

November 2005

NO CHILD LEFT BEHIND ACT

Improved
Accessibility to
Education's
Information Could
Help States Further
Implement Teacher
Qualification
Requirements





Highlights of [GAO-06-25](#), a report to congressional requesters

Why GAO Did This Study

The No Child Left Behind Act (NCLBA) of 2001 established qualification requirements that teachers of core academic subjects must meet by the end of the 2005-2006 school year. Congress has appropriated approximately \$3 billion a year through the Title II, Part A (Title II), of NCLBA for teacher improvement programs since the law was passed. With the deadline approaching for all teachers to meet the requirements, GAO was asked to examine (1) the status of state efforts to meet NCLBA's teacher qualification requirements, (2) the use of Title II funds in selected districts, and (3) how the U.S. Department of Education (Education) monitors states and assists them with implementation of the requirements. To obtain this information, GAO reviewed teacher qualifications data submitted to Education by 47 states, conducted site visits to 6 states selected for variance in factors such as teacher requirements and geographic location, visited 11 school districts across these states identified as high-need, and interviewed national experts and Education officials.

What GAO Recommends

GAO recommends that the Secretary of Education explore ways to make the Web-based information on teacher qualification requirements more accessible to users of its Web site. In comments, Education officials agreed with our recommendation and reported taking actions to address it.

www.gao.gov/cgi-bin/getrpt?GAO-06-25.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Marnie Shaul at (202) 512-6778 or shaulm@gao.gov.

NO CHILD LEFT BEHIND ACT

Improved Accessibility to Education's Information Could Help States Further Implement Teacher Qualification Requirements

What GAO Found

Data reported to Education by 47 states suggest that the majority of core academic classes were taught by teachers who met NCLBA requirements during the 2003-2004 school year. States have improved in their ability to track and report the percentage of core academic classes taught by teachers who met NCLBA qualification requirements, but several limitations on the quality and precision of state-reported data make it difficult to determine the exact percentage of core academic classes taught by teachers meeting the requirements. Five of the 6 states that we visited allowed veteran teachers to demonstrate subject matter competency through a state-developed procedure called High Objective Uniform State Standard of Evaluation (HOUSSE). Officials in states and districts that we visited said that teachers of multiple subjects, such as teachers in rural schools with a small teaching staff, would likely face challenges meeting the requirements by the 2005-2006 deadline.

The 11 school districts that we visited all used Title II funds to provide professional development, and most used Title II funds to reduce class size. Officials in the majority of these districts indicated that NCLBA had led to improvements in the kinds of professional development they funded with Title II funds. Although officials in over half of the districts indicated that they continued to use Title II funds to reduce class size, an activity that was supported under a federal program that predated NCLBA, some district officials told us that they had shifted funds away from class size reduction to initiatives designed to improve teachers' subject matter knowledge and instructional skills, such as professional development. All districts that we visited reported considering student achievement data and targeting Title II funds to improve instruction in the academic subjects in which students were lagging behind. In the 11 districts, few efforts funded with Title II targeted specific groups of teachers, such as teachers in high-poverty schools. Title II funds constituted a small proportion of total funds that districts could use for teacher improvement initiatives, and all districts that we visited used several other funding sources to support their teacher programs.

Education monitored state efforts to meet the teacher qualification requirements and offered multiple types of assistance to help teachers meet the requirements. In monitoring states, Education has found several areas of concern, such as states not ensuring that certain newly hired teachers met NCLBA's requirements. Education's assistance has included professional development for teachers and site visits to provide technical assistance to state officials. Education officials said that their Web site has been an important tool for disseminating resources about the requirements, but officials from most states and districts that we visited told us that they were unaware of some of these resources or had difficulty locating them, despite frequently using the Web site.

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Abbreviations

HOUSSE	High Objective Uniform State Standard of Evaluation
IDEA	Individuals with Disabilities Education Act
LEA	local education agency
NCLBA	No Child Left Behind Act
TAC	Teacher Assistance Corps

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United States Government Accountability Office
Washington, DC 20548

November 21, 2005

The Honorable John A. Boehner
Chairman
The Honorable George Miller
Ranking Minority Member
Committee on Education and the Workforce
House of Representatives

Although research over the past 10 years has shown that teachers play a significant role in improving student performance, many teachers, especially those in high-poverty districts, lack competency in the subjects they teach. Recognizing this, the Congress passed the No Child Left Behind Act of 2001 (NCLBA), which established qualification requirements for the nation's approximately 3 million public school teachers, and made states, districts, and schools responsible for ensuring that teachers meet these requirements. Specifically, the act requires that teachers of core academic subjects such as math and science be "highly qualified" by the end of the 2005-2006 school year.¹ To meet the requirements, teachers must (1) have at least a bachelor's degree, (2) be certified to teach by their state, and (3) demonstrate subject matter competency in each core academic subject they teach. Under the act, teachers may demonstrate subject matter competency through different avenues, including a state-developed High Objective Uniform State Standard of Evaluation

¹ In its October 21 letter to the states, the Department of Education (Education) indicated that states demonstrating a good-faith effort to meet the teacher qualification requirements will have until the end of 2006-2007 school year for all teachers to become highly qualified. Education acknowledged the effects of Hurricane Katrina on the ability of some states to meet the teacher qualification requirements by the deadline, and noted in this and other correspondence that it will work with affected states and school districts to determine whether any flexibility will be needed with regard to implementing these requirements. As of October 21, Education had not granted any waivers regarding the teacher qualification requirements to affected states, but indicated that it may consider certain waivers or additional flexibility, depending on state's needs. Education indicated in a September 21 letter to Louisiana that it may extend the deadline for reporting on the state's implementation of NCLBA provisions, including reporting on the status of teachers in meeting the requirements, if the states determine that additional time is needed. In response to Mississippi's request for a waiver of the teacher qualification requirements, Education noted in a September 12 letter to the state that it would continue to review this matter and would like more information to assess the state's specific needs. Finally, Education noted in a September 21 letter to Texas that it will postpone its monitoring visit to assess the state's implementation of the teacher qualification requirements, originally scheduled for December 2005.

(HOUSSE). State HOUSSE procedures give veteran teachers—generally those with 1 or more years of experience—the opportunity to demonstrate subject matter competency through teaching experience, professional development, coursework, and other activities. If teachers do not meet the requirements, school districts may be required to take certain actions, such as providing additional professional development.²

To help states and districts meet NCLBA’s teacher qualification requirements, the Congress has appropriated approximately \$3 billion a year in grants through the Title II, Part A (Title II), of NCLBA since the law was passed. This amount constituted about 7 percent of all federal funds made available to states in 2004 for supporting education in kindergarten through 12th grade. Title II replaced the Eisenhower Professional Development and Class-Size Reduction programs, allowing states and districts to use funds for similar purposes, including training of teachers and hiring of additional teachers to reduce class size, as well as various other activities to help recruit, retain, and develop teachers. The Department of Education (Education) monitors states’ implementation of NCLBA and provides assistance to states to help them understand the teacher qualification requirements in the act and appropriate uses of Title II funds.

In our prior work, we found that states and districts faced challenges in ensuring that teachers met the requirements and also generally did not have data systems that could track teacher qualifications by subject in order to determine teachers’ status in meeting the requirements for those subjects.³ In response to congressional requests, we are providing information on (1) the status of state efforts to meet NCLBA’s teacher qualification requirements, (2) the use of Title II funds in selected districts, and (3) how Education monitors states and assists them with implementation of the requirements.

To obtain this information, we used multiple data collection methods. First, to provide a national perspective, we reviewed teacher qualification

² In its October 21 letter to the states, Education indicated that it reserves the right to take appropriate action including the withholding of funds if states are not in compliance with the statutory teacher qualification requirements or are not making a good-faith effort to ensure that all teachers meet the qualification requirements.

³ See GAO, *No Child Left Behind Act: More Information Would Help States Determine Which Teachers Are Highly Qualified*, [GAO-03-631](#) (Washington, D.C.: July 17, 2003).

data in the consolidated performance reports that 47 states submitted to Education for the 2003-2004 school year, the latest year for which these reports were available. The remaining 3 states, the District of Columbia, and Puerto Rico did not provide these data to Education. We identified several factors that affect the accuracy of these data and preclude a comparison of classes taught by teachers meeting the requirements across states. However, on the basis of our work, we determined state-reported percentages could be used to demonstrate how close a particular state was to reaching the goal of having all its teachers meet the requirements. The extent of the data limitations is not currently known, and Education has followed up with all states to obtain additional information on their processes for collecting these data. Second, to provide information on how selected states and districts are implementing the requirements and using Title II funds, we visited and interviewed officials in 6 states—California, Colorado, Kansas, Maryland, Rhode Island, and Tennessee—to collect in-depth information on their efforts to meet teacher qualification requirements and use of Title II funds. These states were selected for variance in procedures for teachers to demonstrate subject matter competency, reported quality of their data systems, amount of Title II funds received, and geographic location. At the time of our site visits, none of the states had been visited for monitoring purposes by Education. Across these states, we visited 11 of the nation’s 14,466 school districts, including both urban and rural districts that state officials had identified as high-need based on their poverty level and teacher challenges they experienced. We also interviewed officials from Education, national education organizations, and teachers’ unions. In addition, we reviewed Title II monitoring reports completed by Education as of July 2005. Finally, we analyzed Education’s documents and Web site, legislation, and other materials related to the teacher qualification requirements and Title II funds. We conducted our work between November 2004 and October 2005 in accordance with generally accepted government auditing standards.

Results in Brief

The data reported by 47 states to Education suggest that the majority of core academic classes were taught by teachers who met NCLBA requirements during the 2003-2004 school year. States have improved in their ability to track and report the percentage of core academic classes taught by teachers who met NCLBA qualification requirements, but several limitations affect the quality and precision of state-reported data, making it difficult to determine the exact percentage of core academic classes taught by teachers meeting the requirements. Five of the 6 states that we visited had HOUSSE procedures in place that offered multiple options for veteran teachers—generally those with 1 or more years of experience—to

demonstrate subject matter competency, such as through a combination of experience, academic coursework or professional development, and leadership or service activities. Three of these states also used other methods of evaluating teachers' subject matter knowledge as part of their HOUSSE procedures, such as observing teachers' performance or assessing teachers' contributions to student achievement. Despite the number of ways allowed for teachers to demonstrate subject matter competency, state and district officials and national association representatives told us that teachers providing instruction in multiple core academic subjects, such as teachers in rural schools with a small teaching staff, would likely face difficulty in meeting the requirements by the deadline of school year 2005-2006.

The 11 school districts that we visited used Title II funds to provide professional development for teachers, particularly in core academic subjects. Officials in the majority of these districts also told us that NCLBA's emphasis on student achievement and on strategies supported by research had led to improvements in the kinds of professional development they funded with Title II funds. Officials in 7 of the 11 districts indicated that they continued to use Title II funds to support class size reduction efforts, but some district officials told us that they had begun shifting emphasis from class size reduction to professional development. In identifying appropriate uses of Title II funds, most districts that we visited considered student achievement needs and then targeted programs, such as professional development, to those academic subjects where students were lagging behind. However, only a few of these efforts targeted specific groups of teachers, such as teachers in high-poverty schools. Title II funds are generally a small part of total funds available to the districts for teacher initiatives, and districts visited also used non-Title II funds to address their teachers' needs, including other federal, state, and local funds. For example, one district used other federal funds to help teachers prepare for subject matter exams; another district used private foundation funds to provide financial incentives for teachers who accepted positions in the district's most struggling schools.

Education monitored states' efforts to meet the teacher qualification requirements through its Title II monitoring process and offered assistance to states and districts that included professional development for teachers, on-site visits, and guidance. In the 20 state monitoring reports that Education had issued as of July 2005, it identified several areas of concern related to states' implementation of the teacher qualification requirements. For example, one frequent finding was that states did not require teachers of history, geography, civics/government, or economics to demonstrate

subject matter competency in each subject taught, as required under NCLBA, but instead allowed them to demonstrate competency in the broad subject of social studies. Education also offered a variety of assistance both to the nation's approximately 3 million public school teachers and to state officials responsible for implementing the requirements. To assist teachers, Education offered professional development opportunities during 2004 and 2005 that were attended by about 4,500 teachers and distributed 255,000 "Toolkit for Teachers" information packets. Assistance to state officials included site visits to discuss NCLBA's teacher qualification requirements and offer technical assistance, information on innovative state and local initiatives, and guidance. Education officials said that the department's Web site has been an important part of their efforts to implement NCLBA's teacher qualification requirements. However, officials from most states and districts that we visited told us that they were unaware of some of these resources or had difficulty locating them, even though they use Education's Web site to access information on teacher requirements and programs. For example, officials from 4 states told us that information on other states' efforts to improve teacher qualifications would be helpful, but they were unaware that Education offered this online. Our review of Education's Web site found that resources on NCLBA's teacher qualification requirements were located on several different Web pages that were sometimes not linked, making it challenging to find them.

