Testimony to U.S. Senate Committee on Health, Education, Labor and Pensions

Regarding: For-profit education, specifically the for-profit education company Bridgepoint Education, Inc. and Bridgepoint-owned Ashford University

Focus of Discussion: Review of Ashford University's Master of Arts in Teaching (MAT), an online program designed to prepare students for an initial teaching license in Iowa

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Introduction

I am Arlie Willems and have recently retired from the Iowa Department of Education (Department) where I served for five years as Administrative Consultant for Practitioner Preparation. In that role I was responsible for state reviews of teacher and administrator preparation programs for the purpose of state approval. In my five years at the Department I reviewed twenty-five of the thirty-two teacher preparation programs in Iowa. I respectfully submit the following testimony to the Senate HELP Committee at the request of Senator Harkin in hopes that my comments may shed additional light on the issues of for-profit institutions of higher education.

Reasons for Testifying

My primary reason for being here today is my concern for the future of our PK-12 teaching force, in Iowa and nationally. The state of Iowa values education and continues to implement high standards and rigorous requirements for the preparation of teachers. Iowa understands the singular importance of the classroom teacher to student learning and the clear research on the necessity of quality preparation in providing quality teachers for our K-12 students. With the proliferation of for-profit institutions of higher education, this quality issue could certainly be extrapolated to the general education of our future workforce and leaders.

Although the work of teachers has become eminently more complex in recent decades, attempts at streamlining their preparation have mushroomed. While "traditional" preparation of teachers faces and welcomes increased scrutiny and growing requirements, alternative means of moving individuals into the teaching force have been given what appears to many educators as *carte blanche* treatment. One group of players in the new system of teacher preparation, the for-profit institutions of higher learning, presents a specific threat to the future of our teaching force because of their priorities: bottom line profits over quality education. My last five years have been dedicated to ensuring quality teachers for the state of Iowa; my concern is how that quality

control will continue as an increasing number of teachers are prepared by institutions for whom the bottom line and corporate profits trump attention to the quality of education received by these future teachers.

My second reason for appearing here today results from numerous phone calls and emails that I received from individuals across the country when I worked at the Iowa Department of Education. Time and again my heart went out to individuals who, seeing my name on the Department website, contacted me voicing frustration, anger, helplessness, and stories of time and money wasted on shattered dreams of an education -- an education promised by a for-profit institution of higher education and a promise unfulfilled by that for-profit institution. Often these stories were of mounting debt with nothing to show for it, individuals and families who could easily be devastated by such debt. Interestingly, in my five years at the Department, I received no such contacts regarding more traditional institutions of higher education, whether public or private.

Purpose

My purpose here today is to give you a look into one window of one for-profit institution with an eye toward the quality of programming offered by that institution. The institution is Ashford University. The window is the teacher preparation program, one of few programs at any university that is required to undergo thorough scrutiny. That scrutiny is for the purpose of state approval in fulfillment of the state's responsibility to ensure quality teachers for its K-12 schools.

Iowa System of Review of Educator Preparation Program

In order to ensure quality preparation of teachers and other educators, the Iowa Department of Education operates an approval process based on continuous improvement. Rigorous requirements outlined in "Chapter 79" of the *Iowa Administrative Code* focus on six standards similar to those used for national accreditation by the National Council for Accreditation of Teacher Education (NCATE). Those standards include governance and resources, diversity, faculty, assessment (program), curriculum (student assessment), and clinical practice. Compliance to the standards is expected and required; acknowledgement of excellence and suggestions for further improvement are important aspects of the continuous improvement model. State approval entitles graduates from these programs to receive Iowa licensure upon recommendation of their programs without individual review.

