

Teacher Education Accreditation Council (TEAC)

Six Misconceptions about the Accreditation of Teacher Education Programs and Three Possible Outcomes

Frank B. Murray
University of Delaware¹

Teacher education accreditation, whether by Teacher Education Accreditation Council (TEAC) or National Council for the Accreditation of Teacher Education (NCATE), often serves as the “*canary in the coal mine*” warning for upcoming changes in federal accreditation policy in much the same way that the claims made in the *Nation at Risk* report in 1983 report about public education pre-figured the claims made later in the Spellings Commission report about higher education. The claims in both reports were strikingly the same – the public and policy-makers had lost confidence in the schools and universities because they were thought to be failing to deliver on their commitment to adequately educate their students. The recommendations in the former report became more or less the core recommendations of the latter – (1) establish standards for a “no-frills” curriculum, (2) administer assessments to measure their achievement and (3) impose sanctions if the standards were not achieved. The role of accreditation was to assure that the standards that uniquely define higher education institutions and programs were adhered to so that solid value could be had from the high costs of higher education. The uniquely American way of achieving these outcomes is through approximately 70 independent non-governmental and voluntary agencies for either some or all of the following purposes: (1) consumer protection, (2) the fair and accurate public disclosure of the quality of higher education institutions and programs, (3) the continuous improvement of higher education institutions and programs.

In the Fall 2011 issue of *The Presidency*, a publication of the American Council of Education (ACE), Terry Hartle, a senior vice-president of ACE, outlined six common misconceptions about accreditation held by policy-makers and the public that threaten a seven decade arrangement in which accreditors served the public by vouching for the quality of higher education programs that received federal monies. While most of these misconceptions are rooted in differing, and somewhat incompatible views, of the purposes of accreditation, all, like many misconceptions, will be seen to be only partly in error. They each can stand further scrutiny, however, particularly if accreditation is to survive providing its uniquely American form of quality assurance.

Misconception 1. The first misconception Hartle notes is that “*accreditation does not protect students from lousy schools.*” This view is rooted in the plain and “*to-good-to-be-true*” fact that nearly all institutions and programs that seek

¹ Also chairperson of the Board of Directors of the Teacher Education Accreditation Council (TEAC) and the Council for the Accreditation of Educator Preparation (CAEP), both in Washington, DC

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accreditation eventually succeed in acquiring it. The very few that don't succeed invariably fail because they are no longer financially viable, but the vast majority satisfies its accreditor's standards in all respects. This misconception assumes, of course, that there are large numbers of "lousy schools" that have earned, but should have been denied, accreditation and presumably closed.

There are approximately 1400 teacher education institutions in a nation that also faces an impending teacher shortage.²² A pre-requisite for both TEAC and NCATE teacher education accreditation is state approval of the program seeking accreditation and regional accreditation for the institution offering the program. In these circumstances it is fair to ask what the optimal accreditation or denial rate would be. How many state approved and regionally accredited institutions should be denied accreditation of their teacher education programs as a matter of good practice? Moreover, how could one know how many beforehand so that some standard for denial could be set?

All accredited programs need to submit successive versions of their self-study report (called an *Inquiry Brief* by TEAC) before one could be declared ready for a site-visit (called an audit). Fourteen percent of the programs seeking TEAC accreditation, for example, "failed" the audit insofar as the programs could only be granted pre-accreditation status (a status that indicates that the program is only making steady progress toward accreditation and some programs were required to submit entirely new materials before they could go on to the next stages of the TEAC accreditation process. Thus, only 86% were able to go forward to be even considered for accreditation.

There are several views of the rate for TEAC's first 101 accredited programs, for example, and they range from only 28% to 98% accredited as follows:

1. Of 101 accredited programs, only 28% were accredited with no problems cited that required fixing within two or five years, depending on their severity.
2. Of 101 accredited programs, 39% had severe problems that needed fixing in two years' time, so only 61% fully satisfied TEAC's principles and standards for an initial five-year term.
3. Of 101 accredited programs, 8% were accredited for only two years, thus 92% earned the accreditation status they sought.
4. Of the audited programs, all but two (98%) were in fact eventually accredited.