To help states address the issues of teacher quality and ensure that all teachers meet NCLBA's qualification requirements, we are recommending that the Secretary of Education explore ways to make the Web-based information on teacher qualification requirements more accessible to users of its Web site through such activities as more prominently displaying the link to state teacher initiatives or enhancing the capability of the search function.

Background

The NCLBA of 2001 amended and reauthorized the Elementary and Secondary Education Act, the largest and most comprehensive federal education law. The focus of this legislation is on improving students' academic performance. A growing body of research has shown that teacher effectiveness is a significant factor in improving students' academic performance. Research has also shown that many children, especially those in high-poverty and high-minority schools, are assigned to teachers who lack knowledge of the subjects they teach. For example, a 2004 report stated that one out of four high school courses was being taught by teachers without a college major, or even a minor, in the subject

taught, and that students in high-poverty classrooms were more likely to be assigned to such teachers than students in low-poverty classrooms.⁴

Historically, states have been responsible for developing and administering their education systems, and most states have delegated the authority for operating schools to local governments. States and local governments provide most of the money for public elementary and secondary education. Education reported that 49 percent of the revenue for public elementary and secondary education in the 2001-2002 school year came from state sources, 43 percent came from local sources, and 8 percent came from federal sources.⁵ As a result, state and local dollars fund most major expenses, such as teacher salaries, school buildings, and transportation. Although the autonomy of districts varies, states are responsible for monitoring and assisting their districts that, in turn, monitor and assist their schools.

The federal government has played a limited but important role in education. Education's mission is to ensure equal access to education and promote educational excellence throughout the nation by, among other things, supporting state and local educational improvement efforts, gathering statistics and conducting research, and helping to make education a national priority. Education is responsible for providing assistance to states to help them understand the provisions or requirements of applicable laws and oversees and monitors how states implement them. With the passage of NCLBA, which requires public school teachers to be highly qualified in every core academic subject they teach,⁶ the federal government for the first time established specific criteria for teachers.

The act requires all teachers of core academic subjects to have a bachelor's degree, state certification, and demonstrable subject matter

⁴ "The Real Value of Teachers," *Thinking K-16*, Vol. 8, Issue 1 (The Education Trust, Winter 2004).

⁵ U.S. Department of Education, National Center for Education Statistics, *The Condition of Education 2005*. (U.S. Department of Education, Institute of Education Sciences, 2005).

⁶ Core subjects include English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography.

competency for each core subject taught.⁷ Under the act, teachers may not have state certification requirements waived on an emergency, temporary, or provisional basis. According to the Education Commission of the States, every state required 4 years of college preparation for teacher certification as of 1974. However, ensuring that all teachers are certified and can demonstrate competency in the subject matter they teach presents a new challenge for many states. Allowable ways for teachers to demonstrate subject matter competency vary depending upon a teacher's experience and the grade level being taught. (See fig. 1.) For example, elementary teachers new to the profession must pass a state test to demonstrate subject knowledge and teaching skills. States have the flexibility to identify and approve such tests for new teachers, as well as establish the passing scores on the tests. Middle school and high school teachers have a number of options available to them for demonstration of subject matter competency, including a college major or a state test in the subject taught. In addition to the options available for new teachers, veteran teachers have an additional avenue for demonstrating subject matter competency through their state's HOUSSE procedures.⁸

⁷ NCLBA requirements make an exception in the certification requirement for charter school teachers. The law provides that teachers in charter schools meet the certification requirements set forth in their state's charter school law regarding certification or licensure. A recent GAO survey found that officials in 13 of the 39 surveyed states reported that their state law exempted charter school teachers from certification requirements.

⁸ We use the term "veteran teacher" to refer to teachers who are not new to the teaching profession. Education's August 2005 guidance says that states have the authority to define which teachers are new and not new to the profession, as long as these definitions are reasonable. According to the guidance, Education believes that teachers with less than 1 year of experience should be considered new and therefore must meet subject matter competency requirements using the methods allowable for new teachers.

Figure 1: Federal Teacher Qualification Criteria

	NCLBA's subject matter competency requirement		
	Type of teacher	Elementary	Secondary (middle and high school)
Bachelor's degree and state certification are required for all teachers	New	<ul style="list-style-type: none"> • State test^a 	One of the following options: <ul style="list-style-type: none"> • State test^b • Major • Coursework equivalent to major • Graduate degree • Advanced certification^c
	Veteran	One of the following options: <ul style="list-style-type: none"> • State test^a • HOUSSE 	One of the following options: <ul style="list-style-type: none"> • State test^b • Major • Coursework equivalent to major • Graduate degree • Advanced certification^c • HOUSSE

Source: NCLBA Pub.L.No. 107-110, section 9101(23).

^aMust be a rigorous state test assessing subject and teaching skills in reading, writing, mathematics, and other areas of the basic elementary curriculum.

^bMust be a rigorous state test in the academic subject taught.

^cAn example is the attainment of a National Board Certification in the subject and grade level taught.

States can make the HOUSSE option available to veteran teachers at all grade levels. The act sets forth some general criteria for states to use in developing an acceptable evaluation standard. For example, the standard must be developed in a way that provides objective and coherent information about the teacher's attainment of core content knowledge, must be aligned with state academic content and student achievement standards, and must be uniformly applied to all teachers of the same subject and grade level in the state.

In March 2004, Education announced additional flexibilities to help teachers who deliver instruction in multiple core academic subjects and science teachers meet the requirements. Education announced that veteran teachers who provide instruction in multiple core academic subjects will be able to demonstrate their subject matter competency through a single set of procedures, such as a single, streamlined HOUSSE covering multiple academic subjects. Education also announced that teachers in eligible rural areas who teach multiple core academic subjects and meet the requirements in at least one of those subjects would have additional time to demonstrate subject matter competency in the other

subjects. Further, Education allowed states to rely on their own certification requirements for science to determine specific science areas in which teachers will be required to demonstrate subject matter competency. For example, if a state certified teachers in the general field of science, then a teacher may demonstrate subject matter competency in the general science area instead of each separate science subject, such as physics or biology.

According to Education's August 2005 nonregulatory guidance, the NCLBA teacher qualification requirements apply to special education teachers who provide instruction in core academic subjects, such as teachers in self-contained classrooms.⁹ These teachers may demonstrate subject matter competency by using any of the options allowed to other teachers under NCLBA.

Qualification requirements for special education teachers were modified in the December 2004 reauthorization of the Individuals with Disabilities Education Act (IDEA).¹⁰ The reauthorized IDEA allowed some special education teachers additional flexibility in terms of meeting subject matter competency requirements. First, new special education teachers at the elementary level who are teaching exclusively children with significant cognitive disabilities may use the state HOUSSE procedures to demonstrate subject matter competency, an option otherwise reserved under NCLBA to veteran teachers.¹¹ Second, new special education teachers who teach multiple core academic subjects exclusively to special education students and already meet the requirements in mathematics, language arts, or science, have 2 years after hiring to demonstrate subject matter competency in the other subjects taught. Teachers in this second category may also do this through the HOUSSE process, including a single

⁹ A self-contained classroom is one in which the students stay with their teacher all day and for all academic subjects. In these classrooms, the special education teacher is responsible for providing instruction in more than one core academic subject and thus would need to demonstrate subject matter competency in each of the subjects taught.

¹⁰ IDEA is the primary federal law that addresses the educational needs of students with disabilities. Among other provisions, the law mandates that a free appropriate public education be made available to all eligible children with disabilities and requires an individualized education program for each student.

¹¹ Under IDEA, states can determine the level of instruction provided by middle and high school teachers who teach students with significant cognitive disabilities. If the level of instruction that is being provided is equivalent to the level of instruction at the elementary level, the requirements for elementary teachers apply.

evaluation covering all academic subjects taught. Finally, veteran special education teachers who teach multiple core academic subjects exclusively to special education students have the option of demonstrating subject matter competency through a multisubject HOUSSE, consolidated to assess teachers' subject matter knowledge in multiple subjects through a single process.

The deadline for teachers to meet the requirements depends on the type of school in which they work. Starting with the first day of the 2002-2003 school year, all new teachers hired into school programs supported with Title I funds must demonstrate compliance with the requirements immediately upon hire.¹² Most other teachers have until the end of 2005-2006 school year to meet the requirements in the law. The current timelines for teachers to meet the requirements are shown in figure 2.¹³

¹² Title I, Part A, of the Elementary and Secondary Education Act, allocated more than \$12 billion in fiscal year 2004 to serve disadvantaged students in approximately 90 percent of the nation's school districts.

¹³ In October 2005, Education announced that states showing sufficient effort in implementing the teacher qualification requirements but still falling short of having all their teachers meet them by the end of 2005-2006 school year, will be able to negotiate with Education a plan for achieving that goal by the end of 2006-2007 school year.

Figure 2: Phase-in of Teacher Qualification Requirements

Categories of teachers	Title I teachers hired on or after first day of 2002-2003 school year	Most other teachers of core academic subjects	Current rural teachers who teach two or more core academic subjects and who had already met the requirements in at least one subject	Newly hired rural teachers who teach two or more core academic subjects and who had already met the requirements in at least one subject	Newly hired special education teachers who teach two or more core academic subjects and who had already met the requirements in at least one subject
Deadlines for meeting requirements	Immediately upon hiring	End of 2005-2006 school year	End of 2006-2007 school year	3 years after hiring	2 years after hiring

Source: NCLBA Pub.L.No. 107-110 section 1119(a), Education's August 2005 Title II, Part A, Non-Regulatory Guidance, and IDEA Pub. L. No. 108-446, section 602(10).

Prior GAO work found that states and districts were experiencing challenges implementing NCLBA’s teacher qualification requirements. Among the most commonly cited challenges were difficulties with teacher recruitment and retention resulting from factors such as low teacher pay, lack of adequate professional development opportunities, and difficulty developing and implementing state data systems for tracking teacher qualifications.¹⁴ We found that challenges were especially acute in small, isolated rural districts where teachers often had to teach multiple subjects across different grade levels.¹⁵ Furthermore, although we found that all states required that special education teachers have a bachelor’s degree and be certified to teach—two of the three NCLBA teacher qualification requirements—many states did not require them to demonstrate subject matter competency. As the result, we concluded that state-certified special education teachers who were assigned to teach core academic subjects

¹⁴ See [GAO-03-631](#).

¹⁵ See GAO, *No Child Left Behind Act: Additional Assistance and Research on Effective Strategies Would Help Small Rural Districts*, [GAO-04-909](#) (Washington, D.C.: Sept. 23, 2004).

might not be positioned to meet NCLBA requirements.¹⁶ In the aftermath of Hurricane Katrina, states and districts faced with large numbers of displaced teachers and students may have additional challenges tracking teacher qualification status and ensuring that all teachers meet the requirements by the deadline. Education indicated that it will work with affected states and school districts to determine what flexibility will be needed with regard to implementing the teacher qualification requirements.

Federal funding for teacher initiatives was provided prior to NCLBA, but the act increased the level of funding to help states and districts implement the teacher qualification requirements. Prior to NCLBA, the Eisenhower Professional Development and Class-Size Reduction programs provided funds to the states primarily for professional development in mathematics and science and efforts to reduce class size for students in kindergarten through third grade. Title II replaced these two programs, providing states and districts with approximately \$2.85 billion for fiscal year 2002 to help them implement various initiatives for raising teacher and principal qualifications—\$740 million more than provided in fiscal year 2001 under the previous two programs. In fiscal year 2004, Title II provided \$2.93 billion to states and districts through Improving Teacher Quality State Grants.

The formula currently used to allocate funds to states and districts is similar to the formula used under the Eisenhower Professional Development and the Class-Size Reduction programs and takes into account poverty and student enrollment. Specifically, the amount of Title II funds that each state or district receives is based on its 2001 allocation under the two previous programs, the number of children aged 5 to 17, and the number of those children residing in families with incomes below the poverty line.¹⁷ After reserving up to 1 percent of the funds for administrative purposes, states allocate 95 percent of the remaining funds to the districts. They retain 2.5 percent to support state-level teacher initiatives and allocate the remaining 2.5 percent to the state agency for higher education to support partnerships between higher education

¹⁶ See GAO, *Special Education: Additional Assistance and Better Coordination Needed among Education Offices to Help States Meet NCLBA Teacher Requirements*, [GAO-04-659](#) (Washington, D.C.: July 15, 2004).

¹⁷ For 2004, the poverty threshold was \$19,484 annually for a family of four.

institutions and high-need districts that work together to provide professional development to teachers.