Each of the thirty-two teacher preparation programs is reviewed in a seven-year cycle. Key components of the process include the following:

- 1) Dates for a program review are established. Technical assistance is available from the Department as a program prepares for its review.
- 2) Several months prior to the site review a program submits to the Department an Institutional Report, a self-study based on a template provided by the Department. During the same time the program submits to the Department and to the Board of Educational Examiners (BOEE) documents that delineate requirements for each endorsement (area of licensure) offered by the program.
- 3) The Institutional Report is read and then discussed in a day-long preliminary review. Participating in the Preliminary Review are the State Team and the State Panel; the

review is led by the consultant for preparation at the Department. The State Team consists of seven to fifteen trained volunteer practitioner preparation peers and at least one current practitioner, usually the Iowa Teacher of the Year. This is the team that conducts the site visit. The State Panel consists of nine experienced state reviewers who serve as volunteers for a three-year term; each State Panel member attends all preliminary reviews in a given year and participates on at least one state team. The use of the State Panel and the preliminary review process has proven to be very successful in assisting teams and programs as they prepare for a more in-depth site visit and in providing consistency in reviews of programs that vary greatly is size.

- 4) Following the Preliminary Review the program receives a report specifying questions and requests for further information, if needed. This report provides both the State Team and the program a framework of focus for the site visit.
- 5) The site visit is conducted by the State Team and led by the preparation consultant from the Department. A typical site visit begins on a Sunday evening and concludes on the following Thursday morning with an exit meeting between the state consultant and representatives from the program. The team usually works a minimum of twelve-hour days (Monday and Tuesday) and concludes its work by mid-afternoon on the Wednesday of the visit. All team members, excluding the Department consultant, are volunteers who view this experience as both professional development and professional dues. Amazingly, to a person, these teams end their marathon work having enjoyed the time and the professional stimulation.
 - Team members are assigned a specific standard; in large program reviews more than one team member will review a given standard. Similar to a national review, team members review documents provided by the program and interview faculty, students, administrators, graduates, employers of those graduates, advisory board members, and other stake holders. Team members reviewing the clinical practice standard visit sample PK-12 schools where students in the program complete their student teaching and prestudent teaching clinical experiences. Team members then draft their segments of the Final Report to the program. The team as a whole discusses findings and makes the determination regarding an initial recommendation: whether or not each standard has been met.
- 6) Results of the site visit reported for each of the six standards fall into one of three categories: met or met with strength; met pending conditions; and not met. Any standard receiving a rating of "met pending conditions" must be addressed by the program; the conditions of concern must be corrected within a reasonable amount of time in order for the program to be recommended to the State Board of Education for approval. A rating of "not met" for any given standard indicates that the conditions of concern are considerable; a program may correct such concerns and be recommended for approval within a reasonable amount of time. During that time period the Department is in communication with the program and provides technical assistance as appropriate. Once the Department has received the program's final response and has determined that all six standards have been met, the program is recommended to the State Board for approval. The State Board makes the final decision.

If a program does not correct the concerns to an acceptable level, the program is not recommended for continuous approval. In such an instance a program may be given a one year conditional approval in order to further address issues that the Board determines

problematic, or the Board may determine that the program will lose state approval. In such cases programs are allowed to "teach out" those students currently in the program with close attention to any serious concerns addressed in the report. The use of a "teach out" reflects the policy of the Department to cause "no harm" to students who have begun a program in good faith.

Ashford University

Ashford University, based in Clinton, Iowa, is a wholly owned subsidiary of Bridgepoint Education, Inc., a holding company located in Poway, California. The school was founded in 1918 by the Sisters of St. Francis as a junior college for women and was known as Mount Saint Clare College. Baccalaureate degree programs were initiated in 1979; in 2002, as the institution added graduate degrees, the name of the school was changed to The Franciscan University, later the Franciscan University of the Prairies.

When Bridgepoint purchased the Franciscan University of the Prairies, the university included an established, state approved teacher preparation program. At a meeting with representatives from the Department and the BOEE on July 21, 2005, the president of Ashford University stated that, with the purchase of the university, Bridgepoint purchased an approved teacher preparation program. At that time he gave the impression to the state education officials that he fully expected an automatic continuation of state approval. The president also explained to those in attendance that Ashford University is run according to a business model in which the focus is on the "bottom line"

The approval in place at the time was that of a traditional undergraduate teacher education program, offered on the grounds of the Clinton campus and staffed by a combination of Franciscan sisters and experienced lay teacher preparation educators. This program was to be continued. Totally separate from the original on-ground undergraduate program were a completely online graduate program for initial licensure, the Master of Arts in Teaching (MAT), and a teacher intern program, the alternative preparation model approved in the state of Iowa. These new programs had been conditionally approved on August 12, 2004, and would require a full review before being fully approved. On November 8, 2005, the Department received notice from Ashford University that the intern program had been discontinued and students in that program would have the option of transferring to the MAT program.

