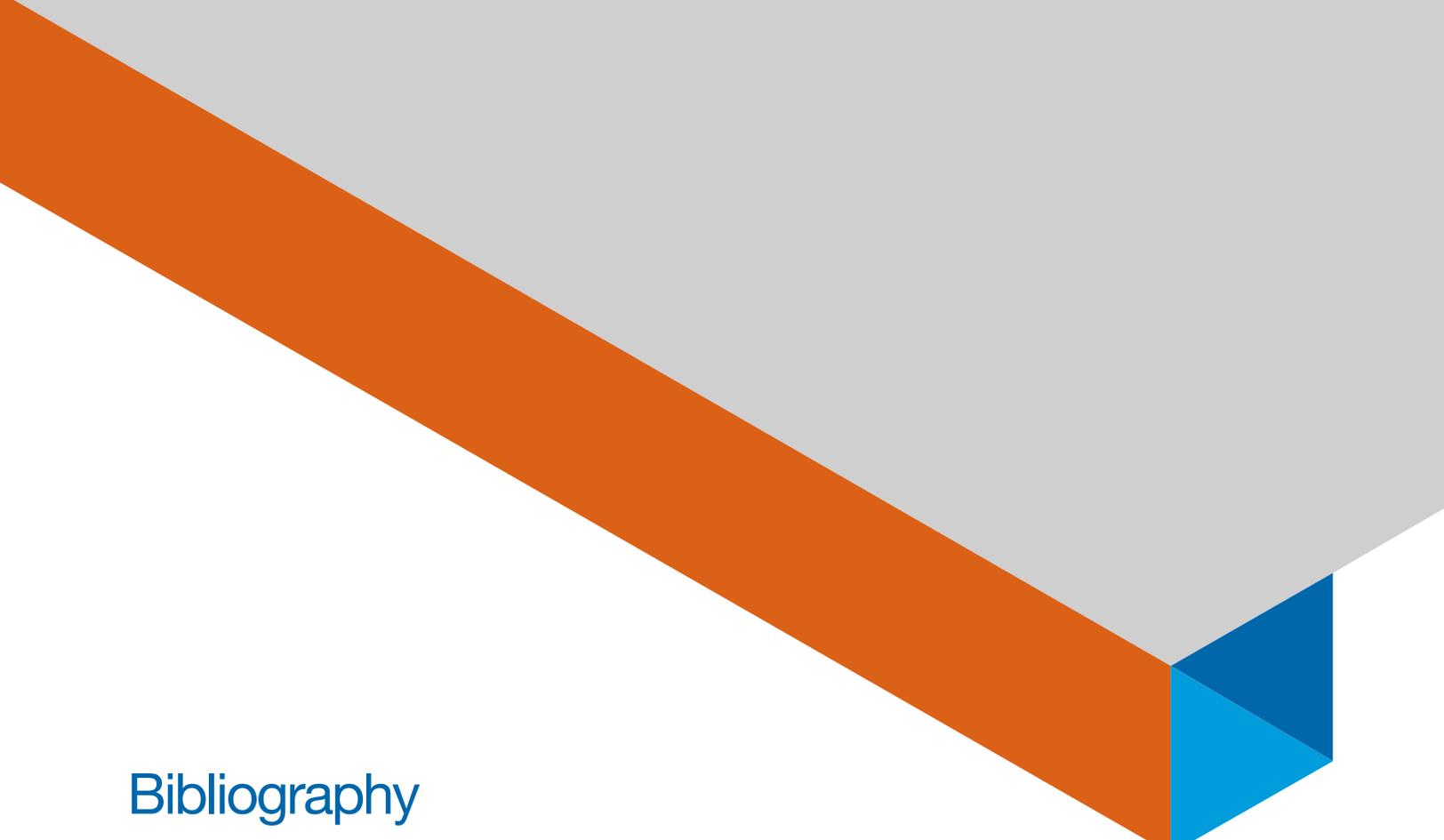
2. Incentivize states to work with districts to develop plans that equitably distribute fully certified, profession-ready teachers.
3. Incentivize states to remove barriers to the profession (such as entrance licensure examinations) that (disproportionately) and negatively impact the pipeline for teachers of color.
4. Require states to maintain public-facing websites and/or portals that present up-to-date and accurate teacher preparation program and provider review, approval, and authorization standards and processes.
5. Incentivize states to remove barriers to the profession (such as entrance licensure examinations) that (disproportionately) and negatively impact the pipeline for teachers of color.
6. Increase federal and foundation funding to HBCUs to strengthen the pipeline of Black teachers. HBCUs constitute 3% of the nation’s colleges and universities, yet these institutions prepare 50% of the nation’s Black teachers. Increased fiscal resources could further expand these institutions’ recruitment, preparation, and graduation efforts and outcomes. Without these strong engines, the nation is not likely to reach its educator workforce diversity goals.