²² That there is a teacher shortage is a complex issue. The nation in fact produces more teachers than it hires and there is a large reservoir of trained teachers in other occupations. Roughly half those in teacher education programs drop out, half who complete the program do something else, and within five years half those who were teaching leave the profession for a disappointing 12.5% yield at the end of the pipeline.

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On the other hand, every program that sought accreditation eventually succeeded in acquiring it. In that sense, the rate is 100% as none were denied in the end. The record also shows, contrary to the misconception that accreditors are unwilling to take action even in the presence of violations of their standards, that both TEAC and NCATE were able to make clear discriminations in the quality of the programs seeking accreditation.

This misconception is a corollary of the now discredited, but formerly pervasive, practice of grading on the curve, which required an *a priori* assumption that quality is normally distributed in the population. Of course, accreditation is corrupted when a certain *a priori* failure rate must be attained as a sign of the accreditor's quality, because the public can never be certain what the true merits of the program were, just they can never be sure what a B grade on the curve means as its meaning is wholly contingent on the proportions of students who earned other grades and this would vary from time to time.

Misconception 2. A second misconception is that "*accreditation is focused on the wrong thing.*" The *wrong thing* is sometimes taken as judging the institution by whether it has accomplished its own mission and not the mission of some other group which has other goals and aspirations for higher education. No one is misled, however, if the program's mission is publicly and clearly stated and the accreditor warrants that it was accomplished.

Sometimes, the *wrong thing* is taken as standards or requirements that have no basis in established scholarship and are little more than the untested preferences of a profession or a discipline. This is a serious problem because here the public could be misled if the accreditors insist on standards that in the end have no convincing bearing on quality and in fact could undermine it. An accreditor, for example, could insist on a certain percentage of graduates pass a state license test when neither the test, nor the pass rate, has been validated (the typical case). In fact a program for high need non-traditional students with low pass rates could be a superb program for those who passed the test. If scores on a standardized test have a curvilinear relationship with competence instead of the assumed linear relationship high pass rates could also signify lower quality. On the whole accreditors with standards that require certain number of books in the library, specific proportions of faculty be tenured, have terminal degrees, be full-time, or that classes be of a certain size, etc., have not been able to show that deviations from these requirements are sound indicators of low quality. In this instance there is no misconception – the wrong things here are the wrong things and problematical.

TEAC, for example, makes its accreditation decision on whether the program exhibits certain principles: that it has reliable and valid evidence that its graduates are competent, caring and qualified beginning teachers and that it has functioning and credible procedures for determining quality. Its standards are the

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research standards of evidence and whether the evidence cited by the program truly supports the claims the program is making with regard to the graduate's competence. This is the right thing upon which to base accreditation and the one thing the public and policy-makers care about – are the graduates competent for their professional assignments?

Misconception 3. Hartle argues that a third misconception is that “*accreditation is not transparent*” by which he means that the public only sees the outcome of the process, only the decision and not what supported it. It is not unlike transcripts that only show the course grade and not what justified the grade, or published articles that do not disclose the reviewers' comments and analysis, or political votes that do not disclose the deals and *quid pro quos* that led to the vote. It is a fair point, all the same, but most accreditors resist full disclosure of the substance of their process because such disclosure would interfere with their accurate assessment of the program's quality. Accurate assessment hinges on the full cooperation of the institution, which occurs optimally when the program's faults and weaknesses are not made public. Without such cooperation the accreditor is likely to make an error in its decision and the public would be misled more seriously on that account.

It is a difficult problem to solve because obviously the manner in which assessments are conducted affects their validity and the accuracy and validity of the accreditor's assessment is the accreditor's overriding concern and sole purpose. This issue may come down to a so far unanswered empirical question: are weaknesses and shortcomings more effectively remedied when they are addressed in the public arena or outside it?