Timeline for the Ashford MAT Program

- August 12, 2004: Conditional approval for three on-line programs, including MAT
 - Teacher Intern Program
 - o Master of Arts in Teaching for Initial Secondary Licensure
 - Master of Arts in Teaching for Initial Secondary Licensure, combined with the Teacher Intern Program
- Spring, 2005: Purchase of The Franciscan University (of the Prairies) by Bridgepoint Education, Inc., a holding company housed in Poway, California. School renamed Ashford University
- July 21, 2005: Iowa Department of Education (Department) one-day visit to Ashford

- August 11, 2005: Conditional approval for the above three programs with full review to be completed in April of 2006
- November 8, 2005: Notification to the Department of Ashford's intention to discontinue the Teacher Intern Program
- December 7, 2005: Department/BOEE meeting with Ashford representatives at Grimes Building
- February 2, 2006: Preliminary Review followed by report to Ashford and submission by Ashford of revised Institutional Report
- April 3-5, 2006: On-site visit
- April 19, 2006: Letter to Department stating that Ashford is discontinuing new enrollments in the MAT Program; the most recent cohort to start the program began January 17, 2006.
- May 24, 2006: Department meeting with Ashford representatives at Grimes Building
- July 14, 2006: Letter from Ashford to Department stating a commitment "to meeting all the standards necessary for a successful teach out of the MAT Program."
- July 27, 2006: State Board approves the Ashford University undergraduate practitioner preparation program through the completion of the next program approval process.
- July 27, 2006: The State Board granted 1) an extension of conditional approval of the MAT Program until April 1, 2007, to allow program completion by the cohort of candidates student teaching in the fall of 2006 and 2) an extension of conditional approval of the MAT Program until the September Board meeting to allow a decision to be made at that time regarding the remaining candidates in the MAT Program.
- August 29, 2006: Stipulations were specified for the Ashford MAT in a letter from the Department to Ashford University following the July State Board meeting.
- September 14, 2006: State Board grants extension of conditional approval of the MAT program for the limited purpose of permitting program completion by the cohort of (approximately 66) candidates who are scheduled to student teach in the spring of 2007. Conditional approval extends to July 1, 2007, for these candidates to accommodate completion of the portfolio course, EDU 698, following student teaching.
- July 1, 2007: Ashford MAT Program no longer approved in the state of Iowa

Report of State Review

The Preliminary Review of the Ashford Program was held on February 2, 2006. Following review of the Ashford Institutional Report and discussion by the State Panel and State Team, a preliminary report was sent to Ashford University. A revised Institutional Report was subsequently submitted to the Department by the Ashford program.

The State Team for the Ashford site visit was comprised of the following: four faculty members, including two program chairs, from approved Iowa teacher preparation programs in private colleges; the Administrative Consultant from the Iowa Board of Educational Examiners, the teacher licensing entity in Iowa; and the 2005 Iowa Teacher of the Year. All team members were trained and experienced reviewers. The team was led by the Administrative Consultant for Practitioner Preparation at the Iowa Department of Education.

The Ashford University site visit took place on April 3-5, 2006. Per standard practice, the team reviewed documents provided by the program and interviewed faculty, students, administrators,

and, as possible, graduates, employers of graduates, and stake holders of both the undergraduate and graduate programs. At least ten individuals in administrative positions from California were in attendance or were interviewed via phone. One key individual was not available for interviews: the chair of the teacher preparation program at Ashford until a few months following the Bridgepoint acquisition was under a confidentiality agreement. The State's request to speak with this individual was denied by Ashford University.

A summary of the final report for the review of the Ashford programs is charted below. Both the graduate online program (MAT) and the undergraduate on-ground program are represented. The programs were reviewed separately, a decision made by the State Team and State Panel following the Preliminary Review because it was the judgment of the Team and Panel that these were two discrete, uncoordinated and very different programs. Later interviews with faculty members of both programs confirmed this fact and reinforced the total lack of communication, collaboration, and coordination between the two programs.