While there is no formula in NCLBA for districts to allocate funds to specific schools, the act requires states to ensure that districts target funds to those schools with the highest number of teachers who are not highly qualified, the largest class sizes, or that have been identified to be in need of improvement. In addition, districts applying for Title II funds from their states are required to conduct a districtwide needs assessment to identify their teacher quality needs. Among other things, the needs assessment should identify those needs that must be addressed if the district is to have all its teachers meeting NCLBA's requirements by the deadline. The needs assessment should take into account activities needed to provide teachers with the means for helping students meet challenging state and local academic achievement standards. Districts must involve teachers in the development of their needs assessment and may consider a variety of factors, such as teacher and student achievement data and projections of professional development necessary to help all teachers meet NCLBA's qualification requirements.

Under Title II, acceptable uses of funds include teacher certification activities, professional development in a variety of core academic subjects, and recruitment and retention initiatives, including hiring teachers in order to reduce class size. (See app. I for state and district authorized activities.) Some of these activities, such as recruitment of new teachers and professional development in math and science, could be funded under the Eisenhower Professional Development and Class-Size Reduction programs as well. However, states and districts have more flexibility in how to spend Title II funds than was previously possible. For example, while under the Class-Size Reduction Program, funds could be spent on financial incentives and mentoring programs for new teachers only, Title II funds can be used for existing teachers as well, if the district identifies a need. While the Eisenhower program focused primarily on professional development in math and science, allowable activities under Title II may include any subject. Under NCLBA, professional development is considered to be an important component of the overall strategy to

improve the quality of teaching and raise student achievement, and the law provides the definition of professional development.¹⁸

In addition to using Title II funds for the purposes of raising teacher qualifications, districts can also transfer these funds to most other NCLBA programs to meet their educational priorities. Specifically, districts are allowed to transfer up to 50 percent of the funds allocated to them under most major NCLBA programs, including Title II, into other programs under NCLBA.¹⁹ Thus, for example, districts may transfer a portion of their Title II funds into Title I for initiatives designed to improve student achievement.

Regardless of whether or not districts transfer funds under the transferability option, they can spend non-Title II funds, such as Title I funds, to support teacher initiatives. Under NCLBA, districts are required to spend at least 5 percent of their Title I funds on helping teachers meet the qualification requirements. Additionally, schools in the district that do not meet their student proficiency goals for 2 or more consecutive years are required to spend at least 10 percent of their Title I funds to provide the school's teachers and principals with high-quality professional development.

States must prepare and publicly disseminate an Annual State Report Card with information on the professional qualifications of teachers in the state, the percentage of such teachers on emergency or provisional credentials, and the percentage of core academic classes being taught by teachers who do not meet NCLBA's teacher qualification requirements. Further, Title I of

¹⁸ NCLBA defined professional development in Title IX of the act. Among other things, the definition emphasizes the type of professional development that increases teachers' academic knowledge, gives teachers the knowledge and skills to provide students with the opportunity to meet challenging state content and student achievement standards, is sustained and intensive rather than short-term, and increases teachers' understanding of effective instructional strategies that are based on the principles of scientifically based research.

¹⁹ Under Title VI of NCLBA, a district meeting its annual student proficiency goals may transfer up to 50 percent of the funds allocated under any of the following programs: Title II, Part A (Improving Teacher Quality State Grants); Title II, Part D (Educational Technology State Grants); Part A of Title IV (Safe and Drug-Free Schools and Communities); and Part A of Title V (State Grants for Innovative Programs). Districts not meeting their student proficiency goals for at least 2 years are identified for improvement and cannot transfer more than 30 percent of their funds under any given program. Districts not meeting their goals for at least 4 years are identified for corrective action and are prohibited from transferring funds under this option.

NCLBA requires districts and schools to inform parents about the qualifications of their children's teachers. Districts are required to notify parents of all students attending Title I schools that they have the right to request information about the qualifications of their child's teacher. Schools must further notify parents if their child has been taught by a teacher who did not meet NCLBA's teacher qualification requirements for 4 or more consecutive weeks.

The accountability provisions under Title I of NCLBA require every state and district receiving Title I funds to develop and submit a plan for how it intends to meet the teacher qualification requirements, along with other provisions of the act such as adopting challenging academic content and student achievement standards. The state plan must establish each district's and school's annual measurable objectives for increasing the number of teachers meeting qualification requirements and receiving high-quality professional development with the goal of ensuring that all teachers meet the requirements by the end of the 2005-2006 school year. In addition, beginning with the 2002-2003 school year, districts receiving Title I funds are required to annually report to the state on their progress toward state-set objectives, and all states are required to submit an annual report to Education detailing state progress in meeting the annual measurable objectives regarding teacher qualification requirements. Under NCLBA, school districts that do not ensure that their teachers meet the qualification requirements must implement certain actions, such as additional professional development. However, their overall funding levels from Education are not affected.²⁰ If states do not meet the requirements for reporting on the qualifications of their teachers, the Secretary of Education has the authority under NCLBA to withhold state administrative funds.

²⁰ Under Section 2141 of NCLBA, if the district falls short of its annual measurable objectives for ensuring that teachers meet qualification requirements for 2 consecutive years, it has to develop an improvement plan. During the development of the improvement plan, the state must provide technical assistance to the district and to any schools served by the district that would enable it to meet its teacher qualification objectives. If the district continues to fall short of its annual measurable objectives and is also failing to meet its annual student proficiency goals for 3 consecutive years, the state has to enter into an agreement with the district. Under that agreement, the state works with the district to develop professional development strategies for teachers and principals to help the district meet its teacher qualification objectives, and in most cases the district cannot use Title I funds for hiring new paraprofessionals.

Education monitors states' progress in implementing the requirements under both Title I and Title II of the act, as well as provides assistance to them. Beginning with the 2002-2003 school year, Title I of the act requires Education to publicly report the annual progress of states, districts, and schools in meeting the measurable objectives for ensuring that all teachers meet the qualification requirements by the deadline.

States Have Made Progress in Meeting Teacher Qualification Requirements, but Challenges Remain

The available data suggest that the majority of core academic courses were taught by qualified teachers in 2003-2004. States have made progress in tracking and reporting teacher qualification data, but challenges remain in reporting precise results. States offered multiple options for veteran teachers to demonstrate subject matter competency as part of their HOUSSE procedures, but the rigor of these procedures varied across the states that we visited. Selected state and district officials told us that certain groups of teachers would likely face challenges meeting the requirements by the 2005-2006 deadline.

Most States Reported That the Majority of Teachers Are Qualified, but Some Data Issues Remain

The data reported by 47 states suggest that the majority of core academic classes were taught by teachers who met NCLBA requirements during the 2003-2004 school year.²¹ Most of these states reported that nearly all of their core academic classes were being taught by teachers who met the requirements. However, data for most states appear to show that core academic classes in low-poverty schools were more likely to be taught by teachers who met the requirements than classes in high-poverty schools.²² The data also suggest that a higher percentage of elementary school classes were taught by teachers who met the requirements than secondary school classes. State-reported percentages for each of the 47 states are shown in appendix II.²³ Data limitations preclude a comparison among states but, on the basis of our work, we determined state-reported

²¹ These states include approximately 97 percent of all public school students in the country.

²² High-poverty and low-poverty schools are respectively those in the top and bottom quartiles of poverty in the state; most states based this on the percentage of students eligible for free or reduced lunch in the school.

²³ Education has followed up with four of the five entities that did not provide data. Officials indicated that changing definitions and challenges with data systems were among the reasons for not providing data. References to Education's efforts to collect and assess teacher qualifications data from the states includes the work completed by Education's data quality contractor.

percentages could be used to demonstrate how close a particular state was to reaching the goal of having all its teachers meet the requirements.

States have improved in their ability to track and report the percentage of core academic classes taught by teachers who met NCLBA qualifications. Reports from 2002 and 2003 from national education organizations, such as the Education Commission of the States, showed that few states were able to track and report these data. Similarly, in our 2003 report on the NCLBA teacher qualification provisions, officials in 7 of the 8 states we visited told us they did not have data systems capable of tracking teacher qualifications for each core subject.²⁴ But by 2005, 47 states reported teacher qualification data to Education for the 2003-2004 school year. Officials in the 6 states that we visited told us that they had improved their data systems, either by creating a new system or by redesigning their existing system to collect information required under NCLBA. For example, several states merged their state-level teacher qualification systems with their district-level class assignment systems to enable them to determine whether classes were being taught by teachers who met the requirements. Education officials also told us the 2003-2004 data had considerably improved from earlier years and that next year's data will accurately reflect the status of state efforts to implement the teacher qualification requirements.

Despite this progress, several issues limit the quality and precision of state-reported data and make it difficult to determine the exact percentage of core academic classes taught by teachers meeting NCLBA qualification requirements. First, district officials in 3 of the 6 states that we visited told us that they had excluded classes taught by special education teachers from their calculations;²⁵ state officials in all 6 site visit states said these teachers faced particular challenges in meeting the requirements. Second, states relied on the data districts provided, but state officials generally noted that data collection processes varied by district, and that the quality of the data could vary as well. For example, two districts that we visited in 1 state reported data that were based on an incorrect assumption about which teachers met the requirements,²⁶ and therefore included some

²⁴ As part of that study, GAO visited California, Connecticut, Illinois, Iowa, Maryland, North Carolina, Delaware, and Wyoming. See [GAO-03-631](#).

²⁵ Special education teachers must be included if they teach core academic subjects.

²⁶ District officials in this state told us that teachers with emergency certification and a plan to meet the requirements counted as meeting the requirements.

teachers as meeting the requirements when they had not. Education also identified data problems in 13 of the 20 states for which it issued monitoring reports by July 2005.²⁷ The impact and magnitude of these problems on state reports is unclear; state-reported data may under- or overstate the percentage of classes taught by teachers who met the requirements, depending on the nature of the data problem. Education has contracted with a research organization to follow up with states to identify any data issues that may have affected state-reported data, such as states excluding certain teachers subject to NCLBA's qualification requirements from their calculations.²⁸

States Offered Multiple Options for Veteran Teachers to Meet the Requirements

Five of the 6 site visit states had HOUSSE procedures in place for veteran teachers—those generally with 1 or more years of experience—to demonstrate subject matter competency, and the procedures included many different options for teachers to use as part of HOUSSE. The HOUSSE procedures in these states included the use of a point system that allowed veteran teachers to demonstrate subject matter competency by earning points in categories of experience, academic coursework or professional development, and leadership or service activities, as well as for evidence of publications, presentations, or awards. Colorado officials said they did not have a HOUSSE but allowed teachers to demonstrate subject matter competency through options typically included in other states' HOUSSE procedures, such as a combination of college coursework and professional development options.²⁹ Figure 3 presents an overview of HOUSSE point systems from the 5 states we visited that had them in place. (App. III shows HOUSSE point systems from 2 site visit states.)

²⁷ These states did not overlap with our site visit states. Education's findings are discussed in a subsequent section of this report.

²⁸ Education's contractor plans to issue a report on its findings regarding state teacher qualifications data in fall 2005.

²⁹ Colorado allowed teachers to demonstrate subject matter competency through accumulation of 24 college or professional development credits. Up to one-fourth of these credit hours could be accumulated through travel relevant to the subject area taught, such as travel to Greece for a history teacher. Officials there indicated that to count travel toward demonstration of subject matter competency, a teacher would need to explain what was learned as the result of this travel and how this knowledge would contribute to student performance, as well as demonstrate how the travel enhanced his or her content knowledge. The responsibility for ensuring the relevance of travel is with the districts, and state officials did not know how often this option was actually used.

Figure 3: Overview of HOUSSE Point Systems in Site Visit States

Range of points that can be earned out of 100 needed						
	College coursework ^a	Experience	Professional development	Leadership/ activities/ service	Awards/ presentations/ publications	Evaluations/ observations of teachers
California	0-100	0-50	0-100	0-100		0-100
Kansas	45-100	0-45	0-55	0-55	0-30	
Maryland ^b	30-100 ^c	0-50	0-10	← 0-10 ^d →		
Rhode Island	0-93	0-24	0-95	0-95	0-20	
Tennessee	0-40	0-52 ^e	0-40	0-30	0-20	0-30 ^f

Examples of how teachers can earn 100 points



California: 50 college coursework + 50 experience = 100
Kansas: 48 college coursework + 27 experience + 25 awards = 100
Maryland: 40 college coursework + 50 experience + 10 professional development = 100
Rhode Island: 51 college coursework + 24 experience + 25 leadership = 100
Tennessee: 40 experience + 30 professional development + 30 evaluation = 100

Source: GAO analysis of state HOUSSE plans; graphics in part by Art Explosion.

^aKansas and Maryland required teachers to earn a minimum number of points in this category.

^bThe maximum points listed are for regular education teachers. Special education teachers may have different maximums.

