

A Special Report by:



TOO LITTLE THOUGHT, TOO LITTLE ACTION

California's Teacher Equity Plan Falls Short

Schools serving the highest proportions of low-income students and students of color by and large employ the highest proportions of inexperienced and underqualified teachers. This trend has been well documented nationwide and in California. It is perhaps the starkest example of inequity in our education system and the most formidable obstacle to closing pervasive and persistent achievement gaps. Again and again, research has found substantial differences in teachers' abilities to move their students forward, and there is sound evidence that teacher effectiveness contributes more to student achievement than virtually any other factor.¹ And though the research is inconclusive about the best proxies for teacher effectiveness, the inequitable distribution of teachers in California by every measurable proxy—including experience, education level, credential status, and salary—is undeniable.²

Ensuring that all students get their fair share of teacher talent should be the *first* priority of leaders in education. State education leaders across the nation were asked to tackle this problem as part of the federal No Child Left Behind (NCLB) law of 2001. As part of this law, in July, 2006, the U.S. Department of Education (USDOE) required all states to:

- Provide a **detailed analysis** of districts, schools, and specific courses staffed by teachers who are not highly qualified, with specific focus on schools not making adequate yearly progress (AYP) on achievement tests.
- Describe the **progress** towards having highly qualified teachers in all classrooms and what the state will do to assist districts and schools who have not met this goal.
- Design a detailed, specific **equity plan** with actions to ensure that poor and minority children are not

taught by a disproportionate number of inexperienced, unqualified, or out-of-field teachers.

This requirement for an equity plan is especially noteworthy because it goes beyond the highly qualified teacher (HQT) provisions of NCLB. The equity-plan provisions represent the only place in NCLB that requires states to focus specifically on the opportunities afforded to *minority* students, whereas the HQT provisions are focused only on disparities between poor students and their more affluent peers. Research in California has shown greater disparities in teacher qualifications by the percent of minority students at a school than by the percent of poor students⁴, making student ethnicity a critically important variable to consider when addressing the teacher equity issue.

In addition, the equity provisions look beyond the question of whether all teachers are highly qualified to ask whether poor and minority students are taught disproportionately by inexperienced teachers. Here again, research has indicated that teacher experience is a critical variable that is not to be overlooked. New teachers, particularly those in their first year of teaching, have been shown to be less effective in the classroom than their more experienced colleagues.⁵

California's HQT plan, though submitted on time, was rejected by the federal government, and rightly so. A peer review panel convened to review state plans found "a number of serious deficiencies, including but not limited to the lack of a plan with specific steps adequate to ensure that poor and minority children are taught at the same rates as other children by highly qualified and experienced teachers."⁶ A statement by the State Superintendent of Public Instruction downplayed the rejection, and minimized the shortcomings of California's plan.⁷ California now has until September 29 to revise its plan and address the many

concerns expressed by the peer review panel.⁸ The panel had substantial criticisms of California's plan, and we concur. California's submission had a paper-thin analysis of the teacher equity problem, and the state's reform plan lacked urgency, specificity, and innovation.

A POOR ANALYSIS OF THE PROBLEM

As part of their HQT plans, states were asked to submit data on whether poor *and minority* children are taught by a disproportionate number of non-HQTs (see HQT definition in sidebar on page 3) and *inexperienced teachers*. California's submission, however, did not include any data regarding minority students, and had no analyses of the distribution of inexperienced teachers. The peer review panel also noted that California failed to provide an analysis of what geographic regions and specific local education agencies (LEAs) had the greatest shortages of HQTs.⁹

Instead, California presented only data regarding poor children. Specifically, it provided a school-level analysis demonstrating that high-poverty schools have lower percentages of classes taught by highly qualified teachers (HQTs). At the elementary level, the state found that 85% of core academic classes at low-poverty schools were taught by HQTs, compared with 88% at high-poverty schools. At the high school level, 80% of core academic classes were taught by HQTs, compared with 89% at low-poverty schools.

