



U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202
Attn: Assistant Secretary for the Office of Elementary and Secondary Education

May 12, 2020

Re: Priorities, requirements, definition, and selection criteria under the Education Innovation and Research (EIR) program (Docket ID ED-2020-OESE-0025)

Learning Forward is writing to express its objections to the U.S. Department of Education's (the Department's) proposal to establish a Professional Development Voucher (PD Voucher) program through the Education, Innovation and Research (EIR) program. Learning Forward is deeply concerned that the Proposed Priority 1—Teacher Directed Professional Learning, a Professional Development (PD) Voucher program, would undermine the high-quality professional learning that ESSA has codified, that research and evidence has shown leads to strong outcomes and toward which Learning Forward believes that America's systems must move.

Specifically, we are concerned that the PD Voucher program:

- **Does not align to the definition of professional learning in ESSA and would not support professional learning that is sustained, collaborative, school-based, and job-embedded.**

The Every Student Succeeds Act's (ESSA) includes a rigorous definition of professional development that embodies the important transition from scattershot, one-off professional development workshops and sessions to collaborative, ongoing, job-embedded professional learning such as coaching, mentoring, and professional learning communities. The PD voucher program would – essentially – ignore ESSA's professional development definition by creating a separate, emergency definition in the EIR regulations. Based on this Notice, this new definition would omit reference to ESSA's requirements that professional development content be "job-embedded", "ongoing", "consistent", and "relevant." We assert that the Department, in proposing to establish its own definition for professional development, is acting well-outside of its authority and manifestly against Congress' intent.

Research has long shown the value of schools deploying collaborative learning structures such as **professional learning communities (PLCs)**, action research teams, and lesson study groups. Multiple researchers have documented that teachers who collaborate in PLCs to continuously improve their practice and their students' learning experiences have a measurable positive impact in schools. A 2009 study that took place in New York City documented student achievement gains across grade levels when teachers engaged in purposeful, content-focused interactions.¹

We also know from our colleagues on the ground in North Kansas City Schools that they found and documented significant student academic gains when their school district implemented professional learning communities. Through this professional learning, teachers studied and



implemented cutting edge literacy instructional strategies aligned to research over several years. As a result, North Kansas City Schools students rose from below the state average to outperforming the state average academically, including amongst their students of poverty and English language learners.²

Finally, key studies show that **coaching** helps teachers get better faster. Coaching is another example of a form of professional development that aligns with the ESSA definition. A 2018 meta-analysis, which examined 60 rigorous studies of coaching³, found large positive effects of coaching on teachers' instructional practices. Across 43 studies, researchers found that coaching accelerates the growth that typically occurs as one moves from novice to veteran status. We know that this is an effective investment in professional learning and one that might not be sustainable for a district if a majority of a district's professional learning funding has to go to individual stipends.

- **Could contribute to scattershot, “sit and get” professional learning that is not aligned to school or district priorities.**

Learning Forward is in full support of personalized professional learning and teachers having a voice in determining the professional learning they experience; we recognize that one size professional development does not fit all educators. At the same time, professional learning needs to be supported by teams and systems that ensure what is gained through professional learning is implemented in classrooms and schools. The proposed PD voucher program in the EIR grant would leave out several central tenets of high-quality professional learning. First, it would undermine district efforts to have rigorous professional development as defined in ESSA. Alignment and coherence are important aspects of professional development and this proposed program would fragment professional development offerings.

Second, the proposed EIR program would privilege individuality over collaboration, thereby overlooking the critical importance of educators working together. In OECD's 2018 TALIS⁴ findings, teachers around the world reported that professional development based on collaboration and collaborative approaches to teaching are among the most impactful for them. This impact would be significantly muted should this EIR program operate on a widespread basis.

- **Would not afford equitable access to professional learning.**

Widespread access to effective professional learning is a critical equity lever in schools – only when ALL educators have access to sustained, relevant professional learning do all students have access to the best teaching and learning possible. Title IIA ensures equity by delivering support to all educators in each district and by allowing experts in districts to carefully curate professional learning opportunities. Under the proposed PD voucher scheme, the expertise at the district level would largely be removed and only those teachers who know the best opportunities and understand their own needs would be able to choose the professional learning best fit for



them. This would leave behind many teachers who lack knowledge of their own needs as well an understanding of the best available professional learning products, creating a system of inequity.

- **Could undermine Title II-A professional learning funding which supports high-quality programs, including coaching, mentoring, and professional learning communities.**

Fragmenting is a very real concern of this PD Voucher program. If we divide a relatively small sum of money amongst individual teachers, and those funds constitute a majority of the funds that school districts spend on professional development, proven professional learning that aligns to the research-based ESSA definition of professional learning (such as coaching and mentoring) would be forfeited. And while no guidance is provided on how much funding would be provided to how many educators, it is unlikely that the amount of the stipend would be sufficient for a teacher to choose the majority of their PD. Additionally, a scenario where teachers choose from a large assortment of professional learning options will make assessing the impact of any of these options virtually impossible, thus making it virtually impossible to document the return on professional learning investments.

About Learning Forward

Learning Forward is the only membership association solely focused on effective professional learning for K-12 educators and serves 40,000 members and subscribers and 32 affiliates while simultaneously influencing the broader education field through its [Standards for Professional Learning](#).

Learning Forward has long worked to ensure that all educators, particularly those serving students with the highest needs, have access to high-quality professional learning that aligns to the Learning Forward Standards for Professional Learning. Because of our efforts to educate the field about what works, professional learning is shifting away from workshops and one-off sessions and is moving toward collaborative, ongoing, job-embedded professional learning such as coaching, mentoring, and professional learning communities. With the current national emergency, continuous learning is more important than ever as educators face new challenges teaching and participating in professional learning online.



Footnotes:

- 1 Saunders, W.M., Goldenberg, C.N. & Gallimore, R. (2009). Increasing achievement by focusing grade-level teams on improving classroom learning: A prospective, quasi-experimental study of Title I schools. *American Educational Research Journal*, 46(4), 1006-1033.
- 2 Sutton, Chad (2018). North Kansas City Schools data summary. *Learning Forward*.
- 3 Kraft MA, Blazar D, Hogan D. The Effect of Teacher Coaching on Instruction and Achievement: A Meta-Analysis of the Causal Evidence <<https://scholar.harvard.edu/mkraft/publications/effect-teacher-coaching-instruction-and-achievement-meta-analysis-causal>>. *Review of Educational Research* [Internet]. 2018;88 (4):547-588.
- 4 OECD (2019), TALIS 2018 Results (Volume I): Teachers and School Leaders as Lifelong Learners, TALIS, OECD Publishing, Paris, <https://doi.org/10.1787/1d0bc92a-en>.