^cMaryland required elementary teachers to earn a minimum of 40 points in this category and middle and high school teachers a minimum of 30 points.

^dMaryland combined leadership, activities, service, awards, presentations and publications into a single category with a maximum of 10 points.

^eTennessee allowed teachers to earn up to 40 points for classroom teaching experience and up to an additional 12 points for teaching content courses at a postsecondary institution.

^fTennessee recently revised its evaluation system to emphasize assessment of teachers' subject matter knowledge. This updated evaluation system places greater emphasis on the content taught and is performed by evaluators trained in the new evaluation format. Teachers evaluated under the new system can use that as a stand-alone option for meeting all the subject matter competency requirements under the state's HOUSSE. Teachers evaluated under the old system can earn up to 30 points through the state's point system—up to 20 of those points can be earned for positive evaluations, and up to 10 points are given to teachers who attained an advanced level of performance under the Tennessee Career Ladder Evaluation System, which had been in existence between 1985 and 1997. Although teachers can continue using the former versions of state evaluations to earn points toward demonstration of subject matter competency, officials indicated that the new evaluation system is now used statewide to assess the performance of all teachers.

In addition to the categories above, the point systems in two states that we visited also included the option for teachers to demonstrate subject matter competency through advanced certification. Teachers in Maryland and Tennessee could earn all of the required points by achieving National Board Certification.³⁰

In addition to the point system, the HOUSSE procedures in some site visit states offered alternatives for demonstrating subject matter competency. For example, teachers in Tennessee could demonstrate subject matter competency through multiple observations of their performance completed by trained evaluators or the data showing their effect on student achievement. Teachers in California who were unable to obtain the required number of points through the point system could use evidence of positive evaluations of their performance in the classroom or prepare a portfolio of their work.³¹

Our review of HOUSSE procedures in states that we visited, particularly the analysis of the points they allowed teachers to count for different activities, showed that they varied in the weight given to these activities. The extent to which certain activities reflect teachers' subject matter knowledge may affect the rigor of these procedures.³² For example, as shown in figure 3, Rhode Island allowed experience to count for about one-fourth of the 100 points required for demonstrating subject matter competency, but the other 4 states with HOUSSE procedures allowed experience to count for about one-half of the points to be earned. Officials in Colorado indicated that they had chosen not to count experience toward teachers' demonstration of subject matter competency because they did not believe that experience would necessarily translate into improved subject knowledge. However, Colorado permitted relevant travel to count toward demonstration of subject matter competency, whereas the other states did not explicitly include travel in their HOUSSE.

³⁰ The National Board for Professional Teaching Standards offers National Board Certification in subject areas such as English language arts and mathematics, requiring teachers to create a portfolio demonstrating their work in the subject area and exercises to demonstrate their subject matter knowledge. For more information, please see <http://www.nbpts.org/>.

³¹ Officials in California explained that their teacher preparation program included subject-specific coursework, and they expected that their veteran teachers would count points for college coursework and experience before counting points for other activities on the state's HOUSSE.

³² Education had not yet monitored these states at the time of our site visits.

Some site visit states also set a minimum number of points to be earned in certain categories, while other states did not require teachers to earn points from those categories. Specifically, Kansas and Maryland required teachers to earn at least a portion of the total number of points they needed to demonstrate subject matter competency through college coursework, while other states did not require a minimum number of points in that category. States also differed in the number of categories in which teachers had to earn points. For example, teachers in Rhode Island were required to earn points from at least three different categories, such as college-level coursework and professional development in the content area. In contrast, teachers in Maryland could earn all points necessary for demonstration of subject matter competency from a single category. California, Kansas, Rhode Island, and Tennessee also set a requirement that some activities had been completed within a recent period of time.³³ For example, Kansas required professional development and service activities to have taken place within the last 6 years to earn points toward demonstrating subject matter competency under HOUSSE.

Some of the options that site visit states permitted as part of their HOUSSE procedures relied on improved student performance or observations of teachers' classroom performance. Tennessee allowed teachers to demonstrate subject matter competency by using data that show their actual contribution to students' achievement in that subject.³⁴ To use this option for the purposes of demonstrating subject matter competency, teachers must demonstrate that the most recent 3-year average gain in the achievement of their students is not detectably different from or is better than the average gain for all students in the state. At the same time, Tennessee and California both counted positive evaluations of teachers' classroom performance as evidence that could be counted toward subject matter competency. Although both states based these evaluations on uniform performance standards established by the state, officials in these states told us that they did not oversee the implementation of these evaluations. As a result, we determined that they could not effectively ensure the quality of evaluations. While we did not

³³ Officials in California noted that the recency requirement applies to professional development activities accepted under the state's HOUSSE. Specifically, teachers can earn points only for those professional development activities that had been completed after the adoption of the state's professional development standards in 1997.

³⁴ Such data are available for teachers through the Tennessee Value-Added Assessment System.

conduct an in-depth review of how the evaluations of teachers' performance were carried out, we identified two areas of concern for using this method as an objective state standard. First, the number and duration of the evaluation sessions may not provide enough information to determine subject matter competency. Second, these evaluations may be conducted by personnel who are also responsible for hiring and retaining teachers in the district, and thus these evaluators may not be objective. In one small rural district that we visited, the assistant superintendent responsible for evaluating the teachers' subject matter competency told us that the evaluation process was subjective.

Finally, while most states that we visited tried to ensure that activities accepted as part of their HOUSSE procedures were connected to the subject area that the teacher taught, Maryland's HOUSSE procedure awarded points for activities not directly related to the subject matter, such as professional development on instructional strategies and principles. Officials there indicated that the majority of points had to be earned from activities specific to the subject matter, and that the state's HOUSSE procedure sought to recognize both subject matter knowledge and the teachers' general teaching expertise.

Some educational experts have noted that the rigor of HOUSSE procedures varied across states and expressed concerns that states whose procedures offered less rigorous options may not adequately assess teachers' subject matter knowledge. The experts we interviewed told us that teachers who are not required to engage in activities directly related to accumulating subject matter knowledge, such as completing college coursework in a subject, may not increase their knowledge of the subject taught. In addition, the experts commented that if experience is heavily emphasized, teachers may not get the subject matter knowledge they need to be effective in the classroom. States with less rigorous procedures may not bring about improvements in teachers' content knowledge or student performance. Officials from Education confirmed that the rigor of HOUSSE procedures varied across states, as is permitted under NCLBA.

Selected States and Districts Faced Implementation Challenges

Although numerous ways exist for veteran teachers to demonstrate subject matter competency, officials in site visit states and districts and national association representatives told us that some teachers providing instruction in multiple core academic subjects, such as special education teachers and teachers in rural areas and specialized school settings, may not meet the requirements by the deadline. Officials in the states that we visited noted that special education teachers would have the greatest

difficulty in meeting the requirements by the deadline, because they were originally certified in special education rather than in a specific academic content area. In addition, special education teachers frequently provide instruction in multiple core academic subjects at the secondary level, creating challenges in meeting the requirements for each subject. Officials also noted that teachers in rural districts may face similar challenges. For example, an official in one state described a rural district landlocked by mountains where three high school teachers were responsible for teaching all classes across all subjects and grades at the high school level, and therefore had to meet the requirements for each subject. Although under IDEA and Education's guidance certain special education and rural teachers who already meet the requirements in one core academic subject have additional time to meet the requirements for the other subjects, officials were still concerned about whether these teachers will be able to meet the requirements for all of the subjects. Officials also reported challenges for middle school teachers who frequently provide instruction in multiple core academic subjects,³⁵ as well as teachers in specialized school settings, such as schools for students dismissed from their regular schools as a result of behavioral problems. Officials from two districts in one state that we visited told us that they had a large number of these specialized schools, and officials there indicated that teachers often had to teach multiple subjects to the same group of students, making it difficult for them because they had to meet the subject matter requirements in each subject taught. Education allowed states to streamline HOUSSE procedures by developing a method for veteran teachers of multiple core academic subjects to demonstrate subject matter competency in all those subjects through a single procedure. One of the states that we visited offered a streamlined HOUSSE procedure for its teachers of multiple core academic subjects. However, officials in the other states that we visited did not have a single HOUSSE procedure for teachers of multiple subjects, and some of them indicated that they would like more information on how to develop one.

Officials in states and districts that we visited also told us that schools will continue to have difficulty recruiting math and science teachers who meet

³⁵ According to the Department of Education, states have the flexibility to determine whether middle school teachers—such as sixth grade teachers in some districts—will have to meet the requirements for elementary or secondary teachers, depending on the degree of rigor and technicality of the subject matter that the teacher will need to know in relation to the state's content standards and academic achievement standards for the subjects that will be taught.

the requirements. Schools had difficulty recruiting these secondary teachers even before NCLBA. These recruitment shortfalls will likely continue after the 2005-2006 deadline passes, in part because thereafter all newly hired teachers of core academic subjects, not just those in Title I schools, will have to demonstrate their subject matter competency before entering the classroom. Some state and district officials told us that they were unable to restrict hiring to teachers who met the requirements because there were not enough candidates who had met the requirements to fill all of the open positions. One state is altering its emergency certificate to incorporate a time limit; this certificate will allow teachers to provide instruction for up to 2 years before they have to fully meet the subject matter competency requirements.³⁶ While state officials responsible for teacher licensing in the state acknowledged that the new certificate does not meet the requirements of NCLBA, they indicated that school districts might not be able to fill all their open positions with teachers who meet the requirements.

We also found that 8 of the 11 districts either did not notify parents when their children were assigned to teachers who did not meet the requirements, as required under the act, or did not make the notification entirely clear to the parents. Five districts in the states that we visited did not send the letters to the parents, with some district officials stating that they did not know that the letters had to be sent. Officials in one state instructed districts not to send the letters until the 2005-2006 deadline had passed. Three districts in another state sent letters to the parents, but these letters did not explicitly indicate that the teacher did not meet the requirements of the law. For example, one district's letter said that the teacher "is a dedicated professional who will always work in the best interest of your child" and "holds a probationary certificate" without

³⁶ The new certificate will allow teachers with significant subject matter competency coursework to teach for up to 2 years as long as they demonstrate progress toward meeting the subject matter requirements. After meeting the subject matter requirements, they can move into one of the state's alternative certification programs to obtain a teaching certificate. Under NCLBA, teachers in alternative certification programs are considered to have met the requirements as long as they receive high-quality professional development and intensive supervision, assume the functions of a teacher for no more than 3 years, and demonstrate satisfactory progress toward obtaining state certification.

explaining to the parents that probationary certificates do not meet NCLBA's requirements.³⁷

Additionally, some officials did not know about other aspects of the requirements, such as actions required for teachers not meeting the requirements and to whom the requirements applied. For example, officials in two states told us that they did not know what actions districts or schools should take against teachers who did not meet the requirements by the deadline. Officials in one district had fired teachers because they did not meet the requirements. Other districts generally had not fired teachers who did not meet the requirements but wanted to know whether they should. There are no actions specified in the NCLBA with respect to teachers' conditions of employment for those who do not meet the requirements by the deadline. In addition, officials in one district did not know until our visit that all teachers of core academic subjects—not just those in Title I schools—would have to meet the requirements by the end of 2005-2006 school year.

Education acknowledged the challenges that states may face in ensuring that all teachers meet the requirements by the end of 2005-2006 school year. On October 21, 2005, Education announced that states may have until the end of the 2006-2007 school year to ensure that all their teachers meet the requirements if they can demonstrate that they are making good-faith effort toward that goal. As evidence of good-faith efforts, states will need to meet the following four conditions: (1) show that the state's requirements for teachers to demonstrate that they are highly qualified are consistent with the law, (2) meet the requirements for parental notification and public reporting, (3) provide complete and accurate teacher qualification data to Education in January 2006 for the 2004-2005 school year, and (4) take action to ensure that poor and minority students are not taught by teachers who do not meet the requirements at a higher rate than other students. The letter also stated that no federal funds will be withheld from states if they are unable to ensure that all their teachers meet the requirements by the end of 2005-2006 school year, as long as these states are implementing the law and making a good-faith effort to reach that goal.

³⁷ Education monitors state and district efforts on this requirement through its Title I monitoring. NCLBA does not make any provisions for penalties for districts failing to make this notification.

Despite the challenges experienced, state officials reported progress in better positioning themselves to meet NCLBA requirements. Although our 2003 report showed that states we visited generally did not have data systems capable of tracking teacher qualifications for each core subject teachers taught,³⁸ officials told us that they had improved their data systems since then. All of the states that we visited had either created a new data system or redesigned their existing data systems to collect information required under NCLBA. For example, several states merged their state-level teacher qualification systems with their district-level class assignment systems to enable states to determine whether classes were being taught by teachers who met the requirements. Another state redesigned its data system so that it would capture teachers' status in meeting the requirements.

