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ETHICAL CONSIDERATIONS IN THE COUNCIL FOR THE ACCREDITATION OF
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DEDICATION

"Whatever you do, work at it with all your heart, as working for the Lord, not for men"

Colossians 3:23

First of all, I would like to dedicate this dissertation to my parents, grandparents, and extended family that supported in me through this process. Thank you for believing in me when I didn't believe in myself. I'm so grateful for such a wonderful group of cheerleaders. My 'tribe' has been an unbelievable source of encouragement. You girls are amazing!

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ABSTRACT

The standard of excellence in teacher preparation is accreditation by the Council for the

Accreditation of Educator Preparation (CAEP). Millions of dollars, untold hours of human effort,

and countless pages of reports go into the process of CAEP accreditation. This conceptual

analysis identifies, clarifies, and attempts to better understand the ethical dimensions of CAEP

accreditation. Adapting to public education a six-step ethical framework originally developed by

Kass (2001) for public health, this study asks the question, is the process of CAEP accreditation

ethical? The six-step ethical framework adapted for this study found that the process of CAEP

accreditation as it currently exists is not ethical. However, because CAEP accreditation may be

required by state law, it may be required.

CHAPTER ONE

Introduction

In the spring of 2005, I interviewed for a teaching position at Midwest Christian University. It was to be a position teaching English and coordinating the general education program at the university. MCU was working to make a shift from a small Bible college to a liberal arts university. Thus far, the changes had been made in name only. The only degrees that were being offered that were not Bible or ministry-related were in business and behavioral sciences.

When I interviewed with the Vice President of Academic Affairs and a professor at MCU, the conversation during the interview turned to developing new programs. The two most important programs in their minds were those in English and education. The English program would help the school transition into the liberal arts institution they were striving to become, and the education program would fill a void that could service the needs and desires of the students currently enrolled. The VP and professor felt that, with my background in English at the high school level, I would be able to start developing the program in English rather quickly. The program in education was something they wanted, but there were a lot of questions about the process of accreditation. Since I had been a certified teacher for a number of years, they felt that I had valuable experience that gave me insight so that I could proceed quickly and easily. The VP said, "You've been a classroom teacher; you must know how to put that kind of a program together." I was eager to start a program in education, but I truly had no idea what it would entail.

The idea of building new programs and helping the school to advance in education was intriguing. It was a life-long dream to teach teachers and help develop the next generation of

educators. Building a program sounded daunting, but my mentors seemed to believe

accreditation would be a paint-by-number exercise.

There had been attempts to begin an education program at MCU in the past. The

university had been working with the Association of Christian Schools International (ACSI), a

Christian accreditation agency used by many parochial K-12 schools. I had just taken the private

school where I had served as administrator for three years through ACSI accreditation. I had

also trained to be an accreditation team member and had served on my first accreditation visit

just a couple of years before I came to MCU. I understood and believed that I would be able to

pull something together at MCU.

In the fall of 2005, I began teaching English courses at MCU for all students. That first

semester I had nearly every student on campus because I was the only faculty member teaching

these courses. The enrollment was small enough that I could teach five courses and include most

of the entry level classes. In the spring of 2006, the VP asked me to present a proposal to the

university's Academic Council for an English degree. I took on this challenge by researching

area universities and other Christian universities that had a similar structure and dynamic. This

proposal was submitted, approved, and made part of the school catalog and degree offerings in

the fall of 2006. Midwest Christian University had an English program, and I believed that we

were on our way.

The following fall of 2006, the English Department was officially débuted. I was still the

only faculty member in the department, but there was only a small group of majors. After this

first, quick success, I was feeling confident and ready to take on new challenges. I completed the

year as the Chair of the English Department. In a small university, this meant that I helped

transfer students complete the few courses they needed to complete the English degree through

various directed studies courses. I also taught the other required English courses for the remaining student population and began teaching the specific English courses for the new degree program. The year was incredibly busy and demanding, but the first English candidate from MCU graduated in spring of 2007.

Next, the administration wanted me to expand my purview to include a new education program. I had begun a master's program in English at the University of Central Oklahoma and continued to teach a full load of courses at MCU (12/12). This meant that I was teaching four courses in the fall and four courses in the spring. As the English program was new, many of the courses I taught were being developed as I taught them. In 2007-2008, I completed fifteen hours of a master's program and started to research what it would take to put an education program into place at MCU.

In the past, MCU had worked with ACSI to train teachers using a private, Christian school model. As a matter of fact, the first course I taught at MCU was called "Methods of Teaching Reading for Christian Education Majors." I was given the documents that had been collected during this time and started looking at ways to use the information for state accreditation. As I began exploring what the requirements were for accreditation in Oklahoma and nationally, I realized that it was going to be a much bigger project than the English program. The regulations required by the state department were much more stringent and varied from the previous accreditation work that had been submitted to a private Christian accreditation organization.

I set a meeting with state department officials to learn the process that would be required. As this conversation started, I began to realize that Midwest was embarking on an unusual journey. The Director of Educational Quality at the Oklahoma Commission of Teacher

Preparation (OCTP) told me that they had looked at their records and realized that no one in their department had taken a school through initial accreditation. Actually, no school in the state had sought initial accreditation in more than thirty years. There were many schools with a teacher education program, but they were all well-established. The OCTP pledged to try to help me create something that was already fully functioning in other places. No one there had ever started a program from scratch. I showed OCTP the documents that had been given to me from MCU regarding their ACSI accreditation, but they were a long way from being the kind of documents and information that were needed to start state accreditation for education. I had a lot of work to do.

Conceptual Framework

The daily routine of keeping the English department functioning, teaching most of the classes in the program, adding new adjuncts for the growing student population, doing coursework to complete a master's program and beginning work on a PhD left me very little time to develop a new education program. MCU was also going through several adjustments, including a presidential search which meant that the climate to build a brand-new program was ever-changing. A new president was named after having a year with an interim president during the search process. Initially, the president wanted me to continue working as the Chair of the English department while trying to complete the application process for the education program. During that year, I was teaching an overload of 15/15 and I also took a group of students to Europe for a study abroad program. It was not physically possible for me to continue at that pace. As a result, a new chair of Education was appointed in 2010 to further the program.

However, the new hire came from a military background and did not have expertise in the teacher education accreditation process in Oklahoma, so he left. The next year, a retired

education professor was hired to re-write the program and complete the work that had been started. Unfortunately, the new hire died unexpectedly in the spring of 2012. However, as he was writing the program and working to submit the initial application to OCTP, MCU hired a consultant to help out.

Eventually, in the spring of 2013, the consultant joined the MCU faculty with the express purpose of building an education program. It was a move to keep the program developing so that all of the work would not be lost. However, once the consultant arrived and began doing an initial assessment of the state of the program, it was obvious that a great deal of work on the foundational pieces of the program still needed to be addressed and stabilized.

Early in that spring semester, the consultant/professor began meeting with faculty on campus who might constitute faculty members in education. Members were selected if they had teacher certification and experience in public school education. Six initial members were identified. The group began meeting as a team to consider what had been previously created and what we wanted to keep or change. Since the team was new and the leadership had undergone many changes, it was important to start working together as a new group and get everyone on the same page.

It was during these initial brainstorming meetings that we began to concentrate on the Conceptual Framework of the program. We wanted to create something new that was a genuine reflection of our university and the mission of the school, especially since the school was trying to settle into a more stable environment. As we contemplated various ideas, we looked at other universities' conceptual frameworks and brainstormed as creatively as we could about the opportunity to create something new and innovative.

As a result of these brainstorming sessions, a few initial ideas began to emerge. The team of MCU educators believed that it was essential for the education program to reflect the mission of the university as a whole. The mission of Midwest Christian University was "Midwest Christian University is a Christ-centered liberal arts institution that equips students for a life of learning, leadership, and service; integrating faith, learning, and living; and empowering graduates to excel and to positively impact their world for Jesus Christ" (Midwest Christian University, 2018). The motto of MCU was "Scholarship, Spirit, and Service," an extension of the school's core values. We wanted to ensure that the teacher candidate who completed our program would emerge and enter public schools as a positive influence who would serve with care. Two of the main components of our Conceptual Framework came from the conversations we had in these initial meetings – caring and service (Conceptual Framework Themes/Standards, 2018).

We also wanted to ensure that our students were academically sound and grounded in research and best practice. This component is reflected in the formulation of a definition of a scholarly teacher – one who "must possess general knowledge, content knowledge, pedagogical knowledge, and professional knowledge to be effective. However, knowing is not enough, teachers must be able to connect concepts and apply them in an educational manner meeting the needs of all learners in the pursuit of life-long learning" (Conceptual Framework Themes/Standards, 2018).

We wanted MCU teacher education graduates to continue to be life-long learners and to reflect on what they experienced in and out of the classroom. As the initial committee of educators, we had many discussions about the factors that contributed to the formation of a great teacher. Out of those conversations, the concept of reflection and self-evaluation became an

important goal for the students who completed the education program at MCU (Conceptual Framework Themes/Standards, 2018).

Conversations and debates about what were the most important goals occurred daily as we met and struggled to create a program that would truly reflect noble ideals, the school's mission and vision, and fit within the constraints set by the state. We finally landed on four components of our Conceptual Framework: Caring, Service, Scholarship, and Reflection. After working with these four components, we realized that by moving the words around a bit, we could come up with: Caring, Reflection, Scholarship and Service. We did not have the "O" in the middle, but we were very close to the word "cross" which gave us a great way to pay tribute to our Christian heritage and belief system.

Pre-conditions

Although there had been previous attempts at a preconditions report, there had not been a successful acceptance of anything submitted. That meant that we were starting from scratch. There were some pieces of the original material that seemed helpful, but nothing of enough substance, so preconditions had to be created.

The consultant/professor began working with various parts of the university to start making sense of should constitute preconditions. She met with the president to obtain direction and understand the vision for the program. However, the school was also in a growing and transition phase. There were so many changes happening simultaneously, yet infrastructure had to be built along the way. We were trying to live in a house that was still under construction. Some of the walls were in place, but one room did not have a ceiling and another was missing the door and a window. It was a constant struggle to establish new policies and procedures while

still trying to keep up with class preparation, grading, course development, advising, and the day-to-day routine.

Along with all of the information gathering and building that was being done in the administration building, the consultant/professor was working with department chairs from history, physical education and English to start pulling pieces together to start degree programs. For a full school year, the consultant/professor met with each department chair individually to evaluate, plan, give direction and guidance, and cheer on the faculty as she worked on the other side of the building to put the structure into place that would be needed to start a program. It was painstaking work that seemed never-ending.

NCATE to CAEP

In order to obtain an accredited teacher education program, MCU needed to align to, not only the state standards, but also align with the standards set forth by the National Council for Accreditation of Teacher Education (NCATE). This accrediting body had been in existence since 1954, but a recent merger between NCATE and the Teacher Education Accreditation Council (TEAC) was already in process (Sawchuk, Teacher-Prep Accrediting Groups to Merge, 2010). This new organization was called the Council for the Accreditation of Educator Preparation (CAEP). So, while faculty at MCU were brainstorming, planning, writing, and developing a new education degree to obtain initial accreditation, we began looking toward changes on the horizon. MCU faculty was deliberate to consider how both sets of accreditation standards could be simultaneously considered. Looking at the two sets of standards from NCATE and CAEP was one early indication that things were not going to be easy.

Table 1:

Standard Comparisons of NCATE, TEAC, & CAEP

	NCATE Standards	TEAC Quality Principles	CAEP Standards
1.	Candidate Knowledge, Skills, and Professional Dispositions	Continuous improvement to advance quality	Content and Pedagogical Knowledge
2.	Assessment System and Unit Evaluation	Inquiry- driven accreditation	Clinical Partnerships and Practice
3.	Field Experiences and Clinical Practice	Audits to ensure quality	Candidate Quality, Recruitment, and Selectivity
4.	Diversity	Frugality	Program Impact
5.	Faculty Qualifications, Performance, and Development		Provider Quality, Continuous Improvement, and Capacity
6.	Unit Governance and Resources		

At the same time faculty was expending thousands of hours in creating documents, everyone was cognizant of the dire scenario of education in the state of Oklahoma (Oklahoma Teacher Shortage Task Force, 2018). As the program would be facing increasingly stringent accreditation and certification standards, MCU teachers would be graduating from an education program in a state that was ranked 49th in teacher pay (NEA Salary Survey, 2018). MCU faculty would be recruiting and trying to maintain a program that would train teachers although the state reported that 31,000 teachers left teaching over the past five years (Oklahoma Teacher Shortage Task Force, 2018). In a state that employs only 40,000 teachers, a loss of 31,000 is significant (Oklahoma Teacher Shortage Task Force, 2018).

Meanwhile, in 2018, the state emergency-certified almost 3,000 teachers (Oklahoma Department of Education website, 2018). To be eligible for emergency certification, all that is

needed is a college degree, a background check, and a request from a school administrator defining the need and requesting for certification to be granted (Emergency Certification, 2014). Under the emergency route to certification, teachers enter the classroom with a college degree, but they have no formal training in education. They may know content but may not have been educated on how to teach.

University-based teacher preparation is under attack, not just in Oklahoma, but in many states. "The U.S. Department of Education found that in 2013-14, of the 37,270 individuals enrolled in teacher-training programs in Texas, more than 15,000 were in alternative programs unaffiliated with any university. Many new teachers point and click their way to certification over the Internet without ever setting foot in a classroom, and circumvent university preparation completely" (Baines, When 'Highly Qualified' Teachers Aren't, 2017). Texas is noted as having "exemption standards … among the broadest nationally" (Dugyala, 2018) allowing individuals to enter the classroom who have not been professionally trained as educators.

In September 2018, *The Guardian* published an article based on a study it conducted of teacher shortages in the U. S. 41 states departments of education responded to the requests for information. Of the 41 responding, 28 states reported. Based on research done by *The Guardian*, some states that did not respond are also experiencing teacher shortages. These statistics are consistent with the U.S. Department of Education report of August 2016.

The result of stop-gap solutions has been a large number for individuals who enter the classroom underprepared. As the shortage is reaching a crisis, the pressure to prepare people to enter classrooms as teachers in as short a time as possible has become the focus instead of academic, ethical, and behavioral sustainability. In Oklahoma, current bills being written and considered for legislation propose to move the preparation of teachers to school districts so that

hiring can begin immediately, putting novices in the classroom while they are learning to teach (Legiscan, 2019).

Recently, I attended CAEP training session. In attendance were university representatives from teacher preparation programs from all over the state of Oklahoma. After spending two days in training, attendees began to note inconsistencies in the standards and there was rampant confusion over what artifacts would be acceptable for purposes of accreditation. Although faculty at MCU had already spent thousands of hours on creating an education program, it was apparent from this CAEP training that, whatever effort we had given, was far short of where it needed to be to meet CAEP's new standards.

John Rawls's *A Theory of Justice* (1971) has as one of its foundational principles, "fair equality of opportunity" (Rawls, 1971). One of the worrisome aspects in the current climate of low teacher respect, low teacher pay, and easy access into teaching is whether or not going through the rigors of a CAEP-accredited, university-based program actually puts future teachers at a disadvantage. Is it ethical for a student to pursue a degree that will not provide them with a vocation that is financially sustainable? Is it ethical to spend years preparing teachers in a university when persons with zero education and no expense can become a teacher through alternative methods?

Is CAEP fair to minority teachers who want to teach, but who may lack the requisite admissions criteria required by all teacher candidates, according to CAEP standards? Is the great expense of accreditation in terms of dollars and time fair to private colleges like MCU, who do not have large endowments or receive state funding?

Grappling with these conflicting issues troubled me. After 15 years of struggling with accreditation of education programs, I hit an existential moment. The accreditation process was

supposed to be about bettering the profession of education and ensuring that educators were being trained appropriately. The ethical responsibility of knowing the right thing to do as an accreditation organization and doing the right thing in the educational community became a concern. When considering the ethical dimensions of the accreditation process, I kept thinking about Aristotle's reflections on ethics, virtue, and the well-lived life.

In his work *Nicomachean Ethics* (2000), Aristotle used the term *ethics* to refer to the way humans should best live. Ethics refers to the examination of human thought, intention, and action. Although his predecessor, Plato, had addressed some of the topics that Aristotle would later write about, it was Aristotle who distilled a more complete definition of ethics and began to seek not only what it meant to be an ethical person, but also how being an ethical person can shape one's life. As Richard Kraut from Stanford explains, "in order to profit from the sort of study he [Aristotle] is undertaking, one must already have been brought up in good habits" (Kraut, 2018). In *Nicomachean Ethics*, Aristotle contended that individuals needed to have a sense of the virtues – justice, courage, generosity – in order to be able to enter into a discussion of ethical behavior. He addressed individuals as those "who are already just, courageous, and generous; or, at any rate, they are well on their way to possessing these virtues" (Kraut, 2018).

According to Aristotle, ethics and virtuous behavior must always be at the forefront of both intention and action. "We must experience these activities not as burdensome constraints, but as noble, worthwhile, and enjoyable in themselves. To be an ethical human being, one must begin by valuing these virtues and making them a practice in daily life" (Aristotle, 2000).

According to Aristotle, practicing virtuous behavior would lead to an ethical life, which in turn, would lead to happiness. He differed from Plato in that he believed one must do the right thing and not just consider what the right thing might be. For Aristotle, just considering what a

possible ethical decision might be is not enough. In *Nicomachean Ethics* (2000), he explains that for some, instead of "doing good acts, they instead just discuss what goodness is, and imagine that they are pursuing philosophy and this this will make them good people" (Aristotle, Nicomachean Ethics, 2000). Aristotle wanted the philosophy of ethics to be more than just a discussion of ideas. The ideas should influence informed action.

Edith Hall, specialist in ancient Greek literature and history from King's College in London, has recently taken Aristotle's ideas and introduced them to a modern audience. Her book, *Aristotle's Way: How Ancient Wisdom Can Change Your Life,* explains Aristotle's philosophy in applicable ways. Hall puts Aristotle's ideas in terms that are simple to comprehend. She discusses the notion that knowing the right thing to do is only part of the equation if one is seeking a fulfilled or "happy" existence. "Aristotle put human experience at the center of all his thought" (Hall, 2018, p. 6). He wanted the thoughts of doing the right thing to impact the actions of one's everyday life.

"Aristotle insists that creating happiness is not a matter of fanatically applying big rules and principles, but of engaging with the texture of life, in every situation" (Hall, 2018, p. 6). It was the action that resulted from right or ethical thinking that Aristotle believed was essential if one was to live a truly purposeful life. Hall explores this concept and how it can impact the way a person lives and approaches daily life choices and, in turn, lead one to a more fulfilled or "happy" life. This "happy" life that Hall refers to goes directly back to Aristotle's language, but does not refer to the modern idea of happiness. Aristotle believed "that the best pleasures are the ones experienced by virtuous people" (Kraut, 2018). He further explains that "to live our lives well we must focus on one sort of good above all others: virtuous activity. It is the good in terms of which all other good must be understood" (Kraut, 2018). Understanding this perspective of

goodness and doing the right thing shapes how a virtuous person lives life. The seeking of virtue informs the individual, but how could the concept of virtue apply to an organization?