In addition to the problem of not presenting data on minority students, the poverty data that were presented effectively understate the teacher quality gap in California. Given the mere three percentage points of difference between high- and low-poverty elementary schools, the state's analysis implies that the teacher quality gap, at least at the elementary level, is practically resolved. *It is not.* Independent organizations have gone far beyond the state's analysis, using publicly available data to thoroughly document the extent of California's teacher equity problem, not just along the lines of student poverty, but also student ethnicity, and not just in the distribution of qualified teachers, but also experienced teachers. Their

findings have been conclusive: California systematically denies poor *and minority* children equal access to qualified *and experienced* teachers.

For example, in a recent study using state data, the Center for the Future of Teaching and Learning and SRI International found that compared to schools with few minority students, schools with high proportions of minority students had on average about twice the percentage of teachers who were lacking full credentials, or were in their first two years of teaching, or both.¹⁰ The same study also found that over half of all intern teachers—who lack a full credential but are considered “highly qualified” by California—are teaching in schools serving 91-100% minority students. The study also analyzed teacher distribution across subject areas, finding that math, science, and special education faced the greatest shortages of highly qualified teachers, and that these subject-specific shortages were much worse in high-minority schools. In math and science, high-minority schools on average had four times as many teachers without full credentials; in special education, they had about 3.5 times as many.ⁱ

Another recent study by the Education Trust-West examined the concentration of more experienced and more credentialed teachers in whiter and more affluent schools through the lens of teacher salary, finding huge funding gaps between districts and between schools in the same district.¹¹ Forty-two of California's 50 largest districts spend significantly less on teacher salaries in schools serving the most Latino and African-American students than schools with the fewest Latinos and African-Americans. On average these minority gaps were greater than the gaps in spending on teacher salaries between high- and low-poverty schools, making it clear that the race of students matters in the distribution of teachers. To be sure, any analysis of teacher equity in California *must* take into account the proportion of minority students at the school level to offer a complete picture. That California did not even take into account the distribution of teacher quality among students of color is a gross oversight.

Equally distressing were the unsupported conclusions the state drew in analyzing teacher equity. California's plan

ⁱ This study did not analyze teachers' HQT status, but rather the credentials teachers hold. Some teachers without full credentials (interns, for example) are considered highly qualified under NCLB. At the same time, some teachers with full credentials may not be NCLB compliant (those teaching out-of-field, for example). While this study did not specifically analyze HQT status, it is highly relevant to the analysis of teacher equity in the state. The analyses serve as estimates of how many teachers are not highly qualified, and more importantly, where non-highly qualified teachers are most likely to be found.

CALIFORNIA'S DEFINITION OF A "HIGHLY QUALIFIED TEACHER"

One of NCLB's key performance goals for states was for all core academic classes to be taught by HQTs by 2005-06, a timeline that has since been extended to 2006-07. Each state set its own HQT definition, and in California, a teacher is considered highly qualified if they 1) hold a bachelor's degree, 2) hold a teaching credential OR are currently enrolled in an intern program, and 3) have demonstrated core academic subject matter competence.

For the purposes of determining compliance with NCLB teacher quality provisions, teachers were divided into two groups: those who were issued a credential or intern certificate before July 1, 2002 (considered "not new") and those who were issued a credential or intern certificate on or after July 1, 2002 (considered "new").¹² "New" elementary teachers must demonstrate subject matter competence by passing the California Subjects Examination for Teachers (CSET). "Not new" elementary teachers may either pass the CSET (or a similar, previously approved test) or complete the California High Objective Uniform State Standard of Evaluation (HOUSSE). "New" middle and high schools teachers must demonstrate subject matter competency by taking a subject matter examination or completing appropriate course work in the subject area. "Not new" middle and high school teachers may demonstrate competency via exam, coursework, or the HOUSSE process.

The HOUSSE process gives "not new" teachers points for prior experience teaching the subject area, course work or standards-aligned professional development in the subject area, and leadership or service in the subject area, requiring a total point value of 100 for demonstrating subject matter competency. Individual districts determine what professional development, leadership, and service activities will be given credit, and how much credit they will be given—making the HOUSSE uniform throughout each district, but certainly not across the state. For teachers who do not obtain 100 points in the regular HOUSSE process, there is also an option to demonstrate competency by being observed or completing a portfolio.