In addition to improving data systems, state officials also reported taking steps to help more teachers meet the requirements. For example, one of the states developed HOUSSE procedures that could be used to demonstrate subject matter competency across multiple subjects. Under those HOUSSE procedures, the same allowable activities, such as professional development and leadership positions, could be counted for more than one subject. Most states that we visited made some changes in certification requirements or professional development standards to make them more consistent with the requirements of NCLBA. For example, two states created a separate certificate for middle school teachers that incorporated subject matter competency requirements—a change that would ensure that middle school teachers have demonstrated subject matter competency.

District officials also reported taking steps, such as changing their personnel policies, to ensure that more of their teachers meet the requirements. For example, officials in two districts told us that they had encouraged principals to consider dismissing teachers who were not on track to meet the requirements. In another state, districts were reassigning teachers to positions for which they met the requirements, and one district's officials instituted a policy of preventing teachers from transferring to any positions for which they did not meet the requirements. Officials in most districts also told us that they have incorporated NCLBA's teacher qualification criteria into their screening of new candidates. Further, officials from 6 of the 11 districts that we visited told

³⁸ See [GAO-03-631](#).

us that they were reducing the number of teachers with emergency credentials.

Visited School Districts Most Often Used Title II Funds for Professional Development

The 11 districts that we visited used Title II funds to support professional development for teachers, particularly in core academic subjects. Officials in the majority of these districts indicated that NCLBA had led to improvements in the kinds of professional development they funded with Title II funds. Seven of the 11 districts that we visited also continued to use the funds for class size reduction efforts. However, district officials told us that they have begun shifting emphasis from class size reduction to initiatives focused on improving teacher qualifications. Most districts that we visited considered student achievement needs in identifying appropriate uses of Title II funds and targeted the funds to programs designed to help teachers address those needs. Few initiatives in these districts targeted specific groups of teachers, such as teachers in high-poverty schools. In addition to using Title II, district officials told us they used various other funding sources to support their teacher initiatives, including other federal, state, and local funds.

All Visited Districts Used Title II Funds for Professional Development, and Many of Them Used These Funds for Class Size Reduction

All districts that we visited used Title II funds to provide professional development to teachers and focused their efforts on improving the quality of instruction in core academic subjects such as reading and math. For example, one district used Title II funds to provide summer workshops on research-based instructional strategies in reading and paid for instructional coaches to support classroom teachers throughout the year. Two districts reported spending Title II funds on math coaches who perform tasks such as working with teachers to develop lessons that reflected states' academic standards and assisting them in using students' test data to identify and address students' academic needs. In four districts, Title II professional development expenditures included the cost of instructional materials, and in one district Title II funds paid for substitute teachers while regular teachers attended training.

In addition to spending for professional development in core academic subjects, officials in 10 of the 11 districts reported using Title II funds on professional development in other areas, such as on general teaching strategies and professional development for nonteaching staff. Most of these districts used at least some Title II funds for professional development that focused on teaching skills and general teaching strategies. For example, one district used Title II funds to support a program for all teachers during their first 3 years of employment with the

district, including biweekly workshops on classroom management, student assessment, and parental involvement. Another district used the funds to help teachers understand the instructional needs of gifted and talented students and to adjust teaching methods to best address those students' needs. Seven districts also used Title II funds to offer professional development for nonteaching staff, such as school administrative personnel. For example, one district coordinated with a postsecondary institution to train assistant principals on becoming more effective educational leaders, while another district used the funds to develop guidance counselors and social workers employed in the district's schools.

Officials in the majority of the districts that we visited told us that NCLBA's emphasis on student achievement and on strategies supported by research had led to improvements in the kinds of professional development they funded with Title II funds. Officials said they had become much more selective when approving professional development providers, looking for those programs that focused on intensive, research-based instructional strategies. In one district, for example, officials said that before NCLBA, providers were often selected on the basis of their long-standing relationship with the district, whereas now the district approved only those providers whose programs could be substantiated by research-based evidence of effectiveness. They also indicated that they had moved away from onetime workshops and begun to emphasize ongoing professional development that provided teachers with opportunities to reinforce and apply concepts learned. Furthermore, district officials that we interviewed reported greater emphasis on professional development opportunities in core academic subjects in which NCLBA required students to be assessed. While officials in some districts said that they were moving in the direction of higher-quality professional development even before NCLBA, several of them indicated that the passage of the act added urgency to these efforts.

Officials in 7 of the 11 districts that we visited told us that they also used Title II funds to hire additional teachers to reduce class size. Districts focused their class size reduction efforts on specific grades, depending on their needs and other funding sources available. For example, one district visited focused its Title II-funded class size reduction efforts on the eighth grade because the state already provided funding for reducing class size in other grades. Officials in another district told us they planned to spend most of their Title II allocation on class size reduction because class size reduction funding from the state was insufficient. While class size reduction may contribute to teacher retention and result in a more individualized approach to student instruction, it also increases the

number of classrooms that need to be staffed. As a result, districts that are already having problems with teacher recruitment may find it difficult to find enough teachers who meet NCLBA's qualification requirements to staff these classrooms. For example, one district visited used about one-third of Title II funds for class size reduction, but district officials indicated that recruitment difficulties forced them to continue to hire teachers who did not meet NCLBA's qualification requirements.

Our previous work found that classroom reduction expenditures amounted to more than 50 percent of total Title II funds that districts spent during 2002-2003 school year,³⁹ a finding consistent with Education's review of districts' Title II spending during the same time period.⁴⁰ Officials in states that we visited and educational organization representatives that we interviewed told us that districts continued to spend funds on activities developed under the previous program. However, some state officials told us that they were encouraging districts to expand their traditional uses of these funds and to place a greater emphasis on initiatives designed to increase teachers' effectiveness in the classroom.

In 6 districts that we visited, officials told us that they had begun shifting away from class size reduction efforts to placing greater emphasis on initiatives for existing teachers. For example, 2 of the districts stopped spending Title II funds on class size reduction efforts, and another district planned to eliminate class size reduction expenditures in the next school year. Officials in 2 other districts told us that while they still funded class size reduction efforts, they had reduced the amount of Title II funds they spent for this purpose. District officials indicated that they were now redirecting funds to support initiatives designed to improve teachers' subject matter knowledge and instructional skills, such as professional development.

In addition to undertaking professional development and class size reduction efforts, 6 of the districts that we visited used Title II funds to

³⁹ Our survey of a nationally representative sample of school districts during 2002-2003 school year showed that classroom reduction expenditures accounted for 56 percent of total Title II funds districts spent. See [GAO-03-631](#).

⁴⁰ Education's survey of a nationally representative sample of school districts showed that they spent 58 percent of Title II funds on teachers' salaries to reduce class size during 2002-2003 school year. See "Improving Teacher Quality in U.S. School Districts; Districts' Use of Title II, Part A, Funds in 2002-2003," Policy and Program Brief, U.S. Department of Education, February 6, 2004.

support recruitment and retention activities. For example, 2 districts used the funds to advertise open teaching positions, as well as to attend recruitment events outside of the district to identify qualified candidates. Another district used Title II funds to expand its alternative certification program, which allowed qualified candidates to teach while they worked to meet requirements for certification. Two districts used Title II funds for bonuses to attract successful administrators. To promote greater retention among new teachers, 3 districts used Title II funds for mentoring activities. For example, 1 of these districts reported using the funds to provide two trained mentors for every new teacher. Ten of the 11 districts that we visited did not use Title II funds to support programs that offered additional pay to teachers based on their performance or other qualifications. A few officials cited reasons for not using such programs, such as the expense or the difficulties in ensuring that they are implemented fairly.

Six of the districts that we visited reported taking advantage of NCLBA's transferability option, with most of them transferring Title II funds into Title V. Under Title V, districts receive funding to support local education reform efforts in a broad range of areas, including activities to improve the academic achievement of all students and raise teacher effectiveness. For example, one district transferred Title II funds into Title V for initiatives designed to address students' academic needs, such as assessing their reading skills. Districts officials indicated that they preferred to transfer funds into Title V because it afforded them the most flexibility in spending the funds. However, one district transferred Title II funds into Title I to provide academic services in reading and math to middle school students.

In addition to participating in activities funded with districts' own Title II allocations, teachers also took part in activities supported through Title II grants to universities and in state-level Title II initiatives. Three of the four university-based grantees that we visited focused on providing professional development to teachers in math or science. For example, one program reviewed offered a 2-week summer math workshop to prepare teachers for the subject matter exams that, if passed, could be used to demonstrate subject matter competency. Another university grantee developed a standards-based online math program for middle school teachers based on the math questions that students most frequently missed on the state's assessment. While university officials administering that program said that it could be used for teachers to earn points toward demonstration of subject matter competency under NCLBA, they did not know how many participants in the program had not yet met the requirements or how many districts allowed teachers to apply their

participation toward earning points through the state's HOUSSE. Additionally, states used a portion of Title II funds retained by state departments of education to support professional development for teachers in core academic subjects. In two states that we visited, officials reported that state Title II initiatives specifically targeted teachers who had not met the subject matter competency requirements of NCLBA; these initiatives either offered them professional development in core academic subjects or reimbursed them for taking college courses in the subjects taught.

Visited Districts Considered Student Achievement Needs in Identifying Uses of Title II Funds

Officials in the districts that we visited said that in deciding what specific initiatives should be funded with Title II funds, such as the types of professional development programs for teachers, they considered student achievement needs and targeted the funds to programs designed to help teachers address those needs.⁴¹ To identify student achievement needs, these officials said that their districts examined students' results on state assessments and a school's progress in meeting annual student proficiency goals in core academic subjects, as required under NCLBA.⁴² The districts then targeted their Title II funds to programs for teachers to improve instruction in those subjects in which students were lagging behind. For example, officials in one district said that because math was an area in which schools did not meet annual student proficiency goals, the district's Title II expenditures were targeted to professional development programs in math. In another district, the superintendent indicated that his district had placed the primary focus of its Title II initiatives on reading in early grades because schools in the district had not met reading proficiency goals for elementary students in the past. Some districts considered student achievement results in combination with other factors to identify most appropriate uses of federal funds. For example, officials in one district said that they looked at both schools' student assessment results and teacher experience levels when deciding where to place Title II-funded instructional coaches.

⁴¹ Two of the 11 districts reported using additional criteria in making Title II funding decisions.

⁴² NCLBA requires states to develop annual measurable objectives for adequate yearly progress that schools and districts must meet to ensure that every student becomes proficient in math and reading/language arts by school year 2013-2014.

Officials in the districts that we visited said that they involved a variety of stakeholders, such as teachers and parents, to help them identify district needs that could be addressed with Title II funds. The nature of stakeholder involvement varied across the districts that we visited. For example, several districts administered a survey to teachers, parents, and students, asking them about their perceptions of the district and its needs. Another district administered an online professional development survey to its teachers, asking them to assess the type of professional development activities received. District officials said they used the results of these surveys to decide how to best spend Title II funds. In other districts, officials considered stakeholders' perspectives in less structured ways. For example, in one district that did not have a separate process for gathering stakeholders' views prior to making funding decisions, officials said that stakeholders' perspectives were still considered as the result of the superintendent's regular meetings with school officials and parent groups across the district.

While most districts that we visited targeted Title II funds to subject areas that presented academic challenges to students, only a few of the Title II funded initiatives were directed to specific groups of teachers, such as teachers in high-poverty schools or teachers who had not yet met the requirements of NCLBA. One district that we visited targeted Title II dollars to teachers in high-poverty schools, funding initiatives such as reimbursing these teachers for taking college classes necessary for them to meet state certification requirements and providing tuition for teachers in alternative certification programs who agreed to teach in high-poverty schools. In four districts that we visited, officials reported having initiatives specifically for teachers who had not yet met NCLBA's qualification requirements. Some of these initiatives offered reimbursement to teachers for taking college courses or other professional development that they could use to demonstrate compliance with NCLBA's requirements. Other initiatives helped teachers prepare for subject matter exams and reimbursed the registration fees of those who passed them to demonstrate subject matter competency in the subject taught. While many professional development programs supported with Title II funds were not necessarily targeted to teachers who still needed to meet the requirements, teachers who had not met the requirements could count their participation toward demonstration of subject matter competency under NCLBA by earning points through their state's HOUSSE.

In each of the districts that we visited, any teacher could participate in at least some professional development or other programs supported with

Title II funds, and district officials indicated that they had made efforts to address district-wide teacher needs. Ten of the 11 districts that we visited had a large number of high-poverty schools,⁴³ and by focusing on districtwide teacher needs, district officials could also address the needs of teachers who provided instruction to low-income students. For example, the superintendent of 1 district, in which all teachers could participate in Title II initiatives, credited the professional development funded through Title II with the narrowing of the achievement gap between the district's low-income and other students. The statutory formula that states used to allocate Title II funds to the districts takes into consideration their poverty levels,⁴⁴ and several officials we interviewed told us they believed Title II funds were generally reaching districts with the greatest need.