Since education is the business of influencing human behavior by teaching children, the ideas of Aristotle on ethics pertain. In field experiences with school children, teacher candidates observe and reflect on students' behaviors and consider the best way to respond and interact with students so that students benefit from the experience. Teacher candidates are given hands-on opportunities to practice doing the right thing, to participate in ethical behavior before ever entering the classroom as a classroom teacher. However, how could such virtuous characteristics be measured by an outside agency?

Teacher education institutions that taught future teachers must "measure up" when it came to meeting standards and being held accountable. Accreditation agencies require that faculty in these programs must maintain certification standards and continue to participate in field hours and experiences in P-12 classrooms to stay current with curriculum goals and practices. On the program level, degrees offered in teacher preparation programs must meet minimum standards that adhere to state and national guidelines. The seal of accreditation is supposed to ensure that the accountability of the program is transparent and reportable. However, to what extent is the accreditation organization, itself, being held to these same values?

For teacher preparation programs, accreditation is non-negotiable—it is required. In order for the university to receive federal funding, accreditation is needed. That means that financial aid for students is contingent upon accreditation. Whether or not CAEP is ethical or not can seem beside the point. After all, CAEP is a mandate that cannot be ignored.

CHAPTER TWO

Literature Review

"Education is not preparation for life; education is life itself." –John Dewey

From ancient times, the aim of education has been to improve mankind, taking a human

from a primitive existence to a higher state of being (Durant, 1961). In Plato's famous work, *The*

Republic, the Greek philosopher proposed The Allegory of the Cave to examine "the effect of

education and the lack of it on our nature" (Plato, 1908). For Plato, the act of education was an

arduous process that required a steep climb out of an allegorical cave. The benefit of climbing

out of the cave was that man was led to enlightenment and a higher level of understanding and

truth. According to Plato, the climber has an obligation to go back into the cave to bring others

into the light. Plato's student Aristotle proposed that the responsibility of the state is to educate

people. According to Aristotle, citizens should be educated to be thoughtful and enlightened so

that they can propel the good of all (Aristotle, 1984). Thomas Davidson, philosopher and

educator who did extensive studies in the works of the ancient Greeks particularly Aristotle,

explains Aristotle's position as follows:

> The purpose of the State is to educate its citizens, to make them virtuous. Virtue
>
> is the very life-principle of the State, and it does not depend, as other conditions
>
> do, upon nature or chance, but upon free will. The ideal State, like every other,
>
> must educate with a view to its own institutions, since only in this way can these
>
> be preserved (Davidson, 1896).

Dating back to the Law v. Nichols Supreme Court case of 1974, which ensured that all

public schools that receive federal funding provide all students with an equal education set the

mandate for of all of the 50 states (Constitutional Obligations for Public Education, 2016). Even

before this case, Alfred North Whitehead, English mathematician and philosopher, explored educational reform and influenced the area of educational philosophy. In *The Aims of Education*, Whitehead recognized the need for men and women to receive an education that would prepare them to contribute to society at large. "What we should aim at producing is men who possess both culture and expert knowledge in some special direction. Their expert knowledge will give them the ground to start from, and their culture will lead them as deep as philosophy and as high as art" (Whitehead, 1957). Decades later, Neil Postman, author and educator who has examined the trajectory of education in the United States, has supported the notion of educating students to be a productive part of American society. In *The End of Education*, Neil Postman wrote that "Public education does not serve a public. It creates a public. And in creating the right kind of public, the schools contribute toward strengthening the spiritual basis of the American Creed. That is how Jefferson understood it, how Horace Mann understood it, how John Dewey understood it" (Postman, 1996).

Educator preparation programs across the country strive to provide rigorous, relevant training through professional education courses that demand expertise in content, classroom management, assessment, and instructional strategies. According to Lahey, an English teacher in a "core virtues" school:

> Over ninety percent of American adults support the teaching of honesty,
> democracy, acceptance of people of different races and ethnic backgrounds,
> patriotism, caring for friends and family members, moral courage, and the Golden
> Rule in public schools, it seems odd that this facet of American education has
> disappeared from public debate (Lahey, 2013).

Lahey contends that teaching character and virtue is necessary and needed.

Although the goals for teacher training programs are specific to individual colleges and universities, they generally align to standards that have been established and agreed upon by professional organizations. Teacher candidates who successfully complete preparation programs are graded not only their classroom performance, but also on their personal dispositions that focus on classroom demeanor, professional behavior, and attitude toward others. Courses such as *Educational Psychology* and *Lifespan Development* delve into how students grow and mature. Other courses such as *The Ethics of Teaching*, *Foundations in Education*, and *Philosophy of Education* inevitably involve discussion around ethical and moral principles.   Teacher dispositions are defined as, "the principles or standards that underpin a teacher's success in the classroom. They are the values, commitments, and professional ethics that govern how a teacher acts with students, families, colleagues, and communities" (Professional Dispositions, 2015).

Holly Thornton, professor in the Department of Curriculum and Instruction at Appalachian State, considers the importance of teacher dispositions in her article "Dispositions in Action: Do Dispositions Make a Difference in Practice?" She notes that, "in order for teachers to be more than mere 'cogs' in a technical process they must possess the dispositions necessary to teach and reach students" (Thornton, 2006). The focus of educator preparation has slowly moved away from dispositions to how well teachers are able to teach students to perform well on the appropriate standardized tests.

Elizabeth Campbell, Associate Professor at the Ontario Institute for Studies in Education at the University of Toronto, has done extensive work in the area of ethics and moral dimensions of teaching and education. Her experience as a professional educator qualifies her to speak to the criteria in educator preparation. She states, "Almost no attention is paid to the ethical or moral knowledge that teachers need to inform their professional judgments and guide their

relations with children, colleagues, and others" (Campbell, 2003). As the rigor of what is

expected for the accreditation of teacher preparation becomes more stringent, there seems to be

less emphasis on non-academic aspects of teaching. The underlying foundation of a teacher's

"ethical knowledge is fostered not by a means of formalized codes and standards alone, but

through a collective mission in which teachers become fully aware of their moral agency and of

how their actions and beliefs have a profound ethical influence on students" (Campbell, 2003).

Knowing that the issue of ethics is considered one component of a teacher preparation

program is one thing. However, understanding that the pressure to train educators quickly and

with accountability standards in mind can sometimes create conflict. Paul Barnwell, a teacher

from Kentucky expresses the dilemma,

> Talking with my students about ethics and gauging their response served as a
>
> wakeup call for me to consider my own role as an educator and just how low
>
> character development, ethics, and helping students develop a moral identity have
>
> fallen with regard to debate over what schools should teach (Barnwell, 2016).

As Barnwell lamented, the recent focus in education has been on producing "students who are

ready for college, defined as simply reaching benchmark scores in reading, English and math on

the ACT" (Barnwell, 2016). Barnwell's point is that the pressure of students and teachers to

perform has pushed the importance of ethical considerations to the side.

When John Dewey considered the importance and goals of education, he recognized the

focus of the child as a member of society. "The moral responsibility of the school, and of those

who conduct it, is to society" (Dewey, 1909). He goes on to say that "The education system

which does not recognize this fact as entailing upon it an ethical responsibility is derelict and a

defaulter" (Dewey, 1909). Although Dewey notes the responsibility of the school to direct

students in the ethical arena, he refrains from proposing a specific standard of ethics that should be taught.

Nel Noddings, noted educator and philosopher, reminded us that Dewey "insists on locating the moral within the social (not in God, a special faculty, or established authority), but we know also that he wants education to move beyond socialization – that, indeed, he wants the workings of intelligence to improve society" (Noddings, 1998). Noddings noted that, at least for a time after Dewey's writings, there was a heavy concentration of education aimed at character development through both art and literature. However, there was a subsequent shift toward stronger emphasis on critical thinking as a result of Dewey's works. Noddings cited other critiques that warned that a move away from a focus on critical thinking could prove dangerous. She referred to author and scholar C. S. Lewis who admonished, "By starving the sensibility of our pupils we only make them easier prey to the propagandist when he comes. For famished nature will be avenged and a hard heart is not infallible protection against a soft head" (Lewis, 1955).

Noddings (1998) contended that care is implicit in the act of teaching. "Ethical caring's great contribution is to guide action long enough for natural caring to be restored and for people once again to interact with mutual and spontaneous regard" (Noddings, 1998). She recognized that the education of a child is not solely in the memorization of facts or recitation of ideals to acquire sufficient test scores. By its nature, educating a child involves a moral perspective.   In *The Ethics of Teaching*, it is described like this:

> The compelling matter is growth as a moral agent, as someone who cares about
> others and is willing and able to accept responsibility for one's self, as someone
> who can engage in open, and undominated dialogue with others about a common

life and accept shared responsibility for the group's life. Promoting this kind of development is what teachers ought to be fundamentally about, whatever else it is that they are about. We are first and foremost in the business of creating persons. It is our first duty to respect the dignity and value of our students and to help them to achieve their status as free, rational, and feeling moral agents (Strike & Soltis, 2009).

Perhaps the question is not whether ethics are relevant, but rather can or should ethical behavior be taught? If individuals are taught explicitly how to behave, will they choose to be ethical in their daily lives? Bowden and Smythe (Bowden & Smythe, 2008), researchers in business ethics, have noted that in the workplace, unethical practices may be common and even accepted as business-as-usual. According to their research, when students were given appropriate and thorough instruction on commonly agreed upon ethical behavior, some still did not act ethically in practice.

In 1975, the National Education Association (NEA) adopted the Code of Ethics of the Education Profession. In the preamble of this code, which outlines principles set forth by the NEA, the "educator accepts the responsibility to adhere to the highest ethical standards" (Strike, Kenneth A. and Jonas F. Soltis, 2009). Since it has been a part of the code of professional educators to adhere to high educational and ethical standards, it is reasonable to assume that professional educators should do what is best for students. Why else would someone want to be a teacher if they are not concerned about the welfare of the students in their charge? Although this seems common sense, recent headlines regarding the conduct of teachers seem to deliver a different story (Dozens of Teacher Misconduct Cases Go Unreported, Utah Audit Finds, 2018;

Gonzales, 2018; Gross, 2018; Kelley, Jeremy P. and Josh Sweigart, 2018; Miller, 2017; Phillips, 2016). What has happened?

Richard Pring, Emeritus Professor of the University of Oxford Department of Education, has done extensive research in the area of educational ethics. Using Kohlberg as a jumping off point, Pring posits that the

> aims and practice of moral education . . . should not be confined to a section of
> the curriculum – as though but one of the fragments which makes up the total
> mosaic. Rather are such aims and practice central to what I would regard as an
> 'educational practice'. Indeed, I shall argue that education itself is a moral
> practice, part of the 'humane studies' or humanities rather than the social
> sciences. Ideally the 'practice' should be in the hands of moral educators (who
> themselves should manifest the signs of moral development) rather than in the
> hands of managers, trainers, or 'deliverers' of a curriculum (Pring, 2001).

Based on Pring's position, teachers should be the ones in the best position to defend the best interests of students. Training teachers from an ethical perspective as suggested by Pring seems necessary if teachers are to carry such a high level of responsibility into schools. Pring would most likely agree that acknowledging and supporting professional educators and treating and respecting them as professionals are essential parts of assuring that education involves people we can entrust with the care of our children.

To ensure that ethical guidelines for teachers are established and maintained, teacher preparation programs in universities seek validation through accreditation organizations that offer a sense of assurance about a teacher's character, dispositions, performance, and training. According to the U. S. Department of Education,

The goal of accreditation is to ensure that education provided by institutions

and/or programs of higher education meets acceptable levels of quality.

Accrediting agencies, which are private educational associations of regional or

national scope, develop evaluation criteria and conduct peer evaluations to assess

whether or not those criteria are met. Institutions and/or programs that request an

agency's evaluation and that meet an agency's criteria are then 'accredited' by

that agency (Database of Accredited Postsecondary Institutions and Programs,

2018).

Currently, the national organization tasked with providing accreditation to teacher

preparation programs is the Council for the Accreditation of Educator Preparation (CAEP).

Although CAEP accredits an institution's preparation programs, they are not the only

organization to be considered when it comes to the standards that must be met to obtain and

retain accreditation.

Standards

A number of agencies and organizations require proof of competence. When considering

the many voices that want to establish standards, professional organizations are at the top of the

list. However, standards required by differing organizations may create a convoluted message

and inconsistent requirements.

"The Interstate New Teacher Assessment and Support Consortium (InTASC) is a

consortium of state education agencies and national educational organizations dedicated to the

reform of the preparation, licensing, and on-going professional development of teachers"

(InTASC Resources, 2017). The standards are as follows:

- Standard #1, Learner Development
- Standard #2, Learning Differences
- Standard #3, Learning Environments
- Standard #4, Content Knowledge
- Standard #5, Application of Content
- Standard #6, Assessment
- Standard #7, Planning for Instruction
- Standard #8, Instructional Strategies
- Standard #9, Professional Learning and Ethical Practice
- Standard #10, Leadership and Collaboration

InTASC is one of many organizations that have established criteria for preparing future teachers.

Standard 9 of the InTASC standards addresses professional behaviors of teachers and the effect

those behaviors have on others. Most institutions seeking accreditation with CAPE address

InTASC standards and may create complicated "crosswalk" charts that show the inter-

relationships among state, CAEP, and InTASC standards (for example, see

https://webcache.googleusercontent.com/search?q=cache:lznkBGgsV7oJ:https://www.colorado.e

du/education/node/2385/attachment+&cd=14&hl=en&ct=clnk&gl=us for the University of

Colorado's crosswalk).

SPAs – Specialty Professional Associations are entities that focus on standards within specific

subject areas. As evidenced by the following list, there are many organizations involved with

accreditation standards: National Council for Teachers of English, National Council of Teaching

of Mathematics, Society of Health and Physical Education, National Science Teachers

Association, National Council for the Social Studies, National Standards for Music Education,

Association for Childhood Education International, American Alliance for Health, Physical

Education, Recreation and Dance, American Association for Health Education. Each of these

organizations requires that institutions adhere to a particular set of standards and become

members of these organizations. SPA reports must be submitted to CAEP three years before a

CAEP visit (CAEP, 2019).

ACTFL - American Council on the Teaching of Foreign Languages (About the American Council on the Teaching of Foreign Languages , 2018). This organization sets the standards that guide the teaching of foreign languages and is considered in the same category as a SPA, but in relation to foreign languages.

Common Core State Standards – Common Core standards have been adopted by forty-two states, the District of Columbia, and four U. S. territories. Common Core standards were established to provide a consistent set of criteria that would become benchmarks for both K-12 and college-ready programs. Although not adopted by Oklahoma, Common Core is still a powerful voice that informs criteria in goal-setting in Oklahoma (Common Core State Standards Initiative: preparing America's Students for College & Career, 2018). In most states, testing revolves around common core standards. Since CAEP requires data on the performance of teachers from CAEP-accredited institutions, Educator Preparation Programs (EPPs) must be well aware of the common core standards and their assessment.

Local Curriculum Guides – Curriculum guides are established by individual districts to create specific goals for that particular area. Many times, curriculum guides are similar to state and national standards with qualifying goals that makes them particular to that district, but sometimes they are not. For example, a local school may emphasize that students understand the history of the region and require prospective teachers to know the history of the region. An EPP would have to heed such a local request, though it might not be part of CAEP or the state's requirements.

ISTE standards used to be an integral part of CAEP accreditation. However, a recent notice on ISTE's website notes:

For more than 20 years, the International Society for Technology in Education (ISTE) has been a member of the national bodies that review and accredit educator preparation programs that use the ISTE Standards — Council for the Accreditation of Educator Preparation (CAEP) and its predecessor, the National Council for Accreditation of Teacher Education (NCATE). Many educator preparation programs have successfully used this process to evolve their programs, advance the use of technology and earn national recognition from both organizations. ISTE has made the decision to discontinue its membership in CAEP in order to launch a new approach to accelerate change in how the organization prepares tomorrow's teachers – International Society for Technology in Education. (https://www.iste.org/explore/Press-Releases/ISTE-Discontinues-Membership-in-CAEP)

The purpose of presenting these long lists of requirements is to demonstrate the great proliferation of standards that has occurred in recent decades. While all of these standards may be useful from the perspective of individual organizations, they make it increasingly complicated for teacher preparation programs to adhere to such a multitude of requirements simultaneously. For example, tenets promulgated by a state department of education or from a specialty program (such as English or mathematics) might differ with requirements of CAEP. While both CAEP and approval from the state department of education and professional organizations are necessary for accreditation, it can be difficult for teacher preparation programs to know how to prioritize one set of standards over another. In actuality, CAEP encourages an institution to adhere to as many different specialty groups as possible. "Assessments and data required for submission should demonstrate the candidates have mastered the SPA standards."

(http://caepnet.org/accreditation/caep-accreditation/spa-program-review-policies-and-
[procedur/guidelines-on-submitting-a-spa-initial-r](http://caepnet.org/accreditation/caep-accreditation/spa-program-review-policies-and-procedur/guidelines-on-submitting-a-spa-initial-r)).

CAEP accreditation involves the standards of the state department of education, the "Specialty Program Areas," and possibly several additional organizations and agencies, including the Federal Department of Education (Obama P. B., 2013). By its nature, CAEP accreditation involves a multiplicity of stakeholders, which can make understanding all of the intricate, moving parts of accreditation quite challenging. Knowing the many requirements and regulations that abound for EPPs, it is easy to understand the complexity of prioritizing what to teach in a teacher preparation program. How are EPPs to determine the most important components of degree programs offered? Ethically, is it fair to have so many competing ideas? Determining the right thing to do in the midst of so many to-do lists is challenging at best, if not impossible. However, Aristotle would contend that, just because an activity is difficult does not mean that it is unethical. Indeed, sometimes the most difficult act can be the most virtuous act. Considering the many facets of this situation drove this research study.

CHAPTER THREE

Methods

"An ethical framework is a set of codes that an individual uses to guide his or her behavior. Ethics are what people use to distinguish right from wrong in the way they interact with the world" (What is an ethical framework?, 2018). A definition of an ethical framework provides direction, but it does not give specific details that determine actions and parameters. The study of ethics "is concerned with questions of how people ought to act, and the search for a definition of right conduct" (Ethics, 2019).

Using Jean Piaget's Theory of Cognitive Development (Dimitriadis & Kamberelis, 2006) as a basis for how individuals (children) develop through a series of processes and experiences, Lawrence Kohlberg expanded it to include relationships to ethical and moral developmental stages (Kohlberg, 1973). Kohlberg believed that moral reasoning developed through life stages and that the stages of development could be enhanced with instruction (Snowman, McCown, & Biehler, 2012). Kohlberg's stages are as follows:

- LEVEL 1: PRECONVENTIONAL MORALITY

    o Stage 1: punishment-obedience orientation. The physical consequences of an action determine goodness or badness.

    o Stage 2: Instrumental relativist orientation. Obedience to laws should involve an even exchange.

- LEVEL 2: CONVENTIONAL MORALITY

    o Stage 3: Good boy-nice girl orientation. The right action is one that will impress others.

- Stage 4: Law-and-order orientation. To maintain the social order, fixed rules must be obeyed.

