



Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) Grant Program

**2021
EVALUATION REPORT**

Program Evaluation Division

OFFICE OF THE LEGISLATIVE AUDITOR

STATE OF MINNESOTA

Program Evaluation Division

The Program Evaluation Division was created within the Office of the Legislative Auditor (OLA) in 1975. The division's mission, as set forth in law, is to determine the degree to which state agencies and programs are accomplishing their goals and objectives and utilizing resources efficiently.

Topics for evaluations are approved by the Legislative Audit Commission (LAC), which has equal representation from the House and Senate and the two major political parties. However, evaluations by the office are independently researched by the Legislative Auditor's professional staff, and reports are issued without prior review by the commission or any other legislators. Findings, conclusions, and recommendations do not necessarily reflect the views of the LAC or any of its members.

OLA also has a Financial Audit Division that annually audits the financial statements of the State of Minnesota and, on a rotating schedule, audits state agencies and various other entities. Financial audits of local units of government are the responsibility of the State Auditor, an elected office established in the Minnesota Constitution.

OLA also conducts special reviews in response to allegations and other concerns brought to the attention of the Legislative Auditor. The Legislative Auditor conducts a preliminary assessment in response to each request for a special review and decides what additional action will be taken by OLA.

For more information about OLA and to access its reports, go to: www.auditor.leg.state.mn.us.

Evaluation Staff

James Nobles, *Legislative Auditor*
Judy Randall, *Deputy Legislative Auditor*

Caitlin Badger
Eleanor Berry
Sarah Delacueva
Scott Fusco
Will Harrison
Jody Hauer
Donald Hirasuna
David Kirchner
Lucas Lockhart
Ivy Marsnik
Ryan Moltz
Jodi Munson Rodríguez
Kaitlyn Schmaltz
Laura Schwartz
Katherine Theisen
Caitlin Zanoni

To obtain reports in electronic ASCII text, Braille, large print, or audio, call 651-296-4708. People with hearing or speech disabilities may call through Minnesota Relay by dialing 7-1-1 or 1-800-627-3529.

To offer comments about our work or suggest an audit, investigation, or evaluation, call 651-296-4708 or e-mail legislative.auditor@state.mn.us.



Printed on Recycled Paper



OFFICE OF THE LEGISLATIVE AUDITOR

STATE OF MINNESOTA • James Nobles, Legislative Auditor

March 2021

Members of the Legislative Audit Commission:

First established in 1997 as the Collaborative Urban Educator grant program, the Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) program awards grants to higher education institutions to increase the number of teacher candidates of color and American Indian teacher candidates in Minnesota who can meet certain licensing requirements.

In this report, we conclude that the Professional Educator Licensing and Standards Board (PELSB) has generally managed the program well, but it is difficult to measure the program's impact. We make several recommendations to PELSB to improve aspects of its administration of the program and to the Legislature to more clearly define the focus of the program.

Our evaluation was conducted by Jodi Munson Rodríguez (project manager), Will Harrison, and Katherine Theisen. PELSB cooperated fully with our evaluation, and we thank them for their assistance.

Sincerely,

James Nobles
Legislative Auditor

Judy Randall
Deputy Legislative Auditor



Summary

Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) Grant Program

Key Facts and Findings:

- The Professional Educator Licensing and Standards Board (PELSB) must award Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grants to increase the number of teacher candidates of color and American Indian teacher candidates who meet certain teacher licensing requirements. (p. 3)
- The Legislature has made a number of changes to the grant program in recent years. (p. 4)
- Statutes limit eligibility for CUGMEC grants to institutions of higher education with PELSB-approved teacher preparation programs. For Fiscal Year 2021, PELSB awarded a total of \$970,000 in CUGMEC funding to eight higher education institutions. (pp. 4, 8)
- Based on our analysis, the majority of CUGMEC beneficiaries who graduated in fiscal years 2016 through 2019 became employed as Minnesota public school teachers. (p. 28)
- A lack of reliable data on Minnesota teacher candidates and public school teachers' race and ethnicity makes it difficult to accurately determine the racial and ethnic composition of the teacher workforce. (p. 34)
- Nevertheless, our analysis indicated there has been a slight increase in recent years in the percentage of Minnesota teachers who are people of color or American Indian. (p. 36)
- PELSB's grant award process met most requirements and was generally transparent, but some aspects of the process lacked clarity. (p. 41)
- The Legislature has not defined a clear focus for the CUGMEC grant program. (p. 61)
- In the absence of legislative direction, PELSB has prioritized CUGMEC funding for direct financial assistance to teacher candidates. (p. 62)

Key Recommendations:

- PELSB should standardize and improve the processes and systems used to collect data on teacher candidates and licensed teachers' race and ethnicity. (p. 35)
- PELSB should ensure that the CUGMEC grant application and scoring rubric incorporate all information needed to meet requirements for awarding grants. (p. 56)
- The Legislature should: (1) clearly define the focus of the CUGMEC grant program, (2) outline how grant funding may be used and establish corresponding outcome measures, and (3) review requirements for awarding grant funds. (p. 66)
- As the Legislature makes decisions related to CUGMEC, it should determine how CUGMEC fits into Minnesota's efforts to increase the number of teachers of color and American Indian teachers in Minnesota. (p. 71)

While PELSB has generally managed the CUGMEC grant program well, it is difficult to measure the program's impact.

The CUGMEC grant program has undergone significant changes in recent years, and it is too soon to know the impact of these changes.

Report Summary

Minnesota has some of the nation's largest education achievement gaps based on student race and ethnicity. And, Minnesota's teacher workforce is significantly less racially and ethnically diverse than its student population. This disparity matters because research suggests that teachers of color can help improve academic outcomes for students of color.

The Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) program provides grants to higher education institutions to increase the number of teacher candidates of color and American Indian teacher candidates who meet certain teacher licensing requirements.¹ Statutes require the Professional Educator Licensing and Standards Board (PELSB) to administer the CUGMEC grant program.

For Fiscal Year 2021, PELSB awarded a total of \$970,000 in CUGMEC funding to eight higher education institutions.

The Legislature has made a number of changes to the CUGMEC grant program in recent years.

First created as the Collaborative Urban Educator grant program in 1997, the Legislature changed the program's name in 2017.²

The 2019 Legislature codified the CUGMEC grant program for the first time; this was also the first year the Legislature explicitly stated that grants must be awarded to increase the number of teacher candidates of color and American Indian candidates.³

The Minnesota Department of Education (MDE) administered the CUGMEC grant program for most of its existence. In 2019, the Legislature moved administration of the

program from MDE to PELSB starting with Fiscal Year 2020 grants.

The Legislature also recently changed how CUGMEC grants are awarded. Until Fiscal Year 2018, a small group of institutions, named most years in law, received CUGMEC funding. For fiscal years 2018 and 2019, the Legislature named certain grantee institutions in law, but it also mandated that MDE award a portion of the funding on a competitive basis. Starting in Fiscal Year 2020, the Legislature required that all grants be awarded through a competitive process.

It is too early to know what impact these and other changes to the CUGMEC grant program will have overall. In fact, it is difficult to measure the impact of the CUGMEC grant program at all. Grantee institutions with whom we spoke supported CUGMEC beneficiaries with funding from other sources as well as CUGMEC. For this and other reasons, we cannot attribute outcomes for CUGMEC beneficiaries solely to that program. But, CUGMEC may have contributed to a variety of outcomes.

While CUGMEC supported hundreds of teacher candidates in fiscal years 2016 through 2020, not all of them became Minnesota public school teachers.

We reviewed data provided by grantee institutions to determine the extent to which the 590 teacher candidates who directly benefitted from CUGMEC funding in fiscal years 2016 through 2020 were still participating in, graduated from, or withdrew from their teacher preparation programs.⁴ Grantee institutions reported that 230 of those 590 CUGMEC beneficiaries (39 percent) graduated by July 2020. Another 272 beneficiaries (46 percent) were enrolled in 2020, which may indicate that they were still working towards their degree. Forty beneficiaries (7 percent) had not

¹ *Minnesota Statutes* 2020, 122A.635, subd. 1.

² *Laws of Minnesota* 1997, First Special Session, chapter 4, art. 5, sec. 28, subd. 9; and *Laws of Minnesota* 2017, First Special Session, chapter 5, art. 2, sec. 57, subd. 27. We refer to the program generally as CUGMEC throughout the report, even when referring to years when it was known by its previous name.

³ *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 15.

⁴ We collected data on CUGMEC beneficiaries from grantee institutions and matched that data to teacher licensing and employment data. For further description of the data and methods used in our analysis of CUGMEC beneficiaries and the Minnesota teacher workforce, see Chapter 2 of the full report.

graduated and had not enrolled in 2020, while the remaining 48 (8 percent) withdrew from their programs.

Moreover, based on our analysis, two-thirds of the 171 CUGMEC beneficiaries who graduated between fiscal years 2016 and 2019 had obtained standard teaching licenses by July 2020. Almost three-fourths of these 171 graduates were employed as public school teachers in Minnesota at some point after graduation.

We surveyed CUGMEC beneficiaries and asked them to what extent their teacher preparation program provided sufficient support to complete the program.⁵ Eighty-five percent of survey respondents stated that their program provided “all” or “most” of the support they needed.

Based on our analysis, there has been a slight increase in recent years in the percentage of Minnesota teachers who are people of color or American Indian.

We identified several issues with the data PELSB maintains on teacher candidates and teachers. However, we determined that data from the 2015-2016 through 2018-2019 school years were consistent enough to provide a broad view of the state’s teacher workforce. In each of those school years, teachers of color and American Indian teachers comprised about 5 percent of the teacher workforce in Minnesota public schools, with about a half of a percentage point increase during that time.⁶

Additionally, the number of newly licensed teachers of color and American Indian teachers who were Minnesota graduates showed no consistent trend in recent years; districts reported a high of about 300 in the 2016-2017 school year but reported fewer than 300 in every other year.

A lack of reliable data on Minnesota teacher candidates and public school teachers’ race

and ethnicity makes it difficult to accurately determine the racial and ethnic composition of the teacher workforce. As a result, we recommend that PELSB standardize and improve the processes and systems used to collect data on teacher candidates and licensed teachers’ race and ethnicity.

PELSB’s grant award process met most requirements and was generally transparent, but some aspects of the process lacked clarity.

PELSB must meet statutory requirements when awarding CUGMEC grants. It must also adhere to policies established by the Office of Grants Management.

We reviewed PELSB’s grant award process for fiscal years 2020 and 2021. While PELSB’s process complied with most requirements, we identified room for improvement. For example, in Fiscal Year 2020, PELSB did not instruct reviewers on how to assign scores for each category in the application scoring rubric. PELSB provided more detailed instructions for scoring Fiscal Year 2021 grants. However, for some categories in the scoring rubric, reviewers had to provide one score based on multiple different data points, and the instructions did not clearly indicate how to calculate the score for each data point.

In addition, PELSB included most, but not all, of the information on which it must base grant awards in its application materials. The fiscal years 2020 and 2021 applications did not require applicants to provide information on how they would sustain support for teacher candidates. PELSB is required to determine award amounts, in part, on this information.⁷

Among other things, we recommend that PELSB ensure that the CUGMEC grant application and scoring rubric incorporate all information needed to meet requirements for awarding grants.

Our analysis indicated there has not been a significant change in recent years in the racial and ethnic composition of Minnesota’s public school teacher workforce.

⁵ We surveyed 268 CUGMEC beneficiaries who received tuition scholarships in Fiscal Year 2020, of whom 82 responded, for a response rate of 31 percent.

⁶ Due to issues we identified with these data, it is unclear whether the increase reflected an actual change in the racial and ethnic composition of the teacher workforce or unreliable data reporting and retention practices.

⁷ *Minnesota Statutes* 2020, 122A.635, subd. 2(c).

Without a clear focus, CUGMEC previously funded a variety of activities, but the grants have recently been awarded for a narrower use.

The Legislature has not defined a clear focus for the CUGMEC grant program.

The CUGMEC grant program was only recently codified in 2019; prior to that, appropriations laws did not clearly and consistently state the program's purpose. Statutes currently indicate that the CUGMEC program is intended to "increase the number of teacher *candidates* of color or who are American Indian..."⁸ However, statutes also indicate that PELSB must award the grants based on program outcomes related not only to teacher *candidates*, but also *teachers*, including teacher licensure and job placement rates.

It is unclear whether the Legislature, when codifying the program, intended to focus the program only on activities that would increase the number of candidates, as opposed to including activities further along the pathway towards becoming a teacher. Different interpretations of the program's purpose may lead to different uses of funding.

In the absence of legislative direction, PELSB has prioritized CUGMEC funding for direct financial assistance to teacher candidates.

Requests for CUGMEC grants exceeded available funds in both fiscal years 2020 and

2021. With grant reviewers' input, PELSB awarded most CUGMEC funding for fiscal years 2020 and 2021 for direct financial assistance to teacher candidates. In prior years, grantees used funds for a variety of activities, including administration and mentoring. Representatives from grantee institutions and other education professionals with whom we communicated had mixed opinions about how funds should be used. Some indicated concern about prioritizing direct financial assistance to teacher candidates at the exclusion of other uses of funding. Others indicated they agreed with PELSB's prioritization.

We recommend that the Legislature: (1) clearly define the focus of the CUGMEC grant program, (2) outline how grant funding may be used and establish corresponding outcome measures, and (3) review requirements for awarding grant funds. We also recommend that, as the Legislature makes decisions related to CUGMEC, it determine how CUGMEC fits into Minnesota's efforts to increase the number of teachers of color and American Indian teachers in Minnesota.

⁸ *Minnesota Statutes* 2020, 122A.635, subd. 1. [Emphasis added.]

Summary of Agency Response

In a letter dated February 24, 2021, Professional Educator Licensing and Standards Board (PELSB) Executive Director Alex Liuzzi and Chair Brian Rappe stated that "PELSB fully supports the findings and recommendations of this report." They said "The findings in this report help highlight the ongoing limitations of PELSB's current data systems...." They also noted that, "The last biennium was the first time PELSB had administered a grant. ... PELSB is grateful for the work of this report to highlight four remaining areas where PELSB can improve and clarify the grant application and review process." Additionally, Director Liuzzi and Chair Rappe stated that "ongoing confusion over the legislative intent of the grant program remain," and that PELSB looks forward to partnering with the Legislature and others to "strengthen and clarify the language in statute to ensure the grant program most effectively meets the goal of increasing teachers of color and American Indian teachers in Minnesota."

Table of Contents

1	Introduction
3	Chapter 1: Background
3	Overview
4	Program History
6	Program Funding and Grant Awards
8	Diversity in Schools
17	Chapter 2: Program Impact
18	Use of Funds
22	Grant Beneficiaries
30	Teacher Candidate Support
32	Impact of Program Changes
34	Statewide Metrics
39	Chapter 3: Grant Administration
39	Grant Administration Transition
41	Grant Award Process
58	Grant Monitoring Process
61	Chapter 4: Discussion
61	Program Purpose and Implementation
68	Diversifying Minnesota's Teacher Workforce
73	List of Recommendations
75	Appendix A: Higher Education Institutions with Approved Teacher Preparation Programs
77	Appendix B: Teacher Diversity Across Minnesota School Districts
79	Appendix C: Key Minnesota Programs
83	Agency Response



List of Exhibits

Chapter 1: Background

- 7 1.1 The Legislature has appropriated varying amounts of money to CUGMEC over time.
- 10 1.2 The teacher workforces in the school districts with the largest student enrollment in each of Minnesota's 13 economic development regions were much less diverse than their student populations in the 2018-2019 school year.

Chapter 2: Program Impact

- 20 2.1 Direct financial assistance for students comprised an increasing proportion of CUGMEC grant expenditures in fiscal years 2016 through 2020.
- 22 2.2 The average amount of direct financial assistance grantee institutions provided to each CUGMEC beneficiary decreased in recent years.
- 25 2.3 The majority of CUGMEC beneficiaries who responded to our survey noted that they had difficulty balancing school with other obligations.
- 26 2.4 Different types of Minnesota teaching licenses have different requirements and restrictions.
- 29 2.5 The majority of recent CUGMEC beneficiaries who graduated became employed as Minnesota public school teachers, but not all remained teachers.
- 31 2.6 Most respondents indicated that financial assistance was extremely helpful as they worked towards completing their teacher preparation programs.

Chapter 3: Grant Administration

- 44 3.1 In Fiscal Year 2021, PELSB awarded less CUGMEC funding than grantees requested.
- 47 3.2 While institutions with teacher preparation programs approved by PELSB are located in nine economic development regions, only five regions have an institution that applied for a grant in fiscal years 2020 or 2021.
- 50 3.3 Reviewers scored CUGMEC applications in eight different categories for Fiscal Year 2021 grants.
- 52 3.4 PELSB provided more detailed instructions to reviewers in the rubric for Fiscal Year 2021, but required reviewers to provide a single score based on multiple data points in some instances.
- 55 3.5 The CUGMEC applications and scoring rubrics reflected most, but not all, requirements for awarding CUGMEC grants.

Chapter 4: Discussion

- 64 4.1 Financial assistance was extremely important to most survey respondents when selecting their teacher preparation programs.

Appendix A: Higher Education Institutions with Approved Teacher Preparation Programs

- 75 A.1 Thirty-one higher education institutions in Minnesota have PELSB-approved teacher preparation programs.

Appendix B: Teacher Diversity Across Minnesota School Districts

- 78 B.1 Most Minnesota public school districts had less than half of the teachers of color or American Indian teachers that would be needed to match the

proportion of students who were students of color or American Indian during the 2018-2019 school year.

Appendix C: Key Minnesota Programs

- 80 C.1 Several Minnesota programs could be used to increase the number of teachers of color and American Indian teachers.

Introduction

First established in 1997 as the Collaborative Urban Educator grant program, the Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) program awards grants to higher education institutions to increase the number of teacher candidates of color and American Indian teacher candidates in Minnesota who can meet certain licensing requirements.¹ The Professional Educator Licensing and Standards Board (PELSB) currently administers the program. Grantee institutions have used CUGMEC grants to fund a variety of supports for teacher candidates, including tuition scholarships, program administration, and seminars.

The Office of the Legislative Auditor (OLA) had not evaluated the grant program in its more than 20 years of existence. That changed in April 2020, when the Legislative Audit Commission directed OLA to evaluate the CUGMEC program. Our primary research questions were:

- **To what extent has the CUGMEC grant program had an impact on the racial and ethnic diversity of Minnesota’s teacher workforce?**
- **How well has PELSB administered the CUGMEC grant program?**

We used a variety of research methods to answer these questions. We examined the racial and ethnic diversity of Minnesota’s teacher workforce by reviewing federal and state data on teacher preparation programs, teacher licensure, and the teacher workforce. We also compiled and analyzed data from grantee institutions on individuals who directly benefitted from CUGMEC grant funding in recent years. In addition, we surveyed individuals who benefitted from CUGMEC in Fiscal Year 2020 to learn about their experiences as teacher candidates.²

To determine how well PELSB has managed the program, we reviewed all CUGMEC grant applications, application review documentation, and final grant contract agreements from fiscal years 2020 and 2021. Among other things, we examined the extent to which PELSB’s processes for granting awards adhered to relevant laws and policies. We also reviewed documentation of PELSB’s grant monitoring activities and communicated with (1) grant application reviewers, (2) institutions that applied for grants but did not receive them, (3) institutions that received grants, and (4) higher education institutions with PELSB-approved licensure programs that did not apply for grants in fiscal years 2020 or 2021.

Finally, we spoke with PELSB staff, staff from the Minnesota Department of Education and the Office of Higher Education, and others knowledgeable about efforts to increase teacher diversity. We communicated with representatives from several education organizations, including the Association of Metropolitan School Districts, the Coalition

¹ We refer to the program generally as CUGMEC throughout the report, even when referring to years when it was known under its previous name. *Minnesota Statutes* 2020, 122A.635, subd. 1.

² We surveyed 268 CUGMEC beneficiaries that received tuition scholarships in Fiscal Year 2020, of whom 82 responded, for a response rate of 31 percent.

to Increase Teachers of Color and American Indian Teachers in Minnesota, EdAllies, Education Minnesota, the Minnesota Education Equity Partnership, and the Minnesota Rural Education Association. We reviewed literature on the impact on students of having teachers of color and American Indian teachers and on the challenges people of color and American Indians may face in becoming teachers and in continuing to teach.

Our evaluation focused on PELSB's administration of the CUGMEC grant program. As such, certain issues and activities were out of the scope of this review. For example, we did not examine administration of the grant program prior to PELSB taking on its administrative role. We did not evaluate the extent to which grantee institutions' teacher preparation programs adequately prepare candidates for teaching. We also were unable to conduct a causal analysis to determine the extent to which CUGMEC alone contributed to program outcomes. While we provide metrics on CUGMEC beneficiaries and Minnesota's teacher workforce, the state currently does not collect the data necessary for measuring a causal effect between the grants and the numbers of teachers of color or American Indian teachers. Additionally, examining the state's overall efforts to increase the number of teacher candidates who are people of color or American Indian was beyond the scope of our analysis.

Chapter 1: Background

According to a recent study by the Federal Reserve Bank of Minneapolis, Minnesota has some of the nation's largest measurable differences in educational achievement across student race and ethnicity.¹ More specifically, it is among the top five states with the largest gaps in college readiness scores in reading and math between White students and Black and Hispanic students.²

Minnesota's teacher workforce is significantly less racially and ethnically diverse than the student population. And, while students of color and American Indian students comprise a growing proportion of Minnesota's students, the proportion of Minnesota teachers who are people of color or American Indian has not increased markedly in recent years. One reason this disparity is important is because, as we discuss in this chapter, research suggests that teachers of color can help improve the academic outcomes and school experiences of students of color.

The Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grant program provides funding to higher education institutions to increase the number of teacher candidates of color and American Indian teacher candidates who meet certain teacher licensing requirements.³ In this chapter, we provide an overview of the CUGMEC grant program. We also discuss changes to the program, the program's funding, and grant eligibility and awards. Finally, we examine the diversity of Minnesota's student and teacher populations and discuss research on teacher diversity.

Overview

Statutes require the Professional Educator Licensing and Standards Board (PELSB) to administer the CUGMEC grant program.⁴ Statutes also provide direction on how PELSB must award grants and to whom those grants may be awarded.⁵

PELSB must award CUGMEC grants to increase the number of teacher candidates of color and American Indian teacher candidates who meet certain teacher licensure requirements.

Statutes state that grants must be awarded "to increase the number of teacher candidates of color or who are American Indian, and meet the requirements for a Tier 3

¹ Rob Grunewald and Anusha Nath, *A Statewide Crisis: Minnesota's Education Achievement Gaps* (Minneapolis: Federal Reserve Bank of Minneapolis, 2019), 3.

² *Ibid.*, 19-20.

³ *Minnesota Statutes* 2020, 122A.635, subd. 1. The CUGMEC program was formerly named the Collaborative Urban Educator grant program. We refer to the program generally as CUGMEC throughout the report, even when referring to years when it was known under its previous name.

⁴ *Minnesota Statutes* 2020, 122A.635, subd. 1.

⁵ *Minnesota Statutes* 2020, 122A.635, subds. 2 and 3.

license....”⁶ A Tier 3 license is a standard professional teaching license that may be renewed without limitation. To obtain a Tier 3 license, individuals must meet specific education, experience, and/or exam requirements. We provide more information on these requirements in Chapter 2.

Statutes limit eligibility for CUGMEC grants to institutions of higher education with PELSB-approved teacher preparation programs.

Statutes state that eligibility for CUGMEC grants “is limited to public or private higher education institutions that offer a teacher preparation program approved by the Professional Educator Licensing and Standards Board.”⁷ Thirty-one higher education institutions in Minnesota currently offer PELSB-approved teacher licensure programs.⁸ Appendix A provides a list of these institutions, as well as the economic development regions in which their teacher preparation programs are located.

PELSB must award CUGMEC grants based on a number of criteria outlined in statutes, such as the number of teacher candidates of color and American Indian teacher candidates supported by the applying institution’s teacher preparation program.⁹ We describe these criteria and PELSB’s grant award process in more detail in Chapter 3.

Higher education institutions have used CUGMEC grant funds for a variety of activities, such as to recruit teacher candidates and support them along their path to becoming a teacher. In recent years, institutions have used the majority of CUGMEC funds to provide direct financial assistance to teacher candidates. For example, Metropolitan State University, a Fiscal Year 2020 CUGMEC grantee, used its award to provide tuition scholarships to students and subsidize teacher candidates’ licensure exam fees. We further discuss how grantees used CUGMEC funds in Chapter 2.

Program History

First created as the Collaborative Urban Educator grant program in 1997, the Legislature changed the program’s name to the Collaborative Urban and Greater Minnesota Educators of Color program in 2017.¹⁰

The Legislature has made a number of changes to the CUGMEC grant program in recent years.

The Legislature recently codified the program in statute, changed the agency responsible for administering the program, and altered the way in which grants are awarded.

⁶ *Minnesota Statutes* 2020, 122A.635, subd. 1.

⁷ *Ibid.*

⁸ Alternative teacher preparation programs are not currently eligible to receive CUGMEC grants. These alternative programs were, however, eligible to receive grants in fiscal years 2018 and 2019.

⁹ *Minnesota Statutes* 2020, 122A.635, subd. 2(a).

¹⁰ *Laws of Minnesota* 1997, First Special Session, chapter 4, art. 5, sec. 28, subd. 9; and *Laws of Minnesota* 2017, First Special Session, chapter 5, art. 2, sec. 57, subd. 27.

Prior to 2019, appropriations laws did not clearly and consistently state the program's purpose. The 2019 Legislature codified the CUGMEC grant program in statute for the first time; this was also the first year the Legislature explicitly stated that grants must be awarded to increase the number of teacher candidates of color or American Indian candidates.¹¹

The Minnesota Department of Education (MDE) administered the CUGMEC grant program for most of its existence.¹² In 2019, the Legislature moved administration of the program from MDE to PELSB starting with Fiscal Year 2020 grants.¹³ As of the publication of this report, PELSB had overseen two grant award processes: one for Fiscal Year 2020 and one for Fiscal Year 2021.

The Legislature also recently changed how CUGMEC grants are awarded. MDE distributed grant funding only to higher education institutions named in law for most of the years it administered the CUGMEC grant program. For fiscal years 2018 and 2019, the Legislature named certain grantee institutions in law but also mandated that MDE award a portion of the funding on a competitive basis.¹⁴ Starting in Fiscal Year 2020, the Legislature required that all grants be awarded through a competitive process.¹⁵

Until Fiscal Year 2018, a small group of higher education institutions, named most years in law, received CUGMEC funding.

From fiscal years 1998 to 2013, the same three institutions received CUGMEC funding: Concordia University, St. Paul; Hamline University; and the University of St. Thomas. The Legislature named the three institutions in appropriations laws for most of these fiscal years; in the years the Legislature did not name grantees, the aforementioned institutions

Ten higher education institutions have received CUGMEC grant funding.

Institution	Fiscal Years Funding Received
Concordia University, St. Paul	1999 to 2021
Hamline University	1998 to 2021
University of St. Thomas	1998 to 2021
Augsburg University	2014 to 2021
College of St. Scholastica	2018 and 2019
Metropolitan State University	2018 to 2021
Minnesota State University, Mankato	2018, 2019, and 2021
Saint Mary's University	2018 to 2021
Winona State University	2018 and 2019
University of Minnesota, Twin Cities	2021

¹¹ *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 15, codified as *Minnesota Statutes* 2020, 122A.635, subd. 1.

¹² For fiscal years 1998 to 2003, the program was administered by MDE's predecessor—the Department of Children, Families, and Learning.

¹³ *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 15, codified as *Minnesota Statutes* 2020, 122A.635, subd. 1.