Visited Districts Used Non-Title II Funds to Support Teacher Initiatives

Title II funds are generally a small part of total funds available to the districts for teacher initiatives, and visited districts used various non-Title II funds to address their teacher needs, including other federal, state, and local funds. In two districts, for example, officials told us that Title II funds represented less than half of all the funds they spent on teacher initiatives. Moreover, districts received federal funds under different programs, and Title II constitutes a relatively small proportion of all federal funds they could use for teacher initiatives. In one district visited, for example, Title II funds constituted about 13 percent of the total federal funds available, with the bulk of the district's federal money coming from Title I. Our prior work also showed that districts planned to spend much larger percentages of other federal, state, and local funds than Title II funds on teacher-related activities, but in high-poverty districts Title II funds constituted a larger share of total funds spent on these activities than in low-poverty districts.⁴⁵

⁴³ We visited one district that did not have high-poverty schools but was chosen because of its rural location.

⁴⁴ After awarding to each district the amount of Title II funds equivalent to what the district received in fiscal year 2001 under the Eisenhower Professional Development and Class-Size Reduction programs, the state allocates any excess funds to the districts based on the following formula: 20 percent of the excess funds must be distributed based on the district's relative number of individuals ages 5 through 17 residing in the area served by the district; 80 percent of the excess funds must be distributed based on the relative number of individuals ages 5 through 17 residing in the area served by the district who are also from families with incomes below the poverty line.

⁴⁵ See [GAO-03-631](#).

Although Title II was one of many resources available to the districts, many district officials we interviewed said that Title II funds played a significant role in their teacher improvement efforts. For example, officials in one district credited Title II-funded professional development with helping teachers prepare for subject matter tests they needed to pass in order to demonstrate subject matter competency under NCLBA. In another district, officials said that their initiatives to support teachers, such as coaches, would not have been possible without Title II funding.

Districts that we visited supported a variety of teacher programs with non-Title II funds. Among other federal funds, Title I was one of the most frequently cited sources for supporting teacher initiatives. For example, two districts used Title I funds to hire coaches or consultants to help individual teachers in high-poverty schools become more effective in the classroom. A few of the initiatives funded with Title I were specifically designed to help teachers meet NCLBA's qualification requirements. For example, one district used the funds to reimburse teachers who passed the subject matter exam for their registration fees and for taking additional college coursework to help them meet NCLBA's subject matter competency requirements. In addition to using federal funds, districts also used state funds for teacher initiatives. For example, districts in one state received funds from the state for activities such as professional development to support all beginning teachers. Finally, districts used local and private funds to support various teacher initiatives. For example, one district used local funds to reimburse teachers for taking additional courses to raise their qualifications, while another district used private foundation funds to provide housing allowances for high-performing teachers who accepted positions in the district's most struggling inner-city schools.

Two districts that we visited had implemented or planned to implement differential compensation programs that offered financial rewards to teachers, such as onetime bonuses or salary increases, based on their performance or other qualifications. One school district in Tennessee made recruitment, retention, and salary bonuses available to teachers who had demonstrated a record of effectiveness and taught in some of the district's neediest schools.⁴⁶ To assess teachers' eligibility for these

⁴⁶ Hamilton County Schools is an urban school district in Chattanooga, Tennessee, with 79 schools, 2,674 full-time teachers, and student enrollment of 40,494 in the 2004-2005 school year.

bonuses, the district used the data showing teachers' impact on student performance available through the state's system of measuring students' achievement gains from year to year. This initiative is currently supported with both Title I and Title II funds. A school district in Colorado approved a plan for a districtwide differential compensation system that would provide teachers with multiple opportunities to increase their yearly pay, including gaining additional knowledge and skills, assuming positions in hard-to-fill subjects or hard-to-staff schools, earning successful performance evaluations, or meeting annual objectives for students' performance.⁴⁷ This initiative will be funded through a local property tax increase that will create a trust fund to ensure that the new pay system can be permanently sustained.⁴⁸ While officials in that district acknowledged that Title II funds could be used to support differential compensation initiatives, they indicated that Title II alone could not sustain this system.

Officials in the districts that we visited said that they did not look at Title II funds in isolation from other funds when making funding decisions, but rather they attempted to leverage different funding sources available to address their teacher needs. For example, officials in one district said that the district's use of Title I funds for teacher recruitment purposes allowed them to focus Title II funds on the coaching program for teachers.

⁴⁷ Denver Public Schools is an urban school district in Denver, Colorado, with 154 schools, 4,061 teachers, and student enrollment of 72,901 in the 2004-2005 school year.

⁴⁸ In November 2005, Denver voters approved a property tax increase that will be used to finance the differential compensation system. Beginning on January 1, 2006, all new teachers will be automatically enrolled in the new system; current teachers will be able to opt into the system over the first 7 years or remain in the current system.

Education Monitored States and Offered Assistance on Implementing the Requirements, but Some of Education's Information Was Not Readily Accessible

Education monitored states and offered assistance to help teachers meet NCLBA's teacher qualification requirements. In its monitoring reports, Education identified areas of concern related to states' implementation of the teacher qualification requirements. Education's assistance efforts included professional development opportunities and information packets on NCLBA's requirements. The agency also conducted site visits to states to discuss NCLBA's teacher qualification requirements and offer technical assistance. Although several key resources about NCLBA's teacher requirements can be reached only through Education's Web site, officials in most states and districts that we visited told us that they had difficulty locating these resources or were unaware of them. Our review of Education's Web site showed that several key resources on NCLBA's teacher qualification requirements were located on different Web pages that were not linked, making it challenging to find them.

Education Monitored States' Implementation of Teacher Qualification Requirements

Education provided written feedback to states on their implementation of NCLBA's teacher qualification requirements through the Title II monitoring process. Education began Title II monitoring in June 2004 and, as of July 15, 2005, had conducted monitoring visits to 29 states and the District of Columbia and released reports documenting findings to 20 of the states. Reports were generally released to states about 1 to 3 months after the monitoring visit. Education officials reported that states had an opportunity to respond prior to the release of monitoring reports, and to develop a plan to address findings. None of our site visit states received a monitoring report in time to be included in this analysis.

In these 20 monitoring reports, Education issued findings to states that did not fully implement NCLBA requirements. States most frequently received findings for not ensuring that teachers hired into Title I schools or with Title II funds met the teacher requirements (14 states), as required by NCLBA. Another frequent finding was that state-reported data did not adequately reflect the status of teachers in meeting the requirements (13 states). For example, several states could not report data on the percentage of classes taught by teachers not meeting NCLBA's teacher qualification requirements for special education or secondary school classes.

In addition, some states received findings for not requiring certain teachers to demonstrate subject matter competency as required under NCLBA. For example, 9 states received findings for allowing teachers of history, geography, civics/government, or economics to demonstrate subject matter competency in the broad area of social studies instead of in

each subject taught. Seven states received findings for not requiring new elementary school teachers to demonstrate competency in the manner required by NCLBA. Education found that all 7 states had not implemented a test for new elementary school teachers to demonstrate subject matter competency or the test was optional. Eight states received findings related to the demonstration of competency for middle and high school teachers, and 7 states received findings related to the demonstration of competency for special education teachers. In states that did not require certain teachers to demonstrate competency as required by NCLBA, state data do not fully reflect the percentage of classes taught by teachers who met NCLBA teacher qualification requirements.

Table 1 lists the major findings related to NCLBA's teacher qualification requirements.

Table 1: Major Findings from Education’s Title II Monitoring

Teacher qualification requirements that states did not fully implement	Number of states with finding
Hiring	
Did not ensure that teachers hired into Title I schools or with Title II funds met the requirements	14
Reporting and data	
Did not include all required data elements on state report card	10
State-reported data did not adequately reflect the status of teachers in meeting the requirements	13
Demonstration of subject matter competency	
Did not require a state test for new elementary teachers to demonstrate subject matter competency	8
Requirements for veteran elementary teachers were not sufficient to demonstrate subject matter competency	5
Requirements for middle or high school teachers were not sufficient to demonstrate subject matter competency	8
Did not require teachers of history, geography, civics/government, or economics to demonstrate subject matter competency in each subject taught	9
Did not require special education teachers to demonstrate subject matter competency in subjects taught or have not determined the status of these teachers	7
State HOUSSE procedures did not meet criteria in the law	1
Development of annual measurable objectives and plan for meeting the requirements	
Did not develop annual measurable objectives for districts and schools	12

Source: GAO analysis of Education’s Title II monitoring reports.

Note: Information presented for 20 monitoring reports reviewed by GAO.

Of the 20 states that received monitoring reports, 19 states did not receive a finding regarding their HOUSSE procedures, even though some experts have questioned the rigor of HOUSSE procedures in many states. Through the monitoring process, Education is reviewing state HOUSSE procedures to ensure that they are consistent with NCLBA’s criteria. Table 2 lists NCLBA’s criteria for state HOUSSE procedures.

Table 2: NCLBA’s Criteria for HOUSSE Procedures

States can establish a process for evaluating teacher knowledge and ability based on the standard that meets the following criteria:

Is set by the state for both grade-appropriate academic subject matter knowledge and teaching skills

Is aligned with challenging state academic content and student academic achievement standards and developed in consultation with core content specialists, teachers, principals, and school administrators

Provides objective, coherent information about the teacher’s attainment of core content knowledge in the academic subjects taught

Is applied uniformly to all teachers in the same academic subject and the same grade level throughout the state

Takes into consideration, but not be based primarily on, the time the teacher has been teaching in the academic subject

Is made available to the public upon request

May involve multiple objective measures of teacher competency

Source: NCLBA, Pub.L. No. 107-110, section 9101(23)(C)(ii).

As long as their HOUSSE procedures meet each of NCLBA’s criteria, states have had flexibility in developing HOUSSE under NCLBA. Among 19 states with HOUSSE procedures that were determined to meet NCLBA’s criteria were one state with a HOUSSE that allowed for evaluations of teachers’ classroom performance and several states in which teachers meet HOUSSE requirements by being fully certified to teach their subject. Education officials noted that evaluations of teachers’ performance could be accepted as part of state HOUSSSE procedures as long as they are rigorous and objective measures of teachers’ subject matter knowledge that are based on multiple observations and performed by trained evaluators. In addition, Education officials told us that while teacher certification in itself would not be sufficient for demonstration of subject matter competency, several states provided evidence that was accepted by Education showing that their certification requirements met the criteria for HOUSSE in the law. In the one state that received a finding related to its HOUSSE, teachers were allowed to earn more than half of the points necessary to meet HOUSSE requirements through experience. The state received a finding because NCLBA does not allow HOUSSE to be based primarily on teaching experience.

Eleven of the 20 state monitoring reports included written commendations from Education for state efforts to improve professional development, strengthen teacher preparation, or develop data systems that track teacher qualifications. Eight states received commendation for improving or

offering high-quality professional development for teachers. For example, Arkansas was commended for requiring every teacher to complete 60 hours of professional development each year and devoting considerable state funding to professional development. Seven states were commended for strengthening teacher preparation. For example, Georgia was commended for aligning all teacher preparation to state standards for student learning. Six states were commended for new or improved data systems for tracking teacher qualifications. For example, Mississippi received a commendation for tracking teachers' qualifications, certifications, and assignments, and linking those factors to individual students' progress.

Education Offered Assistance to Teachers and States on the Implementation of Teacher Qualification Requirements

Education offered several types of assistance to help the nation's 3 million public school teachers meet NCLBA's teacher qualification requirements, including professional development opportunities. Education offered professional development opportunities workshops in which about 4,500 teachers have participated since June 2004. These workshops and related materials were also made available online free of charge. Teachers accessed these workshops online through Education's Web site or through www.teacherquality.us, a Web site Education uses to provide information on Education's teacher initiatives. In addition, teachers can determine whether their state would accept these workshops as credit toward the state HOUSSE requirement online. As of September 2005, all states and the District of Columbia were awarding points for teachers' participation in these workshops as part of their HOUSSE procedures or for teacher recertification.

Education also offered assistance directly to teachers to help them understand NCLBA's requirements and gave teachers an opportunity to provide feedback about what additional support they need. Education distributed 255,000 "Toolkit for Teachers" information packets that provide information about NCLBA's teacher qualification requirements. The toolkit addressed frequently asked questions that are relevant to teachers, such as whether NCLBA's teacher qualification requirements apply to special education teachers. In addition, Education offered a series of teacher roundtables that gave teachers an opportunity to share their views with Education officials on how Education can support them in the classroom.