- LEVEL 3: POSTCONVENTIONAL MORALITY

    o Stage 5: Social contract orientation. Rules should involve mutual agreements; the right of the individual should be protected.

    o Stage 6: Universal ethical principle orientation. Moral decisions should be based on consistent applications of self-chosen ethical principles. (Snowman, McCown, & Biehler, 2012)

In the stages established by Kohlberg, a child's ethical response to situations is predicated on their developmental stage. Many theorists accept Kohlberg's stages; however, these stages have been contested by Carol Gilligan (Gilligan, 1982) because of the focus on gender in moral development. Although Carol Gilligan was a student of Kohlberg, she recognized that the development for females could be very different from that of males. When considering how these theories of development pertain to ethics, the focus was primarily on the individual instead of the ethics of groups. Regardless, the premise of ethics of an individual being evaluated based on developmental levels and circumstances are well established (Kohlberg, 1973).

In 1979, Beauchamp and Childress who originally devised the four principles of ethical behavior in the field of medicine, set a standard in the area of ethics. Their work, *Principles of Biomedical Ethics* (Beauchamp & Childress, 1979), includes respect for autonomy, non-maleficence, beneficence, and justice (Beauchamp & Childress, 1979). This groundbreaking work has been used to guide practice among members of the American Dental Association and members of the American Medical Association. Subsequently, these four, simple standards have

influenced the development of other ethical frameworks, extending to fields, such as business and biotechnology.

Of course, the quest to develop a moral code for educators, to provide a consistent and ethical direction for the profession of teaching, has been ongoing. The National Association of State Directors of Teacher Education and Certification has their own Model Code of Ethics for Educators (MCEE) which includes the following five principles:

- Principle 1: Responsibility to the Profession

- Principle 2: Responsibility for Professional Competence

- Principle 3: Responsibility to Students

- Principle 4: Responsibility to the School Community

- Principle 5: Responsible and Ethical Use of Technology

 (Model Code of Ethics for Educators, 2015).

Bazerman and Gino (2012), from the Harvard School of Business, suggest a new definition of behavior ethics as "the study of systematic and predictable ways in which individuals make ethical decisions and judge the ethical decisions of others that are at odds with intuition and the benefits of the broader society" (Bazerman & Gino, 2012). Decision-making models have been evaluated in counseling to determine best practices and responsibilities in counseling (Cottone & Claus, 2000). How can the moral correctness of choices be measured when it comes to how we deal with others? How do these choices play out in education?

Looking at the American Educational Research Association's Code of Ethics approved in 2011, the five principles adopted provide another frame to consider when approaching the question of ethical behavior of an educational organization. The principles of AERA are as follows:

Principle A: Professional Competence – Education researchers strive to maintain the highest levels of competence in their work; they recognize the limitations of their expertise; and they undertake only those takes for which they are qualified by education, training, or experience. They recognize the need for ongoing education in order to remain professionally competent; and they utilize the appropriate scientific, scholarly, professional, technical, and administrative resources needed to ensure competence in their professional activities. They consult with other professionals when necessary for the benefit of their students, research participants, and clients.

Principle B: Integrity – Education researchers are honest, fair, and respectful of others in their professional activities – in research, teaching, practice, and service. Education researchers do not knowingly act in ways that jeopardize the welfare of others. Education researchers conduct their professional activities in ways that are worthy of trust and confidence.

Principle C: Professional, Scientific, and Scholarly Responsibility – Education researchers adhere to the highest scientific standards and professional standards and accept responsibility for their work. Education researchers value the public trust in research and are concerned about their ethical behavior and the behavior of other education researchers that might compromise that trust. Education researchers understand that they form a community and show respect for other education researchers even when they disagree on theoretical, methodological, and personal approaches to professional activities."

Principle D: Respect for People's Rights, Dignity, and Diversity – "Education researchers respect the rights, dignity, and work of all people and take care to do no harm in the conduct of their work. In their research, they have a special obligation to protect the rights, welfare, and dignity of research participants. They are sensitive to cultural, individual, and role differences in teaching, studying, and providing service to groups of people with distinctive characteristics."

Principle E: Social Responsibility - "Education researchers are aware of their professional and scientific responsibility to the communities and societies in which they live and work. They apply and make public their knowledge in order to contribute to the public good. When undertaking research, they strive to advance scientific and scholarly knowledge and to serve the public good." (Code of Ethics: American Educational Research Association, 2011)

While the MCEE principles and the AERA principles may be laudatory, the process of transforming such sets of principles into operationalizable, measurable sets of ethical standards is problematic. A practical instrument that would assess the ethical dimensions of particular

educational policies and directives would take years to develop and then, many years more to validate.

Vincente Belizario, Vice-Chancellor for Research and Executive Director for the National Institutes of Health, recognized that the aim of public health issues was "to improve health, primarily of populations rather than of individuals" (Belizario, 2014). Belizario recommends using an ethical framework, developed by Nancy Kass to determine the ethical parameters of public health programs undertaken by public health personnel. Kass's work as it pertains to ethics has been used by Belizario and hundreds of other researchers (Kass, 2001). Indeed, Kass's straightforward, ethical framework (developed in 2001) has proven valid and reliable in hundreds of studies (Omer, 2013).

Nancy Kass, the Phoebe R. Berman Professor of Bioethics and Public Health at Johns Hopkins University, has spent years writing about the role of ethics in the field of public health. As an undergraduate, she focused on health concerns specific to women; however, through her years of research and service in the health industry, her experience allowed her to see the issues of fairness and resource allocation in a broader light (Kass, 2017). In her research, Kass worked with populations of women and HIV/AIDS patients (Kass, 2017) who helped her understand the value of serving the public good through health initiatives and policy improvements. Ultimately, she developed an ethical framework "to determine whether a proposed public health program or policy furthered the goals of improving the public's health, respecting individual liberties, and furthering social justice" (Kass, 2001). Her framework describes the goals, effects, burdens, fairness and ethical dimensions of health initiatives (Kass, 2001).

When considering the population of children who are impacted by teachers being trained to enter the classroom, Kass's ethical framework seems relevant (Kass, A Jouney in Public Health Ethics, Winter 2017).

Kass's Ethical Framework for Public Health is as follows:

1. What are the public health goals of the proposed program?

2. How effective is the program in achieving its stated goals?

3. What are the known or potential burdens of the program?

4. Can the burdens be minimized? Are there alternative approaches?

5. Is the program implemented fairly?

6. How can the benefits and burdens of a program be fairly balanced? (Kass, An Ethics Framework for Public Health, 2001)

The Kass framework is one of the few systematic evaluative instruments developed explicitly to evaluate ethical dimensions of institutional policy and practice (ten Have, Marieke; de Beaufor, Inez D; Mackenbach, Johan P; van der Heide, Agnes, 2010). When considering the issues of ethics and how they apply to the accreditation process, specifically that of CAEP, I made only slight adaptations to the ethical framework developed by Kass. (In order to distinguish the steps of the modified Kass framework from the original formulation, the steps are in all caps.) The modified steps are:

1) WHAT ARE THE GOALS OF RECEIVING CAEP ACCREDITATION?

2) HOW EFFECTIVE IS CAEP IN ACHIEVING ITS STATED GOALS?

3) WHAT ARE THE KNOWN OR POTENTIAL BURDENS OF CAEP?

4) HOW CAN THE BURDENS BE MINIMIZED? ARE THERE ALTERNATIVE APPROACHES TO ACHIEVE THE SAME GOALS?

5) IS CAEP IMPLEMENTED FAIRLY?

6) HOW CAN THE BENEFITS AND BURDENS OF CAEP BE FAIRLY
   BALANCED?

In the case of educational accreditation, the goals are specifically adapted to consider the CAEP system and how it applies to teacher preparation programs it serves.

Problem Statement

As institutions across the country create and attempt to improve teacher preparation programs, significant amounts of time and money are spent to address the requirements of accreditation. Since the transition to CAEP accreditation, a debate has raged concerning the new standards and new requirements. Evaluating the advantages and disadvantages of the CAEP system has been a hot topic for teacher education faculty as they struggle to meet accreditation demands and continue to educate students on a daily basis. However, the ethical dimensions of CAEP accreditation process are also worth considering.

Purpose

This conceptual analysis is intended to identify, clarify, and better understand the ethical dimensions of CAEP accreditation. The goal of using a conceptual analysis is to determine the ethical viability of CAEP.

Research Question

The research question for this study is: Is the process of CAEP accreditation ethical?

Significance of the Study

Most teacher preparation programs in the United States are moving toward CAEP accreditation (Loewus, Liana; Sawchuk, Stephen, 2017). Many states require all institutions that prepare teachers to be CAEP accredited. Thus, the study could be of interest to the more than

2,000 institutions of higher education that have teacher preparation programs (U.S. Department of Education, 2019).

Method

When first contemplating how to approach this research, I thought it was important to look at CAEP accreditation with a broad lens so that the perspectives of various institutions and individuals would be considered. Focusing on the language and goals set forth by CAEP led me to consider conceptual analysis as a research method.

A conceptual analysis is defined as "a structured framework, a means of identifying characteristics and attributes of abstract or ill-defined concepts with the purpose of achieving clarity" (Cronin, P., Ryan, F., Coughlan, M.). Conceptual analysis is often used in discussions of philosophy or the purposes of education, when "a concept is chosen for examination, and the analysis involves quantifying and tallying its presence" (Conceptual Analysis, 2018). Considering the discussion of the ethical components of CAEP, survey participants were given open-ended questions allowing them to provide a perspective that was unique. This gave participants a voice in the conversation. When considering a method to study this topic, the conceptual analysis seemed most appropriate because it "provides a knowledge base for practice by offering clarity and enabling understanding, rather than mere knowing" (Baldwin, 2008). By using conceptual analysis, the various aspects of the CAEP accreditation process were identified and defined. An attempt was then made to put them into perspective in light of current common practices and expectations in the field of teacher preparation and certification.

Choosing to use a conceptual analysis allowed consideration of the specific wording of the standards that was used by CAEP as an organization and by education directors from Educator Preparation Programs (EPPs) to gain insight into the ethical dimensions of the CAEP

process being considered. Therefore, approaching EPP directors/deans who had been involved in program accreditation and had transitioned to the CAEP process was important in order to shed light on accreditation changes that were a part of the new system.

Each state in the U.S. follows EPP accreditation standards established by that state's government. Thus, narrowing the study focus to one state was important in order to eliminate the potential impact on the research variations present in the laws applying to EPPs in different states. With participants determined as the focus for the study, a short survey was developed. As director of an EPP in Oklahoma, I was in direct contact with other deans and directors in the state. After completion of the Institutional Review Board process to acquire permission to research CAEP, the deans/directors were approached through an email survey. The survey prompts were:

1) Tell me about your experiences with CAEP.

2) What are good aspects of CAEP?

3) What do you dislike most about CAEP?

4) Is CAEP an ethical process? Why or why not?

Asking open-ended questions allowed for individuals who responded to the survey to express their experiences without limitations. Surveys yielded valuable information that responded to the ethical dimensions of the CAEP process. The survey was sent to 40 deans/directions of Educator Preparation Programs in the state of Oklahoma. A total of 25 responses were received. Responses were gathered through Qualtrics through

https://ousurvey.ca1.qualtrics.com/ControlPanel/, the University of Oklahoma. Initial data from the Qualtrics survey were evaluated using Dedoose, which is web application software used for analyzing qualitative and mixed methods research. After collecting survey feedback from

participants, I set parameters within Dedoose to categorize the responses. Categories were

themes based on key words within responses from participants and included codes such as:

accreditation, ethical, non-ethical, unethical, expectations, and assessment. The Dedoose

program was used to evaluate the language as part of the conceptual analysis approach that was

applied to this research. Hard copies of the responses were also used to code information so that

themes were easier to identify and to process results that were collected.

In the remaining text of the study, please note the modified Kass framework will be in all

capital letters. The text taken directly from CAEP documents will be in **Calibri font, bold.**

CHAPTER FOUR

Results

Based on the following modified steps of the Kass framework, I began to evaluate the
ethical process of CAEP accreditation.

1. WHAT ARE THE GOALS OF RECEIVING CAEP ACCREDITATION?

2. HOW EFFECTIVE IS CAEP IN ACHIEVING ITS STATED GOALS?

3. WHAT ARE THE KNOWN OR POTENTIAL BURDENS OF CAEP?

4. HOW CAN THE BURDENS BE MINIMIZED? ARE THERE ALTERNATIVE
    APPROACHES TO ACHIEVE THE SAME GOALS?

5. IS CAEP IMPLEMENTED FAIRLY?

6. HOW CAN THE BENEFIT AND BURDENS OF CAEP BE FAIRLY BALANCED?

In order to fully understand the information collected through the Qualtrics survey, it is
necessary to understand the context in which this information is framed. According to the
history page of the CAEP website, the standards of NCATE and TEAC no longer apply (History
of CAEP, 2015). So CAEP must be assessed somewhat ahistorically. The Strategic Goals of
CAEP established at their founding in 2013 were as follows:

1) **To raise the bar in educator preparation**

2) **To promote continuous improvement**

3) **To advance research and innovation**

4) **To increase accreditation's value**

5) **To be a model accrediting body**

6) **To be a model learning organization**

Since the universities in Oklahoma that have Educator Preparation Programs were initially
accredited by NCATE, it was important to consider the transition that the educator preparation

programs were experiencing. The adjustment to the new standards of CAEP meant that all

Oklahoma universities were moving to a new system at the same time. (See Table 1, page 9 to

see a comparison of NCATE and CAEP accreditation standards.)

The standards of NCATE and CAEP both emphasize content, pedagogical knowledge,

field experiences, qualifications, development, and improvement. The standards of measurement

for these comparable requirements were also similar. However, there were two differences that

seemed apparent. One of the distinctions of the new CAEP Standards was in the area of teacher

candidate preparedness. In the NCATE Standards, dispositions of teacher candidates were

included in the first standard. The intent of this requirement was to assess the candidates'

propensity for success in the classroom based on their ethical practices including

professionalism, sense of responsibility, and attitudes towards students as learners. This

component is absent in the new CAEP standards.

The second disparity was in the area of Program Impact. Section 4.3 of this standard

relates to satisfaction of employers and states, "The provider demonstrates, using measures that

result in valid and reliable data and including employment milestones such as promotion and

retention, that employers are satisfied with the completers' preparation for their assigned

responsibilities in working with P-12 students" (Standard 4: Program Impact, 2015). This is a

significant difference from the NCATE Standards and provides an entirely new requirement for

teacher educator programs. The logistical issues involved in collecting data on teacher education

graduates from a program regarding employment and employer satisfaction can be significant.

When teacher candidates complete their program of study at a university, tracking their location

of residence and employment can prove difficult when they no longer report to the university.

Because the satisfaction of the school district administration relies on the success of the teacher in the classroom, knowing how students perform can be important. It is also important for teachers to understand the extent to which appropriate measures can be taken to improve instruction. As noted by the Data Quality Campaign, "While states have the capacity to provide this information through their comprehensive and secure longitudinal data systems, this critical feedback loop between states and EPPs often does not exist" (Using Data to Drive Success in Educator Prep, 2016). This creates a mismatch between the expectations of CAEP and the data Educator Preparation Providers have available to them.

Increasing rigor and elevating respect for the teaching profession, may be desirable, but the realities of the profession make achieving CAEP goals difficult at best, and in some cases, unrealistic. There is also concern that the goals of CAEP have been influenced by undue pressure from the U.S. Department of Education and were not driven by educators within the profession. This was made apparent in an *Education Week* article in which Sawchuk reported that James Cibulka, founding leader of CAEP, was having to "walk a fine line between competing policy visions for teacher education" (Sawchuk, Teacher Education Group Airs Criticism of New Accreditor, 2015). The president of the American Association of Colleges for Teacher Education (AACTE), Mark R. Ginsberg, admitted that requirements of CAEP have been "confusing or ambiguous." The rising cost involved in implementing some new standards in an education environment "in an era of tight higher-education budgets" is an ongoing area of concern (Sawchuk, Teacher-Prep Accrediting Groups to Merge: Move Could Lead to a More Rigorous Bar, 2010).

"CAEP has been extremely disorganized throughout the entire process [of accreditation]. They changed the format on us while we were in the process of submitting our report, and when

you attend their meetings, you get different answers to questions" (Maher, 2015). According to a dean at a college of education in Minnesota, CAEP representatives weren't clear on how to apply the new standards. "And the group's final accreditation decision didn't align with the feedback reviewers had given beforehand" (Sawchuk, Teacher-Prep Accreditation Group Seeks to Regain Traction, 2016). The dean noted that no one seemed prepared for this new accreditation approach, including team members of CAEP who were making the visit.

From the beginning of CAEP, one of the selling points was that the new accreditation system would provide options for teacher educator preparation programs to demonstrate the ways that they met the requirements of CAEP standards. Initially, there were three options, but two were eliminated and now there is only one pathway. "When CAEP formed, there was still choice initially… (they have) dwindled to one, there was no more choice" (Loewus & Sawchuk 2017). Schools seeking accreditation with CAEP complete an application for accreditation, a Self-Study Report, and host a site visit from CAEP accreditors (CAEP Standards, 2015).

"Of the approximately 50 colleges it's reviewed, CAEP has revoked accreditation twice and denied it once. That makes CAEP tougher than previous accreditors" stated Christopher Koch, CAEP's president in an *Education Week* article (Loewus & Sawchuk, 2017). This means that CAEP has established a 6% failure rate. Historically, 6% is a higher rate of failure than reported by TEAC or NCATE (Loewus, Liana;Sawchuk, Stephen, 2017). This seems to be a more difficult process than it was in the era of NCATE and TEAC.

1. *WHAT ARE THE GOALS OF RECEIVING CAEP ACCREDITATION?*

According to the survey of EPP deans/directors, one recurring theme was that the process of CAEP accreditation was important because it required accountability and "rigorous standards," and "moved expectations to a higher level." One dean/director noted that, "National accreditation is a good thing for our profession" (Appendix A). Recognizing the importance of the CAEP goals, another director stated, "CAEP forces an organization to constantly collect meaningful data to make defensible and ethical decisions about its program" (Appendix A). Another response was that, "the standards that CAEP sets for EPPs are high and make sure that the profession is taken seriously" (Appendix A). On surveys, deans and directors recognized the value of the goals established by CAEP.

Another significant goal of receiving CAEP accreditation is the simple fact that many states require CAEP certification of all EPPs operating within the boundaries of the state (http://caepnet.org/~/media/Files/caep/state-partners/program-review-b-state-agreement-7-16.pdf?la=en). EPPs operating in CAEP partnership states much seek and obtain accreditation or face extinction (CAEP, 2019).

2. *HOW EFFECTIVE IS CAEP IN ACHIEVING ITS STATED GOALS?*

The goals set by CAEP require an intense amount of training, preparation, mentorship, and continued follow-through. Since 2017, effort has been made by CAEP to train EPPs in the new standards. At the spring 2018 CAEPCon, CAEP training sessions were offered on each of the five standards. The training was supposed to clear up questions over documentation and processes, but I and my peers in attendance often felt as if we were more confused after a session than we had been before the session. For example, for Standard 4.3, which is focused on the satisfaction of employers who hire new teachers from the Educator Preparation Programs

(EPPs), CAEP wants to be able to track the success of students after graduation. The standards

focused on content and pedagogical knowledge, clinical partnerships and practices, the quality of

the candidates that are recruited to the program, the impact the EPP has on the teacher candidates

and the teacher candidates' impact as new teachers, and, of course, continuous improvement.