¹⁴ *Laws of Minnesota* 2017, First Special Session, chapter 5, art. 2, sec. 57, subds. 27(b) and (d).

¹⁵ *Laws of Minnesota* 2017, First Special Session, chapter 5, art. 2, sec. 57, subd. 27(e); and *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 15, subd. 1, codified as *Minnesota Statutes* 2020, 122A.635, subd. 1.

received funding.¹⁶ The Legislature added a fourth institution—Augsburg University—to the institutions named in law for fiscal years 2014 through 2019.

New institutions received the grant through a competitive process starting in Fiscal Year 2018, coinciding with a change in law that we described above. MDE awarded CUGMEC grants to six institutions through a competitive process that year. These grants were in addition to the four grants awarded to legislatively named grantees.¹⁷ In Fiscal Year 2020, when PELSB awarded all CUGMEC grants through a competitive process, a total of six institutions received awards.

Program Funding and Grant Awards

CUGMEC appropriations have varied over the program's 24-year history. The Legislature appropriated the largest annual amounts to the program for fiscal years 2000 through 2003, when appropriations were \$1.3 million for each year.¹⁸ As Exhibit 1.1 shows, appropriations decreased after 2003, then increased again in Fiscal Year 2014. As we explained above, the Legislature added a fourth institution to the grantees named in law that year.

Appropriations increased again in 2017, and the Legislature appropriated around \$1.0 million for CUGMEC grants for each of the last five fiscal years.¹⁹ The Legislature appropriated nearly \$1.1 million for CUGMEC for Fiscal Year 2020, and \$1.0 million for Fiscal Year 2021.²⁰ Of those amounts, PELSB could use up to 3 percent to monitor and administer the program.²¹

¹⁶ The Legislature did not name grantees in appropriations laws for fiscal years 1998, 1999, 2010, and 2011. MDE provided funding to the University of St. Thomas for Fiscal Year 1998 and Concordia University, St. Paul, for Fiscal Year 1999. A portion of the funding for the University of St. Thomas was passed to Hamline University for Fiscal Year 1998. Concordia University, St. Paul; Hamline University; and the University of St. Thomas received funding for fiscal years 2010 and 2011 from grants awarded by MDE.

¹⁷ One institution—the University of St. Thomas—received both a legislatively named grant and a grant awarded through MDE's competitive process in Fiscal Year 2018.

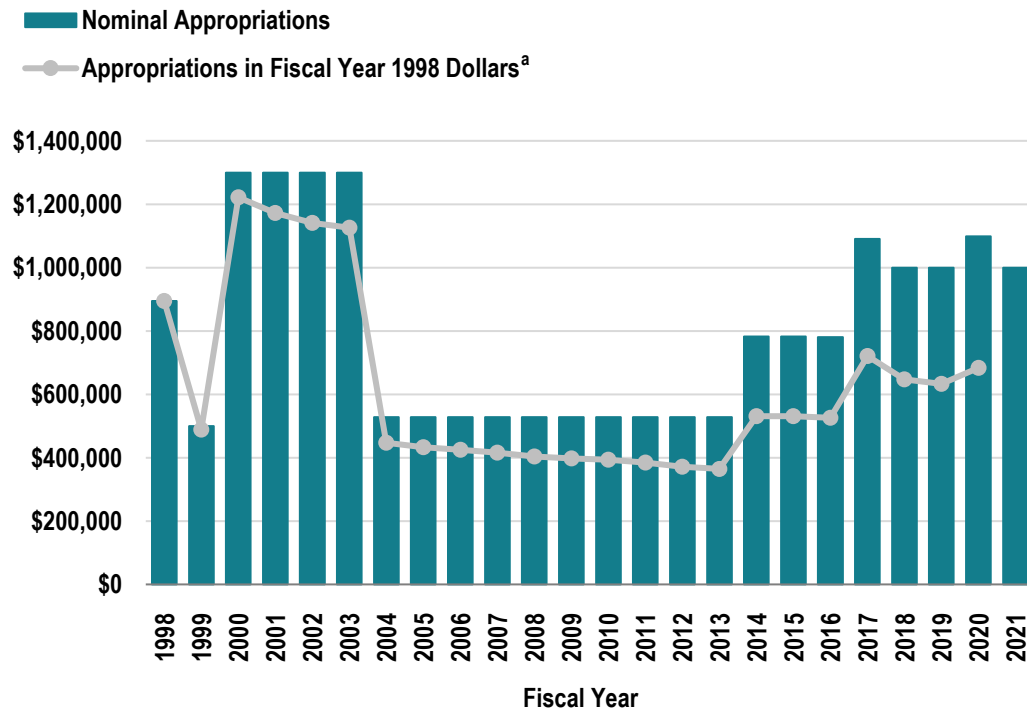
¹⁸ *Laws of Minnesota* 1999, chapter 241, art. 9, sec. 53, subd. 3; and *Laws of Minnesota* 2001, First Special Session, chapter 6, art. 2, sec. 77, subd. 30. We report nominal appropriations in this section.

¹⁹ *Laws of Minnesota* 2015, First Special Session, chapter 3, art. 2, sec. 70, subd. 12; *Laws of Minnesota* 2016, chapter 189, art. 25, sec. 47; *Laws of Minnesota* 2017, First Special Session, chapter 5, art. 2, sec. 57, subd. 27(a); and *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 22, subd. 2(a).

²⁰ *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 22, subd. 2(a).

²¹ *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 22, subd. 2(b). In Fiscal Year 2020, PELSB spent just under 3 percent of that year's appropriation on CUGMEC grant program administration.

Exhibit 1.1: The Legislature has appropriated varying amounts of money to CUGMEC over time.



NOTES: "CUGMEC" refers to the Collaborative Urban and Greater Minnesota Educators of Color grant program. Until Fiscal Year 2018, the grant program was named the Collaborative Urban Educator grant program.

^a We adjusted nominal appropriations for inflation using the consumer price index for urban consumers, Minneapolis-St. Paul-Bloomington. We do not present an appropriation adjusted for inflation for Fiscal Year 2021 because the price index values needed to calculate an adjusted appropriation were not available at the time this report was published.

SOURCES: *Laws of Minnesota* 1997, First Special Session, chapter 4, art. 5, sec. 28, subd. 9; *Laws of Minnesota* 1998, chapter 398, art. 5, sec. 35; *Laws of Minnesota* 1999, chapter 241, art. 9, sec. 53, subd. 3; *Laws of Minnesota* 2001, First Special Session, chapter 6, art. 2, sec. 77, subd. 30; *Laws of Minnesota* 2003, First Special Session, chapter 9, art. 2, sec. 55, subd. 22; *Laws of Minnesota* 2005, First Special Session, chapter 5, art. 2, sec. 84, subd. 15; *Laws of Minnesota* 2007, chapter 146, art. 2, sec. 45, subd. 14; *Laws of Minnesota* 2009, chapter 96, art. 2, sec. 67, subd. 14; *Laws of Minnesota* 2011, First Special Session, chapter 11, art. 2, sec. 50, subd. 14; *Laws of Minnesota* 2013, chapter 116, art. 3, sec. 37, subd. 12; *Laws of Minnesota* 2015, First Special Session, chapter 3, art. 2, sec. 70, subd. 12; *Laws of Minnesota* 2016, chapter 189, art. 25, sec. 47; *Laws of Minnesota* 2017, First Special Session, chapter 5, art. 2, sec. 57, subd. 27(a); *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 22, subd. 2(a); and U.S. Bureau of Labor Statistics, Midwest Information Office, *Historical Table Minneapolis CPI-U* (Chicago, 2020), https://www.bls.gov/regions/midwest/news-release/consumerpriceindex_minneapolis.htm, accessed January 4, 2021.

PELSB awarded CUGMEC grants to eight institutions in Fiscal Year 2021.

Institution	Amount Awarded
Augsburg University	\$120,000
Concordia University, St. Paul	100,000
Hamline University	125,000
Metropolitan State University	288,000
Minnesota State University, Mankato	140,000
Saint Mary's University	85,000
University of Minnesota, Twin Cities	56,000
University of St. Thomas	56,000

For Fiscal Year 2021, PELSB awarded a total of \$970,000 in CUGMEC funding to eight higher education institutions.

As the box to the left shows, Fiscal Year 2021 grants ranged from \$56,000 to the University of Minnesota, Twin Cities and the University of St. Thomas, to \$288,000 to Metropolitan State University. All but one of the grantees—the University of Minnesota—had previously received at least one CUGMEC grant award. In Chapter 3, we provide more information on Fiscal Year 2021 grants.

Diversity in Schools

The racial and ethnic composition of Minnesota's population has changed over the last decade. In 2010, people of color and American Indians comprised an estimated 17 percent of Minnesota's total population. That portion grew to an estimated 21 percent of Minnesota's total population by 2019. As Minnesota's population becomes more racially and ethnically diverse, it is important to examine whether the state's teacher workforce reflects the student population and the larger adult population. It is also important to reflect on what academic research says about the impact of racially and ethnically diverse teacher workforces on students.

Minnesota Student and Teacher Diversity

In Minnesota's public schools, the teacher workforce has not reflected the racial and ethnic diversity of its students.

Statewide, the percentage of students who identified as a person of color or American Indian was significantly greater than the percentage of teachers of color and American Indian teachers in the 2018-2019 school year.²² That school year, 34 percent of Minnesota students were students of color or American Indian. In contrast, 5 percent of the teacher workforce were teachers of color or American Indian that year.²³

2018-2019 School Year



34 percent of public school **students** were people of color or American Indian



5 percent of public school **teachers** were people of color or American Indian

²² This is the most recent school year for which we had reasonably reliable data on students and teachers. We explain in Chapter 2 that we identified several issues with the data PELSB maintains on teachers.

²³ This includes all individuals employed by and assigned to a school district or charter school in a licensed teaching position as the teacher of record at specific points during the school year, regardless of the type of teaching license held. It includes both instructional and non-instructional (school counselor, school nurse, etc.) licensed roles. It excludes administrative positions (principal, special education director, etc.).

Minnesota's teacher workforce in the 2018-2019 school year was also less diverse than the population of adults aged 20 to 64 in 2019. That year, an estimated 20 percent of Minnesotans aged 20 to 64 were people of color or American Indian.

We compared the percentage of teachers and the percentage of students in Minnesota's public schools who were people of color or American Indian to determine whether the imbalance existed throughout the state.²⁴

Teachers of color and American Indian teachers were underrepresented relative to students of color and American Indian students in nearly all Minnesota school districts and charter schools during the 2018-2019 school year.

Ninety-four percent of the 525 school districts and charter schools included in our analysis had less than half of the teachers of color or American Indian teachers that would be needed to match the proportion of students who were students of color or American Indian during the 2018-2019 school year.²⁵ There were 190 districts and schools (36 percent) that enrolled at least one student of color or American Indian student, but reported no teachers of color or American Indian teachers in their district or school. Only one school district reported enrolling no students of color or American Indian students; that district also reported no teachers of color or American Indian teachers on staff.

The remaining 334 school districts and charter schools (64 percent) enrolled at least one student of color or American Indian student and reported having at least one teacher of color or American Indian teacher on staff in the 2018-2019 school year. Over 90 percent of those 334 districts and schools had less than half of the teachers of color or American Indian teachers needed to match the proportion of students who were students of color or American Indian.²⁶

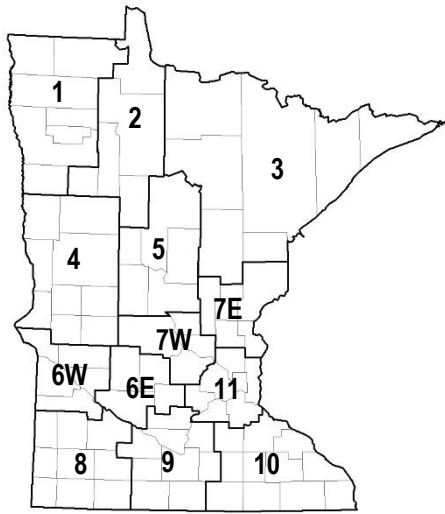
The districts with the largest student enrollment in each of Minnesota's 13 economic development regions ranged from employing 3 percent to 20 percent of the teachers of color and American Indian teachers needed to match the proportion of students who were students of color or American Indian. For example, as shown in Exhibit 1.2, 65 percent of students in the Worthington Public School District in the 2018-2019 school year were people of color or American Indian. However, teachers of color and American Indian teachers comprised only 3 percent of the teacher workforce that year. As a result, Worthington Public School District had only 4 percent of the total number of teachers of color and American Indian teachers needed to match the proportion of students of color and American Indian students in the 2018-2019 school year.

²⁴ We restricted this analysis to K-12 students and teachers.

²⁵ We included all types of public school districts and schools that reported enrolling students and employing teachers in our analysis, including independent school districts, special school districts, charter schools, and state schools. For brevity, we use the phrase "school districts and charter schools" or "public schools" to refer to public schools and districts included in our analysis. We included only districts and schools that both (1) enrolled students and (2) had teachers assigned as staff; there were districts that did not enroll students but did employ teachers, or did enroll students but did not employ teachers, that we did not include in our analysis.

²⁶ Seven of the 334 school districts and charter schools had a higher percentage of teachers of color and American Indian teachers when compared to the districts' and schools' student population during the 2018-2019 school year; 5 of the 7 were charter schools.

Exhibit 1.2: The teacher workforces in the school districts with the largest student enrollment in each of Minnesota's 13 economic development regions were much less diverse than their student populations in the 2018-2019 school year.



EDR	School District	Total Student Enrollment	Percentage of Students Who Were People of Color or American Indian	Percentage of Teachers Who Were People of Color or American Indian	Proportionality
1	Thief River Falls School District	1,978	17%	1%	4%
2	Bemidji Public School District	5,060	29	5	19%
3	Duluth Public School District	8,450	23	5	20%
4	Moorhead Public School District	6,815	29	4	12%
5	Brainerd Public School District	6,577	8	<1	5%
6E	Willmar Public School District	4,277	60	2	3%
6W	Montevideo Public School District	1,366	26	1	4%
7E	Cambridge-Isanti Public School District	4,906	11	1	5%
7W	Elk River Public School District	13,325	14	1	7%
8	Worthington Public School District	3,849	65	3	4%
9	Mankato Public School District	8,492	25	1	4%
10	Rochester Public School District	17,496	41	4	9%
11	Anoka-Hennepin Public School District	37,810	32	4	12%

NOTES: "EDR" is economic development region. Our analysis focused on K-12 students and teachers. "Proportionality" represents the ratio of (1) the percentage of teachers who were people of color or American Indian to (2) the percentage of students who were people of color or American Indian in a given school district. A value of 100 percent indicates that the percentage of teachers who were people of color or American Indian was the same as the percentage of students who were people of color or American Indian. A value below 100 percent indicates that teachers of color and American Indian teachers were underrepresented relative to students of color and American Indian students. For example, the Thief River Falls school district had 4 percent of the teachers of color and American Indian teachers on staff necessary to match the proportion of students who were students of color or American Indian.

SOURCE: Office of the Legislative Auditor, analysis of Minnesota Department of Education and Professional Educators and Licensing Standards Board data.

Appendix B contains a map of the state that displays, by school district, a ratio of (1) the percentage of teachers who were people of color or American Indian to (2) the percentage of students who were people of color or American Indian during the 2018-2019 school year.

Research on Teacher Diversity

In this section, we describe a selection of research on the impact teachers of color and American Indian teachers may have on students.²⁷ We also discuss some challenges people of color and American Indians may face to becoming teachers.²⁸

Student Outcomes

Research suggests that a diverse teacher workforce can have a positive impact on all students' educational experiences. This is especially true for students of color.

Research has shown that teachers of color can help improve the academic outcomes and school experiences of students of color.

Studies have found that teachers of color can help boost the academic performance of students of color, particularly when the teacher and student share the same race or ethnicity. For example, a 2010 literature review on teacher diversity found that “students of color benefit directly when paired with a teacher of their same race/ethnicity, and indirectly when attending a school system where teachers [of color]...are equitably represented.”²⁹ The authors cited a number of studies that showed improved test scores when students of color were taught by teachers of color, including scores on reading and math tests.³⁰ The author of a more recent literature review published in 2019 concluded that there is “fairly strong evidence” that Black

²⁷ In this section, we refer to individuals' race and ethnicity by using the categories and terminology used by the authors of the cited studies. Different authors sometimes grouped different race and ethnicity categories into the broader groups of “students of color” or “teachers of color.” While researchers used these broader terms, their research may not have been based on all groups of people who may identify as people of color. Generally, the research cited below did not include American Indian students or teachers. When the research did include American Indian students or teachers, these individuals were included in the authors' broader definitions of “students of color” or “teachers of color.”

²⁸ We examined research on the experiences of students of color and teacher candidates of color to understand broad themes among these populations. We acknowledge that experiences of individuals or groups may be different from these broad themes.

²⁹ Ana María Villegas and Jacqueline Jordan Irvine, “Diversifying the Teaching Force: An Examination of Major Arguments,” *The Urban Review* 42 (2010): 187. Villegas and Irvine reviewed 15 studies that focused on the impact teachers of color have on students of color. These studies were published in peer-reviewed journals or books, were peer-reviewed reports, or were presented at annual meetings of the American Education Research Association.

³⁰ Villegas and Irvine, “Diversifying the Teaching Force: An Examination of Major Arguments,” 179. The authors summarized findings from four studies that found improved test scores and one study that reported no academic benefits of racially paired teachers and students. They also summarized findings from three studies that showed that increasing the percentage of teachers of color in schools resulted in better academic outcomes for students of color.

students, when assigned to a Black teacher, score higher on achievement tests.³¹ However, the author noted: “There is less overall evidence of an effect of Latino/a student-teacher matching on student achievement, and the existing evidence is mixed.”³²

Students of color can experience other benefits from having teachers of color. For example, the authors of the 2010 literature review mentioned above cited research showing that increases in the proportion of teachers of color in schools may corresponded with *decreases* in placements in special education, suspension or expulsion from schools, absenteeism, and high school dropout rates; and *increases* in admission to gifted programs, enrollment in challenging classes, and college-going rates among students of color.³³

The author of the 2019 review drew a similar conclusion. He found that Black students were “more likely to benefit from assignment to Black teacher [*sic*] in terms of a reduced risk of exclusionary discipline, an increased likelihood of being assigned to a gifted and talented program, improved attendance, and a decreased risk of dropping out of school.”³⁴ Additionally, the author found teachers perceived fewer problem behaviors—including fighting, being disruptive, and being argumentative—when Black and Latino/a students were assigned to teachers of the same race or ethnicity when compared to teachers of a different race or ethnicity.³⁵

The authors of the 2010 study identified several practices teachers of color may bring to the classroom that could explain the findings reported above.³⁶ For example, they reported that teachers of color tend to have more favorable perceptions of students of color than White teachers do. Additionally, the authors contended that teachers of color may use culturally relevant teaching, develop caring and trusting relationships with their students, confront issues of racism through teaching, and serve as advocates and mentors for students of color.

³¹ Christopher Redding, “A Teacher Like Me: A Review of the Effect of Student-Teacher Racial/Ethnic Matching on Teacher Perceptions of Students and Student Academic and Behavioral Outcomes,” *Review of Educational Research* 89, no. 4 (August 2019): 499. Redding reviewed 37 studies that examined how student-teacher racial/ethnic matching affected teachers’ ratings of students and students’ academic and behavioral outcomes.

³² Redding, “A Teacher Like Me: A Review of the Effect of Student-Teacher Racial/Ethnic Matching on Teacher Perceptions of Students and Student Academic and Behavioral Outcomes,” 518.

³³ Villegas and Irvine, “Diversifying the Teaching Force: An Examination of Major Arguments,” 179-180.

³⁴ Redding, “A Teacher Like Me: A Review of the Effect of Student-Teacher Racial/Ethnic Matching on Teacher Perceptions of Students and Student Academic and Behavioral Outcomes,” 524.

³⁵ *Ibid.*, 523.

³⁶ Villegas and Irvine, “Diversifying the Teaching Force: An Examination of Major Arguments,” 180-185.

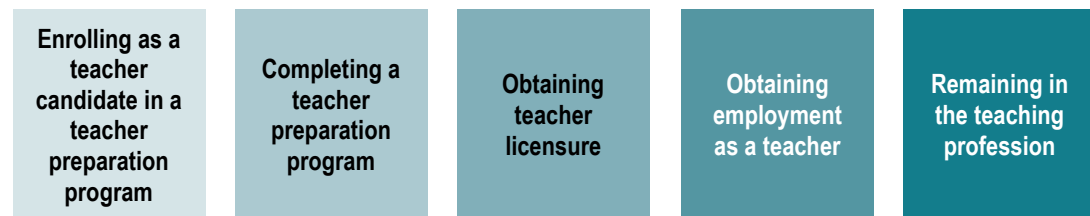
Challenges to Increasing the Number of Teachers of Color and American Indian Teachers

According to a 2019 report on Minnesota teacher supply and demand, 42 percent of school districts that responded to a survey indicated that teacher shortages are a major problem, and 52 percent indicated that it is a minor problem.³⁷ School districts reported that it was particularly difficult to recruit teachers of color. A large majority of the school districts that responded to the survey indicated that they had difficulty recruiting teachers of color and American Indian teachers.³⁸ In contrast, only 14 percent of districts reported difficulty recruiting White teachers.

Researchers have identified a number of challenges that may prevent some people of color and American Indians from becoming teachers.

Individuals' paths to becoming teachers may involve a number of milestones, as the figure below depicts. After becoming interested in teaching careers, individuals may enroll in and complete licensure programs. Prospective teachers may also obtain teacher licensure and find employment as teachers.³⁹

Example of a Teacher Career Pathway



Research suggests that people of color and American Indians may face several challenges along this pathway. Some researchers have indicated that numerous historical and current factors play a role in creating these challenges, including policies that hinder efforts to recruit people of color and American Indians to the field of education.⁴⁰

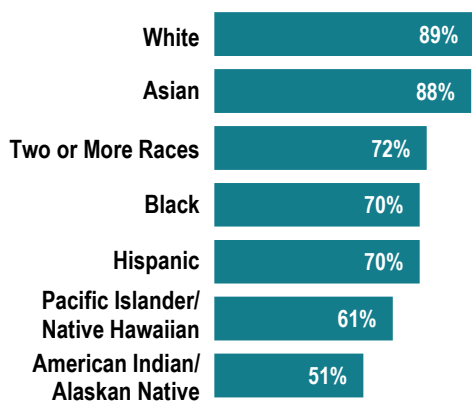
³⁷ Wilder Research in collaboration with PELSB, *2019 Biennial Minnesota Teacher Supply and Demand* (St. Paul, 2019), 13.

³⁸ *Ibid.*, 17. Over 90 percent of districts reported difficulty with recruiting teachers in each of the following race and ethnicity categories: “Asian”; “Black, not of Hispanic origin”; “Hispanic”; “Native American/American Indian”; and “Native Hawaiian or Pacific Islander.” Seventy-six percent of districts reported difficulty with recruiting teachers who identified with two or more races.

³⁹ These milestones do not necessarily follow the same order for all individuals. For example, an individual might obtain a limited teaching license and work as a teacher while enrolled in a teacher preparation program. Some Minnesota teaching licenses do not require completion of a teacher preparation program.

⁴⁰ Dorinda J. Carter et. al., “Changing the Narrative on Diversifying the Teaching Workforce: A Look at Historical and Contemporary Factors That Inform Recruitment and Retention of Teachers of Color,” *Journal of Teacher Education* 70(1) (2019): 6-12; and Desiree Carver-Thomas, *Diversifying the Teaching Profession: How to Recruit and Retain Teachers of Color* (Palo Alto, CA: Learning Policy Institute, 2018), 9-16.

Four-Year High School Graduation Rates by Race and Ethnicity, 2018-2019 School Year



SOURCE: Minnesota Department of Education.

Gaps in educational achievement. In general, Minnesota students of color and American Indian students graduate at lower rates than their White peers, as shown in the box to the left. According to data from MDE, the four-year graduation rate for White students in the 2018-2019 school year was 89 percent. In contrast, the four-year graduation rate was 70 percent for Black students, 70 percent for Hispanic students, and 51 percent for American Indian/Alaska Native students. Additionally, a recent analysis by the Federal Reserve Bank of Minneapolis found that Minnesota schools with higher proportions of students of color and American Indian students had lower average Minnesota Comprehensive Assessments Series III test scores for both Grade 4 reading and Grade 8 math when compared to schools with lower proportions of students of color and American Indian students.⁴¹

Higher education institutions often require prospective teacher candidates to provide records of their high school academic performance as part of the admissions process. As a result, gaps in high school academic performance and graduation rates may contribute to a less racially and ethnically diverse pool of potential Minnesota teachers.

Low interest in teaching. Some research suggests that overall, few high school students are interested in pursuing teaching as a career. According to a national study that examined 2015 high school graduates who took the ACT standardized exam, only 5 percent indicated they were interested in studying education in college.⁴² Of those students, 70 percent were White.⁴³

Low college completion rates. In general, students of color and American Indian students enrolled at Minnesota four-year colleges are less likely than their White peers to graduate within six years. Sixty-seven percent of White students who began college in 2011 graduated by 2017.⁴⁴ In contrast, 44 percent of Black students, 55 percent of Hispanic students, and 42 percent of American Indian students graduated in the same time period.⁴⁵ According to one teacher diversity researcher, research shows that students of color may face several challenges that could prevent them from completing their bachelor's degrees. The researcher stated that:

students of color may be discouraged from completing their degrees due to factors such as being underprepared for college-level coursework

⁴¹ Rob Grunewald and Anusha Nath, *A Statewide Crisis: Minnesota's Education Achievement Gaps* (Minneapolis: Federal Reserve Bank of Minneapolis, 2019), 9.

⁴² *The Condition of Future Educators 2015* (Iowa City, IA: ACT, 2016), 4.

⁴³ *Ibid.*, 3.

⁴⁴ *Graduation Rates at Minnesota Postsecondary Institutions* (St. Paul: Minnesota Office of Higher Education), <http://www.ohe.state.mn.us/sPages/GraduationRates.cfm>, accessed December 31, 2020.

⁴⁵ Sixty-two percent of Asian students and 58 percent of multi-racial students who began college in 2011 graduated by 2017.

caused by a lack of exposure in high school, family responsibilities, transportation difficulties, dissatisfaction with little faculty diversity, and the difficulty of being in an environment that does not reflect or respect their culture or experience.⁴⁶

High student debt. The potential for a large college debt burden may play a role in discouraging some people of color and American Indians from pursuing teaching careers. One study estimated that nationally, Black or African American and Hispanic or Latino teachers were more likely to borrow federal student loan money to fund their education than their White counterparts.⁴⁷ The study also indicated that the Black students who trained to teach and who were included in the analysis held a higher amount of student debt than their White or Latinx peers.

Low passing rates on teacher licensure exams. Most states, including Minnesota, have required that teacher candidates demonstrate subject-matter competence by passing standardized exams.⁴⁸ National research has found that Black and Hispanic teacher candidates pass some of these standardized exams at a lower rate than White teacher candidates. For example, one national study found that during a three-year window from the 2014-2015 through the 2016-2017 school years, 38 percent of Black teacher candidates and 57 percent of Hispanic teacher candidates who took the *Praxis Elementary Education: Multiple Subjects* test passed.⁴⁹ In comparison, 75 percent of White teacher candidates passed the exam.

Challenging teaching conditions. According to a teacher diversity researcher, “Once teachers of color enter the classroom, the teaching conditions they encounter can discourage them from staying at the same school or even staying in the profession.”⁵⁰ The author identified ineffective school leaders, racial discrimination and stereotyping, and school closures and teacher layoffs as challenges that teachers of color may face.