Whether California's HOUSSE process reflects a high standard for teacher quality is debatable at best. As noted above, the process is largely left to the discretion of individual districts, leaving no way for the state to assess teachers' qualifications uniformly or ensure a minimal level of quality. We fear that for many teachers who did not demonstrate subject matter competency via exam or coursework, the HOUSSE process was largely a paperwork exercise. With a few strokes of the pen, thousands of teachers in California became "highly qualified" in a very short timeframe. By using the HOUSSE process for "not new" teachers and the intern designation for "new" teachers, California is technically on its way to meeting NCLB's compliance requirements; at last count 85% of courses were taught by HQTs.¹³ The more important question is whether this reflects any real progress in improving teacher quality.

Recently, in response to requests from the federal government, California has been considering changes to the HOUSSE process, including eliminating credit for leadership and service options, eliminating the portfolio option, and limiting the observation option to teachers who teach multiple subjects at the secondary level in special circumstances (such as special education, alternative programs, or small rural schools with few teachers). These changes may be made by July, 2007, but the decision process is still underway, and the USDOE has since postponed its request for states to revise HOUSSE until the reauthorization of NCLB. In any case, most of the "not new" teachers who were eligible to use the HOUSSE process have already done so, and the opportunity for a more rigorous assessment of these teachers' subject matter competence has passed.

states, “Recent analysis of NCLB HQT data indicates that California does not have a significant problem with the equitable distribution of HQTs within districts, but instead, there is an imbalance between districts.” There is no supporting information for this statement, making it difficult to independently assess the accuracy of the state’s finding. If accurate, however, the finding stands in stark contrast to the findings of The Education Trust-West, which found substantial within-district disparities when looking at teacher salary, a measure that encompasses both teacher education level and years of experience.¹⁴

Compared to other analyses of the teacher equity problem, why does the state’s analysis reveal only small disparities by poverty level and no significant differences within districts? It may be that the state’s analysis of HQT distribution patterns don’t detect within-district disparities in teacher quality because California has set the bar too low with its HQT definition (see sidebar on page 3). In recent years, California has shown rapid progress in raising the number and proportion of teachers who are considered highly qualified under NCLB. These rapidly growing numbers include teachers who are enrolled in intern programs but are not fully credentialed, and teachers who have completed the Housse process, which allows multiple methods for satisfying the subject matter competency requirements. The USDOE has acknowledged that Housse methods in many states are “substantially less rigorous than the other measures authorized in the statute.”¹⁵ As more and more teachers are designated as HQTs through one of these two processes, differences in access to teacher talent disappear. In other words, once virtually every teacher is deemed “highly qualified,” then all schools will appear to have equally qualified faculties, regardless of vast differences in experience, education, and most importantly, actual effectiveness in the classroom.

California’s definition of HQT and its process for demonstrating compliance may be inadequate for determining whether teachers are in fact highly qualified and also have the insidious side effect of papering over the teacher equity problem. Given the existing independent research on teacher equity that utilizes other measures, the state should consider that its own analysis may not convey a complete picture of the problem and should commit to a more thorough analysis moving forward.

In its plan, California revealed another disturbing problem: the inadequacy of the state’s data system. The plan noted that upcoming changes would strengthen the education data system, and noted that the changes would improve its ability to analyze the distribution of HQT teachers beginning in 2006-07. However, the current shortcomings of the state’s data system do not explain away the lack of data provided in the HQT plan and its other inadequacies. Although California’s lack of a comprehensive data system does prevent deep and precise analysis of the distribution of HQTs and inexperienced teachers (see sidebar on page 5), the state does collect a great deal of relevant data and could have presented a far better analysis of the problem in its HQT plan. As the independent studies discussed above demonstrate, there are many analyses possible that are highly relevant to the teacher equity problem. California did not provide the most complete analysis possible in its first HQT plan, and this needs to be corrected.

In short, California’s analysis of the teacher equity problem is incomplete. It is missing key components, including analyses of the teacher gap by student ethnicity and teacher experience. Further, the data it did report understated the problem and should not be taken as evidence that the teacher equity gap is nearly resolved.

