

June 15, 2006

Dr. Henry Johnson
Assistant Secretary for Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue, SW
FOB 6
Washington, DC 20202

Dear Dr. Johnson:

It is our understanding that both the American Federation of Teachers and the National Education Association have recently urged the U.S. Department of Education to permit states to permanently institute the HOUSSE route as a method of assigning teachers highly qualified status. As advocates for meaningful teacher quality policies, we must register our firm opposition to use of the HOUSSE route, as it is currently defined in Section 9101(23)(C)(ii) of ESEA, beyond the end of the 2006-2007 school year.

The problems with HOUSSE since its inception have been well documented. In particular, our December 2004 report *Searching the Attic* revealed the empty strategies that states employed to declare their veteran teachers “highly qualified,” demonstrating a near-universal disregard for the goals of the highly qualified teacher provision. Though there were many different HOUSSE routes adopted by states, nearly all of them were remarkably similar in one sense: they provided loopholes for the very teachers most in need of improving their subject matter knowledge.

Recognizing that some vehicle must be in place for awarding highly qualified status to teachers who are not new to the profession, we propose that the HOUSSE route be preserved for defined groups of veteran teachers under very limited parameters. However, it is imperative that 1) its connection to subject matter knowledge be more explicit; and 2) its process be streamlined, both for states and districts to administer and teachers to achieve.

With the understanding that the HOUSSE route should only be available to teachers who are already highly qualified in one subject area in at least one state, our recommendation is that all future HOUSSE routes be made to require completion of a *minor* in subject-specific coursework—that is,

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15 credits of coursework from an arts or sciences department of an accredited higher education institution. The myriad of currently approved methods (acting as a mentor, serving on a committee, even professional development) should be eliminated. We suggest this change, not because these methods are without merit, but because their monitoring and enforcement impose a drain on the resources of states and districts, and when discretion is left to district personnel offices, teachers often end up having to jump through numerous hoops of questionable value.

Requiring veteran teachers to complete a minor is a sensible compromise solution. Many teachers are already likely to have a minor or a few courses in their new subject. Moreover, teachers would always have the option of bypassing coursework altogether by taking a test.

NCTQ recognizes that veteran teachers should have the ability to move to a new school, a new state, or a new subject area. That is why we advise states to adopt flexible policies and practices that minimize red tape and allow school districts to hire the teachers they need. However, HOUSSE represents an instance in which a policy with good intentions was framed too broadly. Five years after the implementation of NCLB, there is almost no evidence that it has provided any value—and plenty of evidence that it has been a bureaucratic disaster. It is important to make sure that does not happen again. America's parents, children, and teachers *all* deserve to know that the “highly qualified” designation is a meaningful one.

Thank you for your consideration.

Sincerely,

Kate Walsh
President