While this is undoubtedly a fine set of data points, the CAEP training sessions did little to

explain exactly how such data might be collected.

The strategic goals of CAEP have been revised every three years, according to Jennifer

Carinci (Carinci, 2018), Director of Research and Engagement with CAEP. Currently, the five

strategic goals of CAEP are as follows:

1) **Continuous Improvement – EPPS will use evidence, based on CAEP Standards, to continuously monitor, evaluate, and improve their programs.**

2) **Quality Assurance – The CAEP accreditation process will be valid, consistent, transparent, and data-driven.**

3) **Credibility – CAEP will be respected as the arbiter of educator preparation program quality.**

4) **Equity – CAEP will ensure consistent application of the principles of equity and diversity in its evaluation of programs.**

5) **Strong Foundation – CAEP will continuously monitor and improve internal policies, process, and procedures to assure transparency, accountability, fiscal efficiency, and high quality service and support, to serve as a model of equity and attention to diversity. (Vision, Mission & Goals, 2015).**

Currently, CAEP's first goal is listed as Continuous Improvement and its definition of that goal is that "EPPs will use evidence, based on CAEP Standards, to continuously monitor, evaluate, and improve their programs" (Vision, Mission & Goals, 2015). Promoting continuous improvement is one of the areas that has been accepted and implemented into the understanding and language of teacher preparation programs across the country.

For example, the language on Northwestern Oklahoma State University's website claims that they use data from program outcomes to help meet the needs of their students as they prepare them for the classroom (School of Education: Division of Education, 2017). Students must be able to demonstrate their desire to improve through continual learning and intellectual growth. The University of Oklahoma Jeannine Rainbolt College of Education's webpage states that students "actively engage in continuous evaluation and refinement of their learning" (The TE-PLUS Conceptual Framework, 2016). In looking at the websites for Teacher Preparation Programs in the state of Oklahoma, all espouse the idea of continuous improvement.

Indeed, continuous improvement was identified by several administrators in the Qualtrics survey as critical to teacher preparation. One administrator wrote that "the emphasis on continuous improvement and quality assurance is positive" (Appendix A). However, another administrator said, "Standards and expectations have been a moving target since their introduction, though changes are becoming less frequent" (Appendix A). Lack of stability of CAEP's definition of adequate continuous improvement was a common theme of frustration shown in survey responses. Although CAEP seems to be stabilizing its expectations, the relatively benign goal of *continuous improvement* seems to have perplexed deans and directors. "Dealing with CAEP," said one administrator, "has been mostly confusing and frustrating."

Quality Assurance - The CAEP accreditation process will be valid, consistent, transparent, and data-driven. (Vision, Mission & Goals, 2015)

According to survey results, CAEP accreditation has severe problems with validity, consistency, and transparency. One dean lamented that it was impossible to adhere to standards when they are, "ever-changing" (Appendix A). Another dean wrote, "The information from one session (CAEP conference) to the next is unreliable. It's sad that conference participants record comments by video or ask for what is being said in writing because so many have lost trust in CAEP's presenters and leaders" (Appendix A).

Two other comments were particularly damning with regard to consistency:

"It [CAEP] has also provided conflicting information, unreliable information during trainings, ill-informed or unprepared presenters, lots of talks about the standards and few helpful strategies and examples, etc." (Appendix A).

"It was frustrating that there was a lack of consistency, especially 3-4 years ago, in the CAEP staff's interpretations of the standards." (Appendix A).

Because CAEP's mission is crafted around the idea of a workforce of quality teachers, "quality assurance" might include, not just assurance over a particular program-in-action, but assurance for the quality of teachers in America. Certainly, when quality assurance is considered more broadly in this manner, CAEP does not fare well. As reported in Oklahoma in August of 2017, more than 1,400 teachers entered Oklahoma classrooms with emergency certifications (Felder, 2017), the highest number of emergency certifications in Oklahoma history. In 2018, the number of emergency certifications rose to 3,000 (Baines and Machell, 2018). Joy Hofmeister, Oklahoma State Superintendent of Public Instruction, noted that, "nearly 84% of emergency certified teachers in Oklahoma lack any classroom experience" (Felder, 2017).

Although CAEP is setting the bar of success high, the reality is that the number of professionally trained teachers is dwindling in proportion to emergency-certified and alternatively-certified teachers (Felder, 2017).

In other countries, the number of professionally prepared teachers is increasing, not decreasing (Stewart, 2017). In Singapore, for example, the field of education has grown and improved dramatically since independence from Great Britain in 1965. Although the country is young, it recognized the need for high quality teachers and made preparation of those teachers and the education of students within the country a high priority. Teacher candidates are selected from the top third of the graduates from their secondary schools and are compensated with a stipend of about 60% of a teacher's salary throughout their training to become an educator (Stewart, 2017). In addition, Singapore teachers are allowed up to 100 hours per year for additional professional development (paid by their employer) to make sure that they are current in the field (Stewart, 2017). The priorities and high standards that are evident in Singapore are supported by the government through funding, training, and a level of respect for the profession that is absent in the United States.

This respect is also seen in Finland where teachers are considered the "most respected profession" (Finland: Teacher and Principal Quality, 2017). As with the case in Singapore, recruitment is much more competitive, but the level of respect that is given to teachers in Finland is also high. Teaching in these countries is a profession respected in society and autonomy is given to teachers to do the job for which they have has been trained. The training that teachers receive is provided by scholarships that include both tuition and fees (Finland: Teacher and Principal Quality, 2017). Alternatively, in the United States, finding teachers to fill the classrooms is becoming increasingly difficult. Although CAEP sets as its goal the assurance of

quality, mandating high standards without changing the American cultural landscape may not be enough to professionalize the job.

Credibility - CAEP will be respected as the arbiter of educator preparation program quality.

CAEP's goal of credibility states that it "will be respected as the arbiter of educator preparation program quality" (Vision, Mission & Goals, 2015). In October 2017, a new accreditation group has evolved: the Association for Advancing Quality in Educator Preparation, AAQEP. Hawaii has already received approval to be the first state to participate in the new process (Loewus & Sawchuk, 2017) and the entire State University of New York system has already switched over (AAQEP website). Table 2 lists the 69 colleges and universities that have already switched to AAQEP.

Table 2:

AAQEP Member Institutions

1. Abilene Christian (TX)	36. Saint Francis College (NY)
2. Alfred University (NY)	37. Saint John's University (NY)
3. American InterContinental University (IL	38. Saint Joseph's College (NY)
4. Bank Street College (TX)	39. School of Visual Arts (NY)
5. Barnard College (NY)	40. Skidmore College (NY)
6. Bemidiji State University (MN)	41. SUNY Albany
7. Brigham Young University –Hawaii	42. SUNY Binghamton
8. Brooklyn College (NY)	43. SUNY Buffalo
9. Cazenovia college (NY)	44. SUNY Empire State
10. Clarkson University (NY)	45. SUNY Old Westbury
11. College of Mount Saint Vincent (NY)	46. SUNY Plattsburgh
12. College of Saint Scholastica (MN)	47. SUNY Stony Brook
13. Daemen College (NY)	48. Syracuse University (NY)
14. Dominican College of Blauvelt (NY)	49. Teach Away (ON, Canada)
15. Elmira College (NY)	50. Teachers of Tomorrow (TX)
16. Grand Canyon University (AZ)	51. University of Guam
17. Hartwick College (NY)	52. University of Hawaii at Hilo
18. Hofstra University (NY)	53. University of Hawaii at Manoa
19. Houghton College (NY)	54. University of Rochester (NY)
20. Ithaca College (NY)	55. University of Saint Thomas (MN)
21. Keuka College (NY)	56. University of Texas at Arlington
22. Le Moyne College (NY)	57. Utah State University

23. Leeward Community College (HI)	58. Utah Valley University
24. Lenoir-Rhyne University (NC)	59. Utica College (NY)
25. Long Island University (NY)	60. Vassar College (NY)
26. Manhattan College (NY)	61. Wagner College (NY)
27. Marist College (NY)	62. Weber State University (UT)
28. Maryville University (MO)	63. Wells College (NY)
29. Nazareth College of Rochester (NY)	64. Western Governors University (UT)
30. Northern Michigan University	65. Westfield State University (MA)
31. Northwest Missouri State University	66. Westminster College (UT)
32. Plymouth State University (NH)	67. Hawaii Teacher Standards Board
33. Pratt Institute (NY)	68. Mount Saint Mary's University (MD)
34. Roberts Wesleyan College (NY)	69. University of Portland (OR)
35. The Sage Colleges (NY)	

Many AAQEP advisors are former employees of NCATE or its affiliates. One of the main concerns that was the impetus to create a new option for accreditation was voiced by David Cantaffa, Assistant Provost for Educator Preparation for the State University of New York at Albany. He focused on the loss of choice in the process (Loewus, Liana;Sawchuk, Stephen, 2017).

Since the new CAEP organization has come into being in 2013, only about 50 schools had completed their initial accreditation visit by 2018 (Accreditation Resources, 2018). Of those schools, a majority completed the process with only partial information on the site visit because it was too early to include data that needed to be collected with the new standards and collection points required. The date for schools to provide plans for their first visits has been extended from 2018 to spring 2020 because of confusion inherent in the CAEP process. Initial CAEP site visits only required the EPPs to demonstrate that a plan for collecting data was in place. CAEP has had to constantly recalibrate the timeline of site visits and the requirements of those visits because it has struggled to provide clear direction for EPPs (Accreditation Resources, 2018).

Although the start has been less than ideal, the CAEP organization seems to be striving to move forward and pull together unified information and training. In talking with EPP directors from around the country at the 2018 spring conference, people seemed to feel that progress was being made. On the other hand, some EPP directors were still considering new accreditation options or pulling out of national accreditation completely and moving their programs to state accreditation. The conversation with some deans and directors at the CAEP conference revealed the perception was that CAEP is working to shore up procedures, but that it may be too late.

Equity - CAEP will ensure consistent application of the principles of equity and diversity in its evaluation of programs.

Issues of racial and social class diversity of students and faculty in light of CAEP standards abound and will be discussed in depth later in responding to questions 3 and 5. Unquestionably, diversity and inclusion remain significant challenges with CAEP. However, in responding to this particular CAEP strategic goal, discussion will be focused around issues of the size of an institution/college/school.

The expectations of a small teaching institution and its ability to carry out a multitude of tasks are not easily understood by larger, research institutions. As one CAEP team member acknowledged, the site visits at smaller institutions take on a whole new dynamic because of the smaller number of personnel trying to carry out the same requirements as larger institutions.

At smaller institutions, faculties may carry the responsibilities for several different positions. The work that comes with creating CAEP documentation may take several faculty away from their teaching, scholarship, and administrative duties. One dean/director said, "Compliance with CAEP requirements has taken time and resources away from advancing our

educator preparation program in ways that are valued locally" (Appendix A). Another dean/director noted, [the CAEP process is] "just a great deal of extra work" (Appendix A).

The expectations of how a program functions in a small teaching institution are not easily understood by faculty who serve at large research universities. One CAEP team member recognized that the site visits at smaller institutions take on a whole new dynamic because of the smaller number of personnel trying to carry out the same requirements of larger institutions. At smaller institutions, many faculties carry the responsibility of several different positions. In the environment at a small institution, that is the norm.

Since the process of the CAEP accreditation is a new system, the transition meant that there were no existing site visitors. The site visitors who had previously worked with NCATE and TEAC had to go through additional training to learn the new system. According to the CAEP website, the organization depends on "more than 1,200 committed professionals from various sectors" (Volunteers, 2015). Recruiting and training such a large number of people in a short time frame has been a challenge especially in light of the shifting landscape as CAEP has adjusted and restructured its organization.

An issue of concern particular to small programs is the distinct perspectives of faculty who serve as site visitors who are from larger, publicly funded institutions. There are different dynamics in a small institution than in a larger one, but the higher number of site visitors from large universities raises the question of equity.

Strong Foundation - CAEP will continuously monitor and improve internal policies, process, and procedures to assure transparency, accountability, fiscal efficiency, and high-quality service and support, to serve as a model of equity and attention to diversity.

When considering the responses of the EPP deans/directors, the question of CAEP's consistency and transparency in their goal of Quality Assurance becomes a concern. One respondent shared this story:

> Several years ago, I witnessed a scene close to a rebellion when a presenter would not answer direct questions, instead repeating, 'what do you think you could do?' At one point, the one asking the question stated that she didn't know. That's why she paid the $700 to attend! I have little confidence in CAEP's leadership, reliability, and quite honestly value. That's coming from someone who embraces accreditation and appropriate accountability.

In the surveys, deans and directors overwhelmingly acknowledged that consistency was a concern. However, a few also gave credit to CAEP that they seemed to be trying to make improvement in this area (Appendix A).

3. *WHAT ARE THE KNOWN OR POTENTIAL BURDENS OF CAEP?*

Extensive Bureaucracy with Some Almost Impossible Standards

CAEP'S goal of teacher candidates having actual classroom experience and practice throughout their programs certainly is ideal (Oliver & Reschly, 2007). It provides prospective teachers with hands-on opportunities to see how the philosophies and instruction they have been receiving in a formal classroom setting can be applied to authentic, real-life situations in the classroom. Clinical practice components or field experiences require that teacher candidates have hours of experiences in conjunction with courses they are taking prior to the student teaching component, which is an extended hands-on field experience.

One burden is in working with public school teachers who are under an enormous amount of stress (Russell, Altmaier, & Van Velzen, 1987). In light of the conversation of merit pay for

teachers (Greene, Teacher Merit Pay is a Bad Idea, 2019), classroom teachers are under pressure for their students to perform on nationally-normed tests. Because of this, there has been hesitancy to relinquish control of parts of the classroom to a student teacher, especially during the intense preparation time in the spring that precedes testing. Serving as a cooperating teacher equates to additional responsibility to mentor and guide the student and time restraints (Student Teaching in the United States, 2018).

Some teachers feel threatened when asked to implement new ideas or processes. In one instance from my experience, a classroom teacher perceived that the university was treating her as unprofessional because she was asked to receive training on a new assessment system, a required component put into place in an attempt to satisfy a new CAEP system (Classroom Teacher, 2016). With teachers under so much pressure because of high-stakes testing, budget shortfalls, and less support, the addition of a student teacher with new student teacher requirements is sometimes perceived as "just one more thing."

Standard 4 of the CAEP requirements focuses on program impact. This standard has become one of the most concerning for those in the area of teacher preparation (Will, 2018). The standards set forth in this component require that performance data is gathered on new teachers in their first few years based on the standardized test scores of their students. The goals set forth by CAEP are "very ambitious" (Will, 2018). Although the information that is sought might be beneficial, logistically they can be nearly impossible to attain. Even as recently as the CAEP conference training in 2018, presenters (employed by CAEP) acknowledged that there were still areas in the standards that were difficult for EPPs to meet. The implication was that EPPs should do the best that they can and see what happens when the team visits their institutions.

Standards for program impact is a hurdle because EPPs in Oklahoma are finding it difficult to obtain P-12 student test scores as they relate to individual teachers. Obtaining student test scores is required to validate a new teacher's impact in the classroom within their first few years of teaching. There is no set format or access granted in Oklahoma to gather the data needed to effectively gauge the impact that teacher candidates/new teachers have on P-12 student learning and development.

Logistics affect the EPPs ability to satisfy some of the pieces of standard 4. EPPs are searching for ways to validate that all P-12 students receive instruction based on "rigorous college-and career-ready standards." The standardized test scores of P-12 students are not available to universities. This information is protected and access must be given by individual school districts. Developing partnerships with these districts and finding ways to obtain this information has become a major concern in satisfying this particular CAEP standard. In an effort to remedy this dilemma in Oklahoma, EPP deans and directors wrote a grant and received funds from AACTE to develop partnerships with school superintendents. The goal of these partnerships is to provide EPPs access to school records that include student scores and achievement levels as a way to obtain information on the academic impact of new teachers. This process is not without cost, which exposes another concern: the additional financial burdens EPPs must assume.

As EPPs are given additional tasks to achieve accreditation, the number of staff and faculty available on campuses to complete these processes has not changed. The time and effort that is involved in tracking down student teachers and survey data, sorting and filing the data, and compiling the statistics to report is time consuming and costly for faculty and staff. At many institutions, there are not enough funds to employ personnel to address Standard 4. The burden

often falls on faculty who are already carrying a heavy load. One dean/director in the survey said, "The demands made by CAEP are out of reach for EPPs that are already stretched with too many items to attend to" (Appendix A).

Another component that makes "documenting impact" so difficult is the ability of college preparation programs to track their graduates in order to gather this information. Tracking graduates' employment placement would seem to be a prerequisite for tracking the satisfaction of new employers. New teachers are leaving the state of Oklahoma to go to surrounding states that pay more, making it difficult, if not impossible, to track the satisfaction of program graduates. Some information regarding teacher candidate satisfaction can be obtained through surveys at graduation and program completion; however, these teacher candidates will only have a partial understanding of how their program prepared them since they will not have actually been employed and experienced the profession as a certified teacher. Additionally, there are concerns regarding privacy. The information that is required by CAEP must be obtained from teacher candidates/new teachers who are willing to share their information with an organization outside of their degree granting institution. Some students are not willing to share this information, which creates yet another hurdle.

Another concern for teacher preparation programs is how to track students' satisfaction. Being able to track the students who leave the state, for any reason, is a challenging issue that has teacher preparation programs scrambling to find solutions. Some new teacher candidates choose to go into private/parochial education and are not recorded by the state. Whether these students stay in Oklahoma or move to another state, capturing their satisfaction with their teacher training is hard to track down.

Cost

According to the CAEP website, the annual fees Educator Preparation Providers are based on the number of "completers" from the program. "A completer is defined as 'any candidate who exited a preparation program by successfully satisfying the requirement of the EPP'" (Fees caepnet.org). The annual fees range from $2,475 for 0-50 completers, to $5,500 for 1,000+ completers. They also list the fee for international programs, which are EPPs who are outside of the United States, as $11,500.

Table 3:

CAEP Annual Educator Preparation Provider Fees

2016-17		2017-18		
Completers	**Annual Fees**	**Completers**	**Annual Fees**	**Increase**
0-50	$2,475	0-50	$2,560	$85
51-150	$2,745	51-150	$2,840	$95
151-300	$3,130	151-300	$3,240	$110
301-500	$3,625	301-500	$3,750	$125
501-1000	$4,775	501-1000	$4,940	$165
1000+	$5,550	1000+	$5,740	$190
International	$11,500	International	$11,500	

(Accreditation Costs, 2018)

In addition to annual fees, the cost of attending CAEP conferences for training in their accreditation system can prove detrimental to EPP budgets that are already strained. The registration expense for one individual to attend the conference for Spring 2018 was $835. Additional expenses of travel, room, and board make this additional investment significant, especially for small insitutions. One dean/director summed it up as, "CAEP is expensive."