In Chapter 2, we describe some specific challenges teacher candidates who benefited from CUGMEC reported facing along their pathway to becoming a teacher.

⁴⁶ Carver-Thomas, *Diversifying the Teaching Profession: How to Recruit and Retain Teachers of Color*, 10.

⁴⁷ Bayliss Fiddiman, Colleen Campbell, and Lisette Partelow, *Student Debt: An Overlooked Barrier to Increasing Teacher Diversity* (Washington, DC: Center for American Progress, 2019), <https://www.americanprogress.org/issues/education-postsecondary/reports/2019/07/09/471850/student-debt-overlooked-barrier-increasing-teacher-diversity/>, accessed June 29, 2020. The authors of the study indicated, however, that the data they reported on the percentage of Black or African American and Hispanic or Latino teachers who borrowed federal student loan money should be interpreted with caution due to large standard errors.

⁴⁸ As explained in Chapter 2, standardized exams are required for only certain types of Minnesota teaching licenses.

⁴⁹ Hannah Putman and Kate Walsh, *A Fair Chance: Simple Steps to Strengthen and Diversify the Teacher Workforce* (Washington, DC: National Council on Teacher Quality, 2019), 10. The *Praxis Elementary Education: Multiple Subjects* test is not required for Minnesota teacher candidates. However, it is the most widely used elementary content test in the nation; the test is required by 18 states and optional in 5 others.

⁵⁰ Carver-Thomas, *Diversifying the Teaching Profession: How to Recruit and Retain Teachers of Color*, 14.



Chapter 2: Program Impact

Statutes require individual grantee institutions and the program administrator, the Professional Educator Licensing and Standards Board (PELSB), to report on specific metrics related to the Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grant program.¹ While these mandated reports have provided information about each individual grantee institution, we focused on analyzing metrics across grantee institutions to provide a broader picture of the CUGMEC program.

It is difficult to measure the impact of the CUGMEC grant program.

First, as we explain in detail in Chapter 4, the Legislature has not articulated a clear purpose for the CUGMEC grant program. The Legislature only codified CUGMEC in 2019, and prior to that, appropriations laws did not clearly and consistently state the program’s purpose. Statutes are currently unclear on whether the program is meant to focus on increasing the number of *teacher candidates* or *teachers* who are people of color or American Indian. Without a clear purpose, it is difficult to determine whether the program has been successful.

Second, the state lacks certain data necessary to measure the overall impact of the CUGMEC grant program. Some data are unavailable across grantee institutions or unreliable across Minnesota’s public schools. Later in this chapter, we describe difficulties we encountered analyzing statewide data on teachers; in Chapter 3, we describe challenges assessing the program’s impact as a whole using data submitted by individual grantee institutions.

Third, even if the purpose of the program was clear and the necessary data were available, measuring the CUGMEC grant program’s impact would be difficult. Our efforts would be confounded by the variety of supports and financial assistance that teacher preparation programs have provided using CUGMEC grant funds. Grantee institutions reported using CUGMEC to provide individual teacher candidates with financial assistance ranging from less than \$100 to tens of thousands of dollars. Some grantee institutions also used CUGMEC funds for tutoring, mentoring, or other supports.

Finally, grantee institutions supported CUGMEC beneficiaries using funding from other sources, in addition to CUGMEC grants. We spoke with representatives from the six institutions that received CUGMEC grants in Fiscal Year 2020, listed in the box to the right. Those representatives told us about other financial resources they used to provide

Recipients of Fiscal Year 2020 CUGMEC Grant Awards	
Institution of Higher Education	Grant Award
Augsburg University	\$118,788
Concordia University, St. Paul	152,300
Hamline University	100,000
Metropolitan State University	406,000
Saint Mary's University	187,926
University of St. Thomas	101,016

¹ *Minnesota Statutes* 2020, 122A.635, subd. 4. The CUGMEC program was formerly named the Collaborative Urban Educator grant program. We refer to the program generally as CUGMEC throughout the report, even when referring to years when it was known under its previous name.

financial assistance and other supports to teacher candidates. For example, one representative described a mentorship program that was paid for through a separate grant program. Other representatives noted that their institutions used sources of funding other than CUGMEC to provide assistance with licensing exams.

Given the variety of resources that grantee institutions used to provide support to teacher candidates, we could not isolate the impact of CUGMEC-funded supports and assistance across institutions. This makes it nearly impossible to determine the overall impact of CUGMEC funding on beneficiaries across grantee institutions.

Despite the limitations outlined above, it is still useful to examine key program-wide performance metrics. In this chapter, we analyze and present data across grantee institutions on uses of CUGMEC funding and the graduation, licensure, and teacher employment rates for recent CUGMEC beneficiaries. We also provide statewide metrics on teachers and teacher candidates of color and American Indian teachers and teacher candidates.

Use of Funds

To learn about how grantee institutions used CUGMEC grant funds, we analyzed data on individuals who directly benefitted from CUGMEC grant awards from all nine institutions of higher education that received grant funding in fiscal years 2016 through 2020.² Those institutions are listed in the box to the right. We also reviewed institutions' grant expenditures and work plans for fiscal years 2016 through 2020.³

Recipients of CUGMEC Grant Awards, Fiscal Years 2016-2020

Institution of Higher Education	Fiscal Years Grant Received
Augsburg University	2016-2020
Concordia University, St. Paul	2016-2020
Hamline University	2016-2020
University of St. Thomas	2016-2020
College of St. Scholastica	2018-2019
Metropolitan State University	2018-2020
Minnesota State University, Mankato	2018-2019
Saint Mary's University	2018-2020
Winona State University	2018-2019

610

individuals directly
benefitted from
CUGMEC grant
funds in fiscal years
2016-2020.

Grantee institutions reported using CUGMEC funds to directly benefit 610 individuals in fiscal years 2016 through 2020. Half of the CUGMEC beneficiaries that grantee institutions reported supporting were working towards undergraduate degrees (50 percent) and close to

² We asked grantee institutions to identify individuals who received direct financial assistance funded with CUGMEC as well as individuals who participated in activities or received supports funded through CUGMEC. These activities included test preparation seminars, tuition discounts, and "affinity" groups—groups that offer support and foster inclusion for groups of students, including aspiring teachers who are people of color or American Indian. We requested that institutions report data on the amount of direct financial assistance or other supports the institution provided to each beneficiary, among other data.

³ We reviewed expenditure reports that the Minnesota Department of Education (MDE) and PELSB created based on invoices submitted by grantee institutions.

**Race or Ethnicity of CUGMEC Beneficiaries,
Fiscal Years 2016-2020**

Race or Ethnicity	Number of Beneficiaries	Percentage of Beneficiaries
American Indian or Alaskan Native	3	<1%
Asian	160	26
Black or African American	261	43
Hispanic/Latino, any race	108	18
Multiracial	54	9
White or Caucasian	11	2
Unknown	<u>13</u>	<u>2</u>
	610	100

half were working towards graduate or post-baccalaureate degrees (44 percent). About 3 percent of beneficiaries were high school students.⁴

The largest percentage of CUMGEC beneficiaries—more than 40 percent—identified as Black or African American in fiscal years 2016 through 2020, as shown in the box to the left.⁵ Less than 1 percent of beneficiaries identified as American Indian or Alaskan Native.

From Fiscal Year 2016 to Fiscal Year 2020, grantee institutions spent an increasing percentage of CUGMEC grant funding on direct financial assistance to teacher candidates.

According to expenditures data, grantee institutions used about two-thirds of all CUGMEC funding spent in fiscal years 2016 through 2020 to provide direct financial assistance to teacher candidates. They used about one-quarter of funding on salaries and benefits for their staff. The percentages used for these different purposes changed greatly in the five-year period. As shown in Exhibit 2.1, the percentage of grant funding used for direct financial assistance reached a high of 86 percent of total expenditures in Fiscal Year 2020.

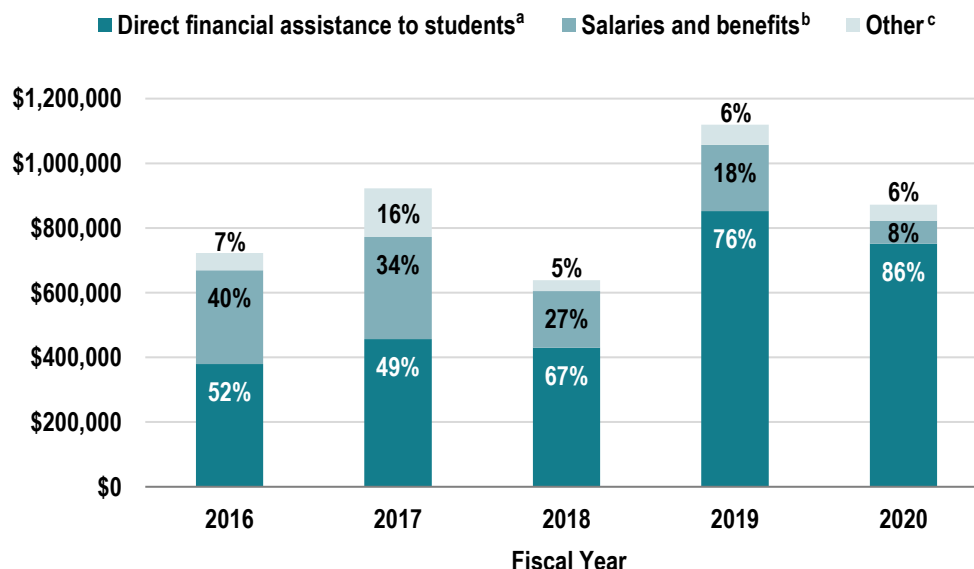
Consequently, the percentage of grant funding expended on salaries and benefits decreased from 40 percent to 8 percent of total expenditures over the five-year period. Grantee institutions reported that salaries covered the costs of grant administration, academic advising, or other activities that could support teacher candidates on their pathway to becoming a teacher. For example, one institution used grant funds to pay for part of a program manager's salary; the manager administered the grant, provided individual academic advising to teacher candidates, and mentored graduates, among other duties.

Grantee institutions used the remaining ("other") funds for a wide range of activities. These included professional development and travel expenses for staff at grantee institutions, food for teacher candidate gatherings, recruitment materials, analysis of teaching programs, and computer software.

⁴ One grantee institution provided test preparation and career exploration activities for high school students interested in a career in education. Grantee institutions did not provide this information for the remaining teacher candidates. In some instances, institutions provided CUGMEC funding to teacher candidates after graduation. For example, a representative at one institution reported that several teacher candidates graduated before completing student teaching and that the institution provided funding for that activity.

⁵ We report race and ethnicity categories as they are described in teacher employment data collected by PELSB.

Exhibit 2.1: Direct financial assistance for students comprised an increasing proportion of CUGMEC grant expenditures in fiscal years 2016 through 2020.



NOTES: "CUGMEC" refers to the Collaborative Urban and Greater Minnesota Educators of Color grant program. Until Fiscal Year 2018, the grant program was named the Collaborative Urban Educator grant program. In 2016 and 2017, one grantee institution reported using grant funding to pay portions of faculty salaries and provided a tuition and fee discount to beneficiaries, rather than providing direct financial assistance to them. Because grantee institutions may carry over grant funding from one fiscal year to the next, expenditures may occur after the year for which they were awarded.

^a "Direct financial assistance to students" includes tuition scholarships and financial assistance with exam fees and textbooks. In some years, assistance with exam fees and textbooks was not reported separately and may have been included in the "other" category.

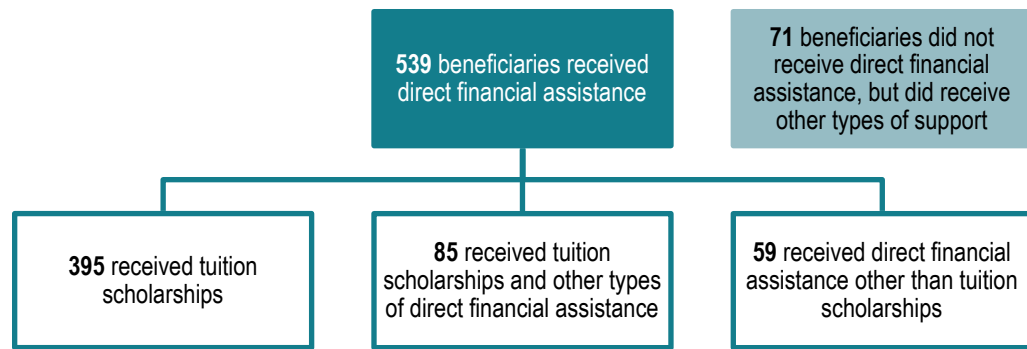
^b "Salaries and benefits" include salaries, wages, and benefits for program directors, administrators, faculty, and others.

^c The "other" category encompasses a variety of activities, including professional development and travel expenses for staff at grantee institutions, food for teacher candidate gatherings, recruitment materials, and computer software.

SOURCE: Office of the Legislative Auditor, analysis of Minnesota Department of Education and Professional Educator Licensing and Standards Board data.

Grantee institutions reported to us that they primarily distributed direct financial assistance as tuition scholarships in fiscal years 2016 through 2020. They reported using CUGMEC funds to provide a total of \$2.7 million in tuition scholarships over this five-year period. They also provided about \$160,000 in other types of direct financial assistance for books, living stipends, testing fees, or other expenses. As the figure on the next page shows, 539 of the 610 CUGMEC beneficiaries in fiscal years 2016 through 2020 received direct financial assistance.⁶

⁶ Some beneficiaries who received direct financial assistance also received other types of support, such as assistance with exam preparation.



Grantee institutions' teacher preparation programs and methods for distributing assistance varied.

Representatives at three of the six institutions that received CUGMEC grants in Fiscal Year 2020 told us they used an application process that included interviews or essays to admit teacher candidates to specialized programs within their teacher preparation programs. In all three cases, the beneficiaries were part of a cohort of teacher candidates that received financial assistance and other supports that were traditionally at least partially funded through CUGMEC. For example, Augsburg University used CUGMEC to support its East African Student to Teacher program, which provided scholarships, bi-monthly seminars, and intensive advising to a group of teacher candidates within Augsburg's broader teacher preparation program.

Representatives from two of the other three institutions reported providing financial assistance to teacher candidates in their broader schools of education. These representatives reported requiring teacher candidates to fill out applications or interest forms for CUGMEC funding to determine eligibility and need for financial assistance. The remaining institution reported distributing funds to all teacher candidates of color and American Indian teacher candidates in varying amounts based on financial need.

Between fiscal years 2016 and 2020, grantee institutions used CUGMEC funds to support an increasing number of teacher candidates but provided less direct financial assistance, on average, to each teacher candidate.

The number of teacher candidates who received CUGMEC-funded direct financial assistance increased from 55 in Fiscal Year 2016 to 292 in Fiscal Year 2020. The number of grantee institutions—and those that provided direct financial assistance to teacher candidates—also increased during that time.⁷ At the same time, the average amount of direct financial assistance that institutions provided to each teacher candidate decreased by almost 60 percent, from about \$6,000 to \$2,500, as shown in Exhibit 2.2. The *total* number of beneficiaries—those that received direct financial assistance or other CUGMEC-funded supports—also increased during that five-year period, from 98 to 312.

⁷ In fiscal years 2016 and 2017, one grantee institution reported using grant funding to pay portions of faculty salaries and provided a tuition and fee discount to beneficiaries, rather than providing direct financial assistance to them. Therefore, that institution reported providing no direct financial assistance to teacher candidates for those years. That institution reported providing financial assistance directly to individual beneficiaries in fiscal years 2019 and 2020.

Exhibit 2.2: The average amount of direct financial assistance grantee institutions provided to each CUGMEC beneficiary decreased in recent years.

	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Number of teacher candidates that received direct financial assistance	55	86	101	229	292
Average amount of direct financial assistance provided to each candidate	\$6,000	\$4,400	\$4,800	\$4,000	\$2,500
Range of direct financial assistance provided to each candidate	\$680 to \$22,900	\$60 to \$13,000	\$100 to \$14,890	\$50 to \$38,120	\$50 to \$15,540
Total amount distributed directly to candidates ^a	\$331,400	\$381,300	\$481,500	\$926,800	\$729,500
Number of grantee institutions providing direct financial assistance ^b	3	3	6	8	8

NOTES: "CUGMEC" refers to the Collaborative Urban and Greater Minnesota Educators of Color grant program. Until Fiscal Year 2018, the CUGMEC program was named the Collaborative Urban Educator grant program. In fiscal years 2016 and 2017, one grantee institution reported using grant funding to pay portions of faculty salaries and provided a tuition and fee discount to beneficiaries, rather than providing direct financial assistance to them, so those funds are not included in this table.

^a Grantee institutions reported distributing these sums each year directly to teacher candidates for tuition scholarships, textbooks, fees, and other expenses. These sums do not include expenditures on salaries, recruitment, or other activities that were not disbursed directly to individual teacher candidates.

^b This number represents the number of institutions that expended CUGMEC funds as direct financial assistance to individual teacher candidates each year. The total number of grantee institutions was different: the same four institutions received funding for fiscal years 2016 and 2017, nine institutions received funding for fiscal years 2018 and 2019, and six for Fiscal Year 2020. Because grantee institutions may carry over grant funding from one fiscal year to the next, expenditures may occur after the year for which they were awarded.

SOURCE: Office of the Legislative Auditor, analysis of data provided by CUGMEC grantee institutions.

Grant Beneficiaries

As we noted previously, we cannot attribute outcomes for CUGMEC beneficiaries solely to the CUGMEC grant program for numerous reasons. At the same time, the program may have contributed to a variety of outcomes for beneficiaries. For that reason, we reviewed data on CUGMEC beneficiaries, and in this section we present summary information on three key performance metrics: (1) graduation rates, (2) teacher licensure rates, and (3) employment rates. We focused on these metrics because grantee institutions are required by law to report similar metrics each year.

While CUGMEC supported hundreds of teacher candidates in fiscal years 2016 through 2020, not all of them became Minnesota public school teachers.

We explain in this section that there were some CUGMEC beneficiaries who did not graduate from their programs, some who graduated but did not obtain teaching licenses, and some who graduated but did not obtain employment as a Minnesota public school teacher. Of course, attrition can occur in any field, and researchers have indicated this is especially true in the field of education. Fewer candidates may have graduated, obtained licensure, or become employed as teachers if they had not received CUGMEC support. Later in this chapter, we highlight supports that grantee institutions provided to teacher candidates that helped them work towards becoming teachers.

We report licensing and employment data for program graduates in this section. While we present the metrics in a linear fashion, it is important to note that not all teacher candidates follow a linear route in their studies and employment. Some individuals obtain teaching licenses and employment before graduation, or even before beginning a teacher preparation program. For instance, one CUGMEC beneficiary told us that they worked as a substitute teacher prior to entering their teacher preparation program. They said they began working as a classroom teacher—which requires at least a limited license—while finishing the last year of their program.

Graduation Rates

One step towards diversifying Minnesota’s teacher workforce is increasing the number of teacher candidates of color and American Indian teacher candidates that complete teacher preparation programs. However, as we explain later, teacher candidates of color and American Indian teacher candidates may face a number of challenges to graduation.

Using data provided by grantee institutions, we reviewed the extent to which CUGMEC beneficiaries have graduated or withdrawn from their teacher preparation programs in recent years.⁸ We determined which of the 590 teacher candidates who benefitted from CUGMEC (1) graduated from their teacher preparation programs, (2) were still actively working to complete their programs, (3) were inactive (had not recently enrolled in courses) but had neither graduated nor formally withdrawn from their program, and (4) withdrew from their programs.⁹

CUGMEC Beneficiary Graduates

Fiscal Year	Number of Graduates
2016 ^{a,b}	7
2017 ^a	50
2018	38
2019	79
2020 ^b	56
	230

^a In 2016 and 2017, the grant was awarded to only four institutions named by the Legislature.

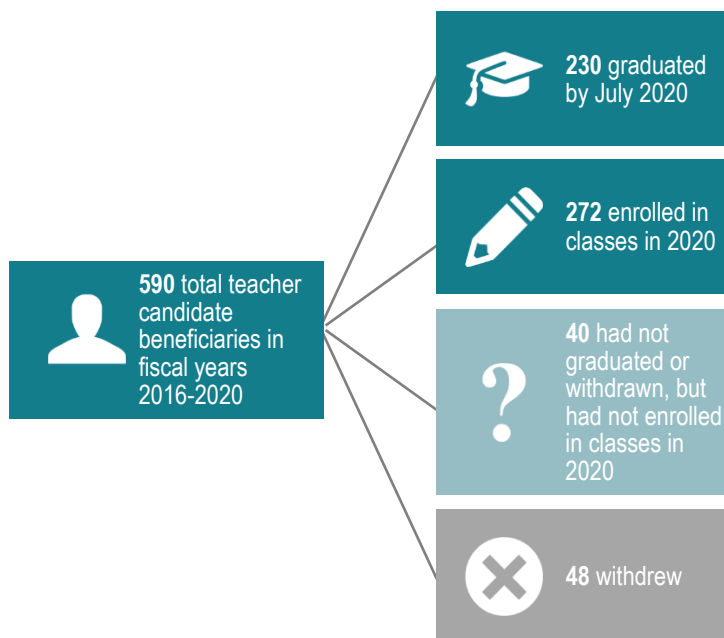
^b The number for 2016 includes three beneficiaries who graduated prior to 2016, but received financial assistance funded by CUGMEC after graduation; 2020 includes six beneficiaries who graduated in July 2020.

⁸ Graduation requirements at grantee institutions may differ from teacher licensure requirements; for example, teacher candidates may graduate before completing required licensing exams and receive CUGMEC funding after graduation to prepare for or take those exams. Graduation rates presented here include completion of post-baccalaureate teacher preparation programs.

⁹ As noted above, grantee institutions reported a total of 610 CUGMEC beneficiaries. We excluded from our analysis the 20 high school student beneficiaries because these students were not participating in teacher preparation programs. We use the term “teacher candidates” here, even though some beneficiaries may not yet have been formally accepted into teacher preparation programs.

The majority of the teacher candidates who benefitted from CUGMEC in fiscal years 2016 through 2020 had either graduated or were working towards graduation at the end of Fiscal Year 2020.

Grantee institutions reported that 230 of the 590 teacher candidates who benefitted from CUGMEC (39 percent) graduated from their teacher preparation programs by July 2020. As the figure to the right shows, they reported that 272 of the 590 beneficiaries (46 percent) were enrolled in 2020, which may indicate that they were still working towards their degree. Forty beneficiaries (7 percent) had not graduated and had not enrolled in 2020. Some of these teacher candidates may intend to return to their studies after a break in enrollment. The remaining 48 candidates (8 percent) withdrew from their programs.



As noted previously, teacher candidates may not always take a linear path from high school to becoming a teacher. Representatives at the six grantee institutions we spoke with told us that they often serve nontraditional teacher candidates: teacher candidates who already have degrees in subjects other than teaching, are older, or who have families to care for. Teacher candidates may take breaks from their programs due to financial or other considerations, such as family obligations. One representative told us that most teacher candidates' first concern is cost; they do not want to go into debt, especially in a field in which their future earning potential is not as high as in many other fields. Another said that if teacher candidates do not have the funds to pay for a semester, they may choose not to enroll in classes that semester.



I am a full-time employee, dad and husband, student, and community supporter, which forced me to take one class at a time...my master's degree...took me more than three years because of the challenges around me.

— CUGMEC Beneficiary

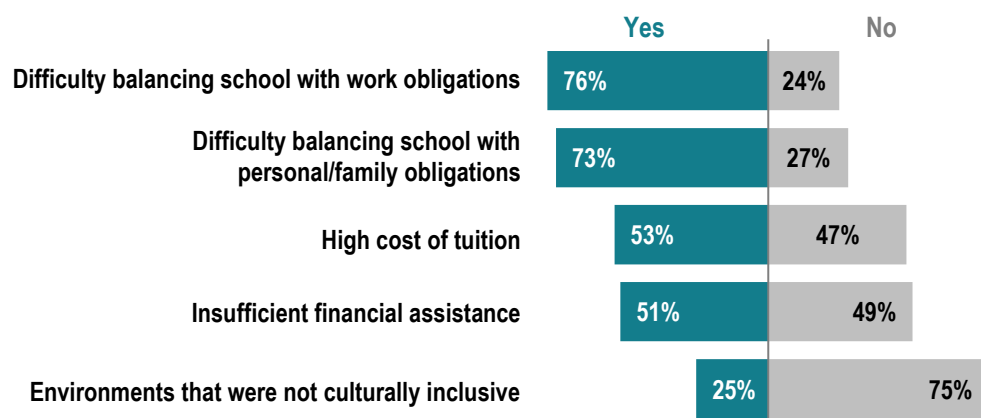
We learned more about challenges CUGMEC beneficiaries have faced by surveying and speaking with beneficiaries. In our survey of teacher candidates who benefitted from CUGMEC in Fiscal Year 2020, 76 and 73 percent of respondents, respectively, indicated that they had difficulty balancing school with work and personal/family obligations while working towards completing their teacher preparation program.¹⁰ One

¹⁰ We surveyed 268 CUGMEC beneficiaries who received tuition scholarships in Fiscal Year 2020, of whom 82 responded, for a response rate of 31 percent. The population of respondents generally resembled the overall population that we surveyed based on the institution they attended, race and ethnicity, graduation status, and age. These percentages exclude nonresponses.

teacher candidate we spoke with told us it was a struggle for them to work full time and find time to take classes. Another explained that they had children to care for, a teaching job, and other responsibilities in addition to completing their teacher preparation program. As shown in Exhibit 2.3, 53 percent of respondents indicated that high tuition costs were a challenge.

Exhibit 2.3: The majority of CUGMEC beneficiaries who responded to our survey noted that they had difficulty balancing school with other obligations.

We asked beneficiaries: “Have you encountered/did you encounter any of the following challenges while working towards completing your teacher preparation program?”



NOTES: We surveyed 268 Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) beneficiaries who received tuition scholarships in Fiscal Year 2020, of whom 82 responded, for a response rate of 31 percent. Percentages in this graphic exclude nonresponses. The number of survey respondents who answered each of the questions from top to bottom are as follows: 79, 79, 79, 78, and 79.

SOURCE: Office of the Legislative Auditor, survey of CUGMEC beneficiaries.

Licensure Rates

As discussed in Chapter 1, statutes require PELSB to award CUGMEC grant funds to “increase the number of teacher candidates of color or who are American Indian, and meet the requirements for a Tier 3 license.”¹¹ A Tier 3 license is a standard, professional license that teachers may renew without limitation. As noted previously, the Legislature codified the CUGMEC grant program in 2019; prior to that time, appropriations laws did not indicate whether funds were intended to be used for a specific purpose—including eligibility for a specific type of teaching license.

In July 2018, Minnesota implemented a tiered system for teacher licensure.¹² To obtain a license, individuals must meet the specific education, experience, exam, and/or other

¹¹ *Minnesota Statutes* 2020, 122A.635, subd. 1.

¹² *Laws of Minnesota* 2017, First Special Session, chapter 5, art. 3, sec. 3, codified as *Minnesota Statutes* 2020, 122A.18, subd. 1(a). While the 2017 Legislature passed the law requiring tiered licensure, the law did not take effect until July 1, 2018.

requirements for the tier of license they are seeking. Individuals who complete a teacher preparation program and meet other requirements may earn a standard (Tier 3 or Tier 4) teaching license that can be renewed indefinitely.¹³ With some exceptions, individuals who do not complete a teacher preparation program may be eligible for a license that can generally be renewed for only a limited period of time (Tier 1 or Tier 2).¹⁴ Exhibit 2.4 shows key aspects of the four licensure tiers.

Exhibit 2.4: Different types of Minnesota teaching licenses have different requirements and restrictions.

Licensure Tier	Select Licensure Requirements	License Duration
Limited Licensure		
Tier 1	<ul style="list-style-type: none"> • Candidate must have a bachelor's degree or specified expertise in career or technical areas of study • District or charter school in which candidate will work must be unable to hire a teacher with Tier 2, Tier 3, or Tier 4 license 	1 year, generally eligible for renewal 3 times under certain circumstances
Tier 2	Candidate must: <ul style="list-style-type: none"> • Have a bachelor's degree or specified expertise in career or technical areas of study • Have a master's degree in specified area content or be enrolled in a Minnesota-approved teacher preparation program • Complete specified coursework 	2 years, generally eligible for renewal 3 times
Standard Licensure		
Tier 3	Candidate must: <ul style="list-style-type: none"> • Have a bachelor's degree or specified expertise in career or technical areas of study • Complete an approved teacher preparation program or have a specified alternative qualification • Pass certain required licensure exams 	3 years, renewable without limitation
Tier 4	Candidate must: <ul style="list-style-type: none"> • Meet all requirements for Tier 3 licensure • Complete an approved teacher preparation program • Pass all required licensure exams • Have at least three years of teaching experience in Minnesota 	5 years, renewable without limitation

SOURCE: *Minnesota Statutes* 2020, 122A.181-122A.184.

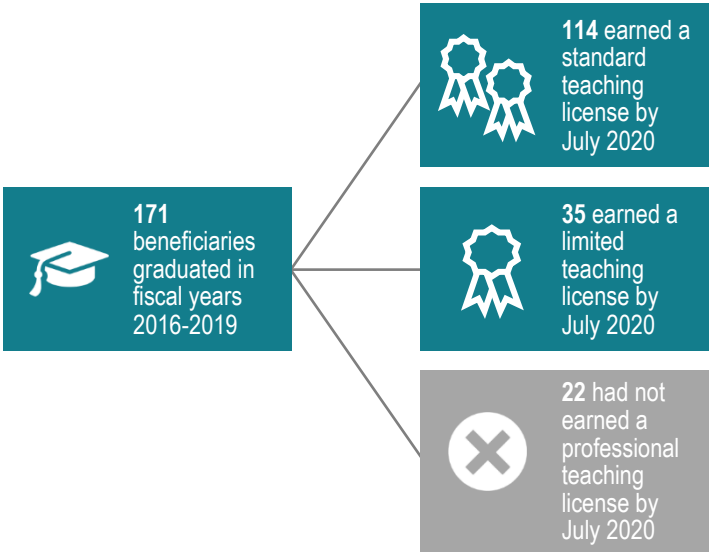
¹³ We use the term “standard teaching license” to refer to professional teaching licenses that can be renewed without limitation. In the current licensing system, these licenses are called “Tier 3” and “Tier 4.” In lieu of completing a teacher preparation program, individuals may substitute specified alternative qualifications to obtain a Tier 3 license.

¹⁴ We use the term “limited teaching license” to refer to teaching licenses that have limited renewal periods and other restrictions. Individuals do not need to complete a teacher preparation program to obtain limited teaching licenses. In the current licensing system, these licenses are called “Tier 1” and “Tier 2.”

To review licensure rates, we first identified the number of CUGMEC beneficiaries who graduated and had time between graduation and our review to obtain licensure. Based on data provided by grantee institutions on CUGMEC beneficiaries, 171 CUGMEC beneficiaries graduated from their teacher preparation programs in fiscal years 2016 through 2019.¹⁵ We chose to report licensing results for individuals who graduated as of the end of Fiscal Year 2019 (rather than Fiscal Year 2020, as we reported above) to allow for a year after graduation for beneficiaries to obtain licensure. We matched data on those individuals to PELSB’s licensing data to determine which beneficiaries had obtained teaching licenses and the types of teaching licenses they obtained.

Based on our analysis, two-thirds of CUGMEC beneficiaries who graduated between fiscal years 2016 and 2019 had obtained standard teaching licenses by July 2020.

Of the 171 CUGMEC beneficiaries who graduated in those four fiscal years, 114 (67 percent) obtained standard teaching licenses by July 2020.¹⁶ An additional 35 graduates (20 percent) earned limited teaching licenses in that time period. The remaining 22 graduates (13 percent) had not earned a professional teaching license in Minnesota, as shown in the figure to the right.¹⁷



There should be assistance for preparing for the test required for getting [a teaching] license, or get rid of the tests all together....

— CUGMEC Beneficiary

Representatives from grantee institutions and beneficiaries indicated that teacher candidates can face challenges in obtaining their licenses, such as difficulty passing licensing exams. One beneficiary we spoke with expressed concern about their ability to pass the exams, not due to the content, but instead due to the time it takes them to complete the exams as a person who speaks multiple languages. In addition, two of the grantee institution representatives we spoke with expressed concerns about racial bias in licensing exams.

¹⁵ This number includes only individuals who benefitted from CUGMEC funding in fiscal years 2016 through 2020. As noted previously, some individuals have received CUGMEC funding after graduation. An additional three individuals received CUGMEC-funded supports at some point in fiscal years 2016 through 2020, but they graduated prior to that time period.

¹⁶ All three individuals who graduated prior to Fiscal Year 2016, but received CUGMEC-funded supports at some point in fiscal years 2016 through 2020, obtained standard teaching licenses by July 2020. Of the 56 beneficiaries who graduated in July 2019 through July 2020, 15 had obtained a standard teaching license and 7 had obtained a limited license by July 2020.

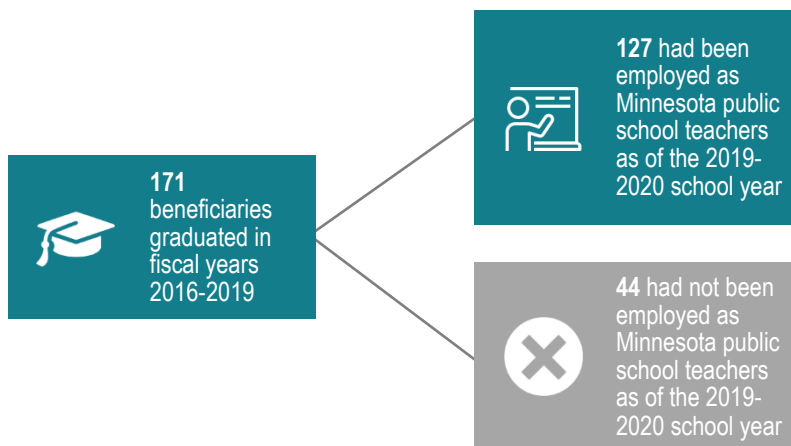
¹⁷ We excluded short-term substitute teaching licenses from our review of professional teaching licenses.

Employment Rates

We also compared data on the 171 CUGMEC beneficiaries who graduated in fiscal years 2016 through 2019 to PELSBS's teacher employment data. In doing this, we determined the extent to which beneficiaries were employed as public school teachers in Minnesota in the past five school years.

The majority of CUGMEC beneficiaries who graduated in fiscal years 2016 through 2019 became employed as Minnesota public school teachers, according to our analysis.

We determined that, of the 171 graduates, 127 (74 percent) were employed as public school teachers in Minnesota at some point after graduation.¹⁸ This includes individuals who began teaching and continued to teach through the most recent school year, as well as those that taught for only a period of time and then left the Minnesota public school system. It does not include individuals employed by private schools in Minnesota or schools outside Minnesota.



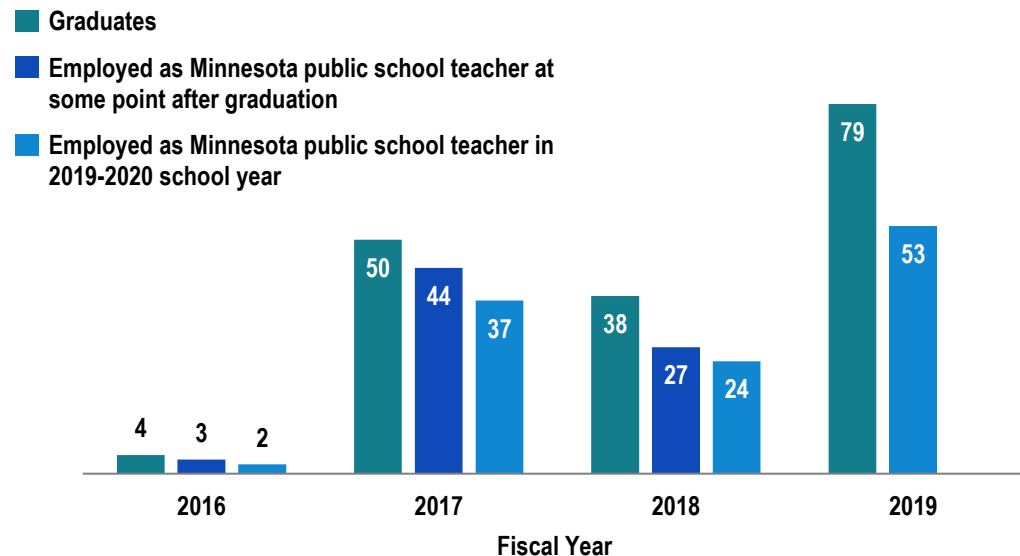
We also analyzed the extent to which CUGMEC beneficiaries who graduated in fiscal years 2016 through 2018 were employed in a Minnesota public school in the most recent school year (2019-2020). For example, 50 CUGMEC beneficiaries graduated in Fiscal Year 2017. Of those, 44 (88 percent) obtained employment as public school teachers in Minnesota at some point after graduation and 37 (74 percent) were employed in the 2019-2020 school year, as shown in Exhibit 2.5.¹⁹ Overall, 74 teacher candidates who graduated in fiscal years 2016, 2017, or 2018 obtained employment as Minnesota public school teachers after graduation; 63 were employed as a Minnesota public school teacher in the 2019-2020 school year.²⁰

¹⁸ This is restricted to individuals who benefitted from CUGMEC funds in fiscal years 2016 through 2020. Of the three individuals who graduated prior to that time period, but benefitted from CUGMEC funding during that time period, two became employed as Minnesota public school teachers by the 2019-2020 school year. The total number of employed beneficiaries (127) includes individuals employed by and assigned to a school district or charter school in a licensed teaching position as the teacher of record at specific points during the school year, regardless of the type of teaching license held. It excludes administrative positions.

¹⁹ Four of the beneficiaries included in these calculations were employed only in the 2019-2020 school year.

²⁰ Ten of the beneficiaries included in these calculations were employed only in the 2019-2020 school year.

Exhibit 2.5: The majority of recent CUGMEC beneficiaries who graduated became employed as Minnesota public school teachers, but not all remained teachers.



NOTES: “CUGMEC” refers to the Collaborative Urban and Greater Minnesota Educators of Color grant program. Until Fiscal Year 2018, the grant program was named the Collaborative Urban Educator grant program. We reviewed data on public school teacher employment for each year following graduation. For example, for Fiscal Year 2016 graduates, we analyzed data for the 2016-2017 through 2019-2020 school years, represented in the dark blue column. In the light blue column, we present the number of graduates who were employed in the most recent school year (2019-2020). We could review employment data for Fiscal Year 2019 graduates only for the 2019-2020 school year, so we present one employment column for that year. We did not include data on administrative positions, but we did include data on non-instructional licensed positions, such as school counselors.

SOURCE: Office of the Legislative Auditor, analysis of data from CUGMEC grantee institutions and Professional Educator Licensing and Standards Board data on public teachers’ employment.

We also looked at the retention of teachers who graduated in fiscal years 2016, 2017, and 2018 and obtained employment as Minnesota public school teachers after graduation. We determined that 64 obtained employment prior to the 2019-2020 school year. Of those, over three-quarters (78 percent) were still employed in the 2019-2020 school year.

At the beginning of this section, we noted that CUGMEC beneficiaries may become teachers in Minnesota before entering teacher preparation programs, while completing those programs, or after graduation. Numerous CUGMEC beneficiaries were employed as teachers before or while they were receiving CUGMEC support—not only after graduation. Overall, 167 of the 590 teacher candidates who benefitted from CUGMEC in fiscal years 2016 through 2020 (graduates and those who had not graduated) were employed as licensed public school teachers in Minnesota during the 2019-2020 school year.²¹

²¹ This does not include beneficiaries who were employed by school districts or charter schools as non-licensed staff, such as classroom aides. It also does not include individuals holding administrative positions.

Teacher Candidate Support

In Chapter 1, we described some of the challenges researchers have identified that teacher candidates of color and American Indian teacher candidates may face along their pathway to becoming a teacher. Earlier in this chapter, we explained some of the challenges that CUGMEC beneficiaries described to us. Representatives of grantee institutions with whom we spoke also described numerous challenges. These included a lack of diversity at institutions of higher education and the financial burden teacher preparation imposes. One representative said that teacher licensure and the field of education are “steeped in whiteness.” Another told us that some teacher preparation programs may not have changed their practices in a way that is inclusive of teacher candidates of color and American Indian candidates. We heard similar comments from some education professionals, with one telling us that racial isolation is something that teacher candidates of color may need help navigating.

Grantee representatives told us about supports that their institutions offer to help teacher candidates through those challenges. For example, representatives from two institutions told us their institutions have focused on employing faculty of color. A representative from another said that their institution has allocated resources to help all faculty and staff become more culturally aware. As another example, a representative told us that the regular cohort meetings their institution facilitated provided emotional support for teacher candidates of color.

The majority of the CUGMEC beneficiaries we heard from told us their teacher preparation program provided all or most of the support they needed.

We asked CUGMEC beneficiaries to what extent their teacher preparation program provided sufficient support to complete the program. Eighty-five percent of survey respondents stated that their teacher preparation program provided “all” or “most” of the support they needed to complete the program.²²



The [financial assistance] was also very encouraging as sometimes I don't know if I'll have the means (financial, emotional, fortitude) to forge ahead and complete my teacher license.

— CUGMEC Beneficiary

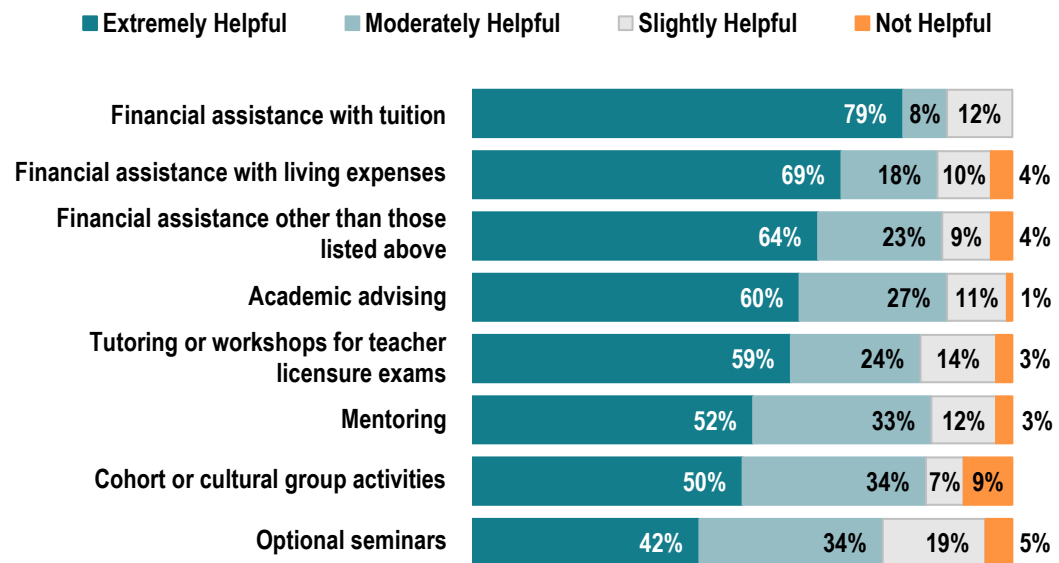
We also asked how helpful certain services or supports were to CUGMEC beneficiaries as they worked towards completing their teacher preparation program. As Exhibit 2.6 shows, the highest percentage of respondents noted that financial assistance with tuition (79 percent) and living expenses (69 percent) was “extremely helpful.”²³ Numerous beneficiaries we surveyed and spoke with told us financial assistance was the *most* helpful support they received. For example, one beneficiary noted that they were going to drop out of their teacher preparation program until they received financial assistance with tuition.

²² This excluded three non-responses, for a total of 79 responses. Forty-three percent reported that their program provided “all” of the support, 42 percent responded “most,” and the remaining 15 percent reported that the program provided “some” of the support they needed.

²³ These percentages exclude non-responses and responses that indicated “Not Applicable.”

Exhibit 2.6: Most respondents indicated that financial assistance was extremely helpful as they worked towards completing their teacher preparation programs.

We asked beneficiaries: “How helpful are/were each of the following services or supports as you work(ed) towards completing your teacher preparation program?”^a



NOTES: We surveyed 268 Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) beneficiaries who received tuition scholarships in Fiscal Year 2020, of whom 82 responded, for a response rate of 31 percent. Some totals do not sum to 100 percent due to rounding.

^a We instructed survey respondents to select “Not Applicable” if their institution did not offer a specific support listed or if the respondent had not used a specific support listed. The graph excludes non-responses and “Not Applicable” responses. The number of survey respondents who answered each of the questions with a response other than “Not Applicable” from top to bottom are as follows: 73, 51, 53, 73, 59, 67, 68, and 59.

SOURCE: Office of the Legislative Auditor, survey of CUGMEC beneficiaries.

Other beneficiaries we surveyed and spoke with told us supportive faculty and advisors were most helpful to them. One beneficiary, for instance, told us that a particular faculty member had been very responsive and supportive, including providing emotional support. The beneficiary credited the faculty member, in part, with their ability to complete their degree. Beneficiaries noted other supports that helped them during their teacher preparation programs, including assistance with test preparation, mentoring, and culturally inclusive environments.



The academic advisors were vital to my success. [They] were supportive in helping me create my schedule, understand the demands and expectations of different classes as well as adapt my graduation plans based on life and work.

— CUGMEC Beneficiary

However, more than one-quarter of the survey respondents noted ways in which their teacher preparation programs could have better supported them. As stated previously, the amount of CUGMEC-funded financial assistance beneficiaries received varied widely, and several survey respondents indicated that additional financial assistance would have been helpful. One survey respondent noted: “...more scholarship opportunities would have been helpful. I feel like I’m drowning in debt.” Some survey respondents also indicated that mentoring and licensure test preparation were areas in which their programs could better support them.

Impact of Program Changes

We explained in Chapter 1 that the CUGMEC grant program has undergone several changes in recent years. For most of fiscal years 1998 through 2019, the Legislature named a small group of private institutions to receive a specified amount of CUGMEC funding.²⁴ Starting in Fiscal Year 2018, the Legislature also appropriated funding to award grants competitively.²⁵ By Fiscal Year 2020, the Legislature directed PELSB to award all grant funding competitively.²⁶ In addition, the Legislature moved responsibility for administering CUGMEC from the Minnesota Department of Education (MDE) to PELSB for Fiscal Year 2020 and thereafter.

It is too early to know the overall impact of the changes to the CUGMEC grant program.

Shifting the grant administrator responsibilities from MDE to PELSB and making the program competitive had an impact on the program. For example, a wider range of institutions have received the grant. As noted in Chapter 1, until Fiscal Year 2018, a small group of private institutions primarily located in the Twin Cities received CUGMEC funding. By Fiscal Year 2021, six private and four public institutions—including five with campuses outside the Twin Cities metropolitan area—had received grants.

At the same time, changing CUGMEC to a competitive program also made funding less predictable. This may affect both institutions’ and teacher candidates’ ability to plan for the future. An education professional told us that the instability of funding, now that the grant is competitive, makes it difficult for institutions to create long-term plans. They said that competitive funding supports only spurts of activity when institutions receive the funding, rather than allowing grantees to create ongoing plans for their programs. Another education professional said that it is difficult for teacher candidates of color to give their best effort in their programs when they live with the stress of not knowing whether they will receive funding from one year to the next.

²⁴ Beginning with fiscal years 1998 and 1999, three institutions received funding: (1) Concordia University, St. Paul, (2) Hamline University, and (3) the University of St. Thomas. The Legislature named a fourth institution, Augsburg University, beginning in Fiscal Year 2014.

²⁵ *Laws of Minnesota* 2017, First Special Session, chapter 5, art. 2, sec. 57, subd. 27(d).

²⁶ *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 15, subd. 1, codified as *Minnesota Statutes* 2020, 122A.635, subd. 1.

In addition, while the Legislature has not mandated changes in the activities for which CUGMEC funding is to be used, PELSB has awarded funding for a narrower purpose than MDE. We previously noted that expenditures on salaries for administration, mentoring, and other services decreased while expenditures for direct teacher candidate financial assistance greatly increased in recent years. As we explain in Chapter 4, this is partially due to PELSB awarding funding almost exclusively for direct financial assistance to teacher candidates for Fiscal Year 2020.

It is unclear what impact this focus on direct financial assistance will ultimately have on services provided to candidates, particularly at institutions that traditionally received CUGMEC grants. Representatives from two of the four institutions that traditionally received CUGMEC grants told us that changes in CUGMEC funding had a negative impact on the services their institutions provided. For example, a representative at one institution said that the institution had designed a program that included mentoring, professional development, and other services to work with students in a holistic fashion. Another representative of that institution said that the recent focus of CUGMEC funding on direct financial assistance means that the institution can no longer provide some of these non-financial supports that help teacher candidates address barriers other than financial ones.

Representatives from the other two institutions that traditionally received CUGMEC funding indicated that their institutions continued to provide services previously funded with CUGMEC using other funding. These services included providing food for cohort meetings and recruitment. However, one of these representatives indicated that they were concerned about the institution's long-term ability to offset the loss of state funding.

It is also unclear whether changes to the CUGMEC program will ultimately increase the overall number of teachers of color and American Indian teachers in Minnesota. As shown previously in Exhibit 2.2, while more teacher candidates benefitted from CUGMEC-funded direct financial assistance in recent years, they received less funding, on average. So, although the number of overall beneficiaries has increased, it is unclear whether the financial assistance they have received is sufficient to support them in completing their programs. For example, a representative at one grantee institution told us that two students had withdrawn from the teacher preparation program due to uncertainty about funding. It is also possible that a narrower use of CUGMEC funding could limit non-financial supports offered by some institutions, which could negatively affect the number of teacher candidates from those institutions who become teachers and remain in the field.

Finally, the impact of changes to funding between fiscal years 2018 and 2021—both decreases in funding to institutions that have traditionally received grants and grants to new institutions—may be difficult to measure in the near future. This is because statutes allow grantee institutions to use grant funds for a two- to four-year period.²⁷ If some grantee institutions spend grant funding over several years, it could take longer to see the impact of recent changes.

²⁷ *Minnesota Statutes* 2020, 122A.635, subd. 3.

Statewide Metrics

In a previous section, we presented metrics specifically on CUGMEC beneficiaries. Those metrics are important, as the impact CUGMEC may have had on each individual candidate should be recognized. But, in order to analyze the program's impact on the teacher workforce throughout Minnesota, it is also necessary to look at broader metrics. In this section, we review data on the race and ethnicity of all of Minnesota's teacher candidates and teacher workforce, and to the extent possible, report on trends in those metrics.

Data Reliability

We previously explained that there is some question about the ultimate goal of the CUGMEC program. If we assume that it is meant to both increase the number of (1) *teacher candidates* of color and American Indian teacher candidates and (2) *teachers* of color and American Indian teachers, it is important to have accurate, reliable statewide data on these metrics so that the state can measure whether it is meeting its goal. However, we identified several issues with the data PELSB maintains on teacher candidates and teachers.

A lack of reliable data on Minnesota teacher candidates and public school teachers' race and ethnicity makes it difficult to accurately determine the racial and ethnic composition of the teacher workforce.

Several factors contribute to a lack of reliability in the data PELSB collects and stores on the race and ethnicity of public school teachers in Minnesota. The first issue is that PELSB does not require school districts and charter schools to collect data on teachers' race and ethnicity in a uniform manner. PELSB's manual for reporting data on teachers states that "The manner of collecting this data is left to the discretion of the district."²⁸ A PELSB official told us that in some school districts, staff ask teachers to self-identify their race and ethnicity, while in others, district staff may report race and ethnicity based on their own observations. This may lead to inaccuracies in the data that school districts and charter schools report. We found that the race or ethnicity recorded in employment data maintained by PELSB was different from the race or ethnicity submitted to us by grantee institutions for 47 (25 percent) of the 189 CUGMEC beneficiaries who were employed in licensed teaching positions in Minnesota public schools in fiscal years 2016 through 2020.²⁹

Data entry errors also play a role in the reliability of data on teachers' race and ethnicity. We reviewed data reported to PELSB by more than 530 school districts and charter

²⁸ Minnesota Professional Educator Licensing and Standards Board, *Staff Automated Report (STAR) Manual, Fiscal Year 2021, School Year 2020-2021* (Saint Paul, 2020), 18 and 33, https://mn.gov/pelsb/assets/20.21%20STAR%20Manual_tcm1113-445756.pdf, accessed September 15, 2020. Note that the manual also states that school districts and charter schools should clearly indicate to staff that districts and charter schools must report data on race and ethnicity.

²⁹ This represents the total number of CUGMEC beneficiaries who were employed in licensed teaching positions at certain points in the 2015-2016 through 2019-2020 school years. It includes both beneficiaries who had and had not graduated from their teacher preparation programs.

schools in the 2015-2016 through 2019-2020 school years. Each of those districts and schools may introduce errors in the data based on mistakes or misinterpretations. For example, we compared data on race in the 2018-2019 and 2019-2020 school years, and found that one large school district reported the race of more than 2,700 teachers differently from one year to the next.

Another factor affecting data reliability is that PELSB has recently made changes to both its licensing and employment data systems. These changes have affected the way in which the data are stored and accessed, and it appears these changes have resulted in errors in race and ethnicity data. Due to these recent system errors, we determined that the data on teachers' race and ethnicity from the 2019-2020 school year were not reliable enough to report.

It was also difficult to obtain reliable data on teacher candidates in Minnesota. Minnesota statutes require PELSB to collect and report annually on teacher preparation program outcomes.³⁰ The report includes the number of teacher candidates enrolled in each teacher preparation program, but PELSB stated in its 2019 report that the data "continues to have inconsistencies, including missing data and misleading data representation."³¹ Higher education institutions with teacher preparation programs are also required to report enrollment data to the U.S. Department of Education, but we found inconsistencies in how programs reported those data as well, including how they defined a teacher candidate.

RECOMMENDATION

PELSB should standardize and improve the processes and systems used to collect data on teacher candidates and licensed teachers' race and ethnicity.

If the Legislature intends to increase the number of teachers of color and American Indian teachers in Minnesota, it needs reliable data to determine the extent to which programs and policies are advancing towards that goal. Currently, data collected by PELSB can provide information about broad trends, but it is not accurate enough to pinpoint small changes in the racial and ethnic composition of the teacher workforce.

While teachers are not required to provide data on their race and ethnicity, PELSB should establish a consistent procedure through which it expects school districts and charter schools to collect and report data. In addition, PELSB should validate data provided by school districts, charter schools, and teacher preparation programs and ensure that the data systems used to collect, store, and report these data are working together without error. This will help legislators and policy experts better track Minnesota's progress towards diversifying the teacher workforce. We recognize that, given PELSB's limited number of staff, this could be difficult to manage and may require greater resources. But, we believe a greater investment in reliable data would provide Minnesota with more valuable data.

³⁰ *Minnesota Statutes* 2020, 122A.091, subd. 1(a).

³¹ Minnesota Professional Educator Licensing and Standards Board, *Teacher Preparation Provider Data Summary Report* (St. Paul, 2019), Introduction. This was the most recent data available during the course of our evaluation; PELSB published its 2020 report in December 2020.

Minnesota's Teacher Workforce

While we have concerns about the accuracy of the data on the racial and ethnic composition of Minnesota's teacher workforce, we determined that data from the 2015-2016 through 2018-2019 school years were consistent enough to provide a broad view of the state's workforce.

Based on our analysis, there has been a slight increase in recent years in the percentage of Minnesota teachers who are people of color or American Indian.

We did not see significant changes in recent years in the racial and ethnic composition of the overall teacher workforce. Teachers of color and American Indian teachers comprised approximately 5 percent of the teacher workforce in Minnesota public schools in each of the school years 2015-2016 through 2018-2019.³² We saw a small increase of about one-half of one percentage point from the 2015-2016 school year to the 2018-2019 school year. But, due to issues we identified with these data, it is unclear whether the increase reflected an actual change in the racial and ethnic composition of the teacher workforce or unreliable data reporting and retention practices.

We also saw little change in recent years in the racial and ethnic composition of new teachers entering the field. The percentage of newly licensed teaching staff that graduated from Minnesota teacher preparation programs who were teachers of color or American Indian teachers increased from about 8 percent to roughly 11 percent from the 2015-2016 school year to the 2018-2019 school year. However, the *number* of new teachers of color and American Indian teachers has not shown a consistent trend in recent years; districts reported a high of about 300 in the 2016-2017 school year while they reported fewer than 300 in every other year.

These percentages are similar to those reported by teacher preparation programs in data submissions for federal reporting purposes.³³ Minnesota teacher preparation programs reported about 7,900 teacher candidates enrolled in 29 teacher preparation programs during the 2017-2018 school year, the most recent year for which data were available.³⁴ Approximately 11 percent of those candidates were teacher candidates of color or

³² This includes all individuals employed by and assigned to a school district or charter school in a licensed teaching position as the teacher of record at specific points during the school year, regardless of the type of teaching license held. It includes both instructional and non-instructional (school guidance counselor, school nurse, etc.) licensed roles. It excludes administrative positions (principal, special education director, etc.).

³³ As noted previously, we identified some issues with the consistency of data reported by teacher preparation programs to meet federal requirements. For this reason, the numbers we report are estimates.

³⁴ Teacher preparation programs are only required to report enrollment data for individuals enrolled in teacher preparation programs for an initial license. One of Minnesota's 31 PELSB-approved teacher preparation programs did not report data because it only offers programs for additional licensure. Additionally, a second program did not report data because the only PELSB-approved licensure program it offers is a school counseling program.

American Indian.³⁵ Collectively, programs reported that about 3 percent of candidates of any race were Hispanic or Latino.

To better understand CUGMEC's potential impact on the racial and ethnic composition of the statewide teacher workforce, we examined the number of new teachers of color and American Indian teachers each year that benefitted directly from CUGMEC.

Recent CUGMEC beneficiaries comprised only a fraction of the newly licensed and employed teachers of color and American Indian teachers in Minnesota in the 2016-2017 through 2018-2019 school years, according to our analysis.

For the 2016-2017 through 2018-2019 school years, our analysis of teacher employment data found that about 10 percent of the newly licensed Minnesota graduates employed by public schools were teachers of color or American Indian teachers. School districts and charter schools reported employing an average of nearly 280 newly licensed Minnesota graduates of color or American Indian graduates each year; we determined that about 22 (8 percent) of those individuals each year were CUGMEC beneficiaries at some point in fiscal years 2016 through 2020.³⁶

³⁵ This includes individuals who identified as American Indian or Alaskan Native, Asian, Black or African American, Native Hawaiian or Pacific Islander, or two or more races. It did not include individuals who identified as Hispanic or Latino of any race. Unlike data on teacher employment, these data do not combine Hispanic or Latino ethnicity data with data on race.

³⁶ Two to three additional CUGMEC beneficiaries were reported as newly licensed teachers who graduated from Minnesota institutions each year; their race was reported as "White" in teacher employment data while grantee institutions reported that they were teachers of color. We cannot say definitively whether the roughly 22 individuals were the only CUGMEC beneficiaries among the group of newly licensed and employed teachers each school year. We requested data only on CUGMEC beneficiaries from fiscal years 2016 through 2020; individuals who benefitted from CUGMEC in prior years could have obtained licenses and become teachers in fiscal years 2016 through 2020. In addition, individuals who obtained limited licenses in those years could choose to attend teacher preparation programs in Fiscal Year 2021, or later, and receive CUGMEC benefits.



Chapter 3: Grant Administration

Grant administrators have an important role in ensuring that state funds are awarded in accordance with legislative priorities and used for their intended purposes. Their responsibilities include awarding grant funds through a transparent process that follows all applicable requirements, and monitoring grant awards to ensure grantees used funds appropriately.

In this chapter, we discuss the Professional Educator Licensing and Standards Board's (PELSB's) administration of the Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grant program.¹ As we noted in Chapter 1, the Legislature recently transferred the responsibility of administering CUGMEC from the Minnesota Department of Education (MDE) to PELSB. We first discuss what PELSB did to prepare for the grant administration transition. We then explain PELSB's grant award and monitoring processes and make recommendations for improvement.

Grant Administration Transition

MDE was responsible for administering the CUGMEC grant program for more than 20 years before the Legislature transferred responsibility to PELSB in 2019.² At the time this report was published, PELSB had overseen the grant award process for two years—Fiscal Year 2020 and Fiscal Year 2021.³

PELSB had limited time to prepare for administering Fiscal Year 2020 CUGMEC grants, but it appropriately sought feedback from other state agencies, grantees, and other stakeholders.

PELSB became responsible for administering CUGMEC on July 1, 2019. Statutes required the board to award Fiscal Year 2020 grants by September 15, 2019.⁴ This gave PELSB less than three months to post a request for proposal and collect and review applications.⁵ PELSB staff told us that the board's award process for Fiscal Year 2020 grants should not be seen as typical because the board had limited time to establish this process and had not yet hired staff to manage grants.

¹ The CUGMEC grant program was formerly named the Collaborative Urban Educator grant program. We refer to the program generally as CUGMEC throughout the report, even when referring to years when it was known under its previous name.

² For fiscal years 1998 to 2003, the program was administered by MDE's predecessor—the Department of Children, Families, and Learning.

³ We refer to Fiscal Year 2020 and Fiscal Year 2021 grants based on the fiscal year for which funding was appropriated; PELSB's process for awarding Fiscal Year 2021 grants actually occurred during Fiscal Year 2020.

⁴ *Minnesota Statutes* 2020, 122A.635, subd. 3.

⁵ *Ibid.* After Fiscal Year 2020, statutes require PELSB to award grants by August 15 of the fiscal year in which the grants are to be used. PELSB officials told us that for Fiscal Year 2020 grants, they notified awardees two days after the deadline, as shown in the box on the next page.

The box to the right shows the timeline PELSB followed during its first year administering the grant.

To prepare for administering the grant, PELSB staff met with MDE staff to learn how the department had administered the CUGMEC grant program. As allowed by statute, PELSB also entered into an agreement with the Office of Higher Education to help administer the grant award process in Fiscal Year 2020.⁶ Additionally, PELSB staff told us that they sought input from the Office of Grants Management and from several state councils.

Fiscal Year 2020 CUGMEC Application Timeline	
Date	Grant Award Process Step
July 15, 2019	CUGMEC application available
July 30, 2019	Information session for interested institutions
August 1, 2019	Deadline to submit intent to apply
August 21, 2019	Application deadline
September 17, 2019	Awardees notified
October 15, 2019	Grant period began

PELSB also sought input from stakeholders in developing the CUGMEC grant application process, request for proposal, and the application scoring system for Fiscal Year 2020 grants. This was in line with Minnesota’s Office of Grants Management policies that direct granting agencies to incorporate input from the “grantee community” when drafting requests for proposals.⁷ Stakeholders with whom PELSB consulted included representatives from the Coalition to Increase Teachers of Color and American Indian Teachers in Minnesota, Education Minnesota, and the Minnesota Education Equity Partnership.

PELSB again sought feedback from stakeholders in developing the Fiscal Year 2021 application process and materials. A PELSB official told us that they also sought feedback from grantees. Representatives from most institutions that received Fiscal Year 2020 grants indicated that they appreciated PELSB’s efforts to seek input from grantees on the Fiscal Year 2020 grant application process. In addition, representatives from several grantee institutions told us that PELSB made changes in response to their feedback.

PELSB made changes to the application process for Fiscal Year 2021, including providing more direction to applicants, adding more instructions for the application scoring rubric, and changing the timeline for the application process. PELSB’s decision to change the timeline was in response to concerns that grantees had expressed about the timeline’s impact on their use of grant funding. As noted above, the Legislature did not require PELSB to award Fiscal Year 2020 grants until September 15, 2019, and final grant contracts were not effective until October 15, 2019—after the 2019-2020 school year had already started. Representatives from some institutions told us this

⁶ *Minnesota Statutes* 2020, 122A.635, subd. 3.

⁷ Minnesota Department of Administration, Office of Grants Management, Operating Policy and Procedure 08-03, *Policy on Writing and Publicizing Grants Notices and Requests for Proposal*, revised September 15, 2017.

meant that their institutions were not able to use Fiscal Year 2020 funding to offer direct financial assistance to students during the fall semester of the 2019-2020 school year. For grants awarded from Fiscal Year 2021 appropriations, PELSB notified grantees of their awards on April 23, 2020. The box to the right shows the timeline for Fiscal Year 2021 grants.

Fiscal Year 2021 CUGMEC Application Timeline

Date	Grant Award Process Step
January 31, 2020	CUGMEC application available
February 12, 2020	Information session for interested institutions
February 21, 2020	Deadline to submit intent to apply
March 13, 2020	Application deadline
April 23, 2020	Awardees notified
July 1, 2020	Grant period began

Grant Award Process

The Legislature has enacted certain requirements PELSB must follow when awarding CUGMEC grants. PELSB must also adhere to policies established by the Office of Grants Management, which are meant to promote equity and consistency in state grant-making activities.⁸ We reviewed the grant award process PELSB used for fiscal years 2020 and 2021 and compared it to requirements outlined in statute and to policies developed by the Office of Grants Management. We also reviewed the extent to which the process was understandable and transparent.

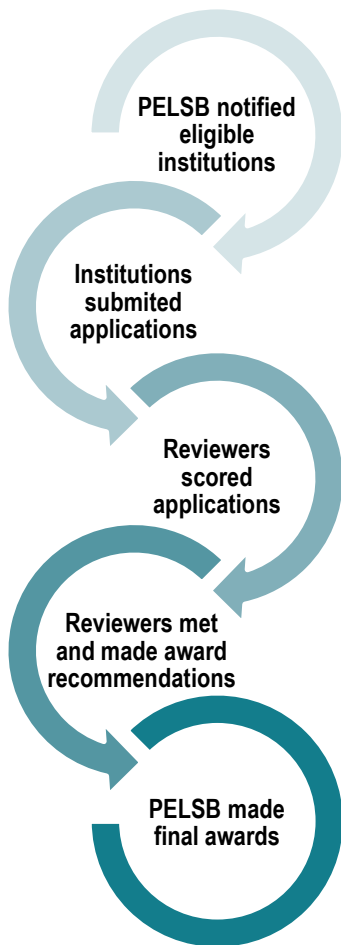
PELSB's grant award process met most requirements and was generally transparent, but some aspects of the process lacked clarity.

In this section, we discuss the ways in which PELSB's grant award process met statutory and policy requirements and promoted transparency. We also identify a few minor ways in which PELSB's process did not align with requirements.

Overview

PELSB's process for awarding CUGMEC grants was similar for fiscal years 2020 and 2021. PELSB posted the request for proposal on its website and notified eligible higher education institutions of the grant opportunity. It also made available an application template that applicants were instructed to complete and submit according to directions in the request for proposal.

Once the application deadline passed, PELSB assigned three grant application reviewers to score each application based on the application scoring rubric. For fiscal years 2020 and 2021, PELSB identified reviewers—who were not PELSB employees—with the help of the Office of Higher Education, MDE, and other stakeholders. Reviewers completed conflict of interest forms. Then, PELSB assigned each reviewer about



⁸ *Minnesota Statutes* 2020, 16B.97, subd. 4(a)(1).

three applications to review.⁹ In Fiscal Year 2020, there were 9 reviewers, and in Fiscal Year 2021, there were 11 reviewers.

Reviewers scored each application they were assigned using an application scoring rubric. PELSB must meet certain requirements in statute when awarding CUGMEC grants, and these requirements were generally built into the application scoring rubric. The box to the right shows some of these requirements, which include awarding grants to institutions located in various economic development regions. We describe these requirements and the scoring rubric more fully later in the chapter.

After reviewers scored their assigned applications, PELSB staff facilitated a meeting with reviewers. During this meeting, reviewers discussed how they applied the scoring rubric, and the content of each application. Next, they revised their individual scores as necessary. The reviewers then determined which institutions to recommend for grants and how much each institution should receive.¹⁰ Finally, PELSB made CUGMEC grant awards that were largely based on the reviewers' recommendations.

In Fiscal Year 2020, PELSB's final awards mostly followed what reviewers recommended. For Fiscal Year 2021, however, PELSB's final recommendations were different from what reviewers recommended. For example, PELSB awarded grants to two institutions reviewers had not recommended.¹¹ PELSB staff told us that final awards differed from reviewers'



Key Requirements for Awarding CUGMEC Grants

PELSB must award grants based on:

- The number of teacher candidates being supported in the program who are people of color or American Indian
- Program outcomes, including graduation rates
- The percentage of racially and ethnically diverse teacher candidates enrolled at the institution compared to (1) the percentage of all students enrolled at the institution who are people of color or American Indian and (2) the percentage of underrepresented racially and ethnically diverse teachers in the economic development region of the state where the institution is located

PELSB must also:

- Give priority in awarding grants to institutions that previously received a CUGMEC grant and have demonstrated continuing success
- Determine award amounts based on (1) the number of candidates supported by an applicant program, (2) sustaining support for candidates, and (3) the funds available
- Award grants to institutions located in various economic development regions throughout the state

— **Minnesota Statutes 2020, 122A.635, subds. 2 and 3**

⁹ In Fiscal Year 2020, each of the nine reviewers scored three applications. In Fiscal Year 2021, 9 of the 11 reviewers scored three applications, while 1 reviewer scored four applications and 1 reviewer scored five applications.

¹⁰ One difference between reviewer recommendations for the two years was that Fiscal Year 2020 reviewers specified which activities detailed in grantees' proposed budgets they thought PELSB should fund, while Fiscal Year 2021 reviewers did not.

¹¹ Office of Grants Management policy does not require granting agencies to follow the recommendations of grant application reviewers. Instead, it states that "agency staff may incorporate the scores into final funding recommendations that may also be based on geographic distribution, services to special populations, and the applicants' history as a state grantee and capacity to perform the work." Minnesota Department of Administration, Office of Grants Management, Operating Policy and Procedure 08-02, *Policy on Rating Criteria for Competitive Grant Review*, revised September 15, 2017.

recommendations for Fiscal Year 2021 for two main reasons. First, the two grant recipients that the reviewers did not recommend received an average score similar to the recommended applicants.¹² Second, PELSB wanted to make sure that its awards aligned with statutory requirements.

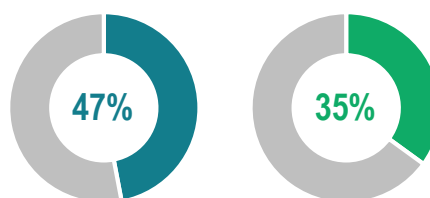
Requested and Awarded Funding

PELSB has awarded grant amounts to applicants based in part on the total amount of funding the Legislature has appropriated for the CUGMEC program.

Requests for CUGMEC grant funds exceeded available funds in both fiscal years 2020 and 2021.

As shown in the box to the right, PELSB awarded less than half of the requested funding for each fiscal year. In Fiscal Year 2020, applicants requested a total of almost \$2.3 million in funding. The Legislature appropriated nearly \$1.1 million for that year, and PELSB awarded a total of about \$1,066,000.¹³ In Fiscal Year 2021, higher education institutions applied for more than \$2.7 million in funding and PELSB

In **Fiscal Year 2020**, PELSB awarded a larger portion of funding requested by CUGMEC applicants than in **Fiscal Year 2021**.



For fiscal years
2020 and 2021,

2/3

of applicants received
CUGMEC funding.

awarded a total of \$970,000 from the \$1 million the Legislature appropriated for the CUGMEC grant program that year.¹⁴

While PELSB awarded less than half of the total amount of funding requested, the board made awards to two-thirds of the applicants in fiscal years 2020 and 2021. In Fiscal Year 2020, PELSB awarded CUGMEC grants to 6 of the 9 institutions that applied, and in Fiscal Year 2021, PELSB awarded grants to 8 of the 12 institutions that applied.

Even for those applicants who did receive grants, PELSB did not fully fund their CUGMEC proposals. In Fiscal Year 2020, PELSB awarded 61 percent of the funding requested by institutions that received grants; in Fiscal Year 2021, PELSB awarded 49 percent of the amount requested by grantee institutions. This resulted in grantee institutions decreasing the number of teacher candidates to whom they planned to provide direct financial assistance for tuition. Exhibit 3.1 shows the percentage of funding grantees received as well as how this affected the number of teacher candidates each grantee institution planned to support with direct financial assistance for tuition.

¹² We noted that both of these institutions received lower scores than one other institution that did not receive an award and was located in an economic development region not currently represented among CUGMEC grantees.

¹³ The amount PELSB awarded was less than the amount appropriated because state law allowed PELSB to retain up to 3 percent of the appropriation for administering the grant. *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 22, subd. 2(b).

¹⁴ *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 22, subd. 2(a).

Exhibit 3.1: In Fiscal Year 2021, PELSB awarded less CUGMEC funding than grantees requested.

Institution	Amount Requested ^a	Amount Awarded ^a	Percentage of Request Funded	Number of Candidates Included in Application ^b	Number of Candidates Included in Agreement ^c
Augsburg University	\$195,000	\$120,000	62%	38	14
Concordia University, St. Paul	195,000	100,000	51	25	15
Hamline University	265,000	125,000	47	65	Unspecified
Metropolitan State University	476,435	288,000	60	180	86
Minnesota State University, Mankato	151,794	140,000	92	30	28
Saint Mary's University	325,918	85,000	26	40	20
University of Minnesota, Twin Cities	193,200	56,000	29	28	20
University of St. Thomas	192,900	56,000	29	31	11

NOTES: The Professional Educator Licensing and Standards Board (PELSB) awarded Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grants from a total appropriation of \$1,000,000 for Fiscal Year 2021. The total amount PELSB awarded (\$970,000) was less than the amount appropriated because appropriation laws allowed PELSB to retain up to 3 percent of the appropriation for monitoring and administering the grant. *Laws of Minnesota 2019, First Special Session, chapter 11, art. 3, sec. 22, subd. 2(b).*

^a These amounts represent funding for all activities, including tuition scholarships, other types of direct financial assistance, other types of support—such as mentoring—and program administration.

^b This represents the number of teacher candidates to whom grantee institutions proposed providing tuition scholarships in their applications. In some instances, the exact number of students that institutions planned to support with tuition scholarships was unclear; these numbers represent our best estimate based on the information submitted in the applications. These numbers may not include students for whom applicants proposed providing other forms of direct financial assistance or other types of support.

^c This represents the number of teacher candidates to whom grantee institutions planned to provide tuition scholarships, as indicated in their final grant agreement. In some instances, the exact number of students that institutions planned to support with tuition scholarships was unclear. These numbers represent our best estimate based on the information contained in the grant agreement. Additionally, these numbers may not include students for whom grantees planned to provide other types of direct financial support—such as assistance with exam costs—or other types of support, such as tutoring.

SOURCE: Office of the Legislative Auditor, analysis of CUGMEC applications and grant agreements for Fiscal Year 2021.

Notification of Grant Opportunity

The Office of Grants Management has developed policies and procedures for executive state granting agencies to follow when notifying eligible institutions of competitive grant opportunities. Agencies are required to post the request for proposal on their websites in accordance with statutes.¹⁵ Additionally, policies state that agencies

¹⁵ Minnesota Department of Administration, Office of Grants Management, Operating Policy and Procedure 08-03, *Policy on Writing and Publicizing Grants Notices and Requests for Proposal*, revised September 15, 2017. *Minnesota Statutes 2020*, 15.994, states that “A state agency with an Internet site must provide information on grants available through the agency and must provide a link to any grant application....”

“should pursue additional methods to reach potential applicants.”¹⁶ The box to the right shows examples of additional methods identified in Office of Grants Management policy.



Examples of Methods to Reach Potential Applicants

1. Targeting communities and parts of the state that have not historically participated in the grant application process
2. Contacting culturally specific and community-based organizations
3. Using agency distribution lists
4. E-mail
5. Posting the grant opportunity in targeted newspapers
6. Notifying prior applicants and recipients
7. Posting the grant opportunity in the Minnesota State Register

— Minnesota Department of Administration,
Office of Grants Management, Policy 08-03

PELSB adequately informed eligible institutions of the CUGMEC grant opportunity, but it has not received applications from institutions throughout the state.

PELSB followed a similar approach to notifying eligible institutions of the CUGMEC grant opportunity for both fiscal years 2020 and 2021. As required by statute and Office of Grants Management policy, PELSB posted the request for proposal to its website. In addition, PELSB used methods recommended by Office of Grants Management policy, including notifying representatives of eligible institutions of the CUGMEC grant opportunity. PELSB also communicated with the Minnesota Association of Colleges for Teacher Education, which informed its members of the grant opportunity. Additionally, for both fiscal years 2020 and 2021, PELSB staff set up information sessions for institutions interested in applying for the grant.

As noted in Chapter 1, statutes limit eligibility for CUGMEC grants to institutions of higher education with PELSB-approved teacher preparation programs.¹⁷ We contacted representatives of 16 higher education institutions with teacher preparation programs that did not apply for CUGMEC grants to determine if they were aware of the program. We received responses from representatives of six of these institutions. Representatives of five of the six institutions indicated that they were familiar with CUGMEC but had chosen not to apply for various reasons.¹⁸

¹⁶ Minnesota Department of Administration, Office of Grants Management, Operating Policy and Procedure 08-03, *Policy on Writing and Publicizing Grants Notices and Requests for Proposal*, revised September 15, 2017.

¹⁷ *Minnesota Statutes* 2020, 122A.635, subd. 1.

¹⁸ While most respondents were aware of the program, these responses cannot be viewed as representing all institutions that did not apply, given the low response to our questionnaire. Reasons representatives from these institutions gave for not applying include (1) they did not think they would receive a grant, (2) information sessions were not available online, (3) the timing of the grant opportunity announcement and the institution’s staff availability did not align, and (4) the data required for applying was too arduous.

PELSB is required by law to award CUGMEC grants to institutions “located in various economic development regions throughout the state.”¹⁹ Minnesota has 13 economic development regions, and PELSB has had limited participation from institutions located in the 12 regions outside the Twin Cities metropolitan area.²⁰ Only 9 of the state’s 13 economic development regions—including economic development region 11 which covers the Twin Cities metropolitan area—have PELSB-approved teacher preparation programs. Of these, five have an institution located within them that applied for a CUGMEC grant in Fiscal Year 2020 or Fiscal Year 2021, and three have an institution that received a grant in those fiscal years. Exhibit 3.2 shows the economic development regions with institutions that have PELSB-approved teacher preparation programs throughout the state, including regions with institutions that applied for a grant and those that received one in fiscal years 2020 and 2021.

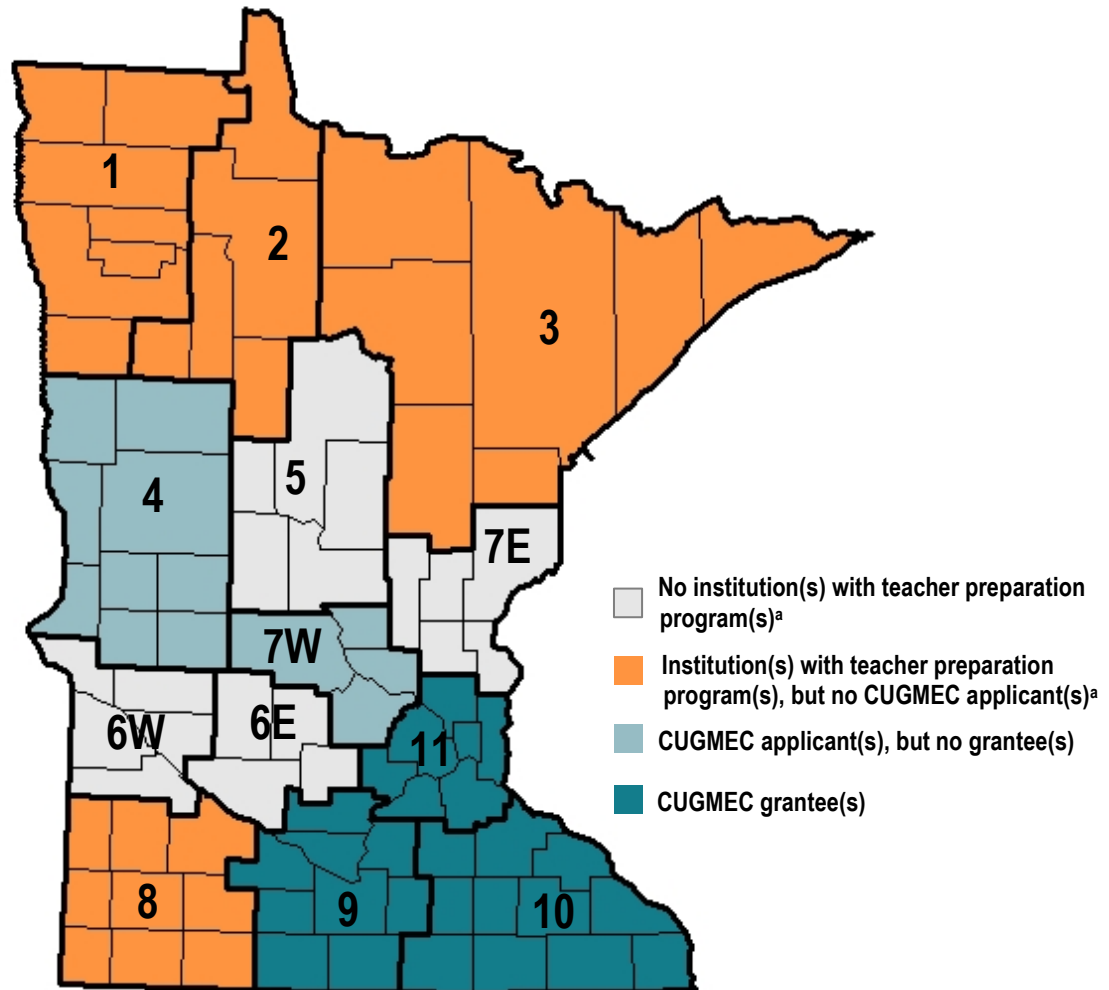
As noted previously, Office of Grants Management policies encourage granting agencies to target “communities and parts of the state that have not historically participated in the grant application process.”²¹ Most institutions that have received CUGMEC grants awarded by PELSB are located only in the Twin Cities metropolitan area. We asked PELSB staff what actions, if any, PELSB has taken to encourage participation from institutions located in parts of the state that have not historically participated in the CUGMEC grant program. The efforts PELSB staff described were the same as PELSB’s general efforts for notifying eligible institutions of the grant opportunity. While PELSB has made efforts to notify eligible institutions of the CUGMEC grant opportunity, we encourage PELSB to do more to target institutions located in economic development regions that have not participated in the CUGMEC application process.

¹⁹ *Minnesota Statutes* 2020, 122A.635, subd. 3.

²⁰ The Twin Cities metropolitan area makes up Economic Development Region 11, which includes the following counties: Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington.

²¹ Minnesota Department of Administration, Office of Grants Management, Operating Policy and Procedure 08-03, *Policy on Writing and Publicizing Grants Notices and Requests for Proposal*, revised September 15, 2017.

Exhibit 3.2: While institutions with teacher preparation programs approved by PELSB are located in nine economic development regions, only five regions have an institution that applied for a grant in fiscal years 2020 or 2021.



NOTES: The Professional Educator Licensing and Standards Board (PELSB) is responsible for administering the Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grant program. *Minnesota Statutes* 2020, 122A.635, subd. 1, limits eligibility for the CUGMEC grant program to public or private higher education institutions with teacher preparation programs that have been approved by PELSB. For this exhibit, we considered only programs' physical locations; some institutions offer teacher preparation programs in online formats. Some institutions offer teacher preparation programs at more than one campus. For example, Augsburg University and Saint Mary's University—both institutions that received a CUGMEC grant—each offer their teacher preparation programs in economic development regions 10 and 11.

^a By "institutions with teacher preparation programs" we mean higher education institutions with PELSB-approved teacher preparation programs.

SOURCE: Office of the Legislative Auditor.

Application Instructions

PELSB provided applicants with an application template in addition to the CUGMEC request for proposal. The request for proposal included instructions for completing the application template that, among other things, directed applicants to submit specific data points about the institution's teacher preparation program. Many of these data points, such as the number of teacher candidates who are of color or who are American Indian who became licensed, were based on grant selection criteria laid out in statute.

PELSB improved its instructions to grant applicants from Fiscal Year 2020 to Fiscal Year 2021, although instructions for reporting certain data remained unclear.

We asked representatives from the nine institutions that applied for CUGMEC grants in Fiscal Year 2020 how clear the application instructions were that year. Representatives from six institutions told us that the application instructions for Fiscal Year 2020 grants were unclear, while representatives from two institutions said they thought the application instructions were clear.²² Representatives from four institutions said they thought the application instructions were clearer in Fiscal Year 2021, although three of these representatives indicated they could still be improved.²³



The overall length of the [Fiscal Year 2021] application was shortened. The data section was also shortened and clarified, but there was still some confusion as to whether they wanted data on the program level, unit level, or institutional level.

— CUGMEC Applicant Institution Representative

We reviewed all applications for fiscal years 2020 and 2021 and found that some data submitted by applicants in both years were not comparable across institutions. This may indicate that application instructions were not clear. For example, the request for proposal instructed applicants to report the number of teacher candidates served by their program who were people of color or American Indian. Based on our review, we concluded that for Fiscal Year 2021, 8 of the 12 applicants provided data for their entire teacher preparation program, while 2 applicants provided data on a subprogram within its teacher preparation program. For two other applicants, it was unclear whether the numbers they provided for this part of the application were for their entire teacher preparation program or a subprogram.

Additionally, applicants varied in how they calculated program completion, licensure, and job placement rates. For example, the Fiscal Year 2021 CUGMEC request for proposal asked applicants to provide program completion rates for teacher candidates who were people of color or American Indian. However, it did not direct applicants on how to select the population of students for whom to calculate the rates. In reviewing Fiscal Year 2021 applications, we noted that the way in which applicants calculated program completion rates was often unclear or varied based on (1) the period of time in

²² One of the nine institutions did not respond directly to our question.

²³ Not all applicants provided information on whether they thought the application had been improved for Fiscal Year 2021.

which institutions reported graduation (such as five years or six years) and (2) whether institutions reported data for undergraduate and graduate students.

We reviewed CUGMEC application instructions for both fiscal years 2020 and 2021 and noted that PELSB provided more guidance to Fiscal Year 2021 applicants on how they should report data. However, this guidance still allowed for variation. For example, in defining “program” the application states: “This may be a program aimed specifically at teacher candidates of color and/or American Indian teacher candidates. However, it may also be a general teacher licensure program.”²⁴ For some data points, the instructions also say if an applicant provides data from a “program that exclusively enrolls teacher candidates of color” the applicant should “make a note of this.”

RECOMMENDATION

PELSB should specify in its grant application instructions how applicants should report data.

PELSB should clearly explain how applicants should define the populations used for calculating program completion, licensure, and job placement rates. It could require that institutions report these data for their institution as a whole, report data only for students who received direct financial assistance from CUGMEC, or report different data points using both types of populations. Without specifying this, the data applicants provide may not be comparable, which could make it difficult for grant application reviewers to accurately compare data submitted by different institutions. This may mean reviewers determined scores based on differences in how institutions reported the data, rather than differences in their program outcomes.

Changing CUGMEC application instructions to require institutions to provide data in a specific way could make it more challenging for some institutions to apply. Some institutions told us that it was time consuming or difficult to provide data required by the application. For example, a representative from one grantee institution told us the application process took a long time because they had to report data in many different ways. A representative from another grantee institution said that the application process was not difficult, but that it took extra time to collect the data it required. A representative from one institution that did not apply for the grant told us that they did not apply because providing the required data was “too arduous.” It’s possible that changing the application to require institutions to report data in a specific way could make reporting the data more difficult for some institutions that are not used to reporting data in this way. However, we believe it is important to make sure data are comparable across applications.

Application Scoring Rubric

As mentioned earlier, after institutions submitted their applications, PELSB assigned three reviewers to each application. Reviewers scored applications using an application scoring rubric PELSB developed with input from stakeholders. In Fiscal Year 2020,

²⁴ Professional Educator Licensing and Standards Board, *Request for Proposals: Collaborative Urban and Greater Minnesota Educators of Color Grant Program* (St. Paul, 2020), 7.

reviewers scored applications in seven categories and in Fiscal Year 2021, eight categories. As explained in Exhibit 3.3, reviewers calculated a score for each application out of a total of 100 possible points for both fiscal years 2020 and 2021.

Exhibit 3.3: Reviewers scored CUGMEC applications in eight different categories for Fiscal Year 2021 grants.

Category	Category Description	Total Possible Points
Project narrative and applicant information	Reviewers assess (1) whether the applicant is a previous grantee; (2) whether the applicant is serving greater Minnesota; (3) the extent to which the project narrative portion of the application addresses prompts; (4) how the project narrative portion compares to other applications; and (5) the applicant's capacity for recruiting, retaining, and inducting teachers of color and American Indian teachers into the workforce	15
Number of candidates supported	Reviewers compare the number of teacher candidates who are candidates of color or American Indian supported by the applicant to the number supported by other applicants	20
Program outcomes	Reviewers determine whether the applicant's program completion, licensure, and placement rates fall into set ranges of percentages and compare the numbers of candidates who complete the program, obtain licensure, and/or are working in Minnesota in their licensure field to other applicants	20
Context	Reviewers consider how the applicant's percentage of teacher candidates who are candidates of color or American Indian compares to the percentage of all students attending the applicant's institution who are students of color or American Indian <i>and</i> to the percentage of teachers in the applicant's economic development region who are teachers of color or American Indian	5
Demonstrated successes and challenges	Reviewers compare the applicant's explanation of its successes and challenges in recruiting, retaining, and inducting teacher candidates who are candidates of color or American Indian to explanations provided by other applicants	20
Project goals, activities, and estimated timelines	Reviewers evaluate the clarity and detail of the application's description of program goals and activities and the extent to which program activities align with the purpose of CUGMEC grant funding as outlined in statute	10
Progress monitoring	Reviewers consider the extent to which the application's proposed methods for measuring the outcomes of funded activities are clear, detailed, and feasible	5
Budget	Reviewers assess the extent to which the application's proposed budget includes a clear, itemized description and matches the contents of the rest of the application	5
TOTAL POSSIBLE SCORE		100

NOTES: The Professional Educator Licensing and Standards Board (PELSB) used outside reviewers to score Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grant applications. The table reflects OLA's summary of the categories and descriptions included in the Fiscal Year 2021 application scoring rubric. The Fiscal Year 2020 application scoring rubric had a total possible score of 100 points and included seven categories.

SOURCE: Office of the Legislative Auditor, review of Professional Educator Licensing and Standards Board, *Collaborative Urban and Greater Minnesota Educators of Color Grant Proposal Review Form – Fiscal Year 2021* (St. Paul, 2020), 3-6; and Professional Educator Licensing and Standards Board, *Proposal Review Form Fiscal Year 2020* (St. Paul, 2019).

We reviewed the application scoring rubric—which included scoring instructions for reviewers—for both fiscal years 2020 and 2021.

PELSB provided more detailed instructions to reviewers in Fiscal Year 2021 than in Fiscal Year 2020, but it was still unclear how PELSB expected reviewers to calculate certain scores.

In Fiscal Year 2020, PELSB did not instruct grant application reviewers on how to assign scores for each category in the application scoring rubric. PELSB provided more detailed instructions for scoring Fiscal Year 2021 grants. However, for some categories in the scoring rubric, reviewers had to provide one score based on multiple different data points, and the instructions did not clearly indicate how to calculate the score for each of these data points.

For example, PELSB directed reviewers to assign one score to an application based on an institution's number of program completers, licensed graduates, and teachers working in Minnesota in their licensure field, as well as the institution's rates for program completion, licensure, and job placement. These instructions appeared to assume that each of these numbers and rates would be similar, and it was unclear to us how PELSB expected reviewers to score applications in which all of these numbers were not similar. Exhibit 3.4 shows the instructions PELSB provided to reviewers for these data points.

Unclear directions for scoring applications can result in a lack of consistency across reviewers. As part of our review of PELSB's grant award process, we examined variation in the scores reviewers gave to each application. Reviewers' scores differed by 20 or more out of a potential 100 points for 4 of 9 applications in Fiscal Year 2020 and 4 of 12 applications in 2021. One application received scores from two different reviewers that differed by nearly 40 points. We observed similar variation in reviewers' scores for some specific categories in the rubric.

We communicated with grant application reviewers and grant applicants about the clarity of the application scoring rubric. Grant application reviewers that responded to our questionnaire provided differing views on the clarity of the instructions PELSB provided to them. We sent questionnaires to all 11 people who served as grant application reviewers for Fiscal Year 2021. We received responses from six.²⁵ Four of the individuals indicated that they thought the instructions PELSB provided to them were clear, while one indicated that the instructions were not clear. That reviewer described the scoring process as “confusing” and “subjective,” but added that reviewers were given an opportunity to update their scores after the scoring instructions were clarified at the reviewers' meeting. The sixth reviewer that responded to our questionnaire did not clearly indicate whether they thought the instructions were clear or unclear.

²⁵ The responses we received should not be seen as representative of all reviewers, in part because of the small number of responses we received.

Exhibit 3.4: PELSB provided more detailed instructions to reviewers in the rubric for Fiscal Year 2021, but required reviewers to provide a single score based on multiple data points in some instances.

Rubric Category ^a	Applicable Statutory Criteria ^b	Fiscal Year 2020 Scoring Instructions ^c	Fiscal Year 2021 Scoring Instructions
Program Outcomes	<ol style="list-style-type: none"> 1. Program graduation or completion rate 2. Number of program graduates or completers who are candidates of color or American Indian^d 3. Licensure rate 4. Number of licensed candidates who are candidates of color or American Indian 5. Placement rate 6. Number of candidates placed who are candidates of color or American Indian 	This section is designed to convey how successfully a program recruits, retains, graduates, and inducts teacher candidates who are of color or who are American Indian.	<p>0-10 Points: Completion, licensure and placement rates are less than 70%. Total numbers of program completers, licensed candidates and those working in Minnesota in their licensure field are in the lowest range of all applications.</p> <p>11-15 Points: Completion, licensure and placement rates are in the 70%-79% range. Total numbers of program completers, licensed candidates and those working in Minnesota in their licensure field are close to the mean and median of all applications.</p> <p>16-20 Points: Completion, licensure and placement rates are in the 80%-100% range. Total numbers of program completers, licensed candidates and those working in Minnesota in their licensure field are in the highest range of all applications.</p>

NOTES: The Professional Educator Licensing and Standards Board (PELSB) used a scoring rubric for Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) applications that contained seven categories in Fiscal Year 2020 and eight categories in Fiscal Year 2021. The table above describes only one of these categories.

^a This refers to the "Section II: Criteria 2" category in Fiscal Year 2020 and the "Section 2: Criterion 2 – Program Outcomes" category in Fiscal Year 2021.

^b Statutes require PELSB to award grants based on certain criteria. *Minnesota Statutes* 2020, 122A.635, subd. 2(a).

^c Instructions similar to those included in this column were also included as part of the Fiscal Year 2021 instructions. They are not listed in the "Fiscal Year 2021 Scoring Instructions" column for brevity.

^d As we discuss later in the chapter, this criteria was not included in the rubric for Fiscal Year 2020.

SOURCE: Office of the Legislative Auditor, review of *Minnesota Statutes* 2020, 122A.635, subd. 2(a); Professional Educator Licensing and Standards Board, *Proposal Review Form Fiscal Year 2020* (St. Paul, 2019), 1-3; Professional Educator Licensing and Standards Board, *Request for Proposals Collaborative Urban and Greater Minnesota Educators of Color Grant Program* (St. Paul, 2019), 7; and Professional Educator Licensing and Standards Board, *Collaborative Urban and Greater Minnesota Educators of Color Grant Proposal Review Form – Fiscal Year 2021* (St. Paul, 2020), 4.

Representatives from several institutions that applied for the grant in both fiscal years 2020 and 2021 indicated that they thought PELSB had improved the clarity of its system for scoring grants. We communicated with representatives from the nine institutions that applied for Fiscal Year 2020 grants. Representatives from six of the nine institutions told us that they found the scoring system to be unclear that year. Four of these same representatives indicated that PELSB had improved the clarity of the application scoring system for Fiscal Year 2021. Additionally, one representative from an institution that applied for the first time in Fiscal Year 2021 told us the rubric was clear in that year.²⁶

RECOMMENDATION

PELSB should provide clear instructions on how to calculate scores related to all criteria in the application scoring rubric.

As discussed above, PELSB made improvements to the CUGMEC application scoring rubric from Fiscal Year 2020 to Fiscal Year 2021. However, PELSB should further clarify its directions for scoring applications to ensure consistency in the review process. In particular, the board should develop directions for scoring each data point covered by the application scoring rubric. This could result in a more consistent understanding of the scoring process and less variation among grant application reviewers' scores. It may also provide more clarity to grant applicants about how their application will be scored and why their applications receive the scores they receive. There is always the potential for individual reviewers to misunderstand or interpret directions in their own way, but clearer instructions should help promote a shared understanding of the characteristics that would warrant a high or low score.

Award Requirements

As we noted previously, statutes state that PELSB must award grants based on specific selection criteria.²⁷ For example, PELSB must award grants based on “the number of teacher candidates being supported in the program who are of color or who are American Indian.”²⁸ Statutes also include other requirements PELSB must adhere to when awarding grants. For instance, PELSB “must give priority in awarding grants... to institutions that received grants...and have demonstrated continuing success in recruiting, retaining, graduating, and inducting teacher candidates of color or who are American Indian.”²⁹

²⁶ Two other institutions applied for the first time in Fiscal Year 2021. The representative from one of these institutions did not respond directly to our question, while the other institution did not respond to our questionnaire.

²⁷ *Minnesota Statutes* 2020, 122A.635, subd. 2(a).

²⁸ *Minnesota Statutes* 2020, 122A.635, subd. 2(a)(1).

²⁹ *Minnesota Statutes* 2020, 122A.635, subd. 2(b).

PELSB's CUGMEC application and application scoring rubric reflected most, but not all, of the information on which PELSB must base its grant awards.

PELSB's application template for fiscal years 2020 and 2021 required applicants to provide data related to most of the requirements PELSB must adhere to when awarding grants, as shown in Exhibit 3.5.³⁰ Similarly, PELSB's scoring rubric for fiscal years 2020 and 2021 also prompted reviewers to consider most requirements when scoring grant applications.

However, PELSB did not include all elements it was required to consider in its application templates and rubrics. For both fiscal years, the application template did not require applicants to report the number of teacher candidates of color or American Indian teacher candidates who completed the teacher preparation program.³¹ Similarly, the application scoring rubric for Fiscal Year 2020 did not include this criterion. The scoring rubric for Fiscal Year 2021 did instruct reviewers to base their score for the application in part on the number of candidates of color and American Indian candidates who completed their program. However, applicants would have needed to provide this information in order for reviewers to do this. In reviewing all 12 of the Fiscal Year 2021 applications, it appeared that 7 provided the number of teacher candidates who were candidates of color or American Indian who completed the teacher preparation program, while 3 did not.³²

Additionally, while PELSB's application template for both fiscal years 2020 and 2021 required applicants to report the number of candidates in their programs supported with CUGMEC funding, it did not require applicants to provide information on how they would *sustain* support for those candidates.³³ The scoring rubric also did not instruct reviewers to consider this requirement. Without requiring applicants to submit this information or reviewers to consider it, it is unclear how PELSB could base its awards on sustaining support for candidates in applicants' programs.

PELSB's Fiscal Year 2020 application template did not require applicants to note the economic development region in which their institution was located, nor did the scoring rubric direct reviewers to consider this information when scoring the application. For Fiscal Year 2021, PELSB changed its application template so it asked applicants to provide this information. Additionally, it changed the application scoring rubric so that institutions serving greater Minnesota received three points. While this change may make applications from greater Minnesota as a whole more competitive, it does not




³⁰ While we refer to the "application template" here, some of this discussion also reflects the application instructions included in the request for proposal, as the templates themselves did not contain instructions to applicants for all sections of the template.

³¹ This criterion is required by *Minnesota Statutes* 2020, 122A.635, subd. 2(a)(2).

³² For one of the remaining two applicants, it was unclear whether the number provided represented the number of program completers who were candidates of color or American Indian or another number. The second application did not include a number because the institution explained it was for a new program.

³³ The application templates did ask applicants to describe their retention efforts in general, but not how applicants would sustain support specifically for individuals who received support through CUGMEC.

Exhibit 3.5: The CUGMEC applications and scoring rubrics reflected most, but not all, requirements for awarding CUGMEC grants.

Requirements	Fiscal Year 2020		Fiscal Year 2021	
	Application	Rubric	Application	Rubric
<u>Selection Criteria:</u>				
Number of teacher candidates being supported in the program who are people of color or who are American Indian	●	●	●	●
Graduation or program completion rates	●	●	●	●
Licensure rates	●	●	●	●
Placement rates	●	●	●	●
Number of graduates or program completers who are candidates of color or American Indian	○	○	○	●
Number of candidates licensed who are candidates of color or American Indian	●	●	●	●
Number of candidates placed who are candidates of color or American Indian	●	●	●	●
The percentage of racially and ethnically diverse teacher candidates enrolled in the institution compared with the total percentage of students of color and American Indian students enrolled at the institution, regardless of major	●	●	●	●
The percentage of racially and ethnically diverse teacher candidates enrolled in the institution compared with the percentage of underrepresented racially and ethnically diverse teachers in the economic development region of the state where the institution is located	●	●	●	●
<u>Other Award Requirements:</u>				
Give priority to institutions that previously received a CUGMEC grant and have demonstrated continuing success ^a	●	○	●	●
Determine award amounts based on the number of candidates supported by an applicant program	●	●	●	●
Determine award amounts based on sustaining support for candidates	○	○	○	○
Award grants to institutions located in various economic development regions throughout the state	○	○	●	▨
 Reflects Requirement  Partially Reflects Requirement  Does Not Reflect Requirement				

NOTES: Statutes indicate that the Professional Educator Licensing and Standards Board (PELSB) must award Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grants based on the specific selection criteria listed above. In addition to these selection criteria, statutes direct PELSB to make awards based on the other award requirements listed above.

^a For Fiscal Year 2020, this requirement was included in the instructions to grant application reviewers, but it was not included in the scoring rubric, so it was unclear how reviewers were expected to prioritize previous grantees.

SOURCE: Office of the Legislative Auditor, review of the CUGMEC grant program requests for proposal, application templates, and application scoring rubrics; and *Minnesota Statutes* 2020, 122A.635.

necessarily help PELSB meet the requirement to award grants to institutions located in *various* economic development regions. It is possible for all applicants from greater Minnesota to be located in the same economic development region.

RECOMMENDATION

PELSB should ensure that the CUGMEC grant application and scoring rubric incorporate all information needed to meet requirements for awarding grants.

Among other things, statutes require PELSB to base its awards on the number of teacher candidates who are people of color or American Indian who graduate from an applicant program. Statutes also require PELSB to determine award amounts in part on sustaining support for teacher candidates. To ensure that it is meeting these requirements, PELSB should amend its application template to require institutions to provide relevant information and make sure that the grant application scoring rubric also reflects these requirements.

Statutes also require PELSB to award grants to institutions located in various economic development regions. PELSB changed the application materials for Fiscal Year 2021 to require applicants to report the economic development region in which they were located. However, the application scoring rubric did not adequately consider whether an applicant was from an economic development region not already represented among CUGMEC grantees. PELSB should amend its grant application scoring rubric so that it fully reflects this requirement.

Transparency

Transparency in government—including in processes used to award state funds—is important for promoting accountability. It helps applicants understand why they either received or did not receive a grant. It can also provide stakeholders insight into how well the grant program is being administered.

PELSB took steps to make its grant award process transparent, but it did not fully document decisions regarding reviewers' declared conflicts of interest.

As required by Office of Grants Management policy, PELSB included the application scoring rubric in its request for proposals.³⁴ Additionally, PELSB provided grant applicants with copies of their completed application scoresheets and asked reviewers to provide comments on each application they reviewed. While most reviewers provided comments on their score sheets, we found that these comments rarely explained their

³⁴ Minnesota Department of Administration, Office of Grants Management, Operating Policy and Procedure 08-03, *Policy on Writing and Publicizing Grants Notices and Requests for Proposal*, revised September 15, 2017. The policy notes that “selection criteria and weight” are essential elements of a request for proposal; PELSB provided this information in an “evaluation rubric,” which we refer to as the “application scoring rubric” for clarity.

scores for all criteria. Nevertheless, this represents an effort on PELSB's part to be transparent with how reviewers scored applications.

Some representatives from grantee institutions who we interviewed provided feedback on receiving copies of reviewers' score sheets. For example, a representative from one grantee institution told us that it had received a summary of the reviewers' scores for its application but said that the institution would like to see a more detailed breakdown of how points were allocated. A representative from another grantee institution told us that they believed the way the institution's application was scored was reliable because they could see how the application was scored.

As required by Office of Grants Management Policy, PELSB required all grant application reviewers to complete conflict of interest forms on which they indicated whether they had a conflict of interest with any of the applicants.³⁵ In general, PELSB's practice was to not assign reviewers to applications from institutions with which the reviewer indicated they had a conflict. PELSB staff also told us that reviewers did not participate in discussions about applicants with whom they had identified a conflict of interest. However, in Fiscal Year 2020, there were two instances in which grant reviewers reviewed applications from institutions with which they indicated they had a conflict of interest. A PELSB official told us that they communicated with an Office of Higher Education staff member about these instances and determined that these individuals did not have a conflict of interest. However, PELSB did not document these conversations.

Office of Grants Management policy states that one way for granting agencies to avoid conflicts of interest is to not assign grant reviewers to applications from applicants with which they have a conflict of interest, but it does not require this. However, Office of Grants Management policy does state: "Any disclosed conflicts and their resolution should be noted in meeting minutes, documents or records that the state agency keeps as a regular part of its grants process."³⁶ Given this policy, PELSB should have documented how it resolved the conflicts of interest described above.

RECOMMENDATION

PELSB should document the resolution of all conflicts of interest.

By making sure that it documents the resolution of all conflicts of interest, PELSB will bring its practices in line with Office of Grants Management policy. This will also provide more transparency to other stakeholders on how PELSB mitigates conflicts of interest.

³⁵ Minnesota Department of Administration, Office of Grants Management, Operating Policy and Procedure 08-01, *Conflict of Interest Policy for State Grant-Making*, revised June 18, 2012. As stated earlier, reviewers were not PELSB employees. However, some reviewers were current or former faculty members of institutions that applied for the grants. Reviewers had to indicate on the conflict of interest form for each applicant institution whether they had a conflict of interest with that applicant. One possible conflict of interest was if a reviewer was a past or current faculty member of that applicant institution. In Fiscal Year 2021, 6 of the 11 reviewers identified this type of conflict of interest, but it was unclear from the conflict of interest forms whether they were *past* or *current* employees of the applicant institution.

³⁶ Minnesota Department of Administration, Office of Grants Management, Operating Policy and Procedure 08-01, *Conflict of Interest Policy for State Grant-Making*, revised June 18, 2012.

Grant Monitoring Process

Once state agencies award grants, they become responsible for monitoring grantees' performance. Monitoring includes activities that may occur during the grant period, such as conducting site visits and reviewing performance reports. It also includes activities that may occur after the grant period has concluded, such as grant closeout evaluations. Monitoring is important because it provides the state and stakeholders with information on whether grant funding was used for its intended purpose and the extent to which programs achieved intended outcomes.

The grant period for grants awarded from Fiscal Year 2020 appropriations expires on June 30, 2021—after the release of this evaluation report.³⁷ For that reason, at the time that this report was released, PELSB had not completed all monitoring activities for the CUGMEC grants it had awarded. Similarly, the grant period for Fiscal Year 2021 grants started after we began research for this evaluation and had not yet concluded. Because of this, we were unable to determine the extent to which PELSB has met all grant monitoring requirements. However, we did review the extent to which PELSB has performed some monitoring activities required by statute and Office of Grants Management policies for Fiscal Year 2020 grants.

PELSB performed required monitoring activities that we reviewed for Fiscal Year 2020 grants.

Statutes require that each CUGMEC grantee prepare a report for the Legislature and PELSB by January 15 of each year.³⁸ We confirmed that PELSB has collected reports for all Fiscal Year 2020 CUGMEC grantees. We also confirmed that PELSB met an Office of Grants Management policy requirement that grant agreements outline grantee reporting requirements, including the reporting schedule.³⁹ Grant contract agreements for both Fiscal Year 2020 and Fiscal Year 2021 direct grantees to complete this legislatively required report.⁴⁰

PELSB staff also conducted site visits for all six Fiscal Year 2020 grantee institutions. Office of Grants Management policies require granting agencies to conduct at least one monitoring visit before final payment is made on all state grants of over \$50,000, and at least annual visits on grants of over \$250,000.⁴¹ Grants for Fiscal Year 2020 ranged from between \$100,000 to \$406,000. PELSB staff completed at least one on-site

³⁷ Grantees also have the option to extend the grant period beyond this as statutes allow them to use grant funds over a two- to four-year period. *Minnesota Statutes* 2020, 122A.635, subd. 3.

³⁸ *Minnesota Statutes* 2020, 122A.635, subd. 4(a).

³⁹ Minnesota Department of Administration, Office of Grants Management, Operating Policy and Procedure 08-09, *Policy on Grant Progress Reports*, issued December 18, 2008.

⁴⁰ We also confirmed that grant contract agreements were signed and met certain other Office of Grants Management policies, including that they specify “the scope and timeline for the work” and “the grantee’s duties.” Minnesota Department of Administration, Office of Grants Management, Operating Policy and Procedure 08-04, *Policy on the Use of Grant Agreements*, revised September 15, 2017.

⁴¹ Minnesota Department of Administration, Office of Grants Management, Operating Policy and Procedure 08-10, *Policy on Grant Monitoring*, revised December 12, 2016.

monitoring visit for each grantee during Fiscal Year 2020. As part of these visits, PELSB staff met with staff from the grantee institutions to conduct a financial review. At some institutions they also spoke with teacher candidates or observed program functions, such as cohort meetings of teacher candidates attending the institution.

During our interviews with representatives from grantee institutions, most expressed appreciation for PELSB's site visits. Four of these representatives said that site visits provided institutions with a good opportunity to provide PELSB more information on their teacher preparation programs. A representative from one of these institutions also noted that they liked that PELSB staff spoke with their program's teacher candidates, while a representative from another institution told us that they appreciated how PELSB staff shared a meal with that program's teacher candidates.

In addition, PELSB developed and posted on its website its own report on Fiscal Year 2020 CUGMEC grantees, as required by law.⁴² The report presented data from the legislatively required reports, along with data submitted as part of grantee institutions' applications for Fiscal Year 2021 grants.

Statutes outline specific information that grantees are required to include in their annual reports to the Legislature and PELSB.⁴³ For example, grantee institutions are required to provide information on the total number of teacher candidates of color who have been recruited to the grantee institution, disaggregated by race or ethnic group. The box to the right lists key information that is required. We reviewed the legislatively required reports submitted by the six Fiscal Year 2020 CUGMEC grantees.



Key Data Required in Grantee Reports

Grantees must report the number of teacher candidates of color, disaggregated by race or ethnic group, by the following categories:

- Number recruited
- Number newly admitted to the licensure program
- Number enrolled in the licensure program
- Number who completed student teaching
- Number who graduated
- Number who are licensed
- Number who are newly employed as Minnesota teachers in their licensure field

— *Minnesota Statutes 2020, 122A.635, subd. 4(a)*

Data included in grantee institutions' reports to the Legislature and PELSB are not comparable across all institutions, making it difficult for the Legislature and PELSB to assess the impact of CUGMEC as a whole.

We noted that grantee institutions did not report data in a way that allows for comparison across institutions or for reporting on the CUGMEC program as a whole. PELSB provided a template to Fiscal Year 2020 grantees to use for their report to the Legislature and PELSB. In the template, PELSB requested that grantees provide different data points related to the number of teacher candidates who were people of color or American Indian. However, PELSB did not indicate whether grantees should

⁴² *Minnesota Statutes 2020, 122A.635, subd. 4(b)*. Professional Educator Licensing and Standards Board, *2020 Collaborative Urban and Greater Minnesota Educators of Color Grant Report* (St. Paul, 2020).

⁴³ *Minnesota Statutes 2020, 122A.635, subd. 4(a)*.

provide data for their entire teacher preparation program or only for teacher candidates who benefitted from CUGMEC. In reviewing data grantees reported for the 2018-2019 school year, we noted that three institutions reported data for all teacher candidates in their teacher preparation program who identify as people of color or American Indian. One of the remaining three institutions reported data only on teacher candidates who benefitted from CUGMEC, one institution provided all requested data points for CUGMEC beneficiaries and certain data on all teacher candidates of color and American Indian candidates, and the remaining institution reported data for all teacher candidates of color *and* for CUGMEC beneficiaries.⁴⁴

If one wanted to look at performance metrics for teacher candidates who directly benefitted from CUGMEC grant funding, then the data provided by three of the institutions would be too broad. If one wanted to review performance metrics for all teacher candidates who are people of color or American Indian, then one of the institution's data would be too narrow. In addition, because the data was reported at an aggregate level, it was difficult to determine how many teacher candidates benefitted from CUGMEC across years and track outcomes for those students.

RECOMMENDATION

The Legislature and PELSB should clarify reporting requirements for the CUGMEC program to allow for reporting on the program as a whole.

The Legislature should change reporting requirements in law to specify that grantee institutions must report metrics on individual teacher candidates—in addition to the program-level data currently required—to PELSB in a way that allows PELSB to aggregate that data and provide the Legislature with an overall picture of CUGMEC grant beneficiaries' outcomes. In addition, PELSB should clarify in its instructions for grantees how grantees should report data. PELSB should specify in its instructions to grantees that they report data on (1) all teacher candidates in their larger teacher preparation program and (2) teacher candidates supported with CUGMEC funding. This would not only make data comparable across grantee institutions, but it would also make sure that data for the same institution are comparable from one year to the next.

Such standardization would allow the Legislature, PELSB, and stakeholders to make a better assessment of how well the CUGMEC program as a whole is working towards increasing the number of teacher candidates of color or American Indian teacher candidates.

⁴⁴ We noted that PELSB did direct grantee institutions to report percentages of teacher candidates who were people of color or American Indian out of the total number of teacher candidates seeking the same licensure at the institution. However, one institution did not report these percentages for all categories; for some categories it instead reported only on candidates of color and American Indian candidates.

Chapter 4: Discussion

In this chapter, we discuss broad issues related to the Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grant program.¹ We focus on the *design* of the CUGMEC grant program, and how that design has made it difficult both to administer the program and measure its impact. To address this, we recommend that the Legislature clarify the focus of the CUGMEC grant program and provide greater direction on how the grants should be awarded and used. We also discuss other Minnesota programs that could be used to increase the number of teachers of color and American Indian teachers. Finally, we recommend that the Legislature determine how CUGMEC fits into the state’s broader efforts to diversify its teacher workforce as it considers changes to the program.

Program Purpose and Implementation

In Chapter 2 we explained that grantee institutions used CUGMEC grant funds for a variety of activities to benefit students in teacher preparation programs. In Chapter 3, we explained that the Legislature has directed the Professional Educator Licensing and Standards Board (PELSB) to award grants based on a wide range of requirements. In reviewing laws, statutes, program reporting documents, and data, as well as speaking with stakeholders, we came to a conclusion about the program.

The Legislature has not defined a clear focus for the CUGMEC grant program.

We noted in Chapter 2 that the purpose of the CUGMEC grant program is unclear. The program was only recently codified in 2019; prior to that, appropriations laws did not clearly and consistently state the program’s purpose.² Codification provided some guidance as to the program’s purpose; statutes currently indicate that the CUGMEC grant program is intended to “increase the number of teacher *candidates* of color or who are American Indian...”³ [Emphasis added.] However, statutes also indicate that PELSB must award the grants based on program outcomes related not only to teacher *candidates*, but also *teachers*, including teacher licensure and job placement rates.⁴ It is unclear whether the Legislature, when codifying the program, intended to focus the program only on activities that would increase the number of candidates—that is, individuals entering teacher preparation programs—as opposed to also including activities further along the pathway towards becoming a teacher, such as licensure and job placement. Different interpretations of the program’s purpose could lead to

¹ The CUGMEC program was formerly named the Collaborative Urban Educator grant program. We refer to the program generally as CUGMEC throughout the report, even when referring to years when it was known under its previous name.

² *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 15, codified as *Minnesota Statutes* 2020, 122A.635.

³ *Minnesota Statutes* 2020, 122A.635, subd. 1.

⁴ *Minnesota Statutes* 2020, 122A.635, subd. 2(a)(2).

different uses of funding. In addition, measuring the program's impact based on these different interpretations would require different metrics.

The CUGMEC program's unclear purpose not only complicates our ability to determine its effectiveness, but also has an impact on how it is administered. For example, it is unclear who the grant may benefit. A PELSB official told us that they believe the grant is intended to help individuals obtain their first standard teaching license, but that intent is not clear in statute. This intent also was not indicated in laws appropriating funds to the program prior to codification. Additionally, this intent may not have been reflected in how funding has been used. Of the teacher candidates who benefitted from CUGMEC funding in fiscal years 2016 through 2020, at least nine candidates held standard teaching licenses before they started to receive CUGMEC funds.⁵ This suggests that these candidates were using CUGMEC funding to obtain additional licenses, rather than their first standard teaching license.

We are not suggesting that CUGMEC funds have been used inappropriately. Instead, we are pointing out that the program had little legislative direction prior to codification and that current statutory language allows for a wide variety of uses.

Use of Funds

In addition to not specifying who can benefit from the CUGMEC grant, the Legislature has not indicated how grantee institutions can or should spend grant funds. Statutes instruct grantees to report on expenditures, including “the amounts used to recruit, retain, and induct” teacher candidates who are people of color or American Indian.⁶ Beyond this, statutes—and appropriations laws before the CUGMEC grant program was codified—are silent on the types of activities institutions may fund with grant money.

In the absence of legislative direction, PELSB has prioritized CUGMEC funding for direct financial assistance to teacher candidates.

In Chapter 2, we noted that CUGMEC grants funded an array of supports in fiscal years 2016 through 2020. These supports included direct financial assistance to teacher candidates, salaries for instructors and administrators, food for teacher candidate gatherings, and analysis of teaching programs. In Chapter 3, we explained that PELSB received requests for more funding than the Legislature made available in Fiscal Year 2020, when the grant program became fully competitive. Therefore, PELSB could not fully fund all grant applications. With input from grant application reviewers, PELSB decided to award nearly 100 percent of Fiscal Year 2020 CUGMEC funding for direct financial assistance to teacher candidates. In Fiscal Year 2021, PELSB awarded over 90 percent of the funding for direct financial assistance to teacher candidates.

Representatives from grantee institutions had mixed opinions about how CUGMEC funds should be used. Some representatives expressed concern about prioritizing direct financial assistance to teacher candidates at the exclusion of other uses of funding.

⁵ This number may be higher, but the manner in which licensing data is maintained did not allow us to determine definitively how many candidates held standard licenses prior to receiving CUGMEC funds.

⁶ *Minnesota Statutes* 2020, 122A.635, subd. 4(a).

These representatives noted that teacher candidates of color and American Indian candidates need supports beyond financial assistance. One representative said that limiting funding for other types of needed support can decrease teacher candidates of color and American Indian candidates' persistence in their teacher preparation program. Representatives from two institutions that applied for funding but did not receive it in 2020 also expressed concerns about reviewers favoring applications that prioritized direct scholarships to teacher candidates.⁷

At the same time, a representative from another grantee institution indicated that they agreed with PELSB's decision to prioritize direct financial assistance to teacher candidates over other uses of funding. That representative said that some institutions would like to use CUGMEC funding to pay for various activities, such as hiring faculty to support candidates of color and American Indian candidates, but this representative did not think that grant funds should be used for those types of activities.

Professionals from several education organizations told us that CUGMEC funding should be used for direct financial assistance to teacher candidates. Professionals from some of these organizations indicated that direct assistance should be used not only for tuition scholarships but also for support during student teaching.

Some education professionals told us that funding should also be used for institutions' administrative expenses or other supports; others disagreed. One education professional indicated that funding should not be used for administrative expenses. Another indicated that funding should not be used for administrative expenses at private institutions—particularly to cover the salaries of administrators—but that it may make sense for it to be used to strengthen programs at public institutions that do not have other sources of funding. A third specified that funding *should* also be used for supports such as mentoring and cohort groups.

One education professional indicated that if funds cannot be used for administration or other supports, then the full burden of providing support to teacher candidates who are people of color or American Indian falls on institutions. This professional said that in such a situation, the Legislature could direct PELSB to use some CUGMEC funding to create a structure to support all Minnesota teacher preparation programs so they are better able to support teacher candidates of color and American Indian teacher candidates.

We surveyed Fiscal Year 2020 CUGMEC beneficiaries and asked them how important certain features were when selecting their teacher preparation program.⁸ As shown in Exhibit 4.1, the highest percentage of respondents indicated that financial assistance (88 percent), flexible class schedules (83 percent), and tuition costs (78 percent) were “extremely important.” We noted in Chapter 2 that the highest percentage of survey respondents also indicated that financial assistance with tuition was “extremely helpful” as they worked towards completing their teacher preparation programs. Three of the

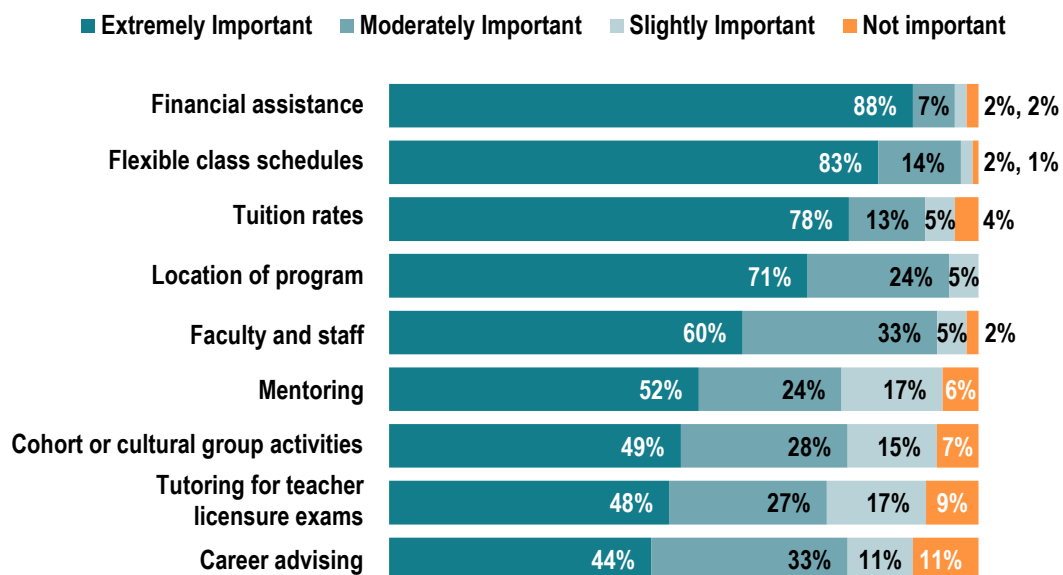
⁷ We sent questionnaires to six institutions that applied for the grant in Fiscal Year 2020 and/or Fiscal Year 2021 but did not receive the grant in Fiscal Year 2020. We received responses from five institutions—two that applied only in Fiscal Year 2021 and three that applied in both fiscal years 2020 and 2021.

⁸ We surveyed 268 CUGMEC beneficiaries who received tuition scholarships in Fiscal Year 2020, of whom 82 responded, for a response rate of 31 percent. The population of respondents generally resembled the overall population that we surveyed based on the institution they attended, race and ethnicity, graduation status, and age.

four beneficiaries we spoke with told us financial assistance played a large role in their decision to attend their chosen institution.

Exhibit 4.1: Financial assistance was extremely important to most survey respondents when selecting their teacher preparation programs.

We asked beneficiaries: “How important to you was each of the following features when selecting your teacher preparation program?”



NOTES: We surveyed 268 Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) beneficiaries who received tuition scholarships in Fiscal Year 2020, of whom 82 responded, for a response rate of 31 percent. These percentages exclude non-responses. Some totals do not sum to 100 percent due to rounding. The number of survey respondents who answered each of the questions from top to bottom are as follows: 82, 81, 82, 82, 82, 82, 81, 82, and 81.

SOURCE: Office of the Legislative Auditor, survey of CUGMEC beneficiaries.

At the same time, numerous beneficiaries told us that certain aspects of their particular program—such as faculty, curriculum, and a cohort of teacher candidates of color—were most important to them when selecting a teacher preparation program. The variety of responses we received emphasize that, while statutes may refer to “teacher candidates of color or who are American Indian” as a group, the individuals within that group have a wide range of experiences and need for support.

Requirements for Awarding Grants

As discussed in Chapter 3, statutes include specific criteria PELSB must consider when awarding CUGMEC grants. Statutes also lay out several competing priorities and other requirements for awarding grants.

Statutes do not indicate how to prioritize the requirements for awarding CUGMEC grants, and it may be difficult to award grants according to all requirements.

For example, statutes direct PELSB to award grants based on both (1) “the number of teacher candidates being supported in the program who are of color or who are American Indian” and (2) the teacher preparation program’s graduation or completion rates.⁹ Statutes do not state how to prioritize those criteria. Therefore, it is unclear, for instance, how PELSB is expected to compare a program that serves a large number of teacher candidates who are people of color or American Indian, but has a low graduation rate, to a program with a high graduation rate but a relatively small number of teacher candidates of color and American Indian candidates.¹⁰

As noted in Chapter 3, PELSB sought feedback from stakeholders for both fiscal years 2020 and 2021 when developing the CUGMEC grant application process and materials. Based on this input, PELSB prioritized certain criteria over others by assigning them higher point values in the scoring rubric.

In addition to selecting grantees based on specified criteria, statutes include other requirements that PELSB must meet when awarding grants. There appears to be tension among some requirements, and it is unclear how or if PELSB can award funds based on all requirements in law. For example, there is tension between the requirements to prioritize awarding grants to previous grantee institutions *and* to award grants to institutions located in various economic development regions throughout the state. Most institutions that have previously received a CUGMEC grant are located in the Twin Cities metropolitan area. To better meet the requirement to award grants to institutions located in various economic development regions, PELSB would need to award grants to new institutions.

It is unclear how PELSB might appropriately balance both of these statutory requirements in a situation where (1) the amount of funding appropriated to CUGMEC remains the same, (2) previous CUGMEC grantees continue to demonstrate success, and (3) PELSB receives competitive applications from institutions located in different economic development regions. A PELSB official indicated that it may be challenging to meet requirements in such a situation.

One possible approach is to make smaller awards to more institutions. In Fiscal Year 2020, PELSB awarded a total of \$1,066,030 in grant funding to six teacher preparation programs, for an average award amount of \$177,672. In Fiscal Year 2021, PELSB awarded \$970,000 to eight teacher preparation programs, for an average award amount of \$121,250.¹¹ While the total amount of funding PELSB awarded decreased by only 9 percent from one year to the next, the average award amount decreased by 32 percent.

⁹ *Minnesota Statutes* 2020, 122A.635, subds. 2(a)(1) and (2).

¹⁰ In Chapter 3, we provided more information on each of the different requirements for awarding CUGMEC grants as part of Exhibit 3.5.

¹¹ It is important to note that this decrease in average funding awarded is a function of both the Legislature appropriating less funding to the program overall *and* the increase in the number of institutions that received the grant.

If funding were to remain the same and PELSB were to award grants to additional institutions, the average award amount would decrease further. This could impact the type and amount of support each grantee institution provides to teacher candidates of color and American Indian teacher candidates at their institutions. For example, some teacher candidates attending institutions that previously received grants may receive less direct financial assistance than in previous years. A representative from one grantee institution told us that it makes a difference if you divide \$1 million by four institutions or if you divide it by eight institutions.

As another example, there is tension between the requirements to base award amounts on (1) the number of candidates supported by an applicant program and (2) sustaining support for those candidates. It is unclear how PELSB should prioritize funding in a situation, for instance, in which one applicant plans to use funding to support 10 teacher candidates, who had received support the previous year, for two years; and another applicant that plans to support 20 new candidates for one year.

PELSB could prioritize sustaining support for teacher candidates by awarding funds to the first applicant, in which case the grant would support fewer teacher candidates. Alternatively, PELSB could prioritize awarding grants based on the total number of teacher candidates supported by the applicants, which would mean awarding funding to the second applicant at the expense of sustaining support for candidates at the first institution. A third option could be to award some funding to both applicants. In this case, some teacher candidates who were previously supported may not receive support or may not receive the same level of support *and* the total number of teacher candidates receiving support may be smaller.

The way in which PELSB prioritizes selection criteria may influence how institutions create their budget proposals, and in turn, the extent to which they can provide sustained financial assistance to teacher candidates. Because of this, it is important that criteria are prioritized in a way that best supports the purpose of the program.

RECOMMENDATIONS

The Legislature should:

- **Clearly define the focus of the CUGMEC grant program.**
 - **Outline how grant funding may be used and establish corresponding outcome measures.**
 - **Review requirements for awarding grant funds.**
-

First, the Legislature should more clearly define the focus of the CUGMEC grant program. As part of these efforts, it should clarify whether the purpose of the program is to increase only the number of *teacher candidates* who are people of color or American Indian, or if it is also to increase the number of *teachers* who are people of color and American Indian. This is important because a focus on increasing the number of teacher candidates may indicate that the Legislature prefers that CUGMEC focus on recruiting and retaining teacher candidates in teacher preparation programs. A focus on increasing

the number of teachers may indicate that the Legislature intends to fund supports all along the pathway to becoming—and remaining—a teacher.

After better defining the CUGMEC program's focus, the Legislature should determine how CUGMEC grant funding should be used to best achieve the program's goals. Specifically, the Legislature should decide whether funding should be used to (1) provide direct financial assistance to teacher candidates, (2) support administrative and supportive activities provided by institutions, or (3) both.

The Legislature may determine that CUGMEC funding should be used *only* for direct financial assistance for teacher candidates. If so, the Legislature should determine whether it continues to make sense to award funds to institutions to distribute to teacher candidates, or whether the state should provide funding directly to teacher candidates. Providing assistance directly to teacher candidates could allow them to use it at the institution of their choice and could potentially provide them with more stability. It could also, however, mean that the state could not direct funding towards institutions that have demonstrated success in supporting teacher candidates of color and American Indian candidates.

If the Legislature decides to use CUGMEC only to provide financial assistance directly to teacher candidates without using institutions as intermediaries, it may wish to consider whether PELSB is the best administrator for the program. The Office of Higher Education administers several programs that provide financial assistance directly to individual students.

Alternatively, the Legislature may determine that CUGMEC funds should be used *exclusively* for grantee institutions' administrative and supportive activities. Doing so could help build and/or sustain teacher preparation program providers' capacity to effectively support aspiring teachers of color and American Indian teachers. At the same time, without offering funding for direct financial assistance, it may be more difficult for institutions to recruit and retain teacher candidates.

Last, the Legislature may determine that CUGMEC should both support institutional capacity and provide direct financial assistance to teacher candidates—as CUGMEC has done in the past. In doing so, the Legislature may want to consider allocating funding separately to the two types of activities in order to more clearly direct how funding is to be used.

In making these decisions, the Legislature should keep in mind that each approach may have unintended consequences. For example, providing funding exclusively as direct financial assistance to teacher candidates may decrease some teacher preparation programs' capacity to effectively serve teacher candidates of color and American Indian candidates. This is because institutions may not otherwise have funding for non-financial supports, such as mentoring or tutoring. On the other hand, providing funding exclusively for administrative and other supports could decrease the amount of financial assistance available to teacher candidates, unless that type of funding is made available through another state program. This could have a negative impact on enrollment and persistence in teacher preparation programs. Continuing to provide funding for both types of activities, however, may mean that the funding is

spread across many activities at many institutions. As we noted in Chapter 2, this makes it difficult to determine the program's impact.

The Legislature should also update program outcome measures to match the program focus and funding priorities that the Legislature determines. For example, if the Legislature decides to focus on providing financial assistance directly to teacher candidates, it may direct the CUGMEC program administrator to report on the race and ethnicity of all teacher candidates throughout the state to determine the program's impact on teacher candidate diversity statewide. In updating outcome measures, it would be helpful for the Legislature to set incremental goals to determine whether the funding is having its intended impact.

After clarifying CUGMEC's focus and determining how funding should be used, the Legislature should review the program's award requirements and determine if it needs to adjust the requirements to reflect these decisions. If the Legislature chooses to retain the current requirements, it should provide PELSB with direction on how to prioritize these requirements. As we noted previously, there is tension among the requirements currently in statute. For example, there is tension between the requirements to award grants to previous grantee institutions *and* to award grants to institutions located in various economic development regions. If the Legislature intends for certain requirements to take precedence over others, it should make that clear. In the absence of this type of direction, PELSB must determine how to prioritize the requirements.

We explained in Chapter 2 that it is too early to know how recent changes to CUGMEC—such as making the grants competitive—will affect beneficiary outcomes. We also discussed some possible challenges related to those changes. For example, we noted that less predictable funding may affect institutions' and teacher candidates' ability to plan for the future. The Legislature should take this into account as it contemplates changes to the CUGMEC program. It should also keep this in mind when determining how to implement changes to the program. Any abrupt changes to the program could impact current beneficiaries' ability to complete their teacher preparation program.

Diversifying Minnesota's Teacher Workforce

As we noted previously, statutes require PELSB to award CUGMEC grants “to increase the number of teacher candidates of color or who are American Indian...”¹² While this statutory language focuses on *teacher candidates*, we explained earlier in this chapter that statutes also imply that the program has a broader goal of increasing the number of *teachers* of color and American Indian teachers in Minnesota. However, as we explained in Chapter 2, the percentage of teachers who are people of color or American Indian has not increased markedly in recent years. In the 2015-2016 through 2018-2019 school years, teachers of color and American Indian teachers represented only about 5 percent of Minnesota's teacher workforce.¹³

¹² *Minnesota Statutes* 2020, 122A.635, subd. 1.

¹³ We saw a small increase of about one-half of one percentage point from the 2015-2016 school year to the 2018-2019 school year. But, due to several issues we identified with the data, it is unclear whether those changes were due to an actual change in the racial and ethnic composition of the teacher workforce or to data reporting and retention practices.

It will take a significant increase in the number of newly hired teachers of color and American Indian teachers in Minnesota to see a change in the composition of the teacher workforce in public schools.

Minnesota had an average public school teacher workforce of about 69,900 in each of the last five school years.¹⁴ To increase the proportion of teachers of color and American Indian teachers from approximately 5 percent to about 10 percent—still well below the percentage of the entire student population that students of color and American Indian students represent—Minnesota would need to retain all of the teachers of color and American Indian teachers currently on staff and increase the number of new hires by more than 3,000 individuals.¹⁵ As we noted in Chapter 2, in recent years the number of newly licensed teachers of color and American Indian teachers who were Minnesota graduates was typically less than 300 each year, only a fraction of whom recently benefitted directly from CUGMEC funding.

Several representatives from grantee institutions and education professionals indicated that the state would need to increase the resources devoted to increasing teachers of color and American Indian teachers in order to make an impact on the racial and ethnic diversity of Minnesota's teacher workforce. While the state could use CUGMEC grants as part of a broader strategy to diversify the teacher workforce, CUGMEC is not the only program in Minnesota that could have an impact on the number of teachers of color and American Indian teachers in the state.

Minnesota has several programs that could be used to diversify the teaching workforce.

A number of state programs focus on similar outcomes and fund similar activities as CUGMEC. We describe the key programs in Appendix C.

Similar to CUGMEC, some programs *require* funding to be used in ways that could help diversify Minnesota's teacher workforce. For example, the Minnesota Indian Teacher Training Program Grant focuses on increasing and retaining American Indian teachers.

Other programs are not defined in a way that *requires* funding to be used for activities that could help diversify Minnesota's teacher workforce, but statutes or appropriations laws *allow* program funding to be used for this purpose. As an example, the Grow Your Own grant program provides funding for teacher candidates seeking licensure.

¹⁴ This includes all individuals employed by and assigned to a school district or charter school in a licensed teaching position as the teacher of record at certain points during the school year, regardless of the type of teaching license held. It includes both instructional and non-instructional (school counselor, school nurse, etc.) licensed roles. It excludes administrative positions (principal, special education director, etc.).

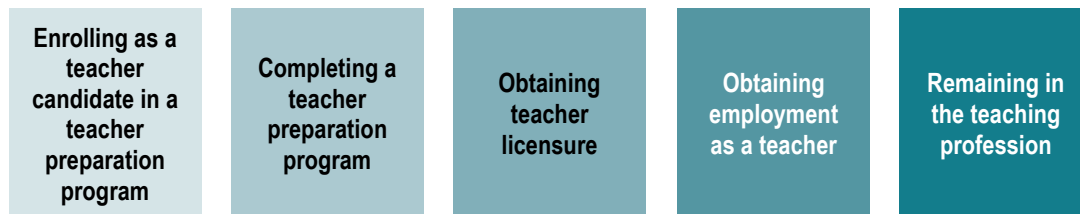
¹⁵ We chose to calculate the number of teachers of color and American Indian teachers Minnesota public schools would need to hire for teachers who are people of color or American Indian to comprise 10 percent of the teacher workforce for illustrative purposes. In Chapter 1, we noted that 34 percent of students were people of color or American Indian in the 2018-2019 school year. Increasing the percentage of teachers who are people of color or American Indian to 10 percent of the total teacher workforce would also be well below the proportion of people of color and American Indians in Minnesota's adult population aged 20 to 64, which we stated in Chapter 1 was about 20 percent in 2019.

While it strongly encourages that these candidates be candidates of color or American Indian, this is not a requirement. This means that the amount of funding this program devotes to increasing the number of teacher candidates who are people of color or American Indian could range from \$0 to the total amount appropriated to the program (\$1.5 million in Fiscal Year 2020).

Some programs fund similar activities—including tuition scholarships and mentoring for teacher candidates—as those the CUGMEC grant program has funded. For example, the Minnesota Indian Teacher Training Program provides grant funding to higher education institutions and school districts to assist American Indians in becoming teachers and to provide additional education for American Indian teachers.¹⁶ Grantees of this program may use funds to provide services and direct financial assistance to teacher candidates. Among other things, the state’s Grow Your Own grant program provides grants to eligible school districts to fund tuition scholarships or stipends for school district employees or community members affiliated with a school district to participate in a nonconventional teacher preparation program. Other programs provide loan forgiveness to teachers and funding for school districts to develop teacher recruitment initiatives and mentorship programs.

Another thing some programs have in common with CUGMEC is the portion of the teacher career pathway on which they are focused. For example, the Grow Your Own program focuses on the first steps of the teacher pathway example below: recruiting teacher candidates and supporting them in completing teacher preparation programs.¹⁷

Example of a Teacher Career Pathway



Statutory language suggests the CUGMEC grant program is also meant to focus on the first steps of the teacher pathway, and funding has recently been focused on tuition scholarships for teacher candidates. However, as we stated in Chapter 2, CUGMEC grants previously funded activities along the entire pathway, including mentoring teachers in their first years of teaching.

Other programs focus on steps further along the pathway towards becoming a teacher. For example, both the Teacher Mentorship and Retention of Effective Teachers program and the Teacher Shortage Loan Repayment program provide incentives for teachers to remain in the field. The Teacher Mentorship and Retention of Effective

¹⁶ *Minnesota Statutes* 2020, 122A.63, subd. 1, indicates that the Minnesota Department of Education may award joint grants to higher education institutions and school districts named in law; the department may award joint grants to other higher education institutions and school districts if funds are available.

¹⁷ As discussed in Chapter 2, these milestones do not necessarily follow the same order for all individuals. For example, an individual might obtain a limited teaching license and work as a teacher while enrolled in a teacher preparation program. Some Minnesota teaching licenses do not require completion of a teacher preparation program.

Teachers program provides funding to school districts and other specified groups to develop and expand mentoring, induction, and retention programs for teachers of color and American Indian teachers, among other things. The Teacher Shortage Loan Repayment program provides up to \$1,000 per year in loan forgiveness for teachers who meet certain requirements.

RECOMMENDATION

As the Legislature makes decisions related to CUGMEC, it should determine how CUGMEC fits into Minnesota's efforts to increase the number of teachers of color and American Indian teachers in Minnesota.

We previously noted that the percentage of all teachers who are people of color or American Indian has not increased markedly in recent years. If CUGMEC is part of a larger effort to change this, it appears this effort has thus far been largely unsuccessful. CUGMEC may have helped prevent the portion of teachers who are people of color or American Indian from decreasing, but that portion has not increased in a significant way.

If increasing the portion of teachers who are teachers of color or American Indian is a legislative priority, the Legislature should work with stakeholders to identify statewide goals and determine how CUGMEC fits into those goals. Given that there are other programs that may help the state increase the number of teachers of color and American Indian teachers in its workforce, the Legislature should determine how CUGMEC is similar to and different from these other programs. It should also consider how CUGMEC adds unique value in Minnesota. This will allow the Legislature to identify how the programs can work together as a system to increase the number of teachers of color and American Indian teachers in Minnesota. Additionally, as the Legislature defines and makes changes to the CUGMEC program, it should consider the broader context in which the program operates and design policy changes that complement other efforts to diversify the state's teacher workforce. It will be important for the Legislature to take these issues into consideration as it contemplates any changes to the CUGMEC grant program.

State agencies—including PELSB, the Minnesota Department of Education, and the Office of Higher Education—have made efforts to identify how they can work together to diversify Minnesota's teacher workforce. In addition, a number of educators, education professionals, and others have formed a coalition that has offered recommendations for increasing the number of teachers of color and American Indian teachers.¹⁸ The Legislature could work with these stakeholders to develop a strategy to achieve the state's goals.

¹⁸ This coalition is the Coalition to Increase Teachers of Color and American Indian Teachers in Minnesota.



List of Recommendations

- The Professional Educator Licensing and Standards Board (PELSB) should standardize and improve the processes and systems used to collect data on teacher candidates and licensed teachers' race and ethnicity. (p. 35)
- PELSB should specify in its grant application instructions how applicants should report data. (p. 49)
- PELSB should provide clear instructions on how to calculate scores related to all criteria in the application scoring rubric. (p. 53)
- PELSB should ensure that the CUGMEC grant application and scoring rubric incorporate all information needed to meet requirements for awarding grants. (p. 56)
- PELSB should document the resolution of all conflicts of interest. (p. 57)
- The Legislature and PELSB should clarify reporting requirements for the CUGMEC program to allow for reporting on the program as a whole. (p. 60)
- The Legislature should:
 - Clearly define the focus of the CUGMEC grant program.
 - Outline how grant funding may be used and establish corresponding outcome measures.
 - Review requirements for awarding grant funds. (p. 66)
- As the Legislature makes decisions related to CUGMEC, it should determine how CUGMEC fits into Minnesota's efforts to increase the number of teachers of color and American Indian teachers in Minnesota. (p. 71)



Appendix A: Higher Education Institutions with Approved Teacher Preparation Programs

Statutes currently limit eligibility for the Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grant program to “public or private higher education institutions that offer a teacher preparation program approved by the Professional Educator Licensing and Standards Board.”¹ At the time that this report was released, there were 31 institutions that offered licensure programs approved by the Professional Educator Licensing and Standards Board.² Exhibit A.1 lists each of these institutions and includes the economic development regions in which their teacher preparation programs are offered.

Exhibit A.1: Thirty-one higher education institutions in Minnesota have PELSB-approved teacher preparation programs.

Institutions with Approved Teacher Preparation Program	Economic Development Regions Where Institution's Teacher Preparation Program is Located
Adler Graduate School ^a	EDR 11
Augsburg University	EDR 10 and EDR 11
Bemidji State University	EDR 2
Bethany Lutheran College	EDR 9
Bethel University	EDR 11
Capella University ^b	Not Applicable
College of Saint Benedict and Saint John's University	EDR 7
College of St. Scholastica	EDR 3 and EDR 11
Concordia College, Moorhead	EDR 4
Concordia University, St. Paul	EDR 11
Crown College	EDR 11
Gustavus Adolphus College	EDR 9
Hamline University	EDR 11
Martin Luther College	EDR 9
Metropolitan State University	EDR 11
Minnesota State University, Mankato	EDR 9 and EDR 11

(Continued on next page.)

¹ *Minnesota Statutes* 2020, 122A.635, subd. 1.

² Other factors may also affect institutions' eligibility for CUGMEC grants.

Exhibit A.1: Thirty-one higher education institutions in Minnesota have PELSB-approved teacher preparation programs (continued).

Institutions with Approved Teacher Preparation Program	Economic Development Regions Where Institution's Teacher Preparation Program is Located
Minnesota State University, Moorhead	EDR 4
North Central University	EDR 11
Southwest Minnesota State University	EDR 8
St. Catherine University	EDR 11
St. Cloud State University	EDR 7W
Saint Mary's University	EDR 10 and EDR 11
St. Olaf College	EDR 10
University of Minnesota, Crookston	EDR 1
University of Minnesota, Duluth	EDR 3
University of Minnesota, Morris	EDR 4
University of Minnesota, Twin Cities	EDR 11
University of Northwestern	EDR 11
University of St. Thomas	EDR 11
Walden University	Not Applicable
Winona State University	EDR 10

NOTES: Statutes direct the Professional Educator Licensing and Standards Board (PELSB) to award Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grants to increase the number of teacher candidates who are people of color or American Indian and meet the requirements of a Tier 3 license. Eligibility is limited to public or private higher education institutions with PELSB-approved teacher preparation programs. *Minnesota Statutes* 2020, 122A.635, subd. 1. Some institutions offer online-only programs, which are not reflected in the "Economic Development Regions Where Institution's Teacher Preparation Program is Located" column.

^a This institution provides one program approved by PELSB for licensure—a school counseling program.

^b This institution provides only programs for additional licensure, not initial licensure.

SOURCE: Office of the Legislative Auditor.

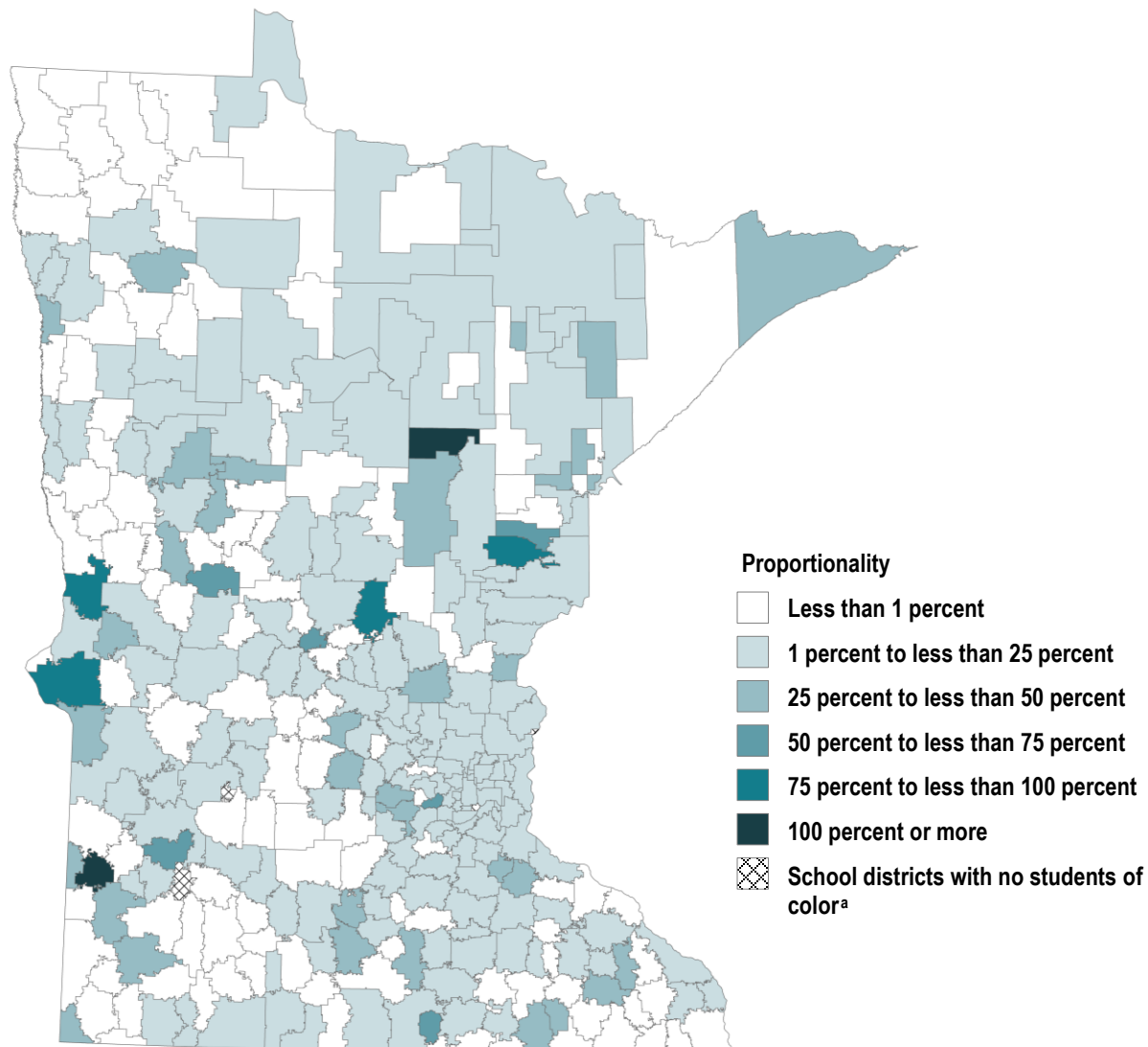
Appendix B: Teacher Diversity Across Minnesota School Districts

As we noted in Chapter 1, Minnesota’s teacher workforce does not reflect the racial and ethnic diversity of its students. Additionally, when we compared the percentage of teachers and the percentage of students in Minnesota’s public schools who were people of color or American Indian in the 2018-2019 school year, we found that the imbalance existed throughout the state.

Exhibit B.1 displays, by public school district, a ratio of (1) the percentage of teachers who were people of color or American Indian to (2) the percentage of students who were people of color or American Indian during the 2018-2019 school year.¹ For example, if 10 percent of teachers and 10 percent of students in one district were people of color or American Indian, the proportion of teachers who were people of color or American Indian for that district would match the proportion of students who were students of color or American Indian. This district would be in the category “100 percent or more” in Exhibit B.1. If 10 percent of another district’s teachers were people of color or American Indian, but 20 percent of its students were people of color or American Indian, the district would have only 50 percent of the teachers it would need on staff to match the proportion of students who were students of color or American Indian.

¹ The exhibit displays independent school districts, common school districts (Franconia and Prinsburg), and special school districts (Minneapolis and South St. Paul). For brevity, we refer to these districts as “public school districts” or “districts” in this appendix.

Exhibit B.1: Most Minnesota public school districts had less than half of the teachers of color or American Indian teachers that would be needed to match the proportion of students who were students of color or American Indian during the 2018-2019 school year.



NOTES: The map displays independent school districts, common school districts, and special school districts. Our analysis focused on K-12 students and teachers. "Proportionality" represents the ratio of (1) the percentage of teachers who were people of color or American Indian to (2) the percentage of students who were people of color or American Indian in a given school district. A value of 100 percent indicates that the percentage of teachers who were people of color or American Indian was the same as the percentage of students who were people of color or American Indian. A value below 100 percent indicates that teachers of color and American Indian teachers were underrepresented relative to students of color and American Indian students. A value above 100 percent indicates that teachers of color and American Indian teachers were overrepresented relative to the students of color and American Indian students.

^a Two school districts, Franconia and Prinsburg, do not directly serve students. One school district, Milroy, reported enrolling no students of color and employing no teachers of color in the 2018-2019 school year.

SOURCE: Office of the Legislative Auditor, analysis of Minnesota Department of Education and Professional Educator Licensing and Standards Board data.

Appendix C: Key Minnesota Programs

As stated in Chapter 1, the Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grant program is intended to increase the number of teacher candidates of color and American Indian teacher candidates who meet certain teacher licensing requirements.¹ The program, administered by the Professional Educator Licensing and Standards Board (PELSB), aims to diversify Minnesota's teacher workforce by providing targeted funding for teacher preparation programs.

However, CUGMEC is not the only program in Minnesota that could have an impact on the numbers of teachers of color and American Indian teachers. Minnesota has several programs that could be used to diversify the teacher workforce. We provide information on these programs in this appendix. Some of the programs focus specifically on increasing the numbers of teachers of color and American Indian teachers; others have a broader focus.

¹ *Minnesota Statutes* 2020, 122A.635, subd. 1. The CUGMEC program was formerly named the Collaborative Urban Educator grant program. We refer to the program generally as CUGMEC throughout the report, even when referring to years when it was known under its previous name.

Exhibit C.1: Several Minnesota programs could be used to increase the number of teachers of color and American Indian teachers.

Program ^a	Description	Eligible Recipients	Program Administrator	Fiscal Year 2020 Appropriation
Achievement and Integration	Eligible school districts develop plans and receive funding to pursue racial and economic integration and increase student academic achievement, create equitable educational opportunities, and reduce academic disparities based on students' racial, ethnic, and economic backgrounds. Eligible school districts may use the revenue for recruitment, retention, and hiring incentives or additional compensation to increase the racial and ethnic diversity of district teachers and administrators.	School districts that have a more diverse student population than nearby districts; or school districts that meet other criteria	MDE	\$81,517,000
Collaborative Urban and Greater Minnesota Educators of Color	Higher education institutions with PELSB-approved teacher preparation programs may apply for grants to increase the number of teacher candidates of color or American Indian teacher candidates. Institutions may use grant funds for a variety of activities, including direct financial assistance to teacher candidates.	Public or private higher education institutions with PELSB-approved teacher preparation programs	PELSB	\$1,099,000
Grow Your Own	Eligible school districts may apply for grants to fund tuition scholarships or stipends for employees or affiliated community members who seek an education license to participate in a nonconventional teacher preparation program. Districts are strongly encouraged to recruit candidates of color and American Indian candidates to participate in their programs. Districts and charter schools may also apply for grants to develop programs that encourage secondary school students to pursue teaching.	School districts with more than 30 percent students of color or American Indian students; or charter schools	MDE	\$1,500,000
Introduction to Teaching Concurrent Enrollment Grant	Eligible schools and districts may apply for grant funds to develop introduction to teaching dual-credit postsecondary course options that encourage secondary school students, especially American Indian students and students of color, to pursue teaching.	School districts and charter schools that partner with an accredited higher education institution	MDE	\$375,000
Minnesota Indian Teacher Training Program Grant	Legislatively named higher education institutions and school districts may receive joint grants to assist American Indians to become teachers and to provide additional education for American Indian teachers. ^b Grantees may use funds to provide services and direct financial assistance to teacher candidates.	Public or private higher education institutions and school districts	MDE	\$460,000
Q Comp / Alternative Teacher Professional Pay System	Among other things, approved programs may include: (1) hiring bonuses for teachers working in high-need or hard-to-fill positions or hard-to-staff schools, or (2) funds for a Grow Your Own program.	School districts, school sites, and charter schools	MDE	\$89,152,000

(Continued on next page.)

Exhibit C.1: Several Minnesota programs could be used to increase teachers of color and American Indian teachers (continued).

Program ^a	Description	Eligible Recipients	Program Administrator	Fiscal Year 2020 Appropriation
Teacher Candidate Grant	Eligible individuals may apply for grants for student teaching stipends. Teacher candidates may receive up to \$7,500 based on the amount of available funding, the number of eligible applicants, and the financial need of the applicants.	Low-income teacher candidates enrolled in approved teacher preparation programs who (1) intend to teach in a shortage area after graduating and receiving their teaching license or (2) belong to an underrepresented racial or ethnic group	OHE	\$1,250,000 ^c
Teacher Mentorship and Retention of Effective Teachers	Applicants may apply for grants to develop and expand mentoring, induction, and retention programs for teachers of color and American Indian teachers, among other things.	School districts; groups of school districts; coalitions of districts, teachers, and teacher preparation programs; or coalitions of schools, teachers, or non-licensed educators	PELSB	\$750,000
Teacher Shortage Loan Repayment	Eligible teachers may apply for loan forgiveness of up to \$1,000 per year (with a maximum of five annual awards per individual). Among other things, teacher shortage areas include economic development regions within the state where there is a shortage of teachers who reflect the racial or ethnic diversity of students in the region.	Teachers who are licensed, employed, and teaching in a designated teacher shortage area	OHE	\$200,000

NOTES: "MDE" is the Minnesota Department of Education. "PELSB" is the Professional Educator Licensing and Standards Board. "OHE" is the Office of Higher Education.

^a The names of some programs in this exhibit differ between statutes and appropriations laws. For example, *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 2, sec. 33, subd. 2, refers to the Achievement and Integration program as "achievement and integration aid." *Minnesota Statutes* 2020, 124D.861, refers to the program as "Achievement and Integration for Minnesota." We used names identified in Minnesota Department of Education, *Diversifying the Teacher Workforce: Inventory of Funded Programs* (Roseville, MN, 2019).

^b *Minnesota Statutes* 2020, 122A.63, subd. 1(b), states that MDE may award joint grants to higher education institutions and school districts not named in law if funds are available.

^c Of the appropriation for Fiscal Year 2020, \$750,000 was for teacher candidates belonging to an underrepresented racial or ethnic group who met other eligibility requirements.

SOURCES: *Minnesota Statutes* 2020, 122A.414; 122A.63; 122A.635; 122A.70; 124D.09; 124D.861; 136A.1275; and 136A.1791. *Laws of Minnesota* 2019, chapter 64, art. 1, sec. 2, subds. 28 and 29; *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 2, sec. 33, subd. 2; *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 22, subds. 2 and 3; *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 23, subds. 2, 3, and 5; *Laws of Minnesota* 2019, First Special Session, chapter 11, art. 3, sec. 23, subd. 6, as amended by *Laws of Minnesota* 2020, chapter 83, art. 1, sec. 101; and *Minnesota Rules*, 3535.0160 and 3535.0170, <https://www.revisor.mn.gov/rules/3535/>, accessed November 9, 2020.



February 24, 2021

Judy Randall, Deputy Legislative Auditor
Office of the Legislative Auditor
Centennial Office Building
658 Cedar Street
St. Paul, Minnesota 55155

Dear Deputy Legislative Auditor Randall:

The staff and board members of the Professional Educator Licensing and Standards Board (PELSB) want to thank the Office of the Legislative Auditor (OLA) staff and leadership for this thorough, expansive, and thoughtful report on the Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) grant program.

The Board's mission is to ensure that Minnesota's students have access to high-quality educators in their schools. This includes ensuring that Minnesota's teacher workforce is representative of Minnesota's student population. The CUGMEC grant program is one effort to ensure state funds are dedicated to the effort of increasing the number of teachers of color and Indigenous teachers in Minnesota.

The CUGMEC grant program has been funded for more than two decades without a thorough review. Significant changes were recently made in the grant structure, requirements, and administration. The detailed recommendations provided in this report provide essential feedback for the future success and impact of these grant funds.

PELSB fully supports the findings and recommendations of this report. Below are responses to specific recommendations highlighted in the report.

Standardize and improve the processes and systems used to collect data: Since the creation of PELSB in 2018, staff and Board members have worked to build data systems that accurately provide policymakers and the public data on licensed educators. The findings in this report help highlight the ongoing limitations of PELSB's current data systems and the need for additional funds and staff to ensure this data becomes standardized and easily available.

Grant administration: The last biennium was the first time PELSB had administered a grant. After working with the Department of Education, the Office of Higher Education, and the Department of Administration grants management division, PELSB gained insight and expertise on grant administration. PELSB is grateful

for the work of this report to highlight four remaining areas where PELSB can improve and clarify the grant application and review process.

Legislative intent: While PELSB worked closely with multiple stakeholders to ensure the focus of grant funds aligned to the intent of the grant program's authorizing statute, ongoing confusion over the legislative intent of the grant program remain. PELSB looks forward to partnering with legislators and stakeholders to address the three recommendations in this report and to strengthen and clarify the language in statute to ensure the grant program most effectively meets the goal of increasing teachers of color and American Indian teachers in Minnesota.

While this report provides clear and tangible recommendations for improvements to the administration and focus of CUGMEC, it also provides an essential analysis into the program's impact. The in-depth research of the OLA team provides critical data through national research, local analysis, and personal interviews, as well as pointing out critical gaps in data. We believe this section of the report will be a key foundation in helping policymakers guide grant dollars in the future.

PELSB firmly believes that increasing the number of teachers of color and Indigenous teachers is essential to a quality and equitable education for all students in Minnesota. We look forward to continuing to work with the Legislature and stakeholders to ensure this grant program effectively addresses this critical need in the state.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Liuzzi".

Alex Liuzzi, Executive Director

A handwritten signature in black ink, appearing to read "Brian Rappe".

Brian Rappe, Chair

Forthcoming OLA Evaluations

Board of Cosmetology Licensing
Child Protection Removals and Reunifications
Driver Examination Stations
MnDOT Workforce and Contracting Goals

Recent OLA Evaluations

Agriculture

Pesticide Regulation, March 2020
Agricultural Utilization Research Institute (AURI),
May 2016
Agricultural Commodity Councils, March 2014

Criminal Justice and Public Safety

Safety in State Correctional Facilities, February 2020
Guardian ad Litem Program, March 2018
Mental Health Services in County Jails, March 2016
Health Services in State Correctional Facilities,
February 2014
Law Enforcement's Use of State Databases,
February 2013

Economic Development

Minnesota Investment Fund, February 2018
Minnesota Research Tax Credit, February 2017
Iron Range Resources and Rehabilitation Board (IRRRB),
March 2016

Education, K-12 and Preschool

*Collaborative Urban and Greater Minnesota Educators
of Color (CUGMEC) Grant Program*, March 2021
Compensatory Education Revenue, March 2020
Debt Service Equalization for School Facilities,
March 2019
Early Childhood Programs, April 2018
Minnesota State High School League, April 2017
Standardized Student Testing, March 2017
Perpich Center for Arts Education, January 2017
Minnesota Teacher Licensure, March 2016

Education, Postsecondary

*Collaborative Urban and Greater Minnesota Educators
of Color (CUGMEC) Grant Program*, March 2021
*Preventive Maintenance for University of Minnesota
Buildings*, June 2012
MnSCU System Office, February 2010
MnSCU Occupational Programs, March 2009

Energy

*Public Utilities Commission's Public Participation
Processes*, July 2020
Renewable Energy Development Fund, October 2010
Biofuel Policies and Programs, April 2009

Environment and Natural Resources

*Public Facilities Authority: Wastewater Infrastructure
Programs*, January 2019
Clean Water Fund Outcomes, March 2017
*Department of Natural Resources: Deer Population
Management*, May 2016
Recycling and Waste Reduction, February 2015

Government Operations

*Office of Minnesota Information Technology Services
(MNIT)*, February 2019
Mineral Taxation, April 2015
*Councils on Asian-Pacific Minnesotans, Black
Minnesotans, Chicano/Latino People, and Indian
Affairs*, March 2014
Helping Communities Recover from Natural Disasters,
March 2012

Health

Office of Health Facility Complaints, March 2018
*Minnesota Department of Health Oversight of HMO
Complaint Resolution*, February 2016
*Minnesota Board of Nursing: Complaint Resolution
Process*, March 2015
Minnesota Health Insurance Exchange (MNsure),
February 2015

Human Services

DHS Oversight of Personal Care Assistance, March 2020
*Home- and Community-Based Services: Financial
Oversight*, February 2017
Managed Care Organizations' Administrative Expenses,
March 2015
Medical Assistance Payment Rates for Dental Services,
March 2013
State-Operated Human Services, February 2013
Child Protection Screening, February 2012
Civil Commitment of Sex Offenders, March 2011

Housing and Local Government

Economic Development and Housing Challenge Program,
February 2019
Consolidation of Local Governments, April 2012

Jobs, Training, and Labor

State Protections for Meatpacking Workers, 2015
State Employee Union Fair Share Fee Calculations,
July 2013
Workforce Programs, February 2010

Miscellaneous

*Minnesota Department of Human Rights: Complaint
Resolution Process*, February 2020
Minnesota State Arts Board Grant Administration,
February 2019
*Board of Animal Health's Oversight of Deer and
Elk Farms*, April 2018
Voter Registration, March 2018
Minnesota Film and TV Board, April 2015

Transportation

MnDOT Measures of Financial Effectiveness,
March 2019
MnDOT Highway Project Selection, March 2016
*MnDOT Selection of Pavement Surface for Road
Preservation*, March 2014
MnDOT Noise Barriers, October 2013



OFFICE OF THE LEGISLATIVE AUDITOR
CENTENNIAL OFFICE BUILDING – SUITE 140
658 CEDAR STREET – SAINT PAUL, MN 55155