

May 20, 2021

Office of Elementary and Secondary Education
Attn: Orman Feres
U.S. Department of Education
400 Maryland Avenue SW, Room 3C124
Washington, DC 20002

Re: Docket ID ED-2021-OESE-0045

On behalf of UnidosUS, I write to thank you for the opportunity to submit public comments on the Department of Education's (the Department) notice of proposed priorities for the following programs of the Effective Educator Development Division (EED): Teacher and School Leader Incentive Program grants (TSL), Teacher Quality Partnerships (TQP), and Supporting Effective Educator Development (SEED) grants.

UnidosUS, previously known as NCLR (National Council of La Raza), is the nation's largest Hispanic civil rights and advocacy organization. Through its unique combination of expert research, advocacy, programs, and an [Affiliate Network](#) of nearly 300 community-based organizations across the United States and Puerto Rico, UnidosUS simultaneously challenges the social, economic, and political barriers at the national and local levels.

As a leading advocate on education policy encompassing the perspectives of Latinos and English learners, UnidosUS has a long and significant history working toward equity in education, including the reauthorization of the Every Student Succeeds Act and the Higher Education Act. UnidosUS respectfully submits these comments in response to the proposed priorities posted in the *Federal Register* on April 20, 2021.

UnidosUS supports the two priorities proposed by the Department as they will help advance the effectiveness of and diversity in the educator workforce, while also ensuring that underserved students (such as students of color, those from low-income backgrounds, students with disabilities, and English learners) have equitable access to high-quality educators.

Proposed Priority 1 – Supporting Educators and Their Professional Growth

We applaud the Department for including proposed priority 1, focused on opportunities for professional growth, leadership, and advancement to support the development and retention of effective teachers. We are especially glad to see that implementing strategies that “support high-need schools (as may be defined in the program's authorizing statute or regulations) in recruiting, preparing, hiring, supporting, developing, and retaining qualified, experienced,

effective, diverse educators” is part of proposed priority 1, as underserved students in high-need schools are often those who lack access to effective and experienced teachers.¹

Additionally, in order to ensure that underserved students have equal access to effective and experienced teachers, programs that recruit, prepare, place, and develop teachers must ensure that they are offering high-quality preparation and professional learning opportunities, including through culturally relevant teaching practices. It is critical that we highlight the important role of culturally responsive teaching practices to ensure that all teachers have the proper skills, knowledge, and training so that every student feels safe, valued, and understood. We urge the Department to include culturally responsive teaching practices into proposed priority 1 in part (d).

- (d) Providing high-quality professional development opportunities to all educators in high-need schools (as may be defined in the program's authorizing statute or regulations) on meeting the needs of diverse learners, including students with disabilities and English learners, which includes an emphasis on culturally responsive teaching practices.

Proposed Priority 2 – Increasing Educator Diversity

We are very encouraged by the inclusion of proposed priority 2, which is focused on increasing the diversity of the educator workforce through improving the recruitment, outreach, preparation, support, and retention of underrepresented teacher candidates. More than half of our nation’s public school students are those of color, but nearly 80% of our teacher workforce is White.² The largest demographic mismatch exists between Latino students and teachers—more than a quarter of students are Latino compared to only 9% of teachers. It is vital that our children have role models and leaders in their lives and classrooms who reflect their racial, cultural, or linguistic background from an early age, boosting their opportunities for success.

The inclusion of proposed priority 2 part (a), “Educator diversity goals, timelines, and action plans at the State, district, or school level including incorporating input from diverse educators,” is an important step toward making progress on increasing diversity, but policymakers, practitioners, and other stakeholders need access to meaningful and timely educator workforce data (which is transparent and publicly available) in order to set these goals and create action plans. These data should be used to inform measurable educator diversity goals and action plans that address the gaps and/or barriers for underrepresented teachers.

We suggest the following edits to parts (a) and (h):

- (a) Clear and measurable educator diversity goals, timelines, and action plans at the State, district, or school level which are publicly available and informed by meaningful and ongoing engagement with, ~~including incorporating input from~~ diverse educators.
- (h) Data systems and reporting structures to provide accurate, public, and timely data about the racial and other demographics of the educator workforce, including candidates

completing teacher preparation programs and classroom retention rates, which can be used to support efforts to diversify the workforce and to measure progress toward teacher and school leader diversity at the State, district, or school level.

As mentioned above regarding proposed priority 1, skills and knowledge of culturally responsive teaching practices are essential for all teachers in order for all classrooms to be equitable and inclusive environments. We cannot simply diversify the racial and ethnic makeup of the profession; we must also diversify the expertise and knowledge of all educators so that they are prepared to work with a diverse student population.

We suggest the following edits to part (g):

- (g) High-quality professional development focused on culturally responsive teaching practices, including ~~on~~-addressing bias in instructional practice and fostering an inclusive, equitable, and supportive workplace and school climate for educators.

We also know that collaborative P-20 partnerships—partnerships between PreK–12 systems, two-year institutions, and four-year institutions, leaders within PreK–12 schools and districts, and nonprofit organizations—can design programs that meet the unique needs of underrepresented students interested in the teaching profession.³ Underserved students, particularly those who are the first in their family to attend college, have a hard time successfully navigating the complex transition from secondary to postsecondary education, and within the postsecondary system have difficulty transferring from two-year to four-year institutions. These types of partnerships can provide guidance and mentorship to students to support their transition from high school to postsecondary education so that they stay on a path to teaching.

We suggest adding a part (l) that prioritizes the following:

- Partnerships between K–12 schools and/or districts and two- and four-year colleges to promote successful transfer and completion of underrepresented teacher candidates (particularly partnerships with Historically Black Colleges and Universities, Hispanic-Serving Institutions, and other minority-serving institutions).

Thank you for allowing us the opportunity to provide comments on the proposed priorities for the educator grant programs of the Effective Educator Development Division. Should you have any questions regarding these comments, please contact me at rgarza@unidosus.org.

Sincerely,

Roxanne Garza
Education Policy Advisor
UnidosUS

¹ Emma García and Elaine Weiss, *The teacher shortage is real, large and growing, and worse than we thought* (Washington, DC: Economic Policy Institute, 2019)

<https://www.epi.org/publication/the-teacher-shortage-is-real-large-and-growing-and-worse-than-we-thought-the-first-report-in-the-perfect-storm-in-the-teacher-labor-market-series/> (accessed May 18, 2021).

² National Center for Education Statistics (website), *Digest of Education Statistics*, “Table 203.50. Enrollment and percentage distribution of enrollment in public elementary and secondary schools, by race/ethnicity and region: Selected years, fall 1995 through fall 2028,” March

2019, https://nces.ed.gov/programs/digest/d18/tables/dt18_203.50.asp?current=yes; and National Center for Education Statistics (website), *Digest of Education Statistics*, “Table 209.10. Number and percentage distribution of teachers in public and private elementary and secondary schools, by selected teacher characteristics: Selected years, 1987–88 through 2015–16,” September 2017,

https://nces.ed.gov/programs/digest/d17/tables/dt17_209.10.asp

³ Roxanne Garza, *Paving the Way for Latinx Teachers: Recruitment and Preparation to Promote Educator Diversity* (Washington, DC: New America, 2019) <https://www.newamerica.org/education-policy/reports/paving-way-latinx-teachers/key-findings> (accessed May 18, 2021).