Education provided technical assistance to state officials from all 50 states through site visits by the Teacher Assistance Corps (TAC). TAC visits, which took place prior to Education's monitoring of NCLBA's teacher

qualification requirements, were intended to help states implement the requirements, according to Education officials. The TAC teams that conducted site visits were composed of Education officials and experts. Education characterized these visits as “conversations without consequences” and did not provide written feedback to states based on the TAC visits. Education officials said that TAC teams discussed HOUSSE procedures, the collection of data on teacher qualifications, the best use of Title II funds, and other issues. Officials from two of the six states that we visited said that TAC suggestions helped them implement their HOUSSE procedures. Three other states that we visited said that TAC teams’ suggestions were not useful in their circumstances. For example, officials in one state said that Education’s suggestion that small rural districts share teachers to ensure that students are taught by teachers who meet NCLBA’s requirements was impractical given the distance between schools. Based on difficulties that states identified during TAC visits, Education offered science teachers and teachers of multiple subjects, including rural teachers, additional flexibility in meeting NCLBA’s teacher requirements.

Through TAC visits, Education officials identified state and local initiatives that they considered to be innovative ways of improving teacher qualifications. Such initiatives addressed teacher certification and licensing, professional development, and other topics. In an effort to share information on these state and local initiatives with policy makers or others, Education posted information about these initiatives on www.teacherquality.us.

Education has provided guidance and hosted meetings for state officials on the implementation of NCLBA’s teacher qualification requirements. Education’s guidance answered questions about NCLBA’s teacher qualification requirements and Title II, such as when teachers with alternative certification can be considered as having met NCLBA’s teacher requirements. Education officials reported that they update their guidance periodically to answer new questions about the teacher requirements, most recently in August 2005. In addition, Education convenes state Title II directors once a year to provide updates on the implementation of NCLBA’s teacher requirements.

Education has also funded several projects that work to improve the preparation and increase the numbers of special education teachers. For example, one center compared special education teachers prepared in alternative certification programs with their counterparts from traditional preparation programs.

Some Information on Education's Web Site Was Not Readily Accessible

According to Education officials, Education's Web site has been an important part of their outreach efforts regarding NCLBA's teacher qualification requirements. Several of the resources related to implementation of the teacher qualification requirements, such as the Teacher Toolkit and state innovative practices, are now available only through Education's Web site. However, officials from most states and districts that we visited who use Education's Web site to access information on teacher programs or requirements told us that they were unaware of some of Education's teacher resources or had difficulty accessing those resources. For example, although all of the states we visited accepted Education's professional development for credit toward recertification or HOUSSE, district officials from only 3 of the 11 districts we spoke with were aware of these opportunities or that they were available online. Moreover, officials in 4 of the states that we visited told us that they wanted to know more about other states' initiatives to improve teacher qualifications but were not aware that Education had made this information available online or did not know how to access the information. In the states that we visited, several state and local officials mentioned that they attempted to find information by using Education's search function but often had trouble finding what they needed.

In our review of Education's Web site, we found that information and resources on the teacher qualification requirements were located on several different Web pages that sometimes were not linked, making the information difficult to locate. For example, state initiatives were available through the "Teachers" section of Education's Web site and not through the "Administrators" section, even though state and local administrators would likely find this information more useful than teachers would. See figure 4 for the description of teacher qualification information included on different sections of Education's Web site.

Figure 4: Information on Teacher Qualifications Available through Education’s Web Site, as of August 2005

Information for teachers:

- Examples of state and local teacher initiatives
- Professional development

Information for NCLBA:

- Professional development
- Guidance on teacher qualification requirements
- Examples of state and local teacher initiatives

Information for administrators:

- Professional development
- Guidance on teacher qualification requirements
- No direct link to state and local teacher initiatives

Policy documents related to NCLBA:

- Guidance on teacher qualification requirements

Source: GAO analysis of Education’s data.

Conclusions

Since we last reported on the status of implementing the teacher qualification requirements in our 2003 report, state and district officials have taken steps to implement these requirements, such as reducing the number of uncertified teachers and developing data systems to track teachers’ qualifications. In addition, Education officials indicated that states have taken steps to raise teacher qualifications through changes in state certification systems.

Although states have made progress in tracking teacher qualifications data and reporting on their status in meeting the requirements, difficulties remain in identifying teachers who do not meet the requirements. This may be a challenge, particularly because a number of states did not include all teachers in their calculations or faced other data issues. Where data challenges exist, Education and the states may not have the information necessary to direct assistance to where it is most needed. This

may result in some teachers not receiving appropriate support to help them meet the requirements. Education is working on identifying data challenges and addressing them through its monitoring visits and other technical assistance to states. Until these data issues are resolved, state reports on their status in meeting the teacher qualification requirements should be viewed as preliminary.

To facilitate state and district implementation efforts, Education relies extensively on its Web site as one of its principal means for providing information and implementation resources for states and districts. However, state and district officials told us that they were unaware of some of the information resources that Education made available and had difficulty locating other known sources of information on Education's Web site. Consequently, states and districts may not be taking full advantage of the opportunities and flexibilities made available by Education that would help them meet teacher qualification goals. Further, without this information, some states and districts may not be correctly applying the requirements, thus jeopardizing the ability of their teachers to meet the requirements by the deadline. This may impede efforts to increase student performance and ensure that all students reach state standards.

Finally, even when all teachers have met NCLBA's qualification requirements, it is unclear whether their doing so will have the expected effect on student performance. Under the law, states have considerable flexibility in developing requirements for teachers to demonstrate subject matter competency. The rigor of these requirements varied across states. Consequently, it remains to be seen how different state requirements will affect the quality of instruction and student performance.

Recommendation for Executive Action

We recommend that the Secretary of Education explore ways to make the Web-based information on teacher qualification requirements more accessible to users of its Web site. Specifically, the Secretary may want to more prominently display the link to state teacher initiatives, as well as consider enhancing the capability of the search function.

Agency Comments and Our Evaluation

We provided a draft of this report to Education for review and comment. In its letter, Education agreed with our recommendation, indicating that the department has already taken steps to address it. Specifically, the department is reviewing how teacher qualification information on the "Teachers" section of its Web site can be better integrated with related

information on other Web sites, including teacherquality.us. Education's written comments are reproduced in appendix IV.

We are sending copies of this report to the Secretary of Education, relevant congressional committees, and other interested parties. We will also make copies available to others upon request. In addition, the report will be made available at no charge on GAO's Web site at <http://www.gao.gov>.

Please contact me at (202) 512-7215 if you or your staff have any questions about this report. Other contacts and major contributors are listed in appendix V.

A handwritten signature in cursive script that reads "Marnie S. Shaul". The signature is written in black ink and is positioned above the printed name.

Marnie S. Shaul, Director
Education, Workforce, and
Income Security Issues

Appendix I: Activities on Which States and Districts Can Spend Title II, Part A, Funds

Table 3 lists our summaries of the authorized activities on which states can spend Title II funds and shows the five categories we used to group them. After reserving 1 percent of the total Title II allocation to the state for administrative activities, states retain only 2.5 percent of the remaining 99 percent for state activities.

Table 3: Title II, Part A, State Activities

Category	Activity
Accountability	1. Developing systems to measure the effectiveness of professional development programs and strategies to document improvements in students' academic achievement
	2. Ensuring that teachers use challenging state academic content standards, assessments, and student achievement standards to improve their teaching practices and their student's achievement
Certification	3. Reforming teacher and principal certification
	4. Reforming tenure and implementing tests for subject matter knowledge
	5. Promoting license and certification reciprocity agreements with other states for teachers and principals
	6. Providing programs that establish, expand, or improve alternative routes for state certification, especially for highly qualified individuals in the areas of mathematics and science
Professional development	7. Conducting programs that provide support to teachers, such as those that provide teacher mentoring and use assessments that are consistent with student academic achievement standards
	8. Providing professional development for teachers and principals
	9. Developing or assisting local educational agencies (LEAs) in developing and using proven innovative strategies for intensive professional development programs that are both cost-effective and easily accessible
	10. Encouraging and supporting the training of teachers and administrators to integrate technology into curricula and instruction, including training to improve their ability to use data to improve their teaching
	11. Providing assistance to teachers to enable them to meet certification, licensing, or other Title II requirements needed to become highly qualified
Recruitment and retention	12. Developing or assisting LEAs to develop, merit-based performance systems and strategies that provide pay differentials and bonus pay for teachers in academic subjects in which there is high need
	13. Developing projects and programs to encourage men to become elementary teachers
	14. Establishing and operating a statewide clearinghouse and programs for the recruitment, placement, and retention of teachers
	15. Assisting LEAs and schools in recruiting and retaining highly qualified teachers, including specialists in core subjects
	16. Developing or assisting LEAs to develop teacher advancement initiatives that promote professional growth and emphasize multiple career paths and pay differentiation
Technical assistance	17. Fulfilling the state agency's responsibility to properly and efficiently carry out the administration of programs, including providing technical assistance to LEAs
	18. Assisting LEAs to develop and implement professional development programs and school leadership academies for principals and superintendents

Source: NCLBA Pub.L. No. 107-110, section 2113.

Appendix I: Activities on Which States and Districts Can Spend Title II, Part A, Funds

Table 4 lists our summaries of the authorized activities on which districts can spend Title II funds and shows the two categories we used to group them. After reserving 1 percent of the total Title II allocation to the state for administrative activities, states allocate 95 percent of the remaining 99 percent to the districts.

Table 4: Title II, Part A, District Activities

Category	Activity
Professional development	1. Providing professional development activities for teachers and principals that improve their knowledge of their core subjects and effective instructional strategies
	2. Carrying out professional development activities designed to improve the quality of principals and superintendents
	3. Carrying out teacher advancement initiatives to promote professional growth and to emphasize multiple career paths and pay differentiation
	4. Carrying out programs and activities that are designed to improve the quality of teachers, such as professional development programs, merit pay programs, and testing teachers in the subjects they teach
Recruitment and retention	5. Developing and implementing mechanisms to assist schools in effectively recruiting and retaining highly qualified teachers and principals
	6. Developing and implementing initiatives to retain highly qualified teachers and principals, particularly in schools with a high percentage of low-achieving students, including programs that provide teacher mentoring and incentives
	7. Carrying out programs and activities related to exemplary teachers
	8. Developing and implementing initiatives to assist schools in recruiting and hiring teachers, including providing financial incentives and establishing programs that train and hire special education and other teachers, recruit qualified professionals from other fields, and provide increased opportunities for minorities, individuals with disabilities, and others
	9. Hiring highly qualified teachers in order to reduce class size, particularly in the early grades

Source: NCLBA Pub.L. No. 107-110, section 2123.

Appendix II: State-Reported Percentage of Core Academic Classes Taught by Teachers Meeting NCLBA's Teacher Qualification Requirements in the 2003-2004 School Year

States	All schools	High-poverty schools	Low-poverty schools	Elementary schools	Secondary schools
Alabama	77	68	79	80	77
Alaska	np	np	np	np	np
Arizona	96	96	96	98	94
Arkansas	np	np	np	np	np
California	52	40	60	49	53
Colorado	91	90	92	95	86
Connecticut	99	98	99	99	99
Delaware	73	68	74	74	72
District of Columbia	np	np	np	np	np
Florida	89	87	91	94	85
Georgia	97	97	98	98	95
Hawaii	73	71	73	90	68
Idaho	97	98	96	98	97
Illinois	98	93	100	np	np
Indiana	96	94	97	96	97
Iowa	95	96	95	97	94
Kansas	95	96	95	98	93
Kentucky	95	98	95	99	92
Louisiana	90	87	92	95	86
Maine	90	91	91	93	89
Maryland	67	47	78	73	64
Massachusetts	94	88	96	95	92
Michigan	92	92	93	97	89
Minnesota	99	98	99	99	98
Mississippi ^a	93	89	95	97	91
Missouri	96	92	97	np	np
Montana	99	98	99	99	98
Nebraska	91	90	95	98	90
Nevada	64	59	75	71	51
New Hampshire	73	69	73	76	70
New Jersey	94	88	96	94	95
New Mexico	67	63	72	74	65
New York	92	81	97	92	94
North Carolina	85	82	87	88	82
North Dakota	77	83	73	100	56

**Appendix II: State-Reported Percentage of
Core Academic Classes Taught by Teachers
Meeting NCLBA's Teacher Qualification
Requirements in the 2003-2004 School Year**

States	All schools	High-poverty schools	Low-poverty schools	Elementary schools	Secondary schools
Ohio	93	91	95	93	93
Oklahoma	98	97	98	98	98
Oregon	87	85	89	97	85
Pennsylvania	97	92	99	np	np
Puerto Rico	np	np	np	np	np
Rhode Island	76	77	74	75	75
South Carolina	75	68	79	75	75
South Dakota	93	89	93	94	91
Tennessee	58	57	50	60	51
Texas	92	92	93	97	93
Utah	69	65	73	80	70
Vermont	np	np	np	np	np
Virginia	95	92	97	96	94
Washington	99	99	99	100	99
West Virginia	96	97	95	97	95
Wisconsin	98	96	99	99	98
Wyoming	99	99	99	100	98

Source: U.S. Department of Education, State Consolidated Performance Reports.