As noted in previous comments from EPP deans/directors who were surveyed, the training required to understand and address the CAEP standards is time-consuming. One noted, "We are a small institution and the multiple standards and requirements are generally very difficult and time-consuming for us. We have a very small faculty and the work required to adhere to CAEP standards, and to be careful to follow guidelines, deadlines, and requirements, is quite problematic for us." Another response was, "I dislike the cost and the lack of clarity in the process. It seems at times that standards and processes are set for an outside audience rather than to challenge and support teacher education programs. I am also concerned that CAEP has conferences that cost too much for the information provided. Why should it take this much explaining to follow the guidelines?"

Conflicting Requirements: Diverse Teaching Force v. Standards That Preclude Diversity

A challenge to meeting the CAEP requirements is that many students arrive at college underprepared academically (Butrymowicz, 2017). The basic skills and levels of performance that were expected of incoming college freshmen, even as little as ten years ago, are in decline (The Mental and Physical Well-Being of Incoming Freshmen: Three Decades of Research, 2018). The ACT report of College and Career Readiness of 2017 stated that of the graduates from 2017, only 39% of them met the benchmarks for three of the four – English, math, science, reading - core subject areas (ACT College & Career Readiness Report - 2017, 2017). Additionally, the 2014 College Board reported that among the underprepared were "a disproportionate number of African-American and Hispanic students" (Baines, When 'Highly Qualified' Teachers Aren't, 2017).   When considering the requirements of CAEP to have teacher candidates in the top 50% the incoming college population and also maintain a diverse population, the goals may be overly ambitious. Preparing students who choose to enter the field

of education to be successful classroom teachers and having them complete their degree program in a timely manner if they are struggling to grasp the basic concepts that should already be in place when they arrive in college is an order that is increasingly difficult (Sawchuk, AACTE Critiques Proposed Accreditation Standards, 2013).

According to CAEP, teacher candidates must have a minimum grade point average of 3.0. The standards increase requiring candidates to perform in the top 50% on nationally normed tests, the ACT and SAT, in 2016-17 to the top 33% of these same tests by 2020. One of the goals of CAEP is to "recruit cohorts of candidates who have posted scores in the upper third on a nationally normed entrance exam" (Sawchuk, Teacher-Prep Accrediting Groups to Merge: Move Could Lead to a More Rigorous Bar, 2010). Instituting high standard-driven requirements on college entrance exams might conflict with recruitment of more black and Latino students who do not typically score high on standardized tests (Austen, 2012).

There are issues with this requirement that raise some serious concerns. For example, one of the other components of this CAEP standard is that teacher candidates reflect the racial and ethnic diversity of the P-12 population. According to "The State of Racial Diversity in the Educator Workforce" report of 2016, the workforce of public schools is "overwhelmingly homogenous – 82% white" (The State of Racial Divesity in the Educator Workforce, 2016). Based on this data, the goal of recruiting high achieving students who reflect this population diversity may be difficult, especially since, according to the 2016 survey of college freshmen conducted by the *Chronicle of Higher Education*, the number of students who intend to major in education is at its lowest point in 45 years (Backgrounds and Beliefs of College Freshmen, 2017).

Relative Lack of Benefit

In October of 2016, the U. S. Department of Education established new regulations regarding the program accountability system, which is a part of Title II. This new mandate required that educator preparation programs provide "more meaningful data on teacher preparation program quality" (Teacher Preparation Issues, 2016), meaning that federal funds distributed to institutions would be based on the performance and data provided. However, in March of 2017, these new regulations were rescinded, based on several concerns (AACTE Statement on the Rescindment of the Federal Regulations for Teacher Preparation Programs, 2017). These concerns included, but were not limited to, "growing teacher shortages, declining enrollment in educator preparation programs, persistent lack of diversity and a low retention rate" (AACTE Statement on the Rescindment of the Federal Regulations for Teacher Preparation Programs, 2017).

With these regulations removed, more time and energy ostensibly could be put toward improving the quality of teacher preparation programs. However, in spite of these regulations being rescinded, CAEP standards did not budge.

4. *HOW CAN THE BURDENS BE MINIMIZED? ARE THERE ALTERNATIVE APPROACHES TO ACHIEVE THE SAME GOALS?*

According to the *CAEP Accreditation Handbook* (Version 3, March 2016), there were three pathways to accreditation: Inquiry Brief Pathway, Selected Improvement Pathway, and Transformation Initiative Pathway (CAEP Handbook: Initial-Level Programs 2018, 2018). Although each of the pathways required that all CAEP standards were met and the programs showed continuous improvement, these pathways allowed institutions to be specific about how their individual programs met the standards. For example, the Transformation Initiative Pathway

had a strong focus on research done within the institution that could be added to the body of information regarding teacher education and pedagogy.   Although three pathways were initially allowed through CAEP, the options for accreditation have now been narrowed to one pathway.

Through the CAEP accreditation process, the first step is the program review. An internal review of the viability of maintaining a teacher education program is completed prior to the on-site visit. Once a program review has been approved, the institution completes a self-study of each of their teacher education programs which is reviewed by assigned accreditation team members who will also serve for the on-site visit. Team members for the visits are representatives from both CAEP and the state (an organization such as the Office of Educational Quality and Accountability). Each state determines the program review process based on their CAEP State Partnership Agreement. In Oklahoma, for example, the agreement aligns the national accreditation standards with state standards that must be met as well.

Reverberations of Accreditation

In order for a college student to be able to use federal financial aid money, the school he/she attends must be regionally accredited. This policy is in place to ensure that funds being distributed by the government are directed to an institution that adheres to stringent standards and is viable both academically and fiscally (Federal Student Aid: an Office of the U.S. Department of Education, n.d.). If a school is not accredited, the student cannot receive federal funds.

For a teacher preparation program to be accredited by Oklahoma, the institution must either be accredited regionally by an organization recognized by the federal government such as the Higher Learning Commission or provide information that validates that the institution is viable both academically and fiscally. Theoretically, a teacher preparation program could attain

accreditation through CAEP and the state without regional accreditation; however, the process to prove academic and fiscal viability is detailed and time-consuming. Additionally, it is almost as detailed as going through the Higher Learning Commission accreditation process on its own. For example, in Oklahoma one small, private institution that had an established teacher preparation program tried to obtain state accreditation, but was not regionally accredited. Despite initiating the program review and completing the self-study and on-site visit, they did not attain accreditation because of the difficulty in trying to prove the school's viability without regional accreditation.

Although students can attend a university that does not have an accredited teacher education program and still become certified, it is more difficult because they must gain certification through an alternative process. The alternative route to certification does require a bachelor's degree from a recognized accredited institution (Guidelines and Eligibility for the Alternative Placement Program, 2016). According to the Oklahoma State Department of Education website, teacher candidates that have graduated from programs approved by the state are able to become certified because of the reciprocal agreement that exists between the state and the accredited teacher prep programs in the state (Traditional Path for Oklahoma Teacher Certification, 2017). If institutions of higher education do not have these approved programs, the degrees that they offer in education are not recognized by the Office of Educational Quality and Accountability, so candidates from these programs are required to follow the alternative teacher certification route.

Alternative Approaches to Certification

The Title 2 website of the Higher Education Act provides statistics and reports for teacher preparation programs throughout the U.S. According to the website, there are alternative routes

to teacher certification that do not involve going through a professional teacher education preparation program. The options for this alternative route vary by state, but they include alternative certification programs for those who are changing career paths and other options like Teach for America. In 2014, it was reported that there were 673 alternative teacher preparation providers in the United States. This accounts for one third of the teacher preparation providers across the country (Alternative Teacher Preparation Programs, 2015). Of those alternative options, 20% were at institutions of higher education (IHE), but 10% were non-university affiliated programs (Alternative Teacher Preparation Programs, 2015). Top teacher-producing states for alternative programs outside of Institutions of Higher Education were Texas (48%), New Jersey (11%), Florida (4%), Oklahoma (3%), and Georgia (3%) (Alternative Teacher Preparation Programs, 2015). The previous table designated states with NCATE accreditation; this table specifies traditional IHE teacher preparation programs in relation to alternative routes.

Table 4:

Alternative Routes Certification Compared Traditional Programs

State	# Alternative Routes to Teacher Certification by state (Title 2 website 2015)	Number of Providers	Traditional	Alternative, IHE-based	Alternative, not IHE-based
Alabama	6	45	27	17	1
Alaska	1	4	4	0	0
Arizona	1	26	14	9	3
Arkansas	12	33	20	10	3
California	2	143	82	52	9
Colorado	2	40	17	6	17

Connecticut	7	18	15	1	2
Delaware	4	5	4	0	1
District of Columbia	1	15	7	2	6
Florida	2	73	47	25	1
Georgia	2	59	39	0	20
Hawaii	11	15	6	6	3
Idaho	3	14	7	5	2
Illinois	1	64	55	8	1
Indiana	1	73	43	30	0
Iowa	4	35	32	3	0
Kansas	1	31	25	6	0
Kentucky	8	47	28	17	2
Louisiana	3	43	18	19	6
Maine	1	17	16	0	1
Maryland	1	34	23	0	11
Massachusetts	2	68	54	0	14
Michigan	1	39	34	3	2
Minnesota	1	32	30	2	0
Mississippi	4	30	15	12	3
Missouri	3	55	41	12	2
Montana	1	10	9	1	0
Nebraska	1	17	16	1	0
Nevada	1	15	10	2	3
New Hampshire	4	17	15	0	2
New Jersey	1	28	24	3	1
New Mexico	1	19	10	9	0

New York	1	135	115	20	0
North Carolina	2	73	46	22	5
North Dakota	0	12	12	0	0
Ohio	0	52	52	0	0
Oklahoma	1	23	22	0	1
Oregon	1	18	18	0	0
Pennsylvania	3	122	91	30	1
Rhode Island	1	9	8	0	1
South Carolina	3	33	30	0	3
South Dakota	1	13	12	0	1
Tennessee	1	68	36	28	4
Texas	1	197	73	68	56
Utah	1	12	10	1	1
Vermont	4	15	11	0	4
Virginia	1	40	36	3	1
Washington	4	28	21	7	0
West Virginia	2	21	20	1	0
Wisconsin	8	41	33	0	8
Wyoming	0	1	1	0	

Alternative teacher preparation programs vary in their approaches, but one well known program is Teach for America (TFA). TFA recruits recent college graduates to teach in low-income/high risk P-12 public schools. The recruiting process to be a candidate is competitive, with only 15% of applicants admitted in 2017, according to Teach for America (What We Look For, 2018). TFA strives to take top ranking graduates from universities across the country to work for two years in these high-risk schools. Recruits from Teach for America are in 53

regions in 36 states within the U. S. (What We Look For, 2018). They state that 48% of their teachers are people of color and 43% are Pell Grant recipients, indicating strong diversity (What We Look For, 2018). Because TFA is represented across the country, it is an alternative route to teaching that is easily recognized throughout the country. It provides an option for people to enter the classroom as teachers, but the quality of teaching from these programs has come under some scrutiny (Schaefer, 2015).

The impact of teachers who have been alternatively certified is hard to measure. The popular Teach for America organization recently celebrated its twenty-five year anniversary, but "after twenty-five years, there's no research (outside of TFA's own) to suggest that its teachers are more successful than the trained educators they push aside" (Greene, 2016).

There has also been criticism from former TFA teachers. One claimed, "I had few insights or resources to draw on" (Blanchard, 2013), citing that the promised "10 hours per week" of training in the classroom was closer to "two 90-minute classes per week" (Blanchard, 2013). Additionally, recent reports seem to indicate that the impact of these programs may not be as strong as they boast. An article from Reuters in 2012 noted that the statistics used to highlight the success of Teach for America teachers were "based on self-designed assessments" (Simon, 2012). The article quotes Heather Harding, former TFA's research director as saying, "I don't think it [the research] stands up to external research scrutiny" (Simon, 2012).

The National Council on Teacher Quality (NCTQ) is an organization that rates and evaluates teacher preparation and has recently started looking at alternative programs (Alternative Teacher Preparation Programs, 2015). The preliminary evaluation reported that the findings on the alternative programs showed generally low performance from candidates who came through these programs (Alternative Teacher Preparation Programs, 2015).

The conversation about national teacher shortages and effective accreditation systems requires examination of alternative certification programs that are preparing teachers to enter the classroom. Since the onset of digital classrooms, online teacher preparation programs have expanded and become the new norm. Meredith Liu considers two types of innovation that move industries to advance: sustaining and disruptive (Disrupting Teacher Education, 2013). In the area of sustaining innovation, she considers the traditional teacher preparation schools and programs from a business perspective and deems these systems too cost prohibitive to produce the number of teachers that are necessary.

On the other hand, the disruptive pathway, alternative certification, "serves new customers with a cheaper, simpler, or more convenient solution than current options" (Disrupting Teacher Education, 2013). Liu highlights the online programs of University of Southern California Master of Arts in Teaching (MAT@USC) and Western Governors University (WGU) and compares these systems to traditional teacher education institutions. Benefits of these programs are that they serve individuals who are older and not able to leave a job to attend a traditional university. These online programs also reach underserved populations because of the cheaper financial investment (Haynie, 2014). MAT@USC and WGU also reach populations around the world and in rural areas who are not able to attend universities because of distance. All of these reasons are valid and make a great sales pitch.

However, Darling Hammond (2010) has found the quality of teachers produced in these programs inferior to those from the traditional, sustaining systems. "The National Council on Teacher Quality gave WGU a rating of "poor" and a grade of "F" for not using a rigorous process for to select cooperating teachers" (Disrupting Teacher Education, 2013). This avenue

of teacher preparation is a trend that is growing, but not providing quality teachers that are needed to sustain the growing need for teachers in the classroom. Statistics from Texas show that there are more teachers certified from online programs than university-based; however, the rate of teacher misconduct in Texas is higher than in any other state (Lawrence Baines, Jennie Hanna, & Anastasia Wickham, 2017). Although teachers are being placed in the classrooms with a form of certification, it no longer holds the value that it once did because the system has opened the door for so many other options to be accepted as the seal of approval/certification.

The notion of "highly qualified" teachers that was introduced by the No Child Left Behind legislation of 2001 has been a term that districts and states have been grappling with ever since its inception. The thought was that students deserve the most qualified teachers possible because of the magnitude of influence a teacher has in the life of a child. A study by the Organization for Economic Cooperation and Development stated:

> of the variables which are potentially open to policy influence, factors to do with teachers and teaching are the important influences on student learning. In particular, the board consensus is that "teacher quality" is the single most important school variable influencing student achievement" (Education and Training Policy: Teachers Matter: Attracting, Developing and Retaining Effective Teachers, 2005).

Despite the importance that teacher quality has on student learning, the opinion of some is that teachers fall behind because of the training that they are receiving in university programs. In a speech at Columbia University's Teacher College, the Secretary of Education Arne Duncan said, "by almost any standard, many if not most of the nation's…schools, colleges and

departments of education are doing a mediocre job of preparing teachers for the reality of the 21st-century classroom" (Medina, 2009).

Duncan recognized that many teachers came through alternatively trained programs; however, he did not acknowledge that these inexperienced and less-prepared teachers often are working in high-need schools and leaving the field of education within a few short years (Williams, 2018). Unfortunately, a teacher in a classroom may be certified, but there is no distinction that designates their level of competence. Parents/guardians are not made aware of the qualifications of the person given the task of teaching their child. The certification system does not specify the level of expertise for teachers. Ultimately, this means that a teacher who has spent a minimum of four years in content courses, pedagogical training, weeks of observations and field experience, and has been vetted through background and disposition checks looks just as qualified as a person who received online training in as little as a few weeks, has never stepped foot inside a classroom, and has not been evaluated for dispositions that qualify them to work with children (Baines, The Teachers We Need vs. the Teachers We Have: The Realities and the Possibilities, 2010).

If more than 1 in 3 teachers are emergency-certified or alternatively-certified and do not go through university-based CAEP accredited programs, how is CAEP ensuring the quality of the teacher work force in the United States (Darling-Hammond, 2017)?

Do Institutions Benefit from the Cost and Demands of the Accreditation Process?

The cost of accreditation (also discussed in responding to question 3: WHAT ARE THE KNOWN OR POTENTIAL BURDENS OF CAEP?) is expected and budgeted into the yearly operating expenses of universities. In order to be a viable program with the credentials necessary

for federal funding and grant opportunities, teacher preparation schools prepare to incur these expenses. It is part of the business of higher education.

For example, the TEACH grant program is established at least to some degree on the basis of accreditation standing (Update on NCATE/TEAC U. S. Department of Education Recognition, May). Educator Preparation Programs know that accreditation of some kind is absolutely necessary for them to be able to function. However, the cost of accreditation continues to rise and programs are considering the value of what accreditation brings to them in light of coming trends in teacher preparation options.

Although the cost of accreditation is partially subsidized by donations from various organizations and the volunteer work of members who serve on the accreditation site visits, schools seeking accreditation are still responsible for the annual fees to the educator preparation providers (EPPs) and the actual accreditation fees/expenses (Accreditation Costs, 2018). At large, publicly funded institutions, the costs may not seem outrageous; however, at smaller, privately funded institutions, these expenses can be significant for a limited budget.

In addition to the Annual Educator Preparation Provider Fees, institutions are also responsible for hosting the CAEP Accreditation Site Visit. These visits include the visit fee of $1,980 for the 2017-2018 school year. Additionally, the EPPs must pay $825 per site visitor (minimum of five per team). This cost can vary depending on whether or not the EPP wants to handle the cost per site visitor independently instead on having the CAEP office mange this part of the visit. The EPP is also responsible for other onsite expenditures including hotel rooms, internet access, transportation, meals, computer rentals (if needed), and additional supplies that team members might need (Accreditation Costs, 2018).

Can Burdens be Minimized?

The burden of accreditation is to provide quality assurance to the federal government, students, parents, and future employers. Accreditation is a demonstration that the educator preparation program has had extensive vetting and maintained a system of training for teacher candidates that prepares them to enter the classroom as a professional that can be trusted. If teachers are trained outside of a system that has demonstrated its value through the accreditation experience, the quality of the educator should come into question. Would it be viable for other professions, such as the medical field, to ignore the standards and rigor set forth by its accreditation process? The minds of children should be no less protected than their physical bodies by exposing them to professionals who are not prepared to enter the classroom. If states and institutions walk away from accreditation standards, how can the profession be validated?

5. *IS CAEP IMPLEMENTED FAIRLY?*

As previously mentioned in the framework initially developed by Kass, the question of fairness is a key component. The Four Principles established by Thomas Beauchamp and James Childress (1979) that guide the medical field are grounded in issues of compassion and fairness. Establishing a foundation of justice in which benefits and risks are distributed and people are treated in a just manner is important. Are the benefits and risks of accreditation through CAEP fair?

In conversations with EPP deans and directors from across the country, the standard practice when calling CAEP has been to take meticulous notes with dates, times, and names. Inevitably, this documentation might be needed subsequently, as CAEP has been known to spontaneously alter its policies and requirements. CAEP's inconsistency has been so prevalent

that meticulous documentation of previous communiqués has become the norm. One dean/director said:

> At a recent CAEP conference, I asked repeatedly for an example of data that CAEP believes would satisfy that requirement [Standard 4]. I couldn't get the question answered during a session, so I had to buttonhole a presenter after a session. The only example she could give was to do a series of case studies of completers. Not only is this incredibly time intensive, this kind of study will only provide data about the completer's perceptions of their impact, not direct evidence of impact (Appendix A).