A POOR PLAN FOR ADDRESSING THE PROBLEM

California’s lack of an effective plan to address the teacher equity problem is as significant as its failure to thoroughly assess the problem in the first place. The plan that California submitted is not a coherent plan of action to resolve the teacher equity problem but rather a plan for monitoring schools’ compliance with HQT requirements, followed by a lengthy list of existing (in some cases, longstanding) programs and policies that to date have not been effective in resolving the teacher quality gap. These include:

- Teacher credentialing reform
- Teacher internship programs
- The California Assumption Program of Loans for Education (APLE)
- National Board for Professional Teaching Standards (NBPTS) incentives
- California Teacher Leadership Program (proposed under SB 1433)

- Troops to Teachers
- A multi-agency program that will enable teachers who teach multiple core subject areas (e.g. in special education, alternative schools, and rural and small schools) to become NCLB compliant
- English Learner authorizations and the Bilingual Teacher Training Program
- County procedures for monitoring teacher assignments
- California Subject Matter Projects
- Mathematics and Reading Professional Development Program
- California Mathematics and Science Partnership

Program

- California State University Mathematics and Science Teacher Initiative
- One Thousand Teachers, One Million Minds Initiative
- Improvements to the CDE's professional development web site

While California's plan includes a large number of programs and policies—many of which are strong individually—it does not indicate how these efforts will specifically assist those LEAs that are struggling to hire enough HQTs and experienced teachers. Almost none of the listed

LIMITS OF THE DATA SYSTEM

Although the state could have gone much further in its analysis of the teacher equity problem, there are problems with the state data system that hinder a more thorough and precise analysis. Specifically, the system is unable to link data between individual teachers and their students, limiting information on how the teacher quality gap impacts different kinds of students.

For example, while the state's data system can reveal important disparities *between schools*, it is unable to assess the likely additional problem of *within-school* disparities. As a result, we can compare the teachers at low-versus high-minority schools, but not the teachers of minority versus nonminority students *at the same school*. Research has shown that novice teachers are often assigned to teach remedial classes and classes with large proportions of English learners while more experienced teachers get assigned to teach higher achieving students.¹⁶ Unfortunately, California's lack of a comprehensive education data system prevents an analysis of whether such within-school assignment practices systematically disadvantage minority or poor students.

The technical problem is the system's inability to link teacher- and student-level data, thereby providing information on exactly which teachers are paired with which students. California's new Longitudinal Teacher Data System (CALTIDES) will technically be capable of linking to the state's Longitudinal Pupil Achievement Data System (CALPADS). While such a linkage would enable important analyses of teacher distribution by student demographic characteristics, we're not there yet.

There are also related problems in tracking teachers' credentials to teach English learners. Upcoming changes to the state's data collection activities will result in substantial improvements, allowing for analysis of which *classes* do or do not have teachers who are qualified to teach ELs. However, without a link between teacher- and student-level data, there will be no way to track exactly which *students* are paired with which teachers.

Another major shortcoming of the current data system is its inability to track whether teachers are highly qualified in each subject area they are teaching. Once changes to the state's data collection forms are implemented in 2006-07, better analyses will be possible for tracking out-of-field teaching at the state, district, and school levels. However, without a link between student- and teacher-level data, the system will still not allow for analyses of specifically which *students* are most impacted by out-of-field teaching.

Finally, the current data system lacks the capacity to track teachers longitudinally, making it impossible to systematically analyze which schools experience the greatest teacher turnover, and where teachers go when they leave.

programs or policies are new, and few are targeted specifically at schools with high percentages of non-HQTs or inexperienced teachers. Some efforts are focused on increasing the number of teachers overall, but not on rectifying the teacher distribution problem. The state's plan does outline how it will monitor whether local education agencies (LEAs) are meeting their HQT goals, and indicates that it will provide phone and email consultations, and on-site visits in the most severe cases. However, the plan does not explain what the technical assistance will consist of, or how exactly LEAs will be held accountable for improvement.