Notes: We identified several factors that affect the accuracy of these data and preclude a comparison of classes taught by teachers meeting the requirements across states. However, on the basis of our work, we determined state-reported percentages could be used to demonstrate how close a particular state was to reaching the goal of having all its teachers meet the requirements. All numbers have been rounded to the nearest whole figure.

^aThese data exclude classes that have students from both elementary and secondary grades.

Np = data were not provided by the states.

Appendix III: Sample HOUSSE Procedures from Two States Visited

CALIFORNIA HIGH OBJECTIVE UNIFORM STATE STANDARD of EVALUATION

CALIFORNIA HOUSSE – PART 1 Assessment of Qualifications and Experience

Teacher's Name _____

Current Core Academic Assignment _____

I have accumulated the 100 Points required for the California HOUSSE. (Attach evidence)

HOUSSE-PART 1: PRIOR EXPERIENCE IN ASSIGNED AREA	Total Points
Experience in teaching core area - 10 pts per school year (Five years maximum) Circle years teaching this core academic subject: 1 2 3 4 5	50 pts Max. ____ pts
HOUSSE-PART 1: CORE ACADEMIC COURSEWORK IN ASSIGNED AREA	Points
Elementary Teachers Core Academic Coursework: Select one if appropriate A. Completed 18 semester units in each of four core areas: 1) Reading/ Language Arts, 2) Mathematics and Science, 3) History and Social Sciences and 4) the Arts. - 50 pts, or B. Completed a CCTC approved Liberal Studies Waiver Program - 50 pts, or C. National Board Certification in grade span - 60 pts, or D. Completed an advanced degree in teaching, curriculum instruction, or assessment in core academic area [e.g., MAT/MEd/MA/MS] - 60 pts	____ pts
Middle/High School Core Academic Coursework: Select one if applicable A. Completed CCTC-Supplementary Authorization - 50 pts., or B. Completed 15-21 Units of Core - 30 pts., or C. Completed 22-30 Units of Core - 50 pts., or D. Completed an advanced degree in teaching/curriculum/assessment in core academic area [e.g., MAT/MEd/MA/MS] - 60 pts.	
HOUSSE-PART 1: STANDARDS ALIGNED PROFESSIONAL DEVELOPMENT IN ASSIGNED AREA	Points
Standards Aligned Professional Development (20 hrs = 5 pts, 40 hrs = 10 pts....) <ul style="list-style-type: none"> Reading and Mathematics Professional Development Program (AB466 Training) Beginning Teacher Support and Assessment (BTSA) Programs Participate, but not yet certified, in National Board Certification program. <p>NOTE: This list is not exhaustive. Professional development activities that are used for the HOUSSE evaluation must be activities that increase teachers' knowledge of core academic subjects, are standards-aligned, sustained, intensive and classroom-focused and are not 1-day or short-term workshops or conferences. NCLB requires that the list of professional development activities is available to the public. (See Section 3.2.3.1)</p>	(Within last six years) ____ pts
HOUSSE-PART 1: LEADERSHIP AND SERVICE TO THE PROFESSION IN ASSIGNED AREA	Points
Service and leadership roles within Core academic content area 1 yr = 30 pts, 2 yr = 60 pts, 3 yrs = 90 pts Mentor, Academic Curriculum Coach, Supervising Teacher, College / University instructor in content area/content methodology, BTSA Support Provider, Department Chair National / State Recognition as "Outstanding Educator" in Content Area NOTE: This list is not exhaustive. NCLB requires that the list of qualified service and leadership activities is available to the public. (See Section 3.2.3.1)	____ pts

Signed by Teacher _____ Date _____

Verified by LEA (Superintendent/designee) _____ Date _____

- ✓ Attach appropriate documentation.
- ✓ Attach a copy of HOUSSE-PART 1 to Certificate of Compliance (Form 1)
 - Go to HOUSSE-PART 2 (Form 3) only if more points are necessary to reach a total of 100.

**Appendix III: Sample HOUSSE Procedures
from Two States Visited**

CALIFORNIA HIGH OBJECTIVE UNIFORM STATE STANDARD of EVALUATION

CALIFORNIA HOUSSE – PART 2

**Assessment of Current Qualifications through Classroom Observation and/or
Portfolio Development**

Teachers Name _____

Current Core Academic Assignment _____

HOUSSE-PART 2: DIRECT OBSERVATION OR PORTFOLIO ASSESSMENT (Attach verification)	Points
Completion of successful observations (20 points each) 1 observation = 20 pts, 2 observations = 40 pts.... Completion of successful portfolio assessment = 100 Points. (No partial credit)	_____ pts

This review of evidence and observation form may be used to complete HOUSSE-PART 2. Sufficient evidence must be presented to indicate that a teacher has demonstrated competence in the K-12 content standards pertaining to the teacher assignment and has met California Standards for the Teaching Profession 3 and 5.1.*

STANDARD THREE UNDERSTANDING AND ORGANIZING SUBJECT MATTER FOR STUDENT LEARNING	EVIDENCE (WRITTEN ON FORM OR ATTACHED) (Evidence may include interview, observation, and use of student achievement data, lesson and unit plans.)
3.1 Demonstrating knowledge of subject matter content and student development	
3.2 Organizing curriculum to support student understanding of subject matter	
3.3 Interrelating ideas and information within and across subject matter areas	
3.4 Developing student understanding through instructional strategies that are appropriate to the subject matter	
3.5 Using materials, resources, and technologies to make subject matter accessible to students	
STANDARD FIVE ASSESSING STUDENTS LEARNING	
5.1 Establishing and communicating learning goals for all students	

(*Standards are from the California Standards for the Teaching Profession, CSTP, <<http://www.btsa.ca.gov/ba/pubs/pdf/cstpreport.pdf>>).

Verified by LEA Administrator/Designee _____ Date _____

- ✓ **Attach appropriate documentation.**
- ✓ Attach a copy of HOUSSE-PART 1 and PART 2 to *NCLB Teacher Requirements: Certificate of Compliance*. (Form 1).

**Appendix III: Sample HOUSSE Procedures
from Two States Visited**

KANSAS CONTENT AREA RUBRIC
(Pursuant to requirements mandated by Federal *No Child Left Behind* Legislation)
To be completed for EACH assignment

NAME: _____ Assignment: _____

Social Security Number: _____

National Board Certified For Assignment? YES NO (If no, please complete the rubric)

Years of Experience in an Accredited School	College Level Course Work in the Content Area	Activities related to the Content Area	Service to the Content Area	Awards, Presentations, Publications in Content Area
Experience must be in assignment /content area	Must be specific to assignment /content area: - 3 semester hour content course equals 9 points o EDU prefix courses must be content related, i.e. methods courses and reading courses are acceptable. o A course in Exceptional Child will be accepted Documented Extended Workshops specific to the assignment/ content area - Formula: 15 hours of attendance equals 3 points	Must be specific to the assignment/content area: - Served on a committee that developed, selected or evaluated content standards - Served on a committee that developed, selected or evaluated content curriculum - Served on a committee that aligned local content standards with state content standards - Served on a committee that developed, aligned, validated or evaluated content assessments - Attendance at district (LEA), regional, state or national professional conferences/ seminars/ workshops - Completed assessment section of NBPTS - Content activities approved by PDC - Previous content activities acceptable to PDC (points not awarded/recorded)	Must be specific to assignment /content area: - Department chair or team leader - Mentor teacher - Cooperating teacher for student teacher - Lead content teacher on IEP for students with special needs - Officer in a regional, state, or national professional content organization - Content instructor at an IHE - Content presentations at the district level	Must be specific to assignment /content area: - Nominated for teacher of the year - Kansas Exemplary Educator Network recipient - Content presentations at regional, state or national professional content organization meetings - Content article in regional, state, or national journal
- 9 points per year MAXIMUM: 45 points	- 3 points per credit hour MINIMUM: 15 Credit Hours or 45 points	- 5 points per year per documented activity RECENCY: Within last 6 years	- 5 points per year per documented service RECENCY: W/in last 6 years	- 5 points per year per documented activity MAXIMUM: 30 points
# Years:	# Sem. Cr. Hrs.:	# Activities:	# Services:	# Activities:
TOTAL Points:	TOTAL Points:	TOTAL Points:	TOTAL Points:	TOTAL Points:

GRAND TOTAL: _____
(100 points required)

Mandated by Federal *No Child Left Behind* Legislation

Appendix IV: Comments from the U.S. Department of Education



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

Ms. Marnie S. Shaul, Director
Education, Workforce, and
Income Security Issues
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

OCT 26 2005

Dear Ms. Shaul:

Thank you for the opportunity to review the GAO's report on "Improved Accessibility to Education's Information Could Help States Further Implement Teacher Qualification Requirements." The Department of Education strongly believes that having highly qualified teachers available in all core academic classes is a critical strategy in closing the achievement gap, the primary goal of the No Child Left Behind legislation. We are pleased to see the effort that the GAO has invested in examining the states' progress toward this goal, and in reviewing and acknowledging the diverse ways in which the Department has supported their efforts.

The GAO report contains the following recommendation for executive action:

"We recommend that the Secretary of Education explore ways to make the Web-based information on teacher qualification requirements more accessible to users of its Web site. Specifically, the Secretary may want to more prominently display the link to state teacher initiatives, as well as consider enhancing the capability of the search function."

The Department concurs with the GAO's recommendation, and has already taken steps to review how information on our ED.gov "Teachers" Web site can be expanded and better integrated with information on www.teacherquality.us, on the ESEA Title II Web site, and with Web sites located at other organizations that maintain related information. It is our goal that, within the next two months, we will provide a more seamless portal to all information about highly qualified teachers.

Again, thank you for sharing your report on this timely and critical issue.

Sincerely,

A handwritten signature in cursive script that reads "Henry L. Johnson".

Henry L. Johnson

600 INDEPENDENCE AVE., S.W. WASHINGTON, D.C. 20202-6100

Our mission is to ensure equal access to education and to promote educational excellence throughout the Nation.

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Marnie S. Shaul, (202)512-7215, shaulm@gao.gov

Staff Acknowledgments

Harriet Ganson (Assistant Director) and Natalya Barden (Analyst-in-Charge) managed all aspects of the assignment. Scott Spicer, Katharine Leavitt, and Deborah Edwards made significant contributions to this report. Other key contributors to this report included Jessica Botsford, Richard Burkard, Emily Leventhal, Jonathan McMurray, Jean McSween, John Mingus, and Shannon VanCleave.

Related GAO Products

No Child Left Behind Act: Education Could Do More to Help States Better Define Graduation Rates and Improve Knowledge about Intervention Strategies. [GAO-05-879](#). Washington, D.C.: Sept. 20, 2005.

No Child Left Behind Act: Most Students with Disabilities Participated in Statewide Assessments, but Inclusion Options Could Be Improved. [GAO-05-618](#). Washington, D.C.: July 20, 2005.

Charter Schools: To Enhance Education's Monitoring and Research, More Charter School-Level Data Are Needed. [GAO-05-5](#). Washington, D.C.: Jan. 12, 2005.

No Child Left Behind Act: Education Needs to Provide Additional Technical Assistance and Conduct Implementation Studies for School Choice Provision. [GAO-05-7](#). Washington, D.C.: Dec. 10, 2004.

No Child Left Behind Act: Improvements Needed in Education's Process for Tracking States' Implementation of Key Provisions. [GAO-04-734](#). Washington, D.C.: Sept. 30, 2004.

No Child Left Behind Act: Additional Assistance and Research on Effective Strategies Would Help Small Rural Districts. [GAO-04-909](#). Washington, D.C.: Sept. 23, 2004.

Special Education: Additional Assistance and Better Coordination Needed among Education Offices to Help States Meet the NCLBA Teacher Requirements. [GAO-04-659](#). Washington, D.C.: July 15, 2004.

Student Mentoring Programs: Education's Monitoring and Information Sharing Could Be Improved. [GAO-04-581](#). Washington, D.C.: June 25, 2004.

No Child Left Behind: More Information Would Help States Determine Which Teachers Are Highly Qualified. [GAO-03-631](#). Washington, D.C.: July 17, 2003.

Title I Characteristics of Tests Will Influence Expenses; Information Sharing May Help States Realize Efficiencies. [GAO-03-389](#). Washington, D.C.: May 8, 2003.

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