The energy needed to keep up with the ever-changing CAEP standards has been a burden for EPPs in light of the many new standards that have to be attended to. One of the survey respondents noted, "It feels like CAEP itself is working through its processes and standards as it implements the standards, which is understandable. But in a high stakes' situation, it is concerning for the participating organizations" (Appendix A).

Another issue of fairness is in the requirements of the standards themselves, particularly in Standard 3: Candidate Quality, Recruitment, and Selectivity. In 3.2, the "minimum criteria are a grade point average of 3.0 and a group average performance on nationally normed assessments or substantially equivalent state-normed assessments of mathematical, reading and writing achievement in the top 50 percent of those assessed" (CAEP Standards, 2015).

These standards have teacher educator programs across the country concerned, in particular the Historically Black College and Universities (HBCU). Dr. Barnette from Savannah State University's school of education and other HBCU deans "fear the potential consequences of such efforts (CAEP standards) may ultimately have on the continued existence of their teacher

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preparation programs and even on their institutions" (Hawkins, 2013). Concerns from these deans and directors have been so high that they have been meeting with CAEP officials regarding these new standards and concerns.

These deans "represent educator preparations programs that graduate more than 50 percent of all Black public-school teachers" (Hawkins, 2013), so their concern is significant. Dr. Tina Marshall-Bradley is a CAEP commissioner, but she also serves as a professor at Paine College. From her vantage point, she understands both sides of the issue of higher standards; however, she recognizes that CAEP is "heavily weighted with policy folks" and suggests that "it may be the reason why HBCU deans feel some of the proposed standards don't reflect the needs of their programs and what's actually happening in the field" (Hawkins, 2013). Barnette's concern regarding the higher standards is legitimate. "Do you have data to show that my 3.0 person will be a more effective teacher than my 2.5 [teacher]? Is this a research-based predictor based on a student's ability to teach?" (Hawkins, 2013). These concerns are heavy on the minds of EPPs across the country knowing that diversity and high scores are both parts of standard 3 that must be met.

Considering the research and data that is required from programs to demonstrate validity and reliability within their programs, Dr. Barnette's concerns about building a diverse teaching force are well founded. One survey respondent said of CAEP, "Their standards are based on faulty research (Standard 4.1 on value-added, which has been largely discredited) are ridiculous notions (Standard 3.1), like a Gallup poll of ordinary people who believe that people who score higher on tests make better teachers" (Appendix A).

Instability at CAEP

In March of 2015, an article appeared in *Education Week* that highlighted criticisms of the new CAEP system by the AACTE citing a "crisis of confidence" (Sawchuk, Teacher Education Group Airs Criticism of New Accreditor: Debate underscores competing visions, 2015). Some of the concerns surrounded the standards and the ambiguous and confusing language and expectations. CAEP admits that initially the handbooks explaining the new standards and regulations were late in being distributed.

"CAEP has been extremely disorganized throughout the entire process. They changed the format on us while we were in the process of submitting our report, and when you attend their meetings, you get different answers to questions", stated Michael J. Maher from North Carolina State University in Raleigh (Sawchuk, Teacher Education Group Airs Criticism of New Accreditor: Debate underscores competing visions, 2015). Even into 2018, the process has continued to shift. To alleviate the burden on EPPs, the phase-in period regarding when programs would have to provide data for their site visits has been extended to provide additional time for the programs to adapt and keep up with new demands.

CAEP is trying to assure EPPs that they are aware of concerns at the institutional level. CAEP acknowledges the anxiety regarding the new requirements and confusion that has prevailed and has attempted to address these changes in an orderly fashion. However, according to administrators of EPPs in the survey, changes have continued to happen which makes being current a challenge for the educators who are trying to adjust and keep up with the modifications (Appendix A).

Other concerns centered on "the representativeness of the CAEP governance structure" (Sawchuk, Teacher Education Group Airs Criticism of New Accreditor: Debate underscores

competing visions, 2015). With the NCATE structure that preceded CAEP, the governing body

of the organization included members from teachers' unions and the AACTE. CAEP's new

governing structure "performs its own vetting" (Sawchuk, Teacher Education Group Asserts

'Crisit of Confidence' in Accreditor, 2015). There is concern that the governing body of CAEP is

not made of up of professionals in education who are representative of the field.

The point of accreditation is that standards are set by experts who know the field best and

know how and what should be monitored because they have the knowledge to be able to speak to

what is valid. Terry Holliday, the Kentucky commissioner of education and the co-chair of the

panel that developed the CAEP standards said, "A critical piece is that the profession should

police itself, and I think that's what an accreditation process does. I'm afraid if we don't police

ourselves, someone else will do it for us, like the Department of Education. They're certainly

trying to" (Sawchuk, Teacher Education Group Asserts 'Crisit of Confidence' in Accreditor,

2015). The fear is that the mandated regulations handed down will be so far from reality that

accreditation will become out of reach. Accreditation has become inextricably tied to funding

for institutions.

One of the other issues regarding the governance structure of CAEP is with the personnel

who serve full-time. There is still a struggle in stabilizing the changes within the new CAEP

organization. The idea of CAEP was proposed in 2010 and was intended to unite NCATE and

TEAC to create a unified, stronger system that would add merit and validity to the field of

education. When this unification happened in 2013, many of the employees from these two

organizations moved over to the new accreditation system of CAEP. These were educators with

years of experience and valuable knowledge.

However, NCATE and TEAC were two entities that were not in agreement on several issues; that was why they were two different organizations. This created "internal divisions about how to interpret its more rigorous standards" (Sawchuk, Teacher-Prep Accreditation Group Seeks to Regain Traction: CAEP standards in force this fall, 2016). As a result, "CAEP has experienced high staff turnover" (Sawchuk, Teacher-Prep Accreditation Group Seeks to Regain Traction: CAEP standards in force this fall, 2016). This fluidity in personnel has resulted in a team at CAEP who is trying to determine the goals and objectives of the organization. Since the time that CAEP has been fully functioning, they have already made one significant change to one of their five standards (Sawchuk, Teacher-Prep Accreditation Group Seeks to Regain Traction: CAEP standards in force this fall, 2016). Initially, Standard 3 required that newly admitted teacher candidates would have an average GPA of 3.0; however, under the revised version, candidates have until graduation to meet the 3.0 mark (Sawchuk, Teacher-Prep Accreditation Group Seeks to Regain Traction: CAEP standards in force this fall, 2016).

This kind of instability has created another level of tension. Recall from Chapter 2 that the goal at the formation of the CAEP process was to allow for different pathways to obtain accreditation. There were even "two corresponding commissions to oversee the accreditation decisions" (Sawchuk, Teacher-Prep Accreditation Group Seeks to Regain Traction: CAEP standards in force this fall, 2016). In an effort to make all of the institutions happy, CAEP created more chaos. The new CAEP system has had a huge learning curve while developing the new process of accreditation. The plethora of inconsistencies and changes from the leadership and direction provided by CAEP has not been a system that has been fair to institutions. The constant fluctuations in pathways, procedures, and leadership have resulted in a loss of confidence in the process.

6. *HOW CAN THE BENEFITS AND BURDENS OF CAEP BE FAIRLY BALANCED?*

As the difficulties with the CAEP process have been discussed, it is easy to question whether EPPs are able to meet the standards that have been mandated when the landscape is in a constant state of fluctuation. According to the CAEP website, three institutions have received Adverse Action since 2016: West Texas A & M University has been denied accreditation; Cedarville University and Dowling College have had their accreditation revoked (Accreditation Decisions, 2018). In addition, seventeen other institutions have withdrawn from CAEP, NCATE, or TEAC accreditation (Accreditation Decisions, 2018). Most of these institutions are still affiliated with the legacy accreditors: NCATE or TEAC; however, Graceland University from Iowa left CAEP in August of 2017 and is now only state accredited (School of Education: Accreditation, 2018).

It is still being decided by many institutions and states whether or not the CAEP system is worth continuing. CAEP requirements are admirable, but costly and come at tremendous cost in terms of human time and effort. One dean/director said, "It is unethical to expect programs to demand so many detailed pieces of information when they are in jeopardy of surviving at all because of the current crisis in education" (Appendix A). Another continued with this comment,

> I do not think authoritarian demands with punitive consequences sets the tone for
> program evaluation. This process should be reflective and should treat
> participants in an equitable manner based on what data are available, geographic
> location, state contexts and policies (Appendix A).

Many benefits are provided to institutions of higher learning when they are accredited. Accreditation promotes accountability since the standards that were met to attain this status must

be maintained and improved if an institution is to retain that status. However, accreditation comes at great costs.

Table 5:

Benefits and Burdens of CAEP

Benefits	Burdens
National recognition of standard	Unstable leadership
Federal and state alignment on standards	Chaotic and changeable policy-making
Assurance of quality for prospective students/parents	Leaders who are "policy heavy" with little experience in the field
Assurance of quality for future employers	Actually works against diversifying the teaching force
Vital for graduate program entrance	Costly to maintain – annual fees, conferences, costs to track/maintain data
Sets minimum benchmark for teacher training	Unrealistic expectations in student selectivity statistics – diversity, higher student performance levels
	Unfair to smaller and historically-black institutions
	Unduly bureaucratic
	Impossible standards, such as the unrealistic expectation of continually tracking completers after leaving a preparation program

According to CAEP (2010):

> Accreditation in the United States is a means to assure and improve higher
>
> education quality, assisting institutions and programs using a set of standards
>
> developed by peers. An institution or program that has successfully completed an
>
> accreditation review has in place the needed instructional, student support and
>
> other services to assist student to achieve their educational goals. Accreditation

has helped to provide the conditions necessary for the United States to develop

diverse, flexible, robust, and often admired higher education (The Value of

Accreditation, 2010).

Currently, the burdens of CAEP accreditation seem greater than its benefits.

CHAPTER FIVE

Discussion & Conclusion

Is the Process of CAEP Accreditation Ethical?

Is the current CAEP accreditation process ethical? This study began by asking that question. According to the CAEP policy manual and other CAEP-approved documents, accreditation encourages programs to assess the work they are doing and continually monitor the quality of students. Accreditation is supposed to drive programs to push for excellence and make outcomes better. It is supposed to keep the latest research and real practice in schools at the forefront.

In considering this study, Kass' Ethical Framework was modified. The new framework was:

1. WHAT ARE THE GOALS OF RECEIVING CAEP ACCREDITATION?

2. HOW EFFECTIVE IS CAEP IN ACHIEVEING ITS STATED GOALS?

3. WHAT ARE THE KNOWN OR POTENTIAL BURDENS OF CAEP?

4. HOW CAN THE BURDENS BE MINIMIZED? ARE THERE ALTERNATIVE APPROACHES TO ACHIEVE THE SAME GOALS?

5. IS CAEP IMPLEMENTED FAIRLY?

6. HOW CAN THE BENEFIT AND BURDENS OF CAEP BE FAIRLY BALANCED?

The goal of this study was to determine whether or not the CAEP accreditation process was ethical based on this framework. Was this accreditation process doing the right thing based on what is determined the right thing to do?

A definition of ethics is "a system of accepted beliefs that control behavior, especially such a system based on morals" (Ethics, 2019). The study of ethics was undertaken by Plato,

born in 428 B.C., and his student, Aristotle, born in 384 B.C., as they explored ideas of virtue and the role of ethics in daily life. Plato's desire to climb out of an allegorical "cave" (Plato, 1908) became a symbol for education, as individuals grow and advance in knowledge and understanding.

According to Aristotle, the goals of education must include virtue as it is moral citizens who can advance civilization (Aristotle, 1984). The goal of education from these perspectives was to provide for a community that was fair and just. Ethical behavior involves knowing the right thing to do and implementing it. Aristotle also examined how to go about making decisions that are just. He recognizes that actions may be done in ignorance that result in negative consequences; however, in order to prevent these consequences, ignorance must be avoided (Aristotle, Nicomachean Ethics, 2000, p. Book III). As this applies to the CAEP standards, the intensions of accountability and professional responsibility are established; however, the burden and feasibility of these requirements on EPPs have resulted in negative consequences. Time and money spent to attend to the standards have proven to be a burden.

John Rawls (*A Theory of Justice*, 1971) used the idea of an ethical community as a lens on which to focus on fairness and how ethics should play out in society. Rawls believed that fairness should drive decisions and that a community should ensure true justice. He states his position on justice, as follows:

First Principle: Each person is to have an equal right to the most extensive total system of equal basic liberties compatible with a similar system of liberty for all.

Second Principle: Social and economic inequalities are to be arranged so that they are both: (a) to the greatest benefit of the least advantaged, consistent with the just savings principle, and (b) attached to offices and positions open to all under

conditions of fair equality of opportunity" (Rawls, A Theory of Justic, 1971, p. 266).

Not only is providing a citizenry with moral instruction important, it is also important to provide circumstances that are fair. A society that does not adapt for unfair circumstances is not just according to Rawls.

Repeatedly in this study, CAEP accreditation was found to fall short in addressing the least advantaged. The least advantaged might include poor, minority students who are unable to post sufficiently high scores on standardized tests to satisfy minimum CAEP standards. The least advantaged might include poor, struggling colleges and universities who can ill-afford the cost of accreditation, let alone the immense obligations of faculty time and effort necessary to maintain documentation of students before, during, and years after they have left their preparation programs. While some CAEP policies and the inconsistent implementation of those policies can be mildly frustrating to well-funded, research universities, they are devastating to smaller, less financially-able institutions. CAEP does not operate under "conditions of fair equality of opportunity."

John Dewey believed that responsibility of education was to become:

an embryonic community life, active with types of occupations that reflect the life of the larger society and permeated throughout with the spirit of art, history, and science. When the school introduces and trains each child of society into membership within such a little community, saturating him with the spirit of service, and providing him with instruments of effective self-direction, we shall have the deepest and best guarantee of a larger society which is worthy, lovely, and harmonious (Dewey, 1980, p. 44).

The surveys of administrators of EPPs were not all negative towards CAEP, but no one expressed that CAEP was "worthy, lovely, and harmonious." Administrators viewed CAEP, not as a helper, but as a sort of unreasonable policeman. According to administrators, oftentimes concern for the welfare for the children in the schools who were taught by teachers from CAEP-accredited institutions seemed secondary to fulfilling the latest bureaucratic mandate.

Noddings (1998) contends that a primary consideration should be a holistic concern for the humans involved. She writes,

> The criteria of judgment need not be stated as rigid or absolute principles, but they must acknowledge certain universals in the human condition. They can be stated as questions which certain kinds of answers are preferred, for example: Will this cause harm or unnecessary pain? (If so, try to avoid doing it.) Does this being need some form of care from me? (What can I reasonably do, given the demands currently existing in my network of care?) At least these questions must be asked, and it is implied in their asking that, as we use Dewey's method of deliberation, we will approve or disapprove likely consequences on the basis of avoiding harm and pain and providing care where it is needed (Noddings, 1998, p. 487).

Although the definition of ethical behavior was not specifically defined, Noddings recognizes the common sense approach to doing the right thing when it comes to working with children. However, the current CAEP system rarely asks, "does this being need some form of care from me?" CAEP's concern is not with helping, but in assessing: the verdict is either pass or fail.

Actually, much in Noddings' conceptions of ethics and working for the benefit of those entrusted to our care as educators aligns well with Nancy Kass' framework. In working in the

area of public health, Kass recognized the need for a common sense approach for assessing the ethical dimensions of health care policy. This study has used Kass' framework to do the same kind of ethical assessment for the education policies promulgated by CAEP.

As noted throughout this study, much of the frustration with the CAEP process has come from sheer confusion about the processes and documentation required. With CAEP, administrators expressed in surveys and in informal conversations that change was immediate and large scale, but that instructions were unclear, unstable, and sometimes contradictory. Understandably, after unanswered questions and multiple revisions, EPPs became skeptical over time (Sawchuk, Teacher Education Group Asserts 'Crisit of Confidence' in Accreditor, 2015).

The new version of the *CAEP Handbook* (2018) does address some concerns regarding issues that have come to the surface. However, because of CAEP's short existence, the issuance of an updated handbook almost immediately on the heels of the release of the initial version has been troubling.

Although the need for accreditation seems valid, the new CAEP accreditation imposes unrealistic demands. The complications with Standard 4, determining the impact of new teachers in the field within their first years of teaching, is at best, an inexact and complicated science. In a document entitled "When States Provide Limited Data: Guidance on Using Standard 4 to Drive Program Improvement," CAEP acknowledges that this standard is a "challenge" for states and EPPs (When State Provide Limited Data: Guidance on Using Standard 4 to Drive Program Improvement, 2016).

CAEP acknowledges issues with privacy and limited access to data and suggests the EPPs have their completers "blog, participate in focus groups, or reflect on student progress in a journal" (When State Provide Limited Data: Guidance on Using Standard 4 to Drive Program

Improvement, 2016). Case studies have also been suggested and are reportedly being used by

EPPs to provide data required to meet this standard. The time and effort required by EPPs to

find ways to obtain detailed, accurate data for reporting purposes has been significant, and at this

point, it is not evident that the data will even prove useful.

Is it Possible to Take the CAEP Accreditation Aystem, Fraught with Inconsistencies,

and Make it Viable for EPPs to Better Serve Students?

The spring CAEP Conference, held in Kansas City in 2018, was a turning point according

to some administrators. One EPP director who had been attending CAEP-endorsed conferences

since CAEP came into existence, noted that she thought, after many missteps, CAEP was finally

moving the in the right direction. Indeed, on the positive side, CAEP has finally updated

resources on the website, created webinars, and posted presentations. Recently, they have

eliminated a few previous contradictions, which have momentarily placated some EPPs.

However, from survey results and in conversations with EPP deans and directors, it appears that

EPPs are also considering the implications of a move away from CAEP. AAQEP, the alternative

accrediting body recently formed, already has attracted many institutions.

Limitations

While this study contributed to the understanding of ethical issues in the CAEP

accreditation process, there were limitations. Because I approached this study from my personal

experience, I might consider the CAEP accreditation process from a biased position. My vantage

point of fifteen years as an administrator for an EPP has provided me with firsthand frustrations

with the process. This includes transitioning from NCATE to CAEP, trying to understand new

standards, and adjusting program criteria and expectations to keep up with the new demands.

A second limitation with the study is the framework to address the ethical issues of CAEP. Since the ethical framework of Kass was originally designed to assess the moral dimensions of health policy, it is not specifically in line with education per se. Although there is much overlap between health and education, Kass' framework has not previously been used to assess the moral dimensions of education policy.

This study is also limited by my limited perspective on accreditation because it has been limited geographically by considering only the state of Oklahoma. Another limitation related to the location of this study has been with my personal experience. Since my experience has been from the perspective of someone working in a smaller, private college, I have considered the process of working with CAEP from a different vantage point than someone working in a R1 public university. Although we are faced with the same changes in the transition from NCATE to CAEP, our circumstances derive from different institutional frameworks.

