Ed Prep Policy Advisory

Needs Assessment Process

Updated August 2024

MASSACHUSETTS Department of Elementary and Secondary Education

This advisory provides an overview of the needs assessment process and information to support sponsoring organizations (SOs) to demonstrate need for a new program or program with low completion rates. This advisory includes the following:

Needs Assessment Overview

- Demonstrating Need
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- Additional Resources:
  - Appendix A: Conducting a Self-Study to Determine Need
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Needs Assessment Overview

A needs assessment is required if a sponsoring organization would like to operate or continue to operate:

1. **Low-Completion Programs**[1]: At the point of Formal Review, DESE requires sponsoring organizations to assess the breadth and depth of program offerings to determine whether there is a continued need for some programs. DESE identifies programs with six or fewer completers over the three years preceding review as low-completion programs. If the sponsoring organization wishes to continue operating these programs, they must complete a needs assessment.
   a. **Zero-Completer Programs:** Programs with zero completers in the three years preceding the Formal Review (i.e., Zero-Completer programs) do not have data available to be reviewed for efficacy. Therefore, these programs, with the exception of DESE-Identified High Needs Programs (see below), will automatically expire at the point of Formal Review. If a sponsoring organization wishes to operate a program after it has been expired under the zero-completer clause, it must submit a needs assessment for the program. If need is demonstrated, the sponsoring organization must submit evidence required of a new program for DESE to review and approve as part of the program approval process.
2. **New Programs**: Sponsoring organizations may put forth new programs during the Formal or Informal Review cycle. A needs assessment must be completed and need must be demonstrated for each new program at the start of this process, before additional submission materials will be considered.

For DESE to review programs in either of these instances, sponsoring organizations must demonstrate need according to one of the categories described below, as well as the sponsoring organizations' capacity to recruit and enroll candidates into the program to meet demand.

[1] If, across all approved programs, a Sponsoring organization has six or fewer completers in the three years preceding the launch of the formal review, there will be insufficient outcomes data to conduct the formal review and the Sponsoring organization's approval will expire. The Sponsoring organization may undergo informal review if it seeks to continue operations as an approved preparation provider.

Demonstrating Need

Sponsoring organizations are responsible for demonstrating need for a program and providing evidence that they will be able to meet the demand. Prior to submitting a needs assessment, DESE highly encourages the sponsoring organization to conduct an internal self-study to assess whether the operation of this program will meet the need of the sponsoring organization and its stakeholder groups according to one of the categories of need listed below. Guidance for the self-study can be found in Appendix A.

If a program is more active than recent completer data suggests, the sponsoring organization should share additional, relevant information, as the program or program grouping may exceed the minimum threshold to demonstrate need. For example:

- A program that had low completion rates in the years preceding the Formal Review and now has six or more candidates enrolled and on track to successfully complete the program may demonstrate need by combining enrolled candidates with completers.
- Programs that meet the below expectations (which align with grouping expectations for Formal Review) may be grouped together to demonstrate sufficient enrollment and/or completion rates:
    - Programs may only be grouped with others at the same level (i.e., Baccalaureate programs cannot be grouped with Post-Baccalaureate programs);
    - Only programs with very similar programs of study should be grouped together. (e.g., Biology 8-12 and Chemistry 8-12 Post-Baccalaureate programs might be grouped, if the primary difference in the programs of study are the content-specific courses covering the SMKs)
    - Any programs that are grouped together should reference the same MA Curriculum Framework(s) in the Subject Matter Knowledge Guidelines, given the distinct guiding principles in each framework.

Categories of Need

There are four categories through which sponsoring organizations can demonstrate need: district need, candidate interest, increasing diversity in the workforce, and impact/effectiveness of completers. To move a program forward for review, the sponsoring organization must demonstrate need in ***one*** of these categories.

The chart below provides a brief description of what need in each of these categories may look like and potential evidence sources that have been presented in the past. This is not an exhaustive list; sponsoring organizations may use other sources of evidence.

Category of Need	Description	Potential Evidence Sources
Local school/district need	License areas in which PK-12 school(s)/district(s) have indicated	▪ Staffing/employment and/or survey data from partner

	to the sponsoring organization future hiring needs that warrant the continuation or creation of the program.	schools/districts demonstrating future employment need in the specific license area. ▪ Letters/communication from school or district leaders indicating explicit future hiring needs in specific license areas.
Candidate interest	Potential candidates have demonstrated explicit interest in enrolling in the specific program.	▪ Survey data from potential candidates indicating interest in enrollment in specific licensure areas. ▪ Data tracking inquiries about the specific licensure program from prospective candidates.
Diversity of the workforce	Ability of a program to increase the diversity of the Massachusetts educator workforce. Evidence in this category must be specific to the educator preparation unit and be demonstrative of its ability to enroll *and* complete candidates in the program.	▪ Disaggregated recruitment, enrollment, and completion data for the educator preparation unit or the specific program. ▪ Disaggregated survey data from potential candidates indicating interest in enrolling in the program.
Impact/Effectiveness of completers	This category applies only to sponsoring organizations that are Approved with Distinction. Being awarded Approval with Distinction signals both the organization's capacity to run effective educator preparation programs and compelling evidence of completers' positive impact in the workforce.	n/a

