



FROM: Terry Stoops, Director of Government Affairs, Defending Education

TO: Office of Postsecondary Education, U.S. Department of Education

RE: Public Comment on Higher Education Act (HEA) Title II Report Cards on State Teacher Credentialing and Preparation

DOCKET ED-2026-SCC-2707

DATE: October 20, 2026

Defending Education is a national grassroots organization dedicated to securing a high-quality, value-neutral education for every American student. And no other factor influences educational quality more than the skills and capabilities of classroom educators. But regrettably, the Higher Education Act (HEA) Title II Report Cards on State Teacher Credentialing and Preparation do not evaluate the relative quality of our nation's teacher preparation programs, nor do they provide satisfactory insight into the intellectual foundations and ideological frameworks inculcated in prospective educators.

The Need for an Evaluative Report Card

While collecting descriptive data on teacher preparation programs is necessary for the proper functioning of the U.S. Department of Education, it is not sufficient. Because the nation's nearly 100,000 public schools rely on our teacher preparation programs to staff their classrooms, taxpayers deserve to know much more about these programs than just the number of enrollees, programs, providers, program completers, and general demographic, certification, and licensure data in each state, territory, and jurisdiction.

Indeed, the term "Title II Report Cards" is a misnomer because the current report cards contain no grades, ratings, or other forms of assessment. A proper report card would include multiple measures of performance for all teacher preparation programs included in the report. Unfortunately, the only evaluative indicator included on the Title II Report Cards is "at-risk" or "low-performing" classifications, which vary by the criteria each state establishes. According to the [Report on Teacher Workforce 2023](#), approximately 1% of programs were low-performing or at risk of being low-performing in 2019-2020. That means that the quality of 99% of the programs identified in the Title II Report Cards is unknown.

A proper Title II report card would evaluate teacher preparation programs based on available metrics, including certification and licensure data, disciplinary records, graduate retention rates, performance evaluations, and, when available, student outcome measures. In addition, annual randomized surveys of teacher preparation program graduates, both employed in the teaching

profession and those who have changed professions, would provide much-needed context to qualitative measures of institutional performance.

For decades, the federal government has measured student performance through the National Assessment of Educational Progress (NAEP), also known as The Nation’s Report Card. The U.S. Department of Education should create similar Title II Report Cards that provide timely, high-quality evaluations of the nation’s teacher preparation programs.

The Need for a Coursework Documentation Component

Title II report cards should also offer details about coursework offered by teacher preparation programs. All teacher preparation programs publish catalogs that describe required and elective courses offered to undergraduate, graduate, and alternative licensure students. Thus, requesting this information does not impose an extraordinary burden on the institutions or the state agency personnel who collect it on behalf of the state. Including course descriptions in the Title II report card would offer invaluable insight into the academic rigor of teacher preparation programs and the potential ideological biases associated with those programs.

Make no mistake that teacher preparation programs are rife with ideological bias.

In 2024, Defending Education published [CorruptED: Colleges of Education and the Teacher as Activist Pipeline](#). Using college of education syllabi and course descriptions from 67 institutions ranging from small private colleges to large state institutions and elite universities, the report detailed what America’s current and future K-12 educators are being taught in colleges of education across the country. CorruptED revealed the shocking infiltration of radical left-wing ideologies in undergraduate and graduate education courses. This ideologically charged instruction has undermined the quality of teacher education programs by diverting resources from critical course content in areas such as classroom management, instructional delivery, and student assessment.

In 2026, Defending Education published a supplement to the CorruptED report [documenting](#) the Southern Poverty Law Center’s (SPLC) ideological infiltration into teacher preparation programs. At least 100 colleges of education in 38 states and the District of Columbia incorporated SPLC’s Learning for Justice resources, lessons, and Social Justice Standards in pre-service teacher preparation programs, coursework, departmental frameworks, and educator training initiatives.

Finally, a recent Defending Education investigation [found](#) that the Massachusetts Department of Elementary and Secondary Education’s (DESE) guidelines for “Educator Preparation”



programs, “Candidate Assessment of Performance,” and “Professional Teaching Standards” require incorporating “anti-racist” teaching practices into pre-service teacher preparation and certified teacher evaluations.

Unfortunately, these are not isolated incidents. For far too long, teacher preparation programs have lacked transparency and accountability. As a result, faculty and administrators have been able to transform conventional teacher education programs into programs that eschew the transmission of traditional content using direct instruction in favor of inculcating progressive ideologies using project-based learning.

Other Considerations

Like many of the federal programs that collect and disseminate education data and statistics, Title II reports lag significantly. Currently, the Title II website includes data for the 2023-2024 academic year. Members of Congress and state legislators need access to timely data to make informed decisions about legislation affecting teacher education programs.

Respectfully submitted,

Terry Stoops
Director of Government Affairs
Defending Education