An additional limitation to this study was discovered after the survey results were collected. When the survey questions were determined, the goal was to remain as unbiased in the questions as possible to try to ensure responses that had not been led in one direction or another. Although the attempt was to gather information that was not pushed towards specific kinds of responses, the parameters for what was meant by "ethical considerations" was left undefined. The result was confusion and a wide variance of responses that could have been more specifically addressed to the questions being asked.

Recommendations for Future Research

Future research should examine the teachers who have gone through a traditional teacher preparation program and those who have entered the classroom through alternative routes. This data will be difficult to obtain since licenses of teachers do not indicate the route taken to enter

the classroom as a teacher. This information would be of value when considering the validity of the CAEP accreditation process and the quality of teachers who receive training through an EPP with CAEP accreditation in comparison to teachers who have not gone through the stringent requirements. It would also be worth evaluating the process of CAEP in other states where access to data on completers in teacher education programs might be easier to obtain thereby simplifying the process of gaining some of the necessary information.

Reflection

Education is in a difficult place. Across the country, reports of teacher shortages are frequently in the headlines. The Department of Education defines teacher shortages as:

1. Teaching positions that are unfilled

2. Teaching positions that are filled by teachers who are certified by irregular, provisional, temporary, or emergency certification

3. Teaching positions that are filled by teachers who are certified, but who are teaching in academic subject areas other than their area of preparation (Teacher Shortage Areas, May).

The Teacher Shortage Areas Nationwide Listing report listed a litany of states with teacher shortages (Teacher Shortage Areas Nationwide Listing for 1990-1991 through 2017-2018, 2017). Many factors perpetuate the teacher shortage: a growing student population, reinstating programs that were cut/reduced during the Great Recession, and huge numbers of teachers leaving the profession (Leib Sutcher, Linda Darling-Hammond, Desiree Carver-Thomas, 2016). "The supply of new teachers is atypically low and has been declining" (Leib Sutcher, Linda Darling-Hammond, Desiree Carver-Thomas, 2016).

Because of the dire shortages across the country, many states have moved to change requirements for becoming a teacher in hopes of attracting people to the field. For example, "In Minnesota, under the new structure aspiring career and technical education, teachers no long need a bachelor's degree to get a teaching license" (Quinton, 2017). The shortage is so acute that legislatures realize that "we risk providing our students with educators who are inadequately prepared" (Quinton, 2017). However, the desperate situation has resulted in desperate measures.

Not only are potential students not entering the profession, the current teacher pool is waning. "Compared to high-achieving jurisdictions like Finland, Singapore, and Ontario, Canada – where only about 3-4% of teachers leave in a given year – U.S. attrition rates are quite high, and are much higher for beginners and teachers in high-poverty schools and districts" (Leib Sutcher, Linda Darling-Hammond, Desiree Carver-Thomas, 2016).

Recall Ayers' estimate that 50% of teacher education graduates leave the profession within five years (Ayers, 2016). Although some of the flight by teachers is accounted for by retirement, "teachers with little preparation tend to leave at rates two to three times as high as those who have had a comprehensive preparation before they enter" (Leib Sutcher, Linda Darling-Hammond, Desiree Carver-Thomas, 2016). In my own experience as a director of an EPP, I have had students leave the program telling me that their parents would not help pay for their education if they stayed in the field of education. Other options that make entering teaching quick and easy make requiring the expenditures of thousands of dollars questionable on economic grounds, if not moral grounds. Is it ethical to encourage prospective teachers to take on hundreds of thousands of dollars of student debt to be educated for a job in which a $50 check would give them the same rights as an emergency-certified teacher?

According to the Council for Higher Education Accreditation, accreditation "is both a process and a status" (The Value of Accreditation, 2010). The process shows that the program meets standards that have been evaluated and approved through a rigorous process of examination. The status is that the program is verified and can be trusted. This practice of accreditation applies to several areas including medicine, law, and engineering. "In a number of fields, especially health professions, graduation from an accredited program is a requirement for receiving a license to practice" (The Value of Accreditation, 2010). In education, the requirment of graduation from an accredited program is no longer needed to obtain teacher certification. So, while CAEP ramps up standards into the stratosphere, prospective teachers are increasingly bypassing institutions of higher education completely.

Dana Goldstein paints a picture of this scenario in her book, *The Teacher Wars: A History of America's Most Embattled Profession*:

> I suspected that the key to understanding the American view of teachers lay in our history, and perhaps had something to do with the tension between our sky-high hopes for public education as the vehicle of meritocracy and our perennial unwillingness to fully invest in our public sector, teachers and schools included. For two hundred years, the American public has asked teachers to close troubling social gaps – between Catholics and Protestants; new immigrants and the American mainstream; black and whites; poor and rich. Yet every new era of education reform has been characterized by a political and media war on the existing teacher upon whom we rely to do this difficult work, often in the absence of the social supports for families that make teaching and learning most effective

for kids, like stable jobs and affordable housing, child care, and health care

(Goldstein, 2014, p. 152).

In conclusion, the current study considered the ethics of the CAEP accreditation process.

Accreditation is a necessity for institutions of higher learning and educator preparation programs.

However, the CAEP accreditation system in the United States has been a burden to the

institutions who are trying to comply with its criteria.

Rawls (*A Theory of Justice*, 1971) proposed a society based on justice and fairness.

Unfortunately, educator preparations programs are not being treating fairly and neither are their

students.

In my fifteen years of experience in higher education, specifically in the area of teacher

preparation, I have often wondered, "Can the benefits and burdens of the CAEP accreditation

process be fairly balanced?"

The cost of college tuition for teacher candidates is expensive, especially knowing the

low wages they will receive when they have completed their educator preparation. This is a

burden that for some students cannot be justified.

The instability of the CAEP organization has continued to bring confusion and concern

from the institutions it serves and represents. As a result, the numbers of institutions leaving

CAEP and moving to other accreditation organizations is growing (Member List, 2019). The

cost of CAEP accreditation incurred by institutions of higher education does not seem worth the

limited support received in return.

Ultimately, in creating a meticulous bureaucracy with a focus on academic performance,

perhaps CAEP has lost sight of a fundamental facet of education – that of care and equal

opportunity for children and institutions. The CAEP system, fraught with inconsistencies, unrealistic demands, and high costs is the only option for education accreditation in Oklahoma.

CAEP, with its good intentions of establishing an accreditation system that professionalizes education and sets goals to challenge and keep EPPs accountable, seems to have lost perspective on the ethical component of doing the right thing. Demanding processes that put undue burdens on institutions all for the sake of meeting a requirement instead of sufficiently evaluating the work that is being done is not right. The process is not fair to institutions because of size, costs, and unrealistic demands. In turn, the process is not fair to teacher candidates because focus is wrongly placed on bureaucratic standards instead of on the business of producing skilled teachers.

Looking back at Aristotle, it is worth considering what he might think of the accreditation system established by CAEP. Aristotle believed that the life well-lived depended on approaching choices and actions from a virtuous perspective. Doing the right thing for the right reason was the driving force behind his philosophy. The ideal of accreditation is to recognize and endorse institutions that have made ethical choices to do the right thing for teacher candidates and, in turn, students in P-12 classrooms.

As the survey results confirm, deans and directors from EPPs in Oklahoma believe that CAEP has good intentions and wants to provide an accreditation system that measures not only university teacher education programs, but also the product of the teacher candidates that complete these programs. However, good the intentions may be, some of the standards in CAEP are not reasonable for programs in Oklahoma. These standards, Standard 4 in particular, have been created based on an ideal that would provide very valuable information to EPPs; however, the information is in many cases not attainable. When programs need to assess the impact of

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their completers but are unable to retrieve this information, the data that is collected is many times sparse and not an accurate picture of true impact. CAEP may not have been aware of the inability to collect the information needed to meet this standard because of ignorance to the logistical issues that are woven into this component. However, Aristotle would say that ignorance must be avoided as much as possible.

This study focused on the question of CAEP being an ethical process through the lens of Kass' modified Ethical Framework. Although the goal of achieving CAEP accreditation is validated because of the need for accountability, CAEP has yet to prove that it has been able to achieve its stated goals. The question of CAEP's fairness in the standards and expectations for differing institutions has not shown to be fair. The burdens of cost, both financially and in faculty workload, do not balance the burdens that EPPs face. Even though it is the only option, it is not an ethical option because the burdens required through CAEP are not worth the benefit it provides.

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APPENDICES

Appendix A

Qualtrics Survey and Responses

Q1 - Tell me about your experiences with CAEP.

Tell me about your experiences with CAEP.

I am in my first year as Director of Teacher Education, so I have had an enormous learning curve in respect to CAEP. I have found the CAEP persons with whom I have dealt to be professional and knowledgeable. However, getting timely and clear answers has, at times, been problematic.

Personally, I was part of NCATE's Clinical Practice Alliance which was taken over by CAEP right as it first formed. It gave me some insight into their initial operations.

CAEP is complicated. As with any change in standards and processes, there is a learning curve and growing pains. The change from NCATE standards to CAEP in some ways was facilitated as many NCATE elements could be reorganized to meet CAEP standards. However, CAEP includes numerous required elements that are not easy (or maybe even possible) to do well. While good faith efforts were recognized when programs were reviewed for NCATE standards, I'm not certain that they will be for CAEP. There's the rub. CAEP's standards are reasonable, but some of the required elements are not. Some states, including Oklahoma, do not have mechanisms in place to provide reliable and relevant longitudinal data. Thus, state EPPs are left to find creative ways to evidence elements such as impact on student learning and the ability of completers to reach career milestones. While I agree that completer outcomes are important pieces of data, if the evidence is not identified and gathered in a reliable way (e.g., piecemeal processes, selective samples), then I'm not sure it has value. So,

our hand-selected completers are doing well? That should be no surprise--just a great deal of extra work. Additionally, data like impact on student learning may vary greatly by numerous extrinsic factors. While we can learn from looking at these data, the potential variance leaves us to make general assumptions and to guess at contextual factors. Personally, I like clear expectations and processes. Some of the standards can be met straightforwardly with trustworthy data. Other elements--including those that are required--leave me questioning validity, reliability, value, purpose, etc. [I apologize if this response is not coherent. The text box is not expanding, and I can only see the last three or four words I have written while I am writing.]

They have been primarily negative. Compliance with CAEP requirements has taken time and resources away from advancing our educator preparation program in ways that are valued locally. the top-down insistence on compliance undermines intrinsic motivation toward continual improvement. I feel that the CAEP Standards and expectations have been a moving target since their introduction, though changes are becoming less frequent.

We are in the middle of the CAEP accreditation process. We submitted and received feedback on our Self-Study Report, and are preparing our Formative Feedback Report Addendum.

CAEP is very overwhelming. The rubrics and information was changing as I wrote our SSR. There is also little help with program reviews.

I have been trained as a CAEP reviewer but have not yet served on as a reviewer for an institution.

I served as a CAEP national site visit for three years. I have written a CAEP self-study for our institution as well.

My experiences have been mostly confusing and frustrating.

We had a program that had been denied National Recognition with the claims that assessment submitted were not aligned to the ELCC Standards. It took a number of phone calls and emails, but we finally convinced CAEP to assign a new team of reviewers who agreed with our position. The slowness of the process was frustrating, but we were gratified to get our status corrected. Overall, I have found the people to be helpful. I find the standards onerous in some areas

This past Spring (2018), our EPP had its site visit. Overall, we had a very positive visit with a great visiting team. This is my 3rd NCATE/CAEP visit here. It is a massive amount of work to prepare for these visits. 90% of my time last year (2017-18) was spent in preparing for our site visit. I have found the CAEP staff (in Washington) has been very helpful and quick to respond whenever I had an inquiry or issue. I have been on multiple BOE teams for other institutions.

It has been a challenge to implement and attempt to meet some of CAEP's standards as compared to NCATE's. In particular, gathering completer data has been quite a task since my state does not have a robust longitudinal data system. I often use the term, "fishing for data" because I have to track down completers and ask for them to share student-growth data with me. Another difficult task has been the verification of assessment instruments for validity

and reliability. It takes quite a bit of time and effort to show that our many assessment instruments are CAEP-worthy.

We had an onsite visit April, 2018

I am a state level site visitor for CAEP. I have coordinated or co-coordinated four CAEP visits at my institution.

The institution just received 5-year accreditation via NCATE. The institution is in the beginning stages of training on CAEP and modifying assessments to meet the new standards.

We have submitted our annual report over the four impact and four outcome measures. We just finished our NCATE legacy visits.

Q2 - What are good aspects of CAEP?

What are good aspects of CAEP?

CAEP forces an organization to constantly collect meaningful data to make defensible and ethical decisions about its programs.

National accreditation is a good thing for our profession

I believe the CAEP standards are reasonable and relevant at the standard level. I'm not convinced about the value of all standard components, especially those for which data are not reliable.

I have no problem with accountability. to the extent that CAEP makes meaningful progress on measuring EPP effectiveness in a justifiable way, that would be beneficial.

The self-study helped us identify our strengths and weaknesses. Our assessment instruments are much stronger due to the requirements.

A national org to check on standards.

The standards that CAEP sets for EPPs are high and make sure that the profession is taken seriously; however, the standards may be unrealistic.

The emphasis on continuous improvement and quality assurance is positive. The emphasis on dispositions and measuring them is another positive change from previous accreditation standards.

We need an accrediting body to demonstrate the value of teacher education.

CAEP requires accountability and constant review of your programs which makes complacency difficult if not impossible if you want to maintain accreditation.

Rigorous standards.

I appreciate CAEP's efforts to ensure Schools of Education are preparing effective teachers. I also appreciate the support documents and webinars. Furthermore, the staff is generally quick in responding to my emails.

It is very thorough and detailed. It moves expectations to a higher level.

Consistency of standards. Most of the standards are research-based.

CAEP is very detailed with expectations. It leaves little room for interpretation of expectations.

CAEP does require EPP's to analyze our data and operations in meaningful ways.

Q3 - What do you dislike most about CAEP?

What do you dislike most about CAEP?

There are two things I dislike most about CAEP. First and foremost, the amount of data we have to collect is beyond onerous. We are in the business of preparing educators; we are not data processing companies. Second, some of the CAEP requirements run counter to what the best research actually tells us. The best example of this is the requirement to provide evidence of our completers on PK-12 student learning. At a recent CAEP conference, I asked repeatedly for examples of data CAEP believes would satisfy that requirement. I couldn't get the question answered during a session, so I had to buttonhole a presenter after a session. The only example she could give was to do a series of case studies of our completers. Not only is this incredibly time intensive, this kind of study will only provide data about the completer's perceptions of their impact, not direct evidence of impact.

Their standards are based on faulty research (4.1 on value-added which has been largely discredited) or on ridiculous notions (3.1 a Gallup poll of ordinary people believe that smarter people make better teachers). I fear that as CAEP has become normalized, no one looks at the original rationales for the standards that they provided.

There are several things. It seemed to me when CAEP first emerged that the tone was assertive and punitive. This tone was reflected through consequential language and through demands that seemed to be influenced by politics rather than by program evaluation and research. When the standards and expectations were released and initially implemented, CAEP claimed that the Council itself would practice this program evaluation process. It has

not. It has also provided conflicting information, unreliable information during trainings, ill-informed or unprepared presenters, lots of talks about the standards and few helpful strategies and examples, etc. Truly, it has embodied the persona of an authoritarian regulator rather than, maybe my perception only, a more authoritative leader/Council as was provided by NCATE. I've attended several CAEP trainings and have had disappointing experiences at each. I've stopped attending because the cost is expensive and the presentations are not valuable. The information from one session to the next is unreliable. It's sad that conference participants record comments by video or ask for what is being said in writing because so many have lost trust in CAEP's presenters and leaders. Additionally, CAEP presenters are incredibly defensive and sometimes combative. Several years ago, I witnessed a scene close to a rebellion when a presenter would not answer direct questions, instead repeating, "what do you think you could do?" At one point the one asking the question stated that she didn't know. That's why she paid the $700 to attend! I have little confidence in CAEP's leadership, reliability, and quite honestly value. That's coming from someone who embraces accreditation and appropriate accountability. CAEP is expensive, unresponsive, and in my opinion, unsatisfactory.

The reporting demands feel excessive in a climate where everyone is "doing more with less". The reporting expectations re: program completes are particularly problematic in State that have no longitudinal data system.

It was frustrating that there was a lack of consistency, especially 3-4 years ago, in the CAEP staff's interpretations of the standards. It seems to be better now.

The ever-changing policies. Rolling out policies and procedure before final accepts are figured out.

The demands made by CAEP are out of reach for EPPs that are already stretched with too many items to attend to. This is especially true when the climate in education does not value the rigor that is established in professional teaching education programs. People are certified and teaching children who do not have to adhere to the rigor demanded by CAEP.

The juxtaposition of raising the standards for admission and completion with the national climate to let anyone teach. In Oklahoma in particular, this is particularly disturbing. We are held to such a high standard while emergency certified teachers need literally no training or experience to work as teachers. It is unfair to ask us to meet such stringent requirements in this environment. Ideally, all would have to meet the same requirements. I also personally have received mis-information several times which was detrimental to our program. Different CAEP VPs have told me different things at different times and having it in writing has not mattered. Ultimately, the transition to CAEP has been very, very messy.

I dislike the cost and the lack of clarity in the process. It seems at times that standards and processes are set for an outside audience rather than to challenge and support teacher education programs. I am also concerned that CAEP has conferences, called CAEP CONs (!) that cost too much for the information provided. Why should it take this much explaining to follow the guidelines?

The enormous amount of paperwork.

We are a small institution and the multiple standards and requirements are generally very difficult and time-consuming for us. We have a very small faculty and the work required to adhere to CAEP standards, and to be careful to follow guidelines, deadlines and requirements, is quite problematic for us. In the transition from NCATE/TEAC to CAEP, I was under the impression that it would be a "kinder, gentler" organization. I have found that it is still very demanding and problematic to maneuver.

The standards to too stringent, especially standard four. If EPPs can show their candidates are effective teachers using multiple instruments and feedback from supervisors, why must we work so hard to prove our completers can do the same. Similarly, the SPA reporting program is WAY TOO cumbersome.

With a new organization and expectations, it was intimidating and confusing as to level of expectations. It felt like CAEP itself is working through its processes and standards as it implements the standards, which is understandable, but in a high stakes situation it is concerning for the participating organization

Some standards are difficult for small programs and we have several in Oklahoma. Using the ACT score as a measure--Yes, Oklahoma is allowed to use the OGET which is good, but to even include the ACT score in the standards was a poor choice. Their request to keep obtain teacher evaluation information on graduates.--We are small and able to do so, but I can't even imagine large programs trying to do this effectively. SPA standards and reviews are getting out of hand.--To have to resubmit two and three times indicates we are not training well or standards are applied inconsistently. CAEP is expensive.

Some of the expectations for EPP assessments seem a bit unrealistic. For example, EPPs must

rely heavily on PK-12 schools accurately reporting data on EPP program completers. I've

learned that this is not always the case with First Year data I received in July 2018. The EPP

graduates claimed they never received a mentor teacher while the FY Administrator Survey

was completed by "mentors" who didn't even know the candidates' correct names.

CAEP does not consider the scope of EPP's in terms of size and admission statuses and have

almost regulated providers out of business.

Q4 - Is CAEP an ethical process? Why or why not?

