

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:

We are writing on behalf of the Executive Board of the Missouri Association College of Teacher Education. Our membership includes all educator preparation programs in the state of Missouri. Our primary concerns are articulated below regarding the U.S. Department of Education's proposed regulations for teacher preparation programs released in the Notice of Proposed Rule Making (NPRM) on December 3, 2014.

In particular, our concerns are focused on four key areas that negatively impact Missouri's educator preparation programs:

- Federal overreach into Missouri's state and local rights to govern education and education quality.
- An unfunded federal mandate that will shift the cost of these regulations solely to Missouri's citizens.
- The continuation of test and punish policies into higher education.
- The disproportionate impact of the regulations on minority serving institutions and high needs fields.

Federal Overreach

Missouri governance has a traditional preference and allegiance to local control. Its citizens highly value the autonomy of states' rights. The proposed regulations are an overreach of the federal government in to local and state control and governance. Specifically we feel the proposed regulations circumvent:

- The rights delegated to local school districts and the citizens of those districts by the Missouri constitution to control the characteristics of quality educators.
- The authority of the Missouri legislative process and the Missouri State Board of Education to determine program approval.
- State law (House Bill 1490) which limits how schools districts in Missouri can share locally held student data such as student learning outcomes.
- The process already underway to improve educator preparation in the state of Missouri.

Unfunded Mandate

We are concerned about the lack of resources provided for implementation of such a massive process for data collection and program evaluation. Specifically we believe these regulations will result in a(n):

- Increased cost of the teacher education credential by virtue of the development and creation of new assessments to meet additional federal requirements.
- Increased student debt as tuition costs because of the demand for new staff to meet cumbersome data requests.
- Reduced hiring of initial educators by school districts due to the increased data management costs required by hiring these professionals.

- Reduced funds for student support services in order to enhance educator preparation data management and tracking systems.
- Significant financial burden for Missouri's K-12 schools to monitor and track candidates in the first five years.

Extension of Ineffective Policies

With federally mandated ratings, performance levels, and high stakes consequences, the proposed regulations will extend policies into higher education that have done little to improve the quality of Missouri's K-12 school districts. In particular, we believe that these policies will be ineffective for Missouri's educator preparation programs and K-12 schools because:

- There is a paucity of research validating value added modeling. Research to date in Missouri has demonstrated problems with VAM suggesting a lack of ability to distinguish between programs.
- Missouri requires each district to create their own student learning outcomes (SLO) for areas of instruction. Currently there are 572 school districts across the state each developing their own SLO's. Given this variety across districts, it is beyond the capacity of the Missouri Department of Education and Secondary Education to develop an effective comparative data set for educator success.
- Many of our border programs or programs that serve private/parochial schools will be at a comparative disadvantage for rating and ranking since the Missouri Department of Elementary and Secondary Education cannot request student data or placement data from these schools.
- The proposed regulations attempt to dictate the labor choices of individuals, which ignores when teachers may take maternity leaves, where they should choose to work, or under what conditions should they work. Moreover, there is a flawed belief that the quality of a program is contingent on labor force choices.

Disproportionate Impact on Minority Serving Institutions in Missouri

An unintended consequence of these regulations will be to disproportionately impact institutions serving minority populations and high needs fields.

- The notion that college choice is a misnomer for low-income students. The ability to attend college for low-income students is often predicated on proximity and not on ratings.
- The significant costs of these regulations will burden smaller programs in ways that may lead them to close programs, such as our historically black colleges and universities, which may lead to a less diverse teacher workforce in Missouri.
- Research indicates the biases of tests for traditionally marginalized populations. Increasing the role of tests in educator preparation will further constrict the number of marginalized candidates for Missouri's K-12 schools.

Conclusion

We believe that the proposed federal regulations operate under the belief that educator preparation in Missouri has not faced enough scrutiny over the quality of the future educators in our programs. In reality, Missouri's educator preparation programs have faced considerable oversight over the development and impact of its programs. In addition to state accountability measures, national accrediting bodies such as the Council for the Accreditation of Educator Preparation provide additional oversight over the quality of many of the educator preparation programs in Missouri. Moreover, what is often overlooked by federal policies are the numerous ways in which educator preparation programs are engaged in constant feedback with the districts that they serve in order to improve quality. These national, state, and local processes

provide local governance of curriculum--a hallmark of higher education in this country. This kind of professional self-monitoring is what occurs in medicine and law, and educator preparation should be held in the same esteem.

Recommendation

Given the significant and substantial issues with the proposed regulations, it is our recommendation that the U.S. Department of Education grant waivers to states like Missouri that are in the process of developing and implementing systems of educator preparation accountability. We believe that the proper role of the federal government in educator preparation is to set principles for accountability systems and work alongside states to develop assessments and instruments for meaningful accountability, transparency, and continuous improvement.

Professionally,
The Missouri Association of Colleges of Teacher Education Executive Board

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