TEAC, for example, seeks to address this *transparency* misconception in two ways. First, at the outset of the TEAC audit the program is asked to pronounce that the auditors' summary of the program's case for accreditation is acceptably accurate. This summary, which sets out the program's claims of its graduate's competence and the evidence for the claims and other matters, is displayed on TEAC's website (www.teac.org) along with the program's accreditation status and the term of accreditation. Thus the public sees the factual details of the program's case for accreditation. Second, representatives of the program are entitled to attend the meeting of the panel that evaluates the case for accreditation and recommends the program's accreditation status. The program sees the entire discussion and is permitted to point out any errors of fact panelists may have made before they vote.

Misconception 4. It is not widely appreciated that “*accreditation is riddled with conflicts of interest*” because few persons outside higher education know that the institutions and programs seeking accreditation pay the accreditors' costs, giving the appearance that institutions are purchasing their accreditation. When an accreditor denies accreditation, it denies itself some income and when it

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accredits, it enhances its income. The appearance of a conflict of interest does not mean there is wrong-doing or inaccurate assessment, but most agree that the appearance undermines confidence that accreditation decisions are always objective.

Some also see that having faculty members serve on accreditation panels, commissions and committees that make accreditation evaluations introduces other kinds of interest conflicts. A faculty member evaluating an institution is aware, for example, that faculty members of the institution seeking accreditation may one day serve on the panel evaluating panelist's own institution and members of the same profession or discipline may feel a bond that limits their objectivity.

Teacher education accreditors, like NCATE in particular, have sought to minimize the appearance of these conflicts by deriving substantial portions of their operating budgets from professional organizations and foundations that have a vested interest in accreditation. Along the same lines, only half TEAC's operating budget comes from member's dues and fees, the balance is from gifts, in-kind support and grants. A Canadian teacher education accreditor is, for example, supported entirely by fees paid by members of the province's teacher's union. There are no easy solutions to this issue as the party or parties that fund teacher education accreditation may have expectations that potentially compromise accreditation or cause the accreditor to consider factors that reduce the accuracy of the accreditation assessment. It is no easy matter to determine who should pay for accreditation, although there is guidance in the principle that the entity or entities that derive the greatest benefit should pay.

TEAC addresses the second concern by using its own professional staff to lead site-visits and draft reports for the panels and committees. While an imperfect solution, it introduces a level of independence from professional colleagues.

Misconception 5. It is sometimes thought that "*accreditation reviews are too infrequent*," particularly when institutions exist in volatile environments of on-line courses, for-profit institutions, unusual market competition, tuition dependence, etc., that lead them to make frequent and rapid changes in their character and programs. Accreditors actually make three decisions when they accredit a program: (1) that the program meets the standards now, (2) how long into the future the standards will be met, and (3) what problems need to be addressed before the next full review. It is the second and third decisions that accreditors, like TEAC and NCATE, address through mandated annual reports and reviews.

Misconception 6. Finally Hartle sees that policy-makers think "*accreditation is not always fair to schools or programs*." The clarification of this misconception entails each of the previous five, which if any one were true, could mean that the accreditor was not fair insofar as the accreditor's decision was inaccurate and

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based on factors that had little to do with quality. Of course, a poorly managed accreditor might give inconsistent and invalid assessments in violation of its own policies and this cannot be tolerated. This misconception, however, is deeper than the accreditor's incompetence in conducting its own business.

The deeper issue is that the quality of higher education remains contested. For teacher education the issue is bound up in the purposes of the public schools themselves. Are they funded, for example, to yield law-abiding citizens who can contribute to the nation's economy and security, or to perpetuate a culture of common values from the past, or is the purpose to subvert the injustices of the common culture of the past and set the nation on a truer path? The private schools have yet other sets of purposes that are more in the service of religious obligation or in the service of a political agenda.

The point here, of course, is that what makes a quality teacher education program, and what would be fair to the accreditation of one, depends to a large extent on settling some unsettled matters – such as: are competent teachers those who accept and achieve the state's standards for their pupils, those who challenge the state's standards and provide a different and superior education, those who conform to school district teaching practice, those insist instead on modern teaching practice, those whose primary goal is to bring about social justice for their students or to maximize student potential or to sort students into categories, or in the current fad, is it those who just insure that standardized tests made by others are passed?