The peer review panel agrees that California's plan is sorely lacking. Their review of California's plan states that it is "general and generic, rather than needs-based," that the efforts listed are not targeted towards the schools and regions that need them most, are not designed to address equitable teacher assignment, are not designed to address the distribution of inexperienced teachers, and that the plan includes no "theory of action" and "no evidence for the probable success of any of the programs that they describe."¹⁷

Another problem with California's plan is that it lacks a specific timeline with measurable benchmarks, leaving no way for evaluating the pace of improvement, and signaling an overall lack of urgency. Instead, the plan is vague and inconsistent in its timeline, at one point saying the state aims for equitable distribution of HQTs by June 30, 2007, but later stating that the target date for equitable distribution is 2014.¹⁸ NCLB does not include a specific deadline for attaining complete equity, but rather expects states and districts to address the equitable distribution of teachers every year. As the peer review panel states in its response to California, "a plan for the equitable distribution of teachers is currently due and deliverable. The 2014 deadline applies to student achievement, not to teacher qualifications and distribution."¹⁹ If California is serious about meeting the laudable student proficiency goals by 2014, then the state's equity plans will need to be in place much sooner.

RECOMMENDATIONS: NEXT STEPS FOR CALIFORNIA

While California's initial submission was sorely lacking,

there is still an opportunity for the state to embark on a real plan of action for correcting the inequitable distribution of teachers—starting immediately. In fact, California must develop a new plan and submit it to the federal government by September 29. This process should not be merely an exercise in complying with the federal law, but rather should be used as an opportunity to seriously analyze the problem, and develop a robust plan for providing every student with a highly qualified teacher. We urge the state to do the following.

A BETTER ANALYSIS OF THE PROBLEM

We recommend first that California immediately comply with the USDOE's request for more complete data. Though our inadequate data system does limit the depth and sophistication of analysis possible, there is much more relevant data to illuminate the distribution problem than the state has provided thus far. A better understanding of the problem is a prerequisite for developing an effective action plan. At a minimum, the state should replicate its school-level poverty analysis with a similar analysis of the school-level percent of minority students, *and* it should do both the poverty and minority analyses for *inexperienced* teachers.

The state's next version of the HQT plan should also include data on what subject areas, geographic areas, and specific LEAs are most impacted. If the data system does not permit analysis of HQT data for any of these permutations, then data on teacher credential status should be substituted.

California's plan should also give more information about the analysis that led to the unsupported conclusion that the teacher equity problem is only found between districts, rather than within districts. The state could consider drawing from independent analyses that have found substantial within-district disparities when using other measures of teacher quality. In short, the state should use all available resources to better understand the teacher equity problem.

Looking forward, the state should continue and accelerate its efforts to build a comprehensive data system that includes longitudinal student and teacher data, and the capacity to link the two together. These improvements will dramatically improve California's ability to assess

the teacher quality gap and its impact on students.

A BETTER PLAN FOR ACTION

We further recommend that California seize this opportunity to develop a real action plan, rather than a simplistic list of programs and policies that to date have not resolved the equity problem. In general, strategies should target resources to the students that are struggling without highly qualified and experienced teaching faculty.

In developing a more robust plan of action for addressing teacher equity, California should consider a range of innovative strategies. These might include incentives for districts with severe staffing problems to develop differential pay structures for teachers in their hardest-to-staff schools and subjects. A related idea is to offer teachers in hard-

to-staff schools extra pay for extra work by extending the school day or school year and compensating teachers for additional time spent with students or in professional development.

Regardless of teacher pay, many teachers in challenging settings report not having the tools and professional support they need to succeed in the classroom. Recognizing this, parallel efforts should be made to improve workplace conditions in those schools that are most chronically hard-to-staff. Comprehensive reform efforts would combine simultaneous improvements in leadership, professional development and instructional support for teachers, and improvements to facilities. Costly efforts such as these might require a reworking of how money is allocated to schools, to better take into account the needs

FOR A GOOD MODEL, LOOK NEXT DOOR: NEVADA'S PLAN FOR TEACHER EQUITY

In its recent report, *Missing the Mark*, The Education Trust analyzed teacher equity plans from all 50 states and highlighted Nevada's strong efforts.²⁰ Nevada's HQT plan presented both solid data and well-developed, targeted strategies to resolve the inequitable distribution of unqualified as well as inexperienced teachers. Nevada used the equity-plan requirement as an opportunity to examine its data and to take stock of the approaches being used to improve teacher quality generally and those that are aimed specifically at inequities. In addition to analyzing the distribution of teachers with less than three years of experience by school poverty and by minority enrollment, Nevada submitted three equity plans: the state plan and plans from the two districts that serve the most low-income and minority students in the state—Clark (Las Vegas) and Washoe (Reno) counties—where the data indicated the greatest inequity in teacher distribution.

