



May 20, 2021

Orman Feres
U.S. Department of Education
400 Maryland Ave SW
Room 3C124
Washington, DC 20202

Re: Proposed Priorities: Effective Educator Development Division Programs; Docket No.: ED-2021-OESE-0045

Dear Mr. Orman Feres:

On behalf of the Center for American Progress (CAP) and representing the interest of providing a high-quality education for every child, we write to offer comments on the proposed priorities for the following U.S. Department of Education (Department) programs under the Effective Educator Development Division: Teacher and School Leader Incentive grants (TSL), Supporting Effective Educator Development (SEED) grants, and Teacher Quality Partnership (TQP) grants. We commend the Department in taking this critical step forward to ensure that all students have access to a high-quality teaching workforce prepared to support their needs.

We support these proposed priorities, and the goals that they intend to achieve. The TSL, SEED, and TQP grant programs are important investments in innovation, and evidence based practices which allow us to better understand what works best for our nation's students and teachers. The first proposed priority for these programs supports educators by ensuring that they have access to quality professional development and best practices for their retention in the profession. In turn, our nation's students will benefit from a teaching workforce that is certified, prepared, and experienced, particularly in schools with the highest need. The second proposed priority for these programs aims to increase racial diversity within the teaching profession. Research indicates that there are benefits to a racially diverse teaching workforce for all students. These proposed priorities will ensure that students have access to a racially diverse teaching workforce prepared to meet their needs, and reflective of the diversity in the U.S. population.

We also comment to highlight some things for the Department's consideration that are important to ensure that these priorities serve the purpose for which they were intended. Here we outline some suggestions that will strengthen the proposed priorities, and ensure that they are implemented in a manner consistent with the Department's intent.

Proposed Priority 1—Supporting Educators and Their Professional Growth

Section (c) of proposed priority 1 would prioritize projects that increase, “the number of teachers with State or national advanced educator certification or certification in a teacher

shortage area.” Under this section, teacher shortage area is determined by the Secretary of Education, but this section will likely need more specificity to ensure that the program serves schools with the highest need, and teacher shortages relevant to the location the program serves. This stipulation would ensure that grant funding goes to programs increasing teachers with certifications that meet the needs of schools serving low income students, and the needs of schools in the state that the program serves.

Section (d) of proposed priority 1 would prioritize projects that provide “high-quality professional development opportunities.” There should be a definition here for what high-quality professional development means. This will prevent programs with questionable practices from seeking grant funding, and then altering outcome data to make the program appear productive. There is a great definition for professional development under Section 8101(42) of the Elementary and Secondary Education Act that would be helpful here.

Proposed Priority 2—Increasing Educator Diversity

Section (a) of proposed priority 2 incentivizes projects with goals and plans around educator diversity with input incorporated from diverse educators. We applaud the importance of incorporating the voice of diverse educators in educator diversity goals. This section should also include some examples or guidelines indicating what input from diverse educators would look like and how their input is expected to be incorporated in the plan development. It is possible that a project could solicit input from two diverse educators, and ultimately fail to incorporate their feedback anyway. An additional stipulation could be, “action plans must include ideas for collecting input from diverse educators, and a commitment to incorporating that input.”

Section (g) would prioritize projects that incorporate, “High-quality professional development on addressing bias in instructional practice and fostering an inclusive, equitable, and supportive workplace and school climate for educators.” As noted above with the term “high-quality professional development,” it is important to define this term to ensure that educators have access to professional development experiences that are impactful. It may also be helpful to add “culturally responsive and sustaining pedagogy” here because it outlines a very specific theory of teaching that provides clear guidance on inclusive instructional practices.

Section (h) encourages projects that create, “Data systems and reporting structures...about the racial and other demographics of the educator workforce.” There should be some mandatory requirements within these data systems to ensure that programs are measuring key data points. For example, these data systems should collect demographic data on teachers in October and April in a given school year with demographic data on which teachers left the school at the end of the year. This information will make it easier to highlight where retention of teachers of color remains a challenge. This section should also clarify the meaning of “publicly accessible” to ensure that this information can be accessed by members of the community via the internet or a mobile phone accessible site.

We commend the Department of Education for the proposed priorities for these grant programs under the Effective Educator Development Division. We are also happy to speak further about any of these recommendations. Please feel to contact Khalilah Harris, Acting Vice President of K-12 Education, at kharris@americanprogress.org or (202) 478-6336.

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Thank You,
Center for American Progress
K-12 Education Team