



June 3, 2014

To: Office of Management and Budget

From: American Association of Colleges for Teacher Education

RE: Pending Rules on Teacher Preparation Program Rating System

- The American Association of Colleges for Teacher Education is comprised of 800 schools and colleges of education around the nation. Colleges of education prepare 90% of all new teachers in both traditional and alternative routes.
- AACTE is committed to high standards for educator preparation and ensuring that every new educator is profession-ready on day one. We support accountability for programs as well as continuous feedback and technical assistance for improvement.
- AACTE is eager to collaborate with all stakeholders in our collective effort to continually strengthen teacher preparation through scientific research and evidence-based standards of practice.
- We believe that programs that do not meet standards should be identified through appropriate federal, state, accreditation and institutional mechanisms. They should be supported in efforts to improve with specific timelines. If sufficient improvement does not occur, they should be closed.
- Educator preparation has undergone significant transformation in the last decade. That robust transformation continues and includes: development of performance assessments (such as edTPA) to determine individual candidate readiness to become a teacher; in-depth clinical preparation, including one year residency programs, to ensure that new teachers are ready for the classrooms of today; development of a new accrediting body (CAEP) with rigorous new professional standards; state pilots in multiple states led by the Council of Chief State School Officers and supported by the Department of Education's Office of Special Education Programs to strengthen program approval, state licensing and certification requirements and statewide data systems.

- Many of the proposals put forward in the negotiated rulemaking session on teacher preparation of 2012 did not reflect these changes and would turn the clock back on on-going reforms.
- New federal regulations should reflect current research, including the considerable research that articulates the limits of the use of value added measures in determining teacher effectiveness (for example American Statistical Association's Statement on Using Value-Added Models for Educational Assessment, April 8, 2014).
- In order to be effective, new federal regulations need to reflect the input of researchers and faculty who are on the front line delivering teacher preparation programs, as well as feedback from principals and school districts who hire their graduates.
- New federal regulations should be workable; they should not be cost-prohibitive or make requirements beyond the capacity of states or institutions.
- Regulations should seek to insure against unintended consequences, such as disproportionate impact on minority serving institutions, the diversity of the workforce, programs that serve high need students, such as students with disabilities.
- Linking access to student financial aid, such as the TEACH grants, represents a significant change in policy for student financial aid. A change such as this will need participation from the broadest set of policy makers, including the Congress.
- We urge that the new regulations acknowledge and support the lead accountability roles of the state in program approval, the profession through accreditation and the institutions through admissions requirements and ongoing candidate evaluation.

For further information or to set up additional conversations, please contact Deborah Koolbeck, Director of Government Relations at dkoolbeck@aacte.org or 202-478-4506.