DESE-Identified High Needs Programs with Low/Zero-Completers

In recognition of the employment demands of Massachusetts school districts, DESE does not require needs assessments for DESE-identified "high need" subject areas in which there are current workforce shortages. DESE-identified high need subject areas are listed on DESE's website and updated annually. (Please note: The list of DESE-identified high needs subject areas is distinct from high needs/shortage areas identified for federal reporting.)

Low/Zero-Completer High Needs Programs: Low/Zero-completers programs associated with DESE-identified high-need subject areas will receive automatic confirmation of need and do not need to

submit a needs assessment. However, these programs are required to submit to DESE an affidavit (see Appendix D) signed by the sponsoring organization's President/Executive Director acknowledging the low number of completers and confirming that the organization will (1) conduct a yearly audit to ensure program materials are up to date, of a high-quality, and meeting all state program approval criteria. If the organization chooses not to complete an affidavit, the program will expire at the conclusion of the Formal Review.

New High Needs Programs: To put forward a new program in a high need subject area, a sponsoring organization is not required to demonstrate need for the program; however, the sponsoring organization must demonstrate their capacity to recruit candidates into and operate the program.

Additional Guidance when Completing a Needs Assessment

Overall, sponsoring organizations should work to construct a clear, concise, and cogent argument for need. DESE will review only the evidence presented. Other considerations to keep in mind when completing a needs assessment include:

- **Choose your best evidence.** Focus the narrative on only the most powerful pieces of evidence that demonstrate need in the selected category. In some instances, one piece of strong evidence can justify confirmation of need.
- **Pay attention to the questions.** Read the worksheet questions carefully and answer them directly. Adhere to the word limit and only attach supplemental documents (maximum 3) if they strengthen your claim to offer the program and are clearly referenced in the narrative.
- **Program design is evaluated as a component of the review, not as evidence of need.** Program delivery and design are not relevant to the demonstration of need. For example, the sponsoring organization may have state-of-the-art technology or offer online courses with increased flexibility, but on their own these specifics do not demonstrate there is a need for the program. Program design and delivery will be evaluated during the Formal Review process, not the needs assessment process.

For further guidance on how to demonstrate evidence in the needs assessment process, refer to Appendix B.

Appendix A: Conducting a Self-Study to Determine Need

We encourage sponsoring organizations to conduct an internal self-study to evaluate their interest and ability to operate a new or low-completion program prior to completing the needs assessment. Please take the following questions into consideration when deciding whether to put forth a needs assessment:

Step 1: Confirm Commitment to the Program

What is the **objective** for your organization to operate this program?

- How does the program align with/contribute to organizational goals?
- Does your organization commit to allocating resources to this program despite the low enrollment?

Notes:

Step 2: Demonstrate Need

If your sponsoring organization confirms it wants to operate this program, consider the need for the program, as well as whose needs the program will meet.

- Local districts? Candidates? **How do you know?**

Notes:

Which of the following categories of need will have the **best data and evidence**?

Local School/District Need:
• Which districts would hire or have hired completers from this program?
  ○ What are the future employment needs for these districts?
  ○ Have these districts indicated they will hire completers from the program in the next few years?

Notes:
Candidate Interest: • What are recent trends in candidate enrollment in the program? • What evidence do you have demonstrating more candidates will enroll in the program in the future?   ○ How does your organization project future candidate enrollment in these programs?
Notes:
Increased Diversity of the Workforce: • Will this program contribute to increased racial/ethnic diversity in the workforce?

• What evidence do you have of the educator preparation unit's ability to recruit and admit a racially and ethnically diverse candidate pool for this program? • What evidence do you have of the educator preparation unit's ability to effectively support and prepare racially and ethnically diverse completers through this program?
Notes:

Step 3: Plan for Recruitment, Enrollment, and Support

Does your organization have the resources **to recruit, enroll, and support** candidates in this program?

For new programs: What specific recruitment strategies will your organization use to drive candidate enrollment?

For low-completion programs: What specific strategies will your organization use to increase enrollment and/or completion?

Notes:

Appendix B: Evidence Demonstrating Need

The table below provides further guidance and examples of strong and weak evidence.