Clearly, the proliferation of ill-credentialed “teachers” and their placement in schools serving the urban poor is linked to a broader issue of the

devaluing of public education and the Black and Brown students who have become the majority constituency of public schools.

Unfortunately, common sense has not gotten us to equality of educational opportunity and educational equity. Research has not gotten us there. Court decisions and decrees have not gotten us there. State and federal policymaking has not gotten us there. Time has not gotten us there. So, what will?

Perhaps the answer lies in the fundamental realization that the economic well-being of the nation’s citizens and the vibrancy of its schools must be inspired by our collective will to eradicate the isolation and ills of racism and poverty. Children are watching and learning. The Black, Brown, and poor children who are languishing in too many schools will soon be the majority of Americans. They already constitute the majority of public school students. What will it mean for American democracy when these young people—many of whom have been pushed and held at the margins of the social, political, and economic order—are the majority? Will their commitment to democracy and public schooling be resonant or absent?



Bibliography

American Association of Colleges for Teacher Education (AACTE). (2020). Teaching in the time of COVID-19: State recommendations for educator preparation programs and new teachers. Retrieved from https://secure.aacte.org/apps/rl/res_get.php?fid=5583&ref=rl

American Association of Colleges for Teacher Education (AACTE). (2020). Strategies that promote diversity, equity and inclusion in educator preparation. Retrieved from https://secure.aacte.org/apps/rl/res_get.php?fid=4977&ref=rl

American Association of Colleges for Teacher Education (AACTE). n.d. State policy principles for strengthening the educator pipeline. Retrieved from https://secure.aacte.org/apps/rl/res_get.php?fid=643&ref=rl

American Institutes for Research (AIR). (May 2017). Impact of TNTP's teaching fellows in urban school districts. Retrieved from <https://www.air.org/sites/default/>

[files/downloads/report/TNTP-Teacher-Fellows-Evaluation-Summary-May-2017.pdf](#)

Congressional Record Service (2018). Teacher preparation policies and issues in the higher education act. Washington, DC: Author.

Education Commission of the States (ECS). (May 2016). Mitigating teacher shortages: Alternative certification. Retrieved from <http://www.ecs.org/wp-content/uploads/Mitigating-Teacher-Shortages-Alternative-Certification.pdf>

Education Commission of the States (ECS). n.d. Teacher preparation state policy profile: A 50 state analysis. Retrieved from <http://ecs.force.com/mbdata/MBProfSN?SID=a0i700000009vaF&rep=TQST&state=Colorado>

Fenwick, L. (2016). Teacher preparation innovation and Historically Black Colleges and Universities (HBCUs). University of Michigan Teaching Works, Working Papers

Retrieved from https://www.teachingworks.org/images/files/TeachingWorks_Fenwick.pdf

Feuer, M. (2013). National Academy of Education. Evaluation of teacher preparation programs. Retrieved from <https://naeducation.org/wp-content/uploads/2016/11/028489-Evaluation-of-Teacher-prep.pdf>

Garcia, E and Weiss, E. (2019). The teacher shortage is real, large and growing, and worse than we thought. Washington, DC: Economic Policy Institute.

Government Accountability Office (GAO). (2015). Teacher preparation programs; Education should ensure states identify low-performing programs and improve information sharing. Retrieved from <https://www.gao.gov/products/gao-15-598>

Irvine, J. and Fenwick, L. (2011). Teachers and teaching for the new millennium: The role of HBCUs. *The Journal of Negro Education* 80(3), 197–208.

Ludlow, C. (2011). Alternative certification pathways: Filling a gap? *Education and Urban Society* 45(4), 440–458.

