



Association of Mathematics Teacher Educators
c/o Meredith College, Department of Mathematics and Computer Science
3800 Hillsborough Street, Raleigh, NC 27607
www.amte.net

Docket ID ED-2014-OPE-0057

January 29, 2015

The Honorable Arne Duncan
Secretary, U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Dear Secretary Duncan:

We write on behalf of the Association of Mathematics Teacher Educators (AMTE) - a national organization with more than 1000 members that supports excellence in the preparation of PK-12 teachers of mathematics - in response to the Department of Education's proposed Federal regulations regarding teacher preparation issues that were published in the Federal Register on December 3, 2014. As leaders of an organization committed to excellence in teacher preparation, we agree that teacher preparation programs can benefit from a sound accountability system that both provides feedback leading to program improvement and sensibly considers and integrates the interest of the federal government, state governments, national accrediting agencies, teacher preparation institutions, and the professional education community. We regret that we find that the proposed regulations fall far short of that mark.

Teachers serve as the largest workforce in the country, and teacher preparation is critical to ensuring effective PK-12 educational systems in the United States. We recognize the importance of data and continuous improvement processes that inform the enhancement of teacher education programs. From the perspective of continuous improvement, we are concerned that certain aspects of the proposed regulatory process are likely to have unintended consequences that *inhibit* rather than promote improvement. The proposed regulations claim to "build on current State systems and create a much-needed feedback loop to facilitate program improvement and provide valuable information." Despite this claim, our reading of the proposed regulations suggests that they would impose costly record-keeping burdens on states, teacher preparation institutions, and PK-12 school districts; provide too little useful and usable information for program improvement; and divert time, attention and resources from initiatives that might yield greater improvements in teacher preparation programs. We have a number of specific concerns:

- The regulations assume that teacher education programs can validly and reliably be characterized as effective or ineffective and that publicly reporting programs as such will lead to meaningful improvements. We know of no evidence to support these assumptions. There is, however, evidence that such characterizations could inhibit meaningful improvements (Campbell, 1976, 2011; Deci, Koestner, & Ryan, 1999; Deci & Ryan, 2008; Gagne & Deci, 2005; National Research Council, 2011; Ryan & Brown, 2005). The regulations presume both a narrow and diminished view of the purposes of

public education and a simplistic view of what is required to improve teacher preparation.

- The regulations would require valid and reliable pre- and post-student assessments for every content area and every grade level that could be used to measure student growth. They would also require necessary data-tracking infrastructure and changes in data security and HR policies that connect individual student data with specific employees and the corresponding teacher preparation institutions. Moreover, this infrastructure would necessitate data sharing across states. This infrastructure does not currently exist, would be costly to create, and is not likely to be established in the next 18 months (the proposed timeline) without an investment of financial and human capital that will deflect attention from other important initiatives to improve the quality of teachers and teaching in the nation's classrooms. A more reasonable approach to developing a major new evaluative system would be to begin with a substantial, multiyear pilot program.
- Additionally, as the regulations note (see, e.g., pp. 71, 851), and as is discussed at length in the National Academy of Education report, *Evaluation of Teacher Preparation Programs: Purposes, Methods, and Policy Options* (2013), there is still a robust debate about the use of value-added models in the analysis of teacher preparation program effectiveness. Any of the existing methodologies that states might adopt for measuring student learning are still relatively underdeveloped, especially for some content areas and grade levels. The reliance of the regulations solely on a test-based accountability framework and value-added measures undermines the scientific credibility of the system that these regulations would create.
- The proposed rating system, performance levels, and high-stakes consequences appear to support a "test and punish" version of accountability rather than an approach designed to collect high quality information leading to useful feedback to support continuous program improvement. Moreover, it is not clear that the system would provide credible and valuable information to consumers seeking information to make decisions about which program might meet their needs.

AMTE also has serious concerns about a number of unaddressed gaps and unintended consequences embedded in the proposed regulations. For example:

- The proposed regulations would likely have a disproportionate impact on institutions whose mission includes providing access to students from underrepresented groups or whose prior education has provided limited preparation for college, including many public and private minority-serving institutions (MSIs). We are especially concerned about the potential negative consequences for aspiring teachers from underrepresented groups and for students and teachers in high-need districts. Burdens imposed by the proposed regulations may lead preparation programs to discourage graduates from teaching in high-need districts with low student achievement. They may also restrict high-need districts from hiring new teachers due to associated burdens and costs. This is of particular concern to AMTE because it has the potential to derail national efforts that your Department of Education has initiated to recruit and support additional teachers in STEM fields to teach in high needs schools around the country.
- The Elementary and Secondary Education Act (ESEA) requires that states work to change the disproportionate congregation of inexperienced teachers in high-need schools (PL 107-110, Section 1111(b)(8)(C)), especially around data collection and reporting requirements. Yet these proposed regulations could promote that very practice by incentivizing preparation programs to place first-year teachers in high-need schools (NPRM, p. 71286).

- The proposed regulations will likely burden institutions with undue cost and labor obligations—much higher than estimated—thereby constituting both an expensive unfunded mandate and a costly process not well aligned with the requirements of state and national accreditation and licensing authorities.
- There are a number of technical issues not adequately addressed in the proposed regulations: (a) How will programs producing small numbers of teachers or those that produce graduates who disperse across the country after program completion be treated within the proposed system? (b) Will alternative and non-traditional certification programs be held accountable for the quality of the teachers they produce using the same accountability metrics? (c) What are the negative consequences for security and privacy of student assessment data? Will student advocate groups agree to student data tracking mechanisms? Will the use of student test scores as a primary evaluation measure be undermined by the growing nationwide dissatisfaction with high-stakes student assessment?

AMTE is the nation's largest professional organization devoted to the improvement of PK-12 mathematics teacher education. For the reasons noted above, and especially because we worry that the proposed regulations will overwhelm and derail other important initiatives that have great promise to address the urgent need to improve mathematics teaching and learning in the United States, we do not support the proposed regulations in their current form. We are concerned that the system implied by the proposed regulations would neither serve the needs of potential candidates in their selection of educator preparation programs nor the needs of program leadership in much needed improvement and redesign efforts..

We stand alongside the American Association of Colleges for Teacher Education and many other educational partners in questioning the wisdom of proceeding with the proposed federal regulations as written. We urge you and your staff to revisit these proposed changes, seeking appropriate input from professionals in the field of teacher education to re-craft proposed regulations to support the improvement of teacher preparation programs in this country. In any revised version of the regulations, we strongly recommend that you put aside what we consider to be an ill-conceived accountability plan that builds upon systems of teacher accountability that have been shown to be problematic in both design and implementation. We share your stated goal that every teacher must be fully prepared to teach all students in the nation's classrooms. If we may be of assistance in your efforts to re-craft the regulations moving forward, we stand ready work with you to develop and strengthen initiatives that will have this result.

Sincerely and on behalf of the AMTE Board of Directors and organization members,

Dr. Fran Arbaugh, President
Dr. Christine Thomas, President-elect

Association of Mathematics Teacher Educators (AMTE)