Guidance	Strong Evidence	Weak Evidence
Evidence should be program-specific *Data and information should speak to both the subject and the level of the program for which you are applying*	▪ Differentiates between Initial and Professional programs ▪ Differentiates between grade spans (e.g., Math 5-8 and Math 8-12)	▪ Aggregates all Post-Baccalaureate programs together when putting forth a needs assessment for a History/Social Science, Initial program ▪ Describes need for ESL 5-12 educators when putting forth a needs assessment for ESL Prek-8 ▪ Describes need for World Language teachers in general when putting forth a Spanish 5-12, Initial Post-Baccalaureate program
Avoid generalizations and unsubstantiated assumptions *Organizations should embed evidence within their narrative to support claims*	▪ "Survey data (see supplemental doc #1) indicates that 10 candidates would be interested in enrolling in this program." ▪ "Of the twenty-one responding districts, eleven districts (52%) indicated that their district will need to hire one or more Teachers of Visual Arts 5-12 in the next three years (see supplemental doc #2)."	▪ "Many candidates have expressed interest in the program." ▪ "There is an ongoing shortage of teachers nationally and in Massachusetts. This is most clearly seen in the Nationwide Teacher Shortage Areas (TSA) report from the U.S. Department of Education."
Use clear, specific language *Language should be concise such that the evidence or narrative can clearly speak for itself*	▪ In a survey to principals, the SO may ask, "In the next three years, do you need to hire English as a Second Language educators at the 5-12 level? How many?" ▪ In a survey to potential candidates, the SO may ask, "Would you apply and enroll in a English as a Second Language program at the 5-12 level at [SO] in the next five years?"	▪ In a survey to principals, the SO asks, "Do you think there is a need for Elementary teachers?" ▪ In a survey to potential candidates, the SO asks, "Are you interested in a special education program?" ▪ A District Letter of Support states, "We have hired many completers from [SO] in the past," or "We value candidates from [SO]."

	▪ A District Letter of Support states, "We need to hire five Spanish 5-12 teachers in the next three years."	
Share specifics about new or revised strategies that will lead to increased enrollment in and completion of the program	▪ "We will make the opportunity to enter this program available beginning at the end of spring semester for first year biology and physics majors and actively promote it in spring communications and the course catalogue. When we have similarly opened opportunities to enter education programs to first year English majors, enrollment in the relevant program increased by 150%."	▪ Statements that do not reflect new or updated strategies such as, "We will continue to conduct office hours so anyone interested in becoming an educator may visit and talk to a program representative" ▪ Statements that are not specific to the preparation unit such as, "Enrollment in the University has increased by 10 percent in the past three years"

Appendix C: Rationale for a Needs Assessment Process

In 2013, there were 1,719 initial licensure teacher programs approved to operate in Massachusetts, though just 46 percent (n=787) of those programs were active[2]. It is DESE's responsibility to review and approve programs that are going to recruit, enroll, and prepare educators that meet the needs of the Commonwealth. The needs assessment fosters an efficient approval process for the following reasons:

- Programs should meet the employment demands of the workforce.
    - Sponsoring organizations must demonstrate that specific programs are needed to meet specific Massachusetts employment demands and that the sponsoring organization is able to address this employment need.

- Investments should be made where they are most needed.
    - Operating a high-quality program and reviewing it effectively require considerable resources from the sponsoring organization and the state, respectively. We are cognizant of where resources are best allocated to support the needs of our schools in Massachusetts.

- Efficacy data needs to be available for review during the Formal Review process for DESE to evaluate whether a program is fully meeting the approval criteria.
    - As a result of federal education law, any public reports containing performance data must suppress results for small groups when there are characteristics that would make it possible to identify individuals. Consequently, it is challenging for DESE to evaluate and fully approve programs when completer effectiveness data is unavailable.
    - DESE is maintaining consistency with other accreditation agencies in its needs assessment process. The Council for the Accreditation of Educator Preparation (CAEP), which conducts national accreditation reviews, does not review any low-completion programs as there is insufficient data to evaluate program efficacy.

[2] For purposes of this analysis, we considered "active programs" to be those for which there was at least 1 completer in 2013-2014.

Appendix D: DESE-Identified High Needs Program Affidavit Template

Sponsoring organizations may use the template language below to attest to their commitment to monitoring the quality of low/zero-completer programs in DESE-Identified high needs areas. The completed affidavit should be on sponsoring organization letterhead and signed by the President/Executive Director of the sponsoring organization.

On behalf of [sponsoring organization], I fully acknowledge the following programs have been identified as low/zero-completer programs by the Massachusetts Department of Elementary and Secondary Education (DESE):

- Program 1
- Program 2

These programs are included on the DESE-Identified high needs program area list. As such, despite their low enrollment, [sponsoring organization] would like to continue operating them. [sponsoring organization] will actively recruit, enroll, and support candidates to complete these high-needs programs to ensure it is meeting the employment demands of the Commonwealth.

As DESE is unable to access data for low/zero-completion programs, [sponsoring organization] will conduct a regular audit of the programs to ensure they are high-quality and all state program approval criteria are met.