

December 30, 2014

Office of Information and Regulatory Affairs, OMB
Attention: Desk Officer for U.S. Department of Education

Re: Comments on Cost Estimates and Burdens for Proposed Teacher Education Regulations

Due to the significant increase and complexity in reporting requirements and the need to develop new processes to collect, maintain, and analyze data, the University of Northern Iowa projects a need to add the following positions to comply with the proposed Department of Education Teacher Education Regulations. This should allow us to take a leadership role with these new Regulations.

- **1 FTE Assessment Coordinator** to work with the teacher education program, the Center for Teaching Effectiveness, the office of financial aid (TEACH grant program compliance), and institutional research: $\$70,000 + 37.3\% \text{ benefits } (\$26,110) = \$96,110$
- **1 FTE Data Analyst**: $\$55,000 + 37.3\% \text{ benefits } (\$20,515) = \$75,515$
- **.5 FTE Administrative Assistant** support: $\$22,000 + \text{benefits } (39.3\%) = \$30,646$ (potential shared services with institutional research).
- **Supplies and Services**, Including software/technology: $\$20,000$
- **Total Annual Costs**: $\$222,271$

We are concerned about the following:

- Proposed evaluation criteria which have not been validated by research.
- Current state data systems are not sufficiently developed to provide the information sought.
- Tying the TEACH grant for students to the ranking of the institution.

We do not believe this is fair to students who otherwise are eligible to receive the grant.

Sincerely,



William N. Ruud, Ph.D.
President