Is CAEP an ethical process? Why or why not?

Because of the requirement to provide evidence of completers' impact on PK-12 student learning, I don't think CAEP is an entirely ethical process.

Ethically I feel like CAEP's problems are more in terms of their expectations than the actual process of accreditation. First, the expectations are ever-changing and information is doled out on a one-on-one basis. Related to that, it seems that the standards and expectations have been designed for one particular type of EPP without much regard for diversity in terms of EPP (R1 vs. regional vs. small private) and of student body (everyone must have a plan for recruitment of diverse populations -- even the HBCUs).

No, I do not think authoritarian demands with punitive consequences sets the tone for program evaluation. This process should be reflective and should treat participants in an equitable manner based on what data are available, geographic locations, state contexts and policies, etc. I do think we can all manage to find a way through the CAEP review process and some program review pieces are valuable. Most of these were those associated with NCATE, however.

I don't know what this means outside of a particular context. Ethical in its intentions? its effects? its philosophy? its practices?

I'm not sure what you mean. I suppose my answer is yes.

Not ethical. CAEP does not hold itself to the standard EPPs must meet with deadlines and explaining information. CAEP seems to have a plan to fail EPPs. There seems to be a NRT and

CRT look on things. CAEP changes things during visits and during writing of SSR. I am not

sure that CAEP rubrics would pass their rubric on rubrics. CAEP does not understand small

EPPs. CAEP standard 3 violates the CAEP diversity standard in terms of standardized tests.

No, not in the current climate. It is unethical to expect programs to demand so many

detailed pieces of information when they are in jeopardy of surviving at all because of the

current crisis in education.

I am not sure what you mean by this question. CAEP is not a process but a set of standards.

Are the standards ethical? I don't see why they are not.

I think it is basically an ethical process, because the site visitors make it so. I think the

conferences put on by CAEP are not ethical, however, because we pay to attend so we can try

to figure out the details that ought to be clear.

For the most part, yes. A few of the CAEP requirements, most notably the attempt to

attribute an institution's candidate as the direct cause of changes in student learning runs

counter to the research. There are too many other factors that affect student learning for

CAEP's attempts to connect candidate performance with changes in student learning to be

valid.

Not quite sure I understand the question here, but I would say overall "yes"...at least in our

EPP, we try to be authentic and genuine in our data collection and in our reporting. I have

found colleagues at other EPP's to be quite transparent and helpful in working together. I am

not sure this relates to the question, but I have found myself feeling guilty in spending so

much time on CAEP and other standards/requirements, and not enough time on my students and on the cultivation of new programs, etc.

Yes, it is ethical. Their goals seem truthful, and the staff displays integrity. If I had a suspicion of unethical practice, I would certainly call them on it.

I believe it is ethical. The expectations, particularly Standard 4 which requires EPP's to report back on the effectiveness of its completers, poses EPP's confidentiality issues when we are tracking their evaluations and test scores.

I believe the CAEP process is ethical because the process utilizes rubrics that have passed reliability and validity studies. Site visitors are carefully screened and are evaluated at the end of each visit.

I think the basic premise of CAEP is logical; however, it seems to have morphed into a dictatorship of EPP expectations that are not realistic or beneficial to candidates.

CAEP is ethical, but not practical for all providers.

Q5 - Consent to Participate in Research at the University of Oklahoma [OU-NC IRB Number: 9506
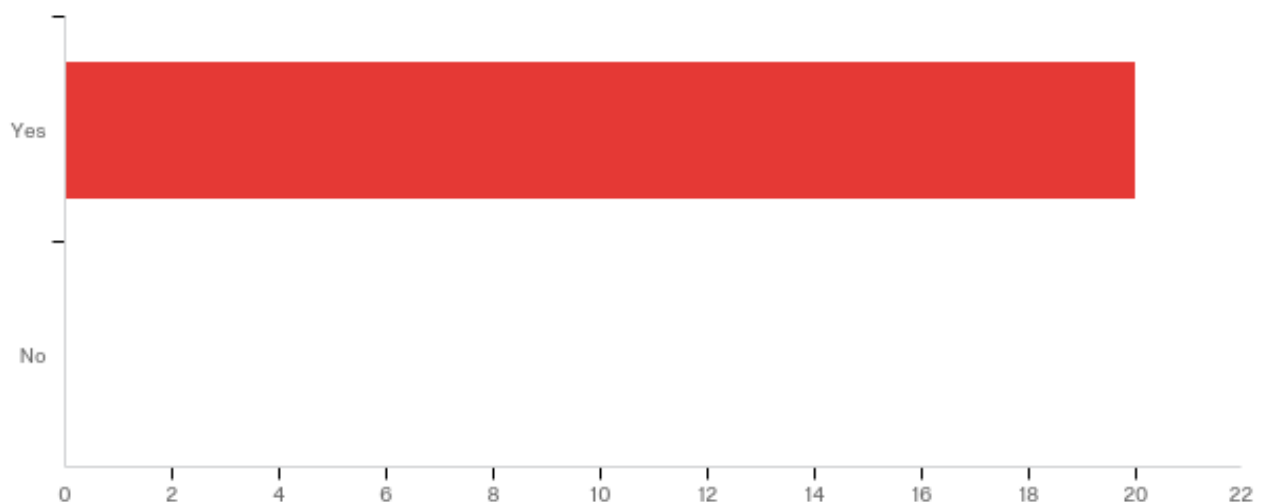
#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Consent to Participate in Research at the University of Oklahoma[OU-NC IRB Number: 9506	1.00	1.00	1.00	0.00	0.00	20

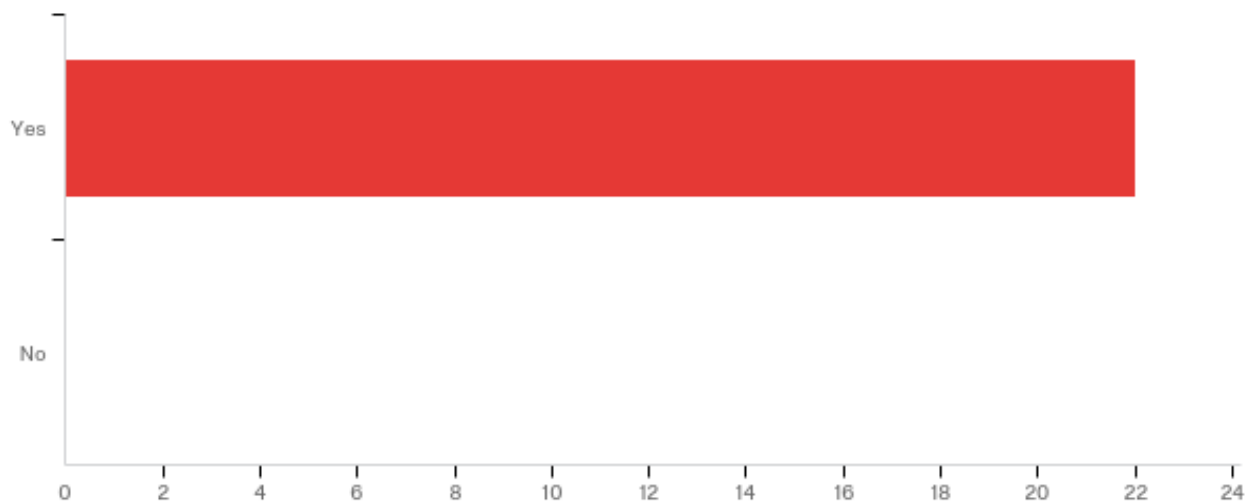| #	Answer	%	Count
1	Yes	100.00%	20
2	No	0.00%	0
	Total	100%	20

Q6 - Are you a dean or director of an Educator Preparation Program?
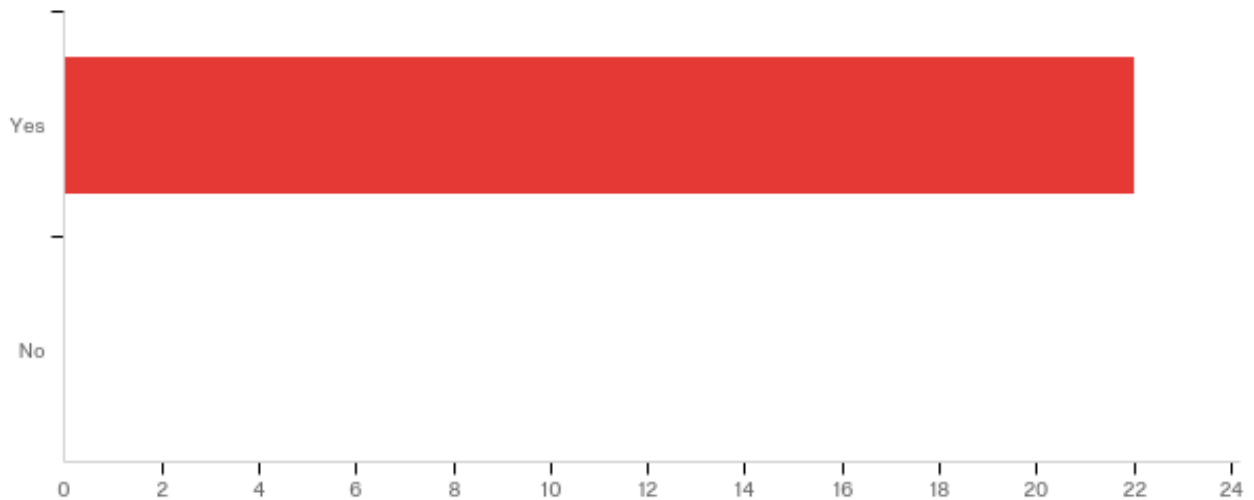
#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Are you a dean or director of an Educator Preparation Program?	11.00	11.00	11.00	0.00	0.00	22

#	Answer	%	Count
11	Yes	100.00%	22
12	No	0.00%	0
	Total	100%	22

Q7 - Are you 18 years of age or older?

#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Are you 18 years of age or older?	1.00	1.00	1.00	0.00	0.00	22

#	Answer	%	Count
1	Yes	100.00%	22
2	No	0.00%	0
	Total	100%	22

Appendix B

2013 CAEP Standards excellence in educator preparation

Standard 1. Content and Pedagogical Knowledge The provider ensures that candidates develop a deep understanding of the critical concepts and principles of their discipline and, by completion, are able to use discipline-specific practices flexibly to advance the learning of all students toward attainment of college- and career-readiness standards.

Candidate Knowledge, Skills, and Professional Dispositions

> 1.1 Candidates demonstrate an understanding of the 10 InTASC standards at the appropriate progression level(s) in the following categories: the learner and learning; content; instructional practice; and professional responsibility.

Provider Responsibilities:

> 1.2 Providers ensure that candidates use research and evidence to develop an understanding of the teaching profession and use both to measure their P-12 students' progress and their own professional practice.

> 1.3 Providers ensure that candidates apply content and pedagogical knowledge as reflected in outcome assessments in response to standards of Specialized Professional Associations (SPA), the National Board for Professional Teaching Standards (NBPTS), states, or other accrediting bodies (e.g., National Association of Schools of Music – NASM).

> 1.4 Providers ensure that candidates demonstrate skills and commitment that afford all P-12 students access to rigorous college- and career-ready standards (e.g., Next Generation Science Standards, National Career Readiness Certificate, Common Core State Standards).

> 1.5 Providers ensure that candidates model and apply technology standards as they design, implement and assess learning experiences to engage students and improve learning; and enrich professional practice.

Standard 2. Clinical Partnerships and Practice The provider ensures that effective partnerships and high-quality clinical practice are central to preparation so that candidates develop the knowledge, skills, and professional dispositions necessary to demonstrate positive impact on all P-12 students' learning and development.

Partnerships for Clinical Preparation:

> 1.1 Partners co-construct mutually beneficial P-12 school and community arrangements, including technology-based collaborations, for clinical preparation and share responsibility for continuous improvement of candidate preparation. Partnerships for clinical preparation can follow a range of forms, participants, and functions. They

establish mutually agreeable expectations for candidate entry, preparation, and exit; ensure that theory and practice are linked; maintain coherence across clinical and academic components of preparation; and share accountability for candidate outcomes.

Clinical Educators:

1.2 Partners co-select, prepare, evaluate, support, and retain high-quality clinical educators, both provider- and school-based, who demonstrate a positive impact on candidates' development and P-12 student learning and development. In collaboration with their partners, providers use multiple indicators and appropriate technology-based applications to establish, maintain, and refine criteria for selection, professional development, performance evaluation, continuous improvement, and retention of clinical educators in all clinical placement settings.

Clinical Experiences:

1.3 The provider works with partners to design clinical experiences of sufficient depth, breadth, diversity, coherence, and duration to ensure that candidates demonstrate their developing effectiveness and positive impact on all students' learning and development. Clinical experiences, including technology-enhanced learning opportunities, are structured to have multiple performance-based assessments at key points within the program to demonstrate candidates' development of the knowledge, skills, and professional dispositions, as delineated in Standard 1, that are associated with a positive impact on the learning and development of all P-12 students.

Standard 3. Candidate Quality, Recruitment, and Selectivity The provider demonstrates that the quality of candidates is a continuing and purposeful part of its responsibility from recruitment, at admission, through the progression of courses and clinical experiences, and to decisions that completers are prepared to teach effectively and are recommended for certification. The provider demonstrates that development of candidate quality is the goal of educator preparation in all phases of the program. This process is ultimately determined by a program's meeting of Standard 4.

Plan for Recruitment of Diverse Candidates who Meet Employment Needs:

3.1 The provider presents plans and goals to recruit and support completion of high-quality candidates from a broad range of backgrounds and diverse populations to accomplish their mission. The admitted pool of candidates reflects the diversity of America's P-12 students. The provider demonstrates efforts to know and address community, state, national, regional, or local needs for hard-to-staff schools and shortage fields, currently, STEM, English-language learning, and students with disabilities.

Candidates Demonstrate Academic Achievement:

3.2 The provider meets CAEP minimum criteria or the state's minimum criteria for academic achievement, whichever are higher, and gathers disaggregated data on the enrolled candidates whose preparation begins during an academic year.

The CAEP minimum criteria are a grade point average of 3.0 and a group average performance on nationally normed assessments or substantially equivalent state normed assessments of mathematical, reading and writing achievement in the top 50 percent of those assessed. An EPP may develop and use a valid and reliable substantially equivalent alternative assessment of academic achievement. The 50th percentile standard for writing will be implemented in 2021. As an alternative to cohort average performance on a nationally- or state-normed writing assessment, the EPP may present evidence of candidates' performance levels on writing tasks similar to those required of practicing educators.

Starting in academic year 2016-2017, the CAEP minimum criteria apply to the group average of enrolled candidates whose preparation begins during an academic year. The provider determines whether the CAEP minimum criteria will be measured (1) at admissions, OR (2) at some other time prior to candidate completion.

In all cases, EPPs must demonstrate academic quality for the group average of each year's enrolled candidates. In addition, EPPs must continuously monitor disaggregated evidence of academic quality for each branch campus (if any), mode of delivery, and individual preparation programs, identifying differences, trends and patterns that should be addressed under component 3.1, Plan for recruitment of diverse candidates who meet employment needs.

CAEP will work with states and providers to designate, and will periodically publish, appropriate "top 50 percent" proficiency scores on a range of nationally or state normed assessments and other substantially equivalent academic achievement measures, with advice from an expert panel.

Alternative arrangements for meeting the purposes of this component will be approved only under special circumstances and in collaboration with one or more states. The CAEP President will report to the Board and the public annually on actions taken under this provision.

Additional Selectivity Factors:

3.3 Educator preparation providers establish and monitor attributes and dispositions beyond academic ability that candidates must demonstrate at admissions and

during the program. The provider selects criteria, describes the measures used and evidence of the reliability and validity of those measures, and reports data that show how the academic and non-academic factors predict candidate performance in the program and effective teaching.

Selectivity During Preparation:

3.4 The provider creates criteria for program progression and monitors candidates' advancement from admissions through completion. All candidates demonstrate the ability to teach to college- and career-ready standards. Providers present multiple forms of evidence to indicate candidates' developing content knowledge, pedagogical content knowledge, pedagogical skills, and the integration of technology in all of these domains.

Selection At Completion:

3.5 Before the provider recommends any completing candidate for licensure or certification, it documents that the candidate has reached a high standard for content knowledge in the fields where certification is sought and can teach effectively with positive impacts on P-12 student learning and development.

3.6 Before the provider recommends any completing candidate for licensure or certification, it documents that the candidate understands the expectations of the profession, including codes of ethics, professional standards of practice, and relevant laws and policies. CAEP monitors the development of measures that assess candidates' success and revises standards in light of new results.

Standard 4. Program Impact The provider demonstrates the impact of its completers on P-12 student learning and development, classroom instruction, and schools, and the satisfaction of its completers with the relevance and effectiveness of their preparation. Impact on P-12

Student Learning and Development:

4.1 The provider documents, using multiple measures that program completers contribute to an expected level of student-learning growth. Multiple measures shall include all available growth measures (including value-added measures, student-growth percentiles, and student learning and development objectives) required by the state for its teachers and available to educator preparation providers, other state-supported P-12 impact measures, and any other measures employed by the provider.

Indicators of Teaching Effectiveness:

4.2 The provider demonstrates, through structured validated observation instruments and/or student surveys, that completers effectively apply the professional knowledge, skills, and dispositions that the preparation experiences were designed to achieve.

Satisfaction of Employers:

4.3. The provider demonstrates, using measures that result in valid and reliable data and including employment milestones such as promotion and retention, that employers are satisfied with the completers' preparation for their assigned responsibilities in working with P-12 students.

Satisfaction of Completers:

4.4 The provider demonstrates, using measures that result in valid and reliable data, that program completers perceive their preparation as relevant to the responsibilities they confront on the job, and that the preparation was effective.

Standard 5. Provider Quality Assurance and Continuous Improvement The provider maintains a quality assurance system comprised of valid data from multiple measures, including evidence of candidates' and completers' positive impact on P-12 student learning and development. The provider supports continuous improvement that is sustained and evidence-based, and that evaluates the effectiveness of its completers. The provider uses the results of inquiry and data collection to establish priorities, enhance program elements and capacity, and test innovations to improve completers' impact on P-12 student learning and development.

Quality and Strategic Evaluation:

5.1 The provider's quality assurance system is comprised of multiple measures that can monitor candidate progress, completer achievements, and provider operational effectiveness. Evidence demonstrates that the provider satisfies all CAEP standards.

5.2 The provider's quality assurance system relies on relevant, verifiable, representative, cumulative and actionable measures, and produces empirical evidence that interpretations of data are valid and consistent.

Continuous Improvement:

5.3. The provider regularly and systematically assesses performance against its goals and relevant standards, tracks results over time, tests innovations and the effects of selection criteria on subsequent progress and completion, and uses results to improve program elements and processes.

5.4. Measures of completer impact, including available outcome data on P-12 student growth, are summarized, externally benchmarked, analyzed, shared widely, and acted upon in decision-making related to programs, resource allocation, and future direction.

5.5. The provider assures that appropriate stakeholders, including alumni, employers, practitioners, school and community partners, and others defined by the provider, are involved in program evaluation, improvement, and identification of models of excellence.