Purpose
This document provides an overview of the U.S. Department of Education’s proposed regulations for teacher education programs, a list of points concerned educators, scholars, students and parents might use when drafting a response to the proposed regulations, and information on how and when to deliver a response. The authors of this Call to Action urge the CEE membership, as well as all concerned parties, to submit a response to these regulations immediately.

How to Comment:
1. E-mail OIRA_DOCKET@omb.eop.gov by February 2, 2015.
2. Submit comments through the comment portal on the regulations website: https://www.federalregister.gov/articles/2014/12/03/2014-28218/teacher-preparation-issues

Summary of Proposed Regulations
On December 3, 2014, the U.S. Department of Education proposed a new federal rule to extend accountability measures to teacher education programs. Under this rule, teacher education programs would be graded based on the employment, placement, and performance of its graduates. Included in the performance ranking is the use of VAM (value added measures), a statistical formula that uses children’s tests scores to demonstrate teacher effectiveness. These rankings will be used to determine eligibility for federal TEACH grants.

The Office of Management & Budget is required to make a decision about the collection of information between 30 and 60 days after the regulations’ publication. For your comments to be fully considered, (1) submit them by email (OIRA_DOCKET@omb.eop.gov) by Jan. 2, 2015 or (2) through the comment portal (https://www.federalregister.gov/articles/2014/12/03/2014-28218/teacher-preparation-issues) by Feb. 2, 2015.

Points to Reiterate in Your Own Words
Too Much Testing
The tests used to create the VAM hinder teaching, learning, and innovation. They diminish the experience of school for teachers and children. They discourage teaching that responds to the child and encourage teaching to the test. Children are defined as data and ranked by test scores.

Flawed Methods, Bad Measures
The methods suggested to rank teacher education programs rely on measures that do not serve children, teachers, or schools. The regulations extend the controversial VAM and standards-based models of K-12 education to higher education. The American Statistical Society discredited the VAM as a valid measure of teacher effectiveness.

Hampers Innovation
Innovation demands risk; regulations demand obedience. By tying university programs to a federal rule, the regulations stifle creative responses to local education needs. Instead of meeting the needs of school systems, teachers, children, and parents, universities will be tied to meeting the standards of regulation, regardless of how those regulations fit the local context. In addition, a federal rule leaves university programs unable to meet new challenges and to adapt to changing conditions.
**Federal Overreach**
States already regulate their teacher education programs. The proposed regulations transfer that power to the federal government and use the TEACH grants to enforce that power. This is the definition of federal overreach.

**The Hidden Costs**
The federal regulations demand data and performance from teacher education programs, but they place the costs of gathering and disseminating that data on states. This is another unfunded mandate from the federal government.

**Caricatures of Teacher Education Programs**
The report portrays teacher education programs as unaccountable producers of poorly prepared teachers. This portrait understands accountability as a statistical formula. Teacher education programs understand assessment and accountability as an ongoing, varied and supportive effort that focuses on the child as an individual with individual needs and abilities. Teacher education programs prepare many, many excellent teachers every year in an inhospitable climate to public education.

**How to Comment:**
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2. Submit comments through the comment portal on the regulations website:

Respectfully submitted,

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Anne Elrod Whitney, Pennsylvania State University
Don Zancanella, University of New Mexico
Melanie Shoffner, CEE Chair, Purdue University

**Sources**
American Statistical Society on VAM

Sharon Robinson, AACTE President
http://hechingerreport.org/content/burdensome-restrictive-flawed-why-proposed-federal-regulations-for-teacher-preparation-programs-are-a-cause-for-concern_18389/

Jane West’s webinar:

Anne Elrod Whitney’s piece Proposed