Accreditors recognized by the Council of Higher Education Accreditation (CHEA) and the United State Department of Education (USDE) are required to show that they administer their accreditation process in fair and consistent ways so this final misconception is easily set aside in that regard, but it is a vastly more problematic misconception when it is focused on unsettled matters.

Hartle sees three outcomes or scenarios if these misconceptions take further root in the policy community and continue to undermine confidence in accreditation.

Scenario 1. He sees that one outcome of the misconceptions is an increased government micro-management of accreditation. Here teacher education provides an instructive bell-weather example for other accreditors to note when regulators attempt to shore up the perceived weaknesses in accreditation. Congress, in an attempt to hold education schools accountable for their programs, and having minimal confidence in teacher education accreditation at the time, required that those programs whose institutions receive any federal funds disclose the pass-rates on the state license tests for the graduates of their program. This seeming reasonable and feasible requirement proved problematic to the point of undermining its intention entirely.

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One issue that plagued the reporting from the beginning was the determination of an appropriate sample on which the schools would report the scores. One would think that the scores of all graduates of the program would be reported, but the simple reporting of pass rates is complicated by the fact that most states use different license tests and set different passing scores even when they use the same test. What pass rate should be reported when a program's graduates go on to teach in several states, each with its own test and cut-score? One solution, and the one eventually adopted, was to report the pass rate of only those who teach within the state where the program is given. This solution, however, gives a misleading picture of the program's graduates, because it omits the majority of the graduates in programs that draw students from several states. These out-of-state students are often the superior students in the program owing to the fact that admission standards are typically higher for out-of-state students. The result is that we are not sure what the pass rate is for all the graduates, the very thing needed for the kind accountability envisioned by Congress.

A second problem arose in the case of those few candidates who successfully complete all but the student teaching (or clinical) requirements of the program. Usually these students get a degree because they have met the university standard for an academic degree, but because they did not succeed in the student teaching course, they are fortunately not recommended by the education school for a license and thus cannot teach in the state's public schools. The regulation required all the graduates, including those the faculty determined should not be teachers, be counted. This also further misrepresents the characteristics of graduates who receive the license to teach because it includes those who are ineligible to teach. And, of course, it also includes all those who could have taught, but decided to do something else.

Because the modal number of institutions that today's college students attend is approaching three, there is the problem of which institution should be credited with the pass or fail of the candidate for the license. Should it be the one that actually gave the degree, the one that gave the student teaching course, and/or some other proportional allocation of credit?

Apart from who is reported and which institution is credited, there are issues about which score to report. Some license tests have several parts that can be taken separately at different times. What should be reported for a student, who takes only one subtest and declines to take the others, or passes some and fails the others? What score gives the best representation of the competence of the program's graduates? Most states allow the test to be re-taken until a passing score can be obtained. In those instances, what rate should be reported -- the highest, the lowest, the average of all the rates? Again, which passing rate best represents the program's candidates?

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Even if one satisfactorily solved the problems of which students and which of rates to report, there is the larger issue of whether the passing rate information is even a credible measure of the quality of an institution or program. Passing rates are problematic for several reasons: first, the psychometric validity of the current tests has not been established convincingly insofar as their associations with high or low levels of actual teaching performance have not been determined. To conclude that an education school is good because large numbers of graduates pass these tests is a risky conclusion because the tests do not assess actual teaching performance.

The regulation had the effect of making high pass-rates *the* defining, and high stakes, measure of the quality of teacher education and by extension a measure that should also be adopted by the accreditors. Conforming to Campbell's law, which predicts that high stakes assessments corrupt both the assessments and the objective of the assessments, education schools within a year or two easily achieved 100% pass rates by using the license test as a screening test. To some extent these moves were seen as subverting the accountability motive of the regulation, but that is a curious concern. If the tests truly measure something important, what relevance is the timing of the tests as long as the tests are passed? What difference does it make if the test was passed before, during, or after the program was completed? That students can pass the license tests before they enter a program, or complete a program, could mean any number of things. It could mean that they were superior students, or that the test was too easy, or that the test is irrelevant and too easy, or that teacher education programs don't add much value, and so forth. Also, by giving the test early, education schools decreased the number of ill-suited students who pursued an education degree, giving them an early signal that their fortunes should be sought elsewhere.