Nevada's state and district plans all include specific, targeted strategies for balancing teacher talent. As an example of a state-level targeted strategy, the legislature has appropriated \$5 million per year for "grants to school districts to adopt a program of performance pay and enhanced compensation for recruitment, retention, and mentoring of licensed personnel at at-risk schools."²¹ The two district plans also include many innovative, targeted strategies to address the inequitable distribution of teaching talent. For example, Clark County monitors teacher transfer requests and "denies the transfer of out-of-field teachers to high-poverty, low-performing schools."²² The district also gives principals in high-need schools an advantage in assembling their teaching faculty. They are allowed two months to consider transfer requests from experienced teachers before principals of other schools can recruit them.²³

Nevada is to be commended for its approach. It gathered the appropriate data, and developed a solid, specific plan of action for addressing the problems it found. In short, it took the challenge of confronting the teacher gap seriously. California would do well to follow Nevada's lead by taking stock of the problem, addressing it head on with a strong state-level plan, and working with the largest and most impacted districts in the state to develop localized strategies.

of students at a particular school.

Other strategies could be lower in cost, such as giving hard-to-staff schools an advantage in hiring. A current example is SB 1655, authored by Senator Jack Scott, which bans the common local practice of forcing underperforming teachers into schools against principals' will. This bill aims to prevent weak teachers from shuffling between low-performing schools rather than being terminated. In addition, it should ease the problem of delayed hiring which often results in hard-to-staff schools losing good teachers who go elsewhere instead of waiting for an offer. Another idea is to give the hardest-to-staff schools the first chance at interviewing and hiring applicants to the district.

In the realm of teacher preparation, more serious investments are needed to develop programs that are designed for individuals who live in or are originally from those communities that have traditionally had difficulty recruiting and retaining teachers. Rather than always struggling to import teachers into hard-to-staff regions, California would be well served to begin developing pipelines into teaching that originate in the communities being served.

In addition, the state should pay teachers for the duration of his or her teacher education program upfront (similar to paid Army or police training) in exchange for a commitment to work in high-need school. A policy such as this would go beyond the loan-forgiveness approach of APLE, and would eliminate the financial incentive to teach while learning how to teach. Any efforts to pay teachers more

for teaching in challenging settings would be strengthened if coupled with stronger evaluation practices to identify and reward those teachers who are most effective.

Finally, any strategy that California chooses to pursue should be aligned with the findings from the state's (more thorough) data analyses and should include progress measures, and mechanisms of public reporting and monitoring from the state. It is possible: Ohio did just this for each of the 68 specific strategies it outlined in its HQT plan, along with specific strategies for monitoring distribution patterns in LEAs.²⁴

CONCLUSION

NCLB was enacted in 2001—five years ago—and included the key goal that all students have a highly qualified teacher. The original legislation included the equity provisions to ensure that poor and minority students are not disproportionately assigned to unqualified or inexperienced teachers, but until recently, the USDOE all but denied the existence of the equity provisions. Now that the federal government has finally taken action to insist that states attend to these provisions, the time for ignoring the problem is over. California needs to act at once on the longstanding problem of inequitable access to teacher talent—not just because it's required, but because it's the right thing to do. We urge California to get serious, dissect the problem thoroughly, and address it with deliberate speed.

Endnotes:

¹ See, for example:

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H. Jordan, R. Mendro, and D. Weerasinghe. (1997). *The Effects of Teachers on Longitudinal Student Achievement*. In Haycock, K. (1998). *Good Teaching Matters...A Lot*. Washington, D.C.: The Education Trust.

