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Via email to: ED blog comment policies

The CCD Education Task Force applauds the Office of Special Education Programs (OSEP) for prioritizing the teacher shortage problem. Indeed, many have characterized this as a national emergency.

CCD has become increasingly alarmed about the shortage of teachers, particularly special education teachers, as well as early intervention providers and specialized instructional support personnel. The shortage is troubling with nearly every state reporting one; the future does not look bright. Across the country there has been a 35% decline in enrollment in teacher education preparation programs in higher education between 2009 and 2014, the most recent years of data available (Learning Policy Institute, 2017). Too frequently states have responded to teacher shortages by lowering certification standards and allowing those with little to no preparation to teach our nation's students with disabilities.

Teachers and other providers need strong preparation in order to use evidence-based strategies, such as how to provide multi-tiered systems of support, positive behavioral interventions and supports, and universal design for learning. These are not skills that are learned on the fly. There is a straight line between student outcomes and teacher and specialized instructional support personnel preparation. Unfortunately, few general educators feel adequately prepared, and it is evidenced in their mindsets and practices. A recent report found that only 17% of general education teachers feel well prepared to teach students with learning disabilities. Instead, most cited "on-the-job training and trial-and-error learning" as how they learned to teach students with disabilities. As many as one-third of teachers have not participated in professional development on teaching students with disabilities and of those who have, most believe it was not effective. Perhaps most importantly, the majority of educators are not convinced that students with disabilities can reach grade-level standards, and one-third do not believe that inclusion benefits students. (National Center for Learning Disabilities, 2019).

Our nation's students and families deserve better. We cannot achieve the outcomes we all desire without a well-prepared workforce. We know that those educators who are fully prepared will stay in the classroom longer and have the skillset as well as the mindset to be effective. As a recently released report concluded: "Evidence shows that underprepared, out-of-field, and substitute teachers typically depress student achievement and have higher attrition rates... Research has found that special education training significantly improves teachers' capacity to effectively teach students with special needs." (Learning Policy Institute, 2017).

A well-prepared workforce is far more than a matter supported by research; it is a requirement of law. The Individuals with Disabilities Education Act (IDEA) requires that students eligible for services under the law are taught by "qualified personnel." (20.U.S.C. Sec. 1453 (b)(6)) It further prohibits anyone from serving as a teacher who does not have at least a bachelor's degree. (20 U.S.C. Sec. 1412 (14)(C)(iii)) In addition, the U.S. Department of Education (the Department), in the state application for IDEA funds, requires states to assure

that: "The State educational agency has established and maintains qualifications to ensure that personnel necessary to carry out this part are appropriately and adequately prepared and trained..." (20 U.S.C. Sec. 1412 (a)(14))

Therefore, the CCD Education Task Force urges OSEP to continue its leadership by sending the clear message *to states and all involved in personnel preparation* that only fully prepared qualified personnel should teach and support students with disabilities. We specifically urge OSEP to:

- Ensure that IDEA's requirements are followed by states as they seek to recruit, train, and retain qualified teachers;
- Include increased funding for IDEA Personnel Preparation in the Administration's FY 2021 Budget Request at the \$100 million level;
- Ensure the Department does not eliminate and also seeks to increase funding for all authorized programs under the IDEA (Part D), the Higher Education Act (e.g. Title II) and the Every Student Succeeds Act (e.g. Title II and Title IV) in order to address the shortage and training of special education teachers;
- Continue to invest in technical assistance and resource development through existing centers such as the Center on Great Teachers and Leaders and develop priorities within existing centers to focus specifically on preparing educators to serve students with disabilities;
- Promote and support TEACH grants and loan forgiveness programs including the Public Service Loan Forgiveness program through activities such as public awareness campaigns and to actively engage in recruiting teacher candidates as important recruitment and retention strategies for prospective special education teachers;
- Provide opportunities that will incentivize states to raise the bar on teacher preparation and credentialing, such as through a competitive grant program or other opportunity for districts and states to develop meaningful partnerships with institutions of higher education and encourage teacher candidates to pursue dual-certification programs, residency programs, or other high-quality learning opportunities; and
- Coordinate efforts with the Office of Elementary and Secondary Education in their Teach to Lead initiative and other programs specifically targeting teachers to ensure each has access to the professional learning experiences that will strengthen their capacity to teach all students, including students with disabilities.

Our Task Force, comprised of approximately 50 national special education and disability organizations, is eager to learn more about OSEP's next steps in this effort. We look forward to working with you.

On behalf of the CCD Education Task Force,

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CCD, headquartered in Washington DC, is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. Since 1973, CCD has advocated on behalf of people of all ages with physical and mental disabilities and their families. CCD has worked to achieve federal legislation and regulations that assure that the 54 million children and adults with disabilities are fully integrated into society.