# ­­­­­\_\_\_­­­\_\_\_\_\_\_Petition for edTPA Rule Change\_\_\_\_\_\_\_\_

# We the undersigned respectfully request that the Illinois State Board of Education (ISBE) approve a change in rule 25.720 requiring teacher education candidates to pass the edTPA™ during student teaching for program completion and licensure. We believe it is premature to use the edTPA™ exclusively as the only evidence-based assessment that can satisfy the mandate of P.A. 97-0607/105 ILCS 5/Section 21B-30 (f) to assess student teachers’ readiness for licensure. It is our belief that the edTPA™ is not yet sufficiently developed for use as a high-stakes assessment for licensure, damaging to the purpose and goals of student teaching, and too costly to our students and institutions of higher education. As of March 2015, 17 states are not participating in edTPA™ at all, only 11 states have a policy in place, and of those 11, edTPA™ is currently being used as a high-stakes consequential assessment in only two (<http://edtpa.aacte.org/state-policy>).

**P.A. 97-0607 School Code 105 ILCS 5/Section 21B-30(f) (**<http://www.ilga.gov/legislation/publicacts/97/097-0607.htm>)

**Educator Testing:**

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

We ask you, the members of the Board, to consider changing Rule 25.720 of the Administrative Code to allow evidence-based assessments approved by the State Board of Education, other than only the edTPA, as acceptable measures of teacher effectiveness during student teaching. A change in rules allowing other evidence-based assessments would still comply with statute and school code. For example:

**Administrative Code-Section 25.720:** (<http://www.isbe.net/rules/archive/pdfs/25ark.pdf>)

**Applicability of Testing Requirement and Scores:**

e) Teacher Performance Assessment (TPA)

Beginning September 1, 2015, each candidate completing an educator preparation program in a teaching field shall be required to pass ~~the~~ a TPA (see Section 21B-30(f) of the School Code), approved by the State Board of Education, including the performance evaluation systems Illinois school districts have designed and implemented to comply with the Performance Evaluation Reform Act of 2010:

1) Each recognized institution offering approved teacher preparation programs shall administer ~~the~~ a TPA during a candidate's student teaching experience.

2) No later than July 1, 2013, each recognized institution offering an approved teacher preparation program shall begin using the TPA with at least some of its students; however, before September 1, 2015, an institution shall not require passage of the TPA as a condition for program completion for students participating in any limited implementation required under this subsection (e) (2) unless the institution requires that all candidates pass the assessment. **(105 ILCS 5/Section 21B-30f)**

Other evidence-based assessments already approved by ISBE could include the Charlotte Danielson Framework, the CPS Reach Assessment, other teacher performance assessments ISBE approved for Illinois school districts to comply with the 2010 Performance Evaluation Reform Act (PERA: [http://www.isbe.net/PERA/default.htm](http://www.google.com/url?q=http%3A%2F%2Fwww.isbe.net%2FPERA%2Fdefault.htm&sa=D&sntz=1&usg=AFQjCNGk__QmektXTA-0hE3T3TJgtXmMVQ)). Illinois programs would still have the option of using the edTPA™.

**We the undersigned share multiple concerns about requiring the edTPA™ exclusively as the high stakes assessment for licensure, including:**

**• High-Stakes Decisions based on Insufficient Data Collected during the required Pilot Period:** ISBE reported at a SEPLB meeting in December 2014 that no conclusions about the impact of the edTPA™ could be derived from the data collected during the required pilot period, which began fall 2013, because of the fewer than 700 officially scored edTPAs™ completed in Illinois, more than 600 were from only one IHE. The other 50+ IHEs in Illinois were each only able to pilot the edTPA™ on an average of 1-2 student teachers a year, because of the few fee waivers each received from Pearson, the testing company, for the pilot period, and IHEs had not been able to budget $300 for each student teacher during a time when it was not required for licensure. There are insufficient data nation-wide to show that candidates who score higher on the edTPA™ perform better as a classroom teacher, yet edTPA™ scores will play a high-stakes role by trumping all other evidence-based assessments of student teachers for licensure.

**• Impact on Student Teachers:** The edTPA™ is costly to student teachers in time, money, and valuable classroom experience. Its use as the one and only performance assessment that satisfies PA 097-607 is unjust when the single point in time it captures merely half-way through student teaching is not an accurate reflection of a student teacher’s true abilities. The $300 cost of the edTPA™ adds an additional financial burden to teacher candidates during a semester when they are least able to supplement their income by working outside the classroom. Student teachers who are judged to be competent by all other performance assessments used in student teaching, as well as those who often "catch up" during the second half of student teaching as they reflect on their first weeks and gain more confidence and experience, will incur more substantial costs unfairly if they fail any part of the edTPA™. They will have to pay an additional $100-$300 to re-take any part(s) of the edTPA™ they fail, potentially thousands of dollars in tuition for remediation and/or repeating student teaching, and stand to lose untold income because of a delay in graduation and licensure by a semester or more.

**• Impact on Student Teaching:** The student teaching experience has been found to be diminished in classrooms who completed the edTPA™ without official scoring during the pilot period. The time spent and focus of the first half of student teaching seemed to be on preparing the edTPA™ rather than on the experiences needed for developing their skills as new teachers. Student teaching occurs in a wide variety of contexts which cannot always provide a consistent or supportive environment for a high stakes assessment like the edTPA™. Cooperating teachers, schools, and districts have not had sufficient time or training to learn how to support student teachers in these settings, to train cooperating teachers, or to develop policy for videotaping student teachers and their students, which is required for this assessment.

**• Inappropriate Use:** The edTPA™ is a summative assessment completed during a formative learning experience. The edTPA™ assesses student teachers on tasks they might be performing for the first time during a learning experience when they are continuing to form and develop their skills as a teacher. Multiple stakeholders have expressed their concern that the edTPA™ is a teacher performance assessment more appropriate for licensed teachers working to earn tenure. Approved teacher preparation programs typically use multiple evidence-based assessments to recommend teacher candidates for licensure rather than a single, high stakes assessment which will be scored by a person hired by an outside entity (Pearson) who does not know the teacher candidate, the students in the classroom, the setting, or other nuances of student teaching. Also, in order to receive the official score in time for graduation and licensure at the end of student teaching, student teachers must begin their edTPA™ portfolio at the beginning of the semester or earlier, videotape a lesson demonstrating best practice no later than mid-semester, and complete their portfolio for submission and scoring weeks before the end of their placement.

**• Impact on IHEs**: IHEs are struggling with budgetary problems. edTPA™ performance data are insufficient for IHEs to plan their budgets to cover the costs of: modifying curricula to meet the edTPA™ standards, designing and offering remediation for unsuccessful student teachers, professional development for faculty and staff, and support of other candidate needs. Many institutions raided their dwindling budgets to require and pay for the edTPA™ for each of their student teachers this semester, so they can work out any administrative, technological, or submission problems with the Pearson computer platform, and to obtain the data needed to make informed decisions about the costs of implementing the edTPA™ before it becomes mandatory and high stakes next semester.

**• Impact on Illinois’ Pipeline of Teachers:** Insufficient data were collected during the pilot period to estimate the impact on the diversity of candidates in the pipeline of future teachers, which already lacks the diversity of teachers needed in Illinois classrooms.

Thank you for taking the time to consider our request, and for all you do on behalf of the children in Illinois. We believe that if we work together on this issue, we will be able to find a way to continue to maintain high standards for our teacher candidates without placing an undue burden on our students, our programs, our partner schools, and our Institutions of Higher Education.