W. Sanders and J. Rivers. (1996). *Cumulative and Residual Effects of Teachers on Future Students Academic Achievement*. Knoxville, TN: University of Tennessee, Value-Added Research and Assessment Center.

² See:

C. Esch, et al. (2005). *The status of the teaching profession 2005*. Santa Cruz, CA: The Center for the Future of Teaching and Learning.

The Education Trust-West. (2005). *California's Hidden Teacher Spending Gap: How State and District Budgeting Practices Shortchange Poor and Minority Students and Their Schools*. Oakland, CA: The Education Trust-West. California's Hidden Spending Gap. Available at <http://www.hiddengap.org/resources/report031105.pdf>

³ California Department of Education. (2006). *Plan of Activities to Meet NCLB Teacher Quality Requirements*. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/ca.doc>

⁴ C. Esch, et al. (2005); The Education Trust-West (2005).

⁵ E. Hanushek, J. Kain, D. O'Brien, & S. Rivkin. (2005). *The Market for Teacher Quality*. NBER Working Paper Series. Working Paper 11154. Cambridge, MA: National Bureau of Economic Research.

⁶ Letter from Henry L. Johnson, U.S. Department of Education, to Kenneth Noonan, President, California State Board of Education, and Jack O'Connell, Superintendent of Public Instruction. August 15, 2006. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/cacl.doc>

⁷ California Department of Education News Release. "Schools Chief Jack O'Connell Comments on Federal Approval of California's Highly Qualified Teachers Plan." August 16, 2006. Available at: <http://www.cde.ca.gov/nr/ne/yr06/yr06rel90.asp>

⁸ U.S. Department of Education. (2006.) *Reviewing Revised State Plans: Meeting the Highly Qualified Teacher (HQT) Goal* [Peer Review Panel Comments]. pp. 3-4 and 12-13. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/carc.doc>

⁹ U.S. Department of Education. (2006.) *Reviewing Revised State Plans: Meeting the Highly Qualified Teacher (HQT) Goal* [Peer Review Panel Comments]. p. 5. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/carc.doc>

Endnotes (cont.):

¹⁰ C. Esch, et al. (2005.)

¹¹ The Education Trust-West. (2005).

¹² California Department of Education. No Child Left Behind Act of 2001 Teacher Requirements. Available: <http://www.cde.ca.gov/nclb/sr/tq/index.asp>

¹³ California Department of Education. (2006). Plan of Activities to Meet NCLB Teacher Quality Requirements. p. 2. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/ca.doc>

¹⁴ The Education Trust-West. (2005).

¹⁵ Letter from Margaret Spellings, U.S. Department of Education, to Chief State School Officers. September 5, 2006. Available at: <http://www.ed.gov/policy/elsec/guid/secletter/060905.html>.

¹⁶ C. Esch, et al. (2005).

¹⁷ U.S. Department of Education. (2006.) Reviewing Revised State Plans: Meeting the Highly Qualified Teacher (HQT) Goal [Peer Review Panel Comments]. p. 13. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/carc.doc>

¹⁸ California Department of Education. (2006). Plan of Activities to Meet NCLB Teacher Quality Requirements. pp. 1, 9. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/ca.doc>

¹⁹ U.S. Department of Education. (2006.) Reviewing Revised State Plans: Meeting the Highly Qualified Teacher (HQT) Goal [Peer Review Panel Comments]. pp. 3-4 and 12-13. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/carc.doc>

²⁰ The Education Trust. (2006). Missing the Mark: An Education Trust Analysis of Teacher-Equity Plans. Washington, D. C.: The Education Trust.

²¹ Nevada State Department of Education. (2006). Nevada Revised HQT Plan. p. 46. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/nv.doc>.

²² Nevada State Department of Education. (2006). Nevada Revised HQT Plan. p. 43. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/nv.doc>.

²³ Nevada State Department of Education. (2006). Nevada Revised HQT Plan. p. 52. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/nv.doc>.

²⁴ Ohio Department of Education. (2006). Ohio's Revised HQT Plan. p.36. Available at: <http://www.ed.gov/programs/teacherqual/hqtplans/ohed.doc>.

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