National Association for the Advancement of Colored People (NAACP). (June 2017). Task force on education: Hearing report. Retrieved from https://www.naacp.org/wp-content/uploads/2017/07/Task_ForceReport_final2.pdf

National Comprehensive Center for Teacher Quality. (2012). Evaluating the effectiveness of teacher preparation programs for support and accountability. Retrieved from <https://files.eric.ed.gov/fulltext/ED543773.pdf>

National Conference of State Legislatures (NCSL). (2016). No time to lose: How to build a world-class education system state by state. Retrieved from https://www.ncsl.org/documents/educ/EDU_International_final_v3.pdf

Renee v. Duncan, 686 F.3d 1002, 12 Cal. Daily Op. Serv. 5106, 2012 Daily Journal D.A.R. 6110, 282 Ed. Law Rep. 812 (9th Cir. 2012). Retrieved from <https://casetext.com/case/renee-v-duncan-3>

Schott Foundation for Public Education. (2011). *Lost Opportunity: A 50 State Report on the Opportunity to Learn in America*. Cambridge, MA: Author.

Southern Regional Education Board (SREB). (2018). State policies to improve teacher preparation. Retrieved from https://www.sreb.org/sites/main/files/file-attachments/state_policies_to_improve_tp_report_web.pdf?1547222272

U.S. Department of Education. (2020). Title II reports on the quality of teacher preparation and states' requirements and assessments for initial credentials. Retrieved from <https://title2.ed.gov/Public/Home.aspx>

Appendix 1. Summary of Program Review and Approval Standards, Licensure Examination Requirements, and Program Approval Agencies According to State Statutes/Agreements

State	State Standards, Exclusively	CAEP Standards	AAQEP	SPA Standards	Praxis II	edTPA	Regional Accrediting Body Standards	SBOE	SDOE	Regents	Other Governing Body
AL		•		•	•	•		•			
AK		•			•			•	•		
AZ		•		•	•					•	
AR	•										
CA		•				•					Commission on Teacher Credentials
CO	•				•						Colorado Educator Preparation Office Department of Higher Education
CT		•			•	•	•	•			
DE		•		•	•	•			•		
DC		•		•	•				•		
FL	•								•		
GA		•		•	•	•					Georgia Professional Standards Commission
HI		•	•		•	•			•		
ID		•			•			•			
IL		•			•	•	•	•			State Educator Preparation & Licensure Board
IN		•		•	•				•		
IO					•	•	•	•			
KS		•								•	
KY		•									Kentucky Council on Postsecondary Education
LA		•		•						•	
ME		•			•				•		
MD	•			•					•		
MA		•								•	
MI		•		•							Michigan Association of State Universities (MASU)
MN					•	•	•				Professional Educator Licensing & Standards Board

State	State Standards, Exclusively	CAEP Standards	AAQEP	SPA Standards	Praxis II	edTPA	Regional Accrediting Body Standards	SBOE	SDOE	Regents	Other Governing Body
MS		•			•				•		
MO		•		•					•		
MT		•		•						•	
NB		•		•				•			
NV	•				•				•		
NH		•		•	•						Office of the Secretary of Higher Education
NJ		•		•	•	•					
NM									•		
NY	•		•			•			•	•	Department of Public Instruction
NC		•		•	•	•					
ND		•		•	•						State Board of Higher Education
OH		•		•	•					•	
OK		•		•					•		
OR		•	•	•		•			•		Teacher Standards & Practice Commission
PA	•			•	•				•		Bureau of School Leadership and Teacher Quality
RI		•		•	•				•		
SC		•		•	•				•		
SD		•		•	•				•		
TN		•		•	•	•			•		
TX	•							•			
UT	•				•			•			
VT	•				•						Standards Board for Professional Education (VSBPE)
VA		•		•	•				•		
WA	•					•					Professional Standards Board (PESB)
WV		•		•		•			•		
WI	•				•	•					Department of Public Instruction
WY	•				•						Professional Teaching Standards Board (PTSB)

Review Praxis and edTPA passing scores by state and/or subject area: ets.org/praxisinstitutions/scores/passing/ and edtpa.com/PageView.aspx?f=GEN