Micro-management typically seeks to make complicated matters simpler than they should be made and still yield valid outcomes. Thus, Scenario 1 has to be seen as an unproductive set back.

Scenario 2. Hartle also sees that the historical link between accreditation and federal funding could be broken, which would reduce the incentives many institutions have for pursuing accreditation. This outcome would have the likely effect of putting some form of the first scenario in place as the government would still need to find some entity to vouch for the legitimacy of higher education programs and institutions and would most likely have to take on the task itself.

To some extent it takes on that role now by "accrediting" the accreditors through a set of recognition standards and requirements. It is fair to say that this recognition process suffers from all weaknesses, cited by Hartle, that are alleged to be present in contemporary accreditation.

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The link between federal programs and accreditation in the field of teacher education has been based on a provision in Individuals with Disabilities Education Act (IDEA), which states: *The Secretary shall make grants under this section only to eligible applicants that meet State and professionally-recognized standards for the preparation of special education and related services personnel, if the purpose of the project is to assist personnel in obtaining degrees.*

While accreditation is not mentioned specifically in the act, the interpretation of the act allows USDE to recognize both accreditors in teacher education. Since the IDEA funds, however, still routinely go to unaccredited institutions a break in the link would have no discernable impact on teacher education unless one assumes that in order to gain federal recognition, accreditors have implemented valuable requirements and processes that they would abandon without recognition. The incentives for teacher education institutions and programs to pursue accreditation have their roots in the states requiring accreditation or relying on it in their own determination of which graduates should be granted a teaching license in their state. Only a handful of states currently require teacher education accreditation and in that sense these states may have unwittingly set up a link to federal funds, separate from the IDEA, because no program in the state can exist to even ask for federal funds for teacher education unless it is accredited.

Finally, in the case of teacher education, and presumably in other areas, it is unlikely that USDE would give up the link between accreditation and federal funding because its regulation of the accreditors, which is only permissible because of the link, permits it to influence and shape what the accreditors accredit.

Scenario 3. In the end Hartle sees the most beneficial outcome is to “*reaffirm credibility and value of accreditation.*” This can be done by clarifying the misconceptions he cites by showing they are more false than true, but also by shifting the focus of accreditation toward raising the standards the field has for the evidence it accepts as indicating a program’s graduates are competent.

Here teacher education accreditation supplies a ready example of how the bar has been rising for evidence of the teaching competence of a program’s graduates. At one time if an accreditor or the state wanted to know whether the graduates were competent to teach, the syllabus for the required student teaching course was presented and accepted as the basis for the inference of teaching competence. At best, the syllabus is evidence of the program’s *intention* and may not have even been evidence of the course that was actually taught and experienced by the students and it tells the accreditor and the state almost nothing about the effectiveness of the student teacher’s teaching. Subsequently, accreditors expected evidence of actual teaching performance

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that was usually supplied in the form of the ratings cooperating teachers and faculty supervisors gave to student teachers about their teaching skill. This was taken as more persuasive evidence of teaching competence although these ratings were invariably inflated and less convincing on that account. The field is now at a point where the evidence of teaching competence has less to do with the teacher's performance than with its effects on the pupils. Both TEAC and NCATE are now expecting evidence that the graduate's own students learned something, a surer sign that true teaching has taken place than the syllabus or ratings. If teacher education programs can provide evidence that the graduates of their teacher education program were over-represented among the teachers who produced high learning gains and under-represented among the teachers who produced low learning gains, many would take that as solid evidence of the program's success and an adequate basis for accreditation. Such evidence, in fact, might trump any other evidence cited previously as almost no one would care what the graduate's scores were on the license test, or the length of the student teaching course, if it could be shown that the program's graduates were those who reliably produced high learning gains in their own pupils.

Current accreditation practices in teacher education have evolved to the point that programs can be asked to provide evidence that education school graduates can teach effectively in such a way that the cited evidence can withstand scrutiny and otherwise meet the tests and standards of scholarly evidence. Such evidence would be an effective way to *reaffirm credibility and value of accreditation*.