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The Honorable Lora Reinbold  
House of Representatives  
Alaska State Capitol  
Juneau, Alaska 99801-1182

Dear Representative Reinbold:

I am writing on behalf of the University of Alaska Anchorage, University of Alaska Fairbanks, and University of Alaska Southeast Provosts and Deans of Education to express our concern about HB 85 "An Act relating to college and career readiness assessments for secondary students; and relating to restrictions on the collection, storage, and handling of student data."

In particular, we are concerned about a provision in Section 7:

- (6) policies and procedures consistent with relevant state and federal privacy laws that
  - (A) limit access to individual and redacted student data to
    - (i) persons who require access to perform duties assigned by the department, a school district, or the administrator of a public school;
    - (ii) the student who is the subject of the data and the 1 student's parent, foster parent, or guardian;
    - (iii) authorized agencies as provided in state or federal law or by an interagency agreement;
  - (B) restrict student data transfer except as necessary to
    - (i) fulfill student requests;
    - (ii) carry out a school transfer or student location request; or
    - (iii) compare multistate assessment data;

This provision of HB 85, if enacted, could prevent UA teacher preparation programs from maintaining their accreditation through the Council on Accreditation of Teacher Preparation, and that in turn could prevent any UA graduate from being certified to teach in the State of Alaska.

As you probably know, the State certifies teachers who have completed approved university teacher preparation programs or State-approved teacher preparation programs. For prospective teachers who graduate from a teacher preparation program in Alaska, the State requires that the program be accredited by the Council for the Accreditation of Educator Preparation (CAEP, formerly called NCATE). All three University of Alaska teacher preparation programs are currently accredited by CAEP, which has

recently been implementing new requirements. Those are described in full in the following document:  
[https://caepnet.files.wordpress.com/2015/03/caep\\_accreditation\\_manual.pdf](https://caepnet.files.wordpress.com/2015/03/caep_accreditation_manual.pdf)

If access to K-12 student information is highly restricted, it might be impossible for UA to meet CAEP Standard 4, which is attached to this letter in its entirety. In particular, UA's ability to meet Standard 4.1 will be impacted by HB 85.

*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.*

This standard requires that University teacher education programs demonstrate that the teachers they have prepared are effective. That must be done by measuring student learning in the classes that the graduates teach. If no data about K-12 student learning are available to UA, that will be impossible.

I understand that (6) (A) (iii) might allow UA to access the information if State law provided for release of the information to UA or an interagency agreement was put in place for each school district where recent UA graduates teach. However, UA prefers that HB 85 expressly permits access by authorized UA personnel, who require the access in order to perform duties assigned by UA.

More concerning, it appears that (6) (B) would prevent any transfer of student data to UA, and that would make it impossible for UA to use student data to meet the CAEP accreditation standards. Hence, UA also asks that (B) be broadened to include a provision that allows data transfer to the University of Alaska. UA must follow Federal privacy laws and has appropriate policies and security measures in place to assure students' privacy. UA would redact and group student data in reports to CAEP to ensure anonymity.

Thank you for considering this matter.

Sincerely yours,



Susan Henrichs

cc: House Education Committee Members

**STANDARD 4**—*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.*

**NOTE 1: CAEP Board policy on Standard 4:**

To be awarded full accreditation, each provider must meet CAEP's guidelines for evidence for the annual report measures, including all components of Standard 4 on impact. The examples of measures and related guidelines, below, are to assist providers in preparing to compile and write their self-study evidence for Standard 4. In addition, the provider's annual reports accumulate year by year provider data for Standard 4 impact measures. Provider analysis of the trends in those annual measures are analyzed and written as part of the self-study evidence for component 5.4 on continuous improvement.

**NOTE 2: Standard 4 and the "8 annual reporting measures"**

The CAEP January requests for provider annual reports include questions about data on each of the 4.1-4.4 measures. The provider request defines the minimum expectation each year until reporting across providers can be complete and consistent. Trends in the provider's cumulative reports since the last accreditation cycle will be included and interpreted as part of the self-study. Providers may supplement that information with other, more detailed, data on the same topics if they have any.

**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.*

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

**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.*

**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.*