Undergraduate Program MAT Online Program

Standard	Initial	Number of	Final	Initial	Number of	Final
Standard	Finding	Item to be	Finding	Finding	Item to be	Finding
	Tilluling	Addressed	Tilluling	Tilluling	Addressed	Tilluling
		Auulesseu			Audiesseu	
Carramana	Met	0	Met	Not Met	13	Not Met
Governance	Met	U	Met	Not Met	13	Not Met
and						
Resources						
Dii4	Mat	1	Mat	Mat	1	Met
Diversity	Met	1	Met	Met	1	Met
	Pending			Pending		
	Conditions			Conditions		
.	3.6	0	3.6	NT . N. f	1.1	NT / N. f. /
Faculty	Met	0	Met	Not Met	11	Not Met
	3.5	2	3.6	37.36		27 . 26 .
Curriculum	Met	3	Met	Not Met	9	Not Met
	Pending					
	Conditions					
Assessment	Met	3	Met	Not Met	10	Not Met
(Program)	Pending					
	Conditions					
Clinical	Met	0	Met	Not Met	11	Not Met
Practice						

In the standard process programs make needed changes, provide the Department evidence of those changes, and then are recommended to the State Board for approval. For the Ashford undergraduate program the Department received evidence of appropriate changes that allowed the designation for all standards to be "Met." Regarding the MAT program, the Department received responses to all of the items that required attention. In some cases evidence indicated that appropriate changes had been made. In most cases, however, the response denied the existence of a problem or defended the current practice; in those cases no evidence of change was seen.

The State Team found the Ashford MAT program to be more a collection of discrete courses than a cohesive program. The program was understaffed for appropriate interaction with students and supervision of both courses and clinical experiences, including student teaching. Many faculty members lacked appropriate academic background and/or experiences for their assigned responsibilities. The team saw no evidence of a comprehensive system for assessment of candidates or of the program, two critical requirements of the state administrative code. The most serious concern noted by the team was the lack of responsibility on the part of the program in providing quality clinical experiences, the aspect of teacher preparation considered the most important by preparation programs in Iowa. Generally, students were responsible for finding their own clinical placements; many of these resulting placements conflicted with what is considered best practice for Iowa preparation. Responsibility for supervision was basically relinquished to individuals within those K-12 schools with little consistency or quality control.

Discussions within the Department and with State Team members determined that the MAT program did not meet the requirements for approval and that a teach-out of the students in the program at that time would be recommended to the State Board. This option had been discussed with the Director of the Department of Education following the Preliminary Review. A teach-out was discussed with the Ashford Chancellor at the conclusion of the site visit when the team had synthesized their findings and determined the existence of significant areas of concern. The Chancellor expressed appreciation for that option; she, personally, wanted to cause as little harm as possible to students in the program.

Teach-Out of Ashford MAT Students

Following a meeting between Ashford representatives and the Department on May 24, 2006, Ashford University requested a teach-out of the MAT program, allowing all students in the program the opportunity to complete the program and graduate.

Three stipulations were specified for the teach-out of Ashford MAT in a letter from the Department to Ashford University following the July State Board meeting. These requirements included the following:

- 1) Each candidate shall student teach in an environment with appropriate support.
- 2) Each student teacher shall have no fewer than six classroom observations during the 12 weeks of student teaching.
- 3) Ashford shall hire a qualified person to monitor the finalization of coursework by candidates as well as student teaching.

Additionally, specific information required by the Department addressed the following: candidate and student teaching information; candidate transcript review; online courses; responsibilities and training of clinical supervisors and cooperating teachers; documentation provided to students; and plans to address problems in student teaching.

A critical requirement was the hiring of an independent professional educator to oversee the teach-out. Vicki Goldsmith was hired by Ashford on August 9, 2006, as Director of Supervision to monitor the final coursework and student teaching of Ashford MAT candidates. Ms Goldsmith, the 2005-2006 Iowa Teacher of the Year, is a retired English teacher and served as clinical expert on six practitioner preparation visit teams during the 2005-2006 school year. In that capacity she monitored eleven online courses and oversaw the student teaching supervision of 108 student teachers. Having monitored threaded discussions within the online courses, Ms. Goldsmith reinforced concern about the quality of coursework that was initially found by the State Team during the onsite visit. Ms. Goldsmith observed student teachers who were determined to be having significant problems; at Ashford's expense, Ms. Goldsmith traveled to North Carolina, South Carolina, Kentucky, Michigan, Colorado, and Georgia as well as several schools in Iowa. Ms. Goldsmith recollects that, of the 108 student teachers, eight had serious enough problems to discontinue the student teaching experience, thus disallowing completion of the program.

Regarding the student teachers, Ms. Goldsmith stated, "The students in the MAT program were almost all middle-aged people changing careers, people with maturity and life experience, so several of them were competent and could use past experience in their new work. One problem, however, was that since we (the Ashford faculty) had not met any of the students, it was easy for ones with significant problems to get through the program without being noticed. Had we not called attention to the poor quality of some of the courses and the poor performances of some of the student teachers, I am convinced that the ones we pulled from the program would now be licensed. . . . I was relieved that the people we pulled were not licensed from Iowa or in our classrooms." In a recent interview Ms. Goldsmith shared this conclusion, "In the past five years I have made fourteen state approval visits. I am concerned that the quality of the programs at forprofit schools is inconsistent and not on a level with the other teacher preparation programs."

As a personal point of privilege, I must note that my colleagues at the BOEE, the Department, and those on the site visit State team agree with me on an interesting dichotomy. As we have interacted with a number of individuals from Ashford over the years, we have encountered a lack of understanding of teaching and teacher preparation, arrogance and even blatant rudeness. We have, however, worked effectively with several individuals from Ashford who, personally, seem to understand teaching and preparation well and exhibit high degrees of professionalism.

Partnership with Rio Salado College

Some months after the completion of the Ashford teach-out I contacted an Ashford official regarding a student complaint. At that time I was told about a partnership that Ashford University had forged with Rio Salado College, one of ten colleges in the Maricopa County Community College District in Arizona. Education courses from the Ashford BA in Social Science with a Concentration in Education apply to Rio Salado's post-baccalaureate teacher education program. Once students have completed the online Ashford BA and the online Rio Salado teacher education program, they are eligible for an Arizona teaching license. Such a

license can then be transported to another state according to each state's reciprocity/exchange policies. This partnership could be seen as a creative way to solve a problem in order to continue drawing students, or it could be seen as a way to circumvent the accountability system for quality in order to continue collecting tuition from students.

An individual who has attained an Arizona license in this way does not automatically receive an Iowa license. The BOEE is just beginning to receive applications from Iowans who have taken this route. The two following examples demonstrate the difference between an Iowa license and one attained through the Rio Salado program:

- 1) An elementary education applicant for an initial Iowa teaching license had completed most of her coursework in an Iowa preparation program and then completed the Rio Salado program for an Arizona license. When she applied for an Iowa license she still had deficiencies; according to a consultant at the BOEE, had she not completed the coursework that she did at an Iowa college, the deficiencies would have been considerable.
- 2) A current applicant for an Iowa license, having completed the Rio Salado program and holding an Arizona license, meets the requirements in Iowa for only one of the three teaching areas accepted in Arizona.

From these examples one could conclude that an individual completing the Ashford BA and the Rio Salado program would still have considerable coursework to complete in order to attain an Iowa license.

Contacts with the Department with Ashford Students

At the time of the teach-out my colleague at the Department Dr. Carole Richardson and I received calls and emails from several Ashford students who were unhappy with the way they were being treated by the Ashford program. Some appeared to have legitimate complaints; some were angry that they had not been allowed to complete the program because Ashford had determined that they did not demonstrate the skills and knowledge necessary to complete student teaching and be licensed. In all cases we contacted the Ashford program in order for them to address the students' concerns.

Following the teach-out in 2006-2007 Dr. Richardson and I received numerous emails and phone calls regarding the Ashford MAT Program. Phone logs indicate that, as late as the spring of 2010, my last months at the Department, I was still receiving as many as three to six calls a month. My colleagues in the BOEE, the state's teacher licensing arm, received similar numbers of calls.

Some calls were simply information-seeking; many were calls of frustration by students with stories of incurring loans and no resulting job that would enable them to make payments. Contacts with the Department have fallen into one of four categories: officials from states other than Iowa; potential education students; current non-education students; and current or recent education students. Licensure officials in several states have called to ask whether the Ashford MAT is an approved program in Iowa in order for them to determine whether or not they will issue a license to an Ashford graduate in their state. Potential Ashford students usually have the same question as those state officials; some potential students immediately determine to look

elsewhere and some decide to follow the option of contacting the Ashford program to discuss the partnership with Rio Salado College. These are the fortunate individuals; they are able to prevent an ill-fated situation for themselves. At times Ashford non-education students call the Department with complaints for lack of anyone else to call, voicing complaints that I could only refer to the Iowa College Student Aid Commission.

Common complaints have included such issues as the following: inaccurate information, lack of or tardy response from the university when students attempt to ask questions or share concerns; financial issues of many types; pressure to enroll or purchase text books in short time frames; rudeness; and general lack of helpfulness. One student summed up her experience in the comment, "That school has been a nightmare."

Calls from current or former Ashford education students may have included any of the above complaints, but more often these complaints addressed misinformation received from Ashford recruiters. As a result of the 2006 state review of Ashford University, the only Ashford program that results in qualification for an Iowa teaching license is the on-ground undergraduate program. Recruiters for Ashford University have provided misinformation to numerous individuals regarding the ability to attain an Iowa teaching license through online course at Ashford. Specifically, the following examples are representative:

- 1) Individuals from Iowa and many other states who had completed Ashford's online Bachelor of Arts in Social Science with a Concentration in Education. These individuals had been led to believe that, upon completion of this program, they would be eligible for a license in their home state because Ashford has a state-approved teacher education program (the on-ground undergraduate program).
- 2) Individuals who were students or graduates of the Ashford online baccalaureate program, but were not aware of the need to complete the Rio Salado program as well in order to receive an Arizona license. These individuals were not even aware of the Rio Salado partnership.
- 3) Ashford students who were intending to complete student teaching through Rio Salado College and believed they would then automatically be eligible for an Iowa teaching license.
- 4) Students who were completing an online degree through Ashford in early childhood and believed that this degree would lead to an Iowa teaching license. It does not.

The basic problem is the misinformation provided to potential students by recruiters who, according to conversations with an Ashford official, are paid on a commission basis. The height of ignorance and/or arrogance was evident when the Department received a phone call from one of the recruiters to chastise us for telling a potential student that the Ashford program was not approved in the state of Iowa.

A concern that my colleagues and I have discussed repeatedly over time is the question of how many other students have similar complaints, but have not voiced them to us – or to anyone else. We are concerned that we have heard from just the "tip of the ice berg."

This overriding concern regarding misinformation continues. As the Department and the BOEE have shared student stories with Ashford and have referred students to the Dean and Chancellor over the years, Ashford has made changes in their website that reflect more accurate information about licensure. One could argue, however, that the advertising, both on the website and in the

media, regarding the goal of becoming a teacher via Ashford are much more visible than the single statement within a paragraph in smaller print that explains the limitations of licensing for graduates from this program. According to Administrative Consultant Susan Fischer and other BOEE officials, the BOEE currently receives up to a dozen calls a month regarding Ashford's online program.

Closing Comments

When the bottom line dominates the decision-making process for educational programming, businesses providing the "service" of education will continue to circumvent a system that protects college students and potential college students. More importantly – for those of us focused on K-12 education – such shortcuts in preparing teachers, if allowed to continue and grow, will result in inadequately prepared teachers in our nation's future classrooms.

Conscientious educators understand that changes need to be made in many of our K-12 classroom as well as in the preparation of our teachers. Conscientious educators understand that innovation and technology must be part of these changes. But change for the sake of change, change that fails to look to the future for unintended consequences, is not true innovation.

If we believe that the education of our children is the key to the future of this country, we cannot afford the preparation of our teachers to be short-changed by businesses for whom the bottom line is the "bottom line." An unbridled business model in education will lead to disaster for education in the United States.

The example that Ashford University provides is instructive. I respectfully submit that we pay attention.