[YOUR INSTITUTION’S LETTERHEAD]

[DATE]

Docket ID ED-2014-OPE-0057

The Honorable Arne Duncan

Secretary

U.S. Department of Education   
400 Maryland Ave, SW  
Washington, DC 20202

Dear Secretary Duncan and Department of Education Colleagues:

As a university teacher educator, I strongly urge you to withdraw the proposed 2015 teacher preparation regulations. The proposed regulations do not reflect current research or up-to-date knowledge of teacher preparation, teacher and student assessment, or the purposes of education.

As elaborated in a comprehensive review of the proposed regulations, published by the National Education Policy Center ([http://nepc.colorado.edu/thinktank/review-proposed-teacher-preparation](http://www.google.com/url?q=http%3A%2F%2Fnepc.colorado.edu%2Fthinktank%2Freview-proposed-teacher-preparation&sa=D&sntz=1&usg=AFQjCNGYlkiwmhNfWKBV7IiIUsvbZYS7BQ)) and authored by Kevin Kumashiro, Dean of the School of Education of the University of San Francisco, there are five central flaws in the proposed regulations that should be addressed before their implementation:

1. The regulations erroneously place unfounded blame on individual teachers for the perceived failure of the educational system in the United States. This analysis ignores important and well-documented factors that influence student success, such as the impact of poverty, the levels of trauma experienced by youth in urban areas, and accessibility of social services such as health care.
2. The regulations include an over-reliance on value-added measures (VAMs), which purportedly identify a causal relationship between student achievement, as measured by high-stakes test scores, and teacher competency. This is a highly controversial form of measurement that several leading research organizations have declared invalid and unreliable. The proposed regulations extend this relationship further to link teacher preparation programs to student achievement; because teacher education programs will be judged by the scores of the students in their graduate’s classrooms, programs may be reluctant to place their graduates in the most difficult and highest poverty classrooms where standardized test scores are more likely to be low.
3. The proposed regulations are an unfunded mandate that places an unreasonable burden on educational institutions, especially public institutions that prepare the majority of the nation’s teachers who serve in high poverty districts. The cost of collecting data on the placement and retention of teachers is substantial, especially when the validity of these data are in question.
4. This program threatens funding sources, such as TEACH grants, for prospective teachers. Rather than providing this federal source of funding for teachers with financial need who are committed to teaching in high poverty areas, the legislation will reduce the number of institutions who have access to this grant. A consequence of this policy is likely to be that there is less incentive for new teachers of color to enter the teaching force.
5. The regulations further narrow the conceptions of teaching and learning, rewarding teaching that is geared toward preparation for tests rather than toward deep engaged learning and preparation for participation in a democratic society.

I recommend that you develop a process for revising these regulations that substantively includes the educational community in advancing your goal of making teacher preparation programs more accountable for successful preparation of teachers. I suggest that you convene classroom teachers and school administrators; academics with expertise in teacher education, teaching, learning and student achievement and assessment; and policymakers to develop accountability measures that more accurately assess program quality and the successful preparation of teachers.

Our country is founded on democratic principles that undergird our educational system and the very innovation we are known for throughout the world. The implementation of these regulations could mean that excellent teacher preparation programs and access to becoming and remaining a P12 teacher, especially among communities of color, is in jeopardy. For these reasons and because of my commitment to the future of our profession and the education and success of all children, I urge you to reconsider and significantly revise this proposed regulation.

Sincerely,

Name

Title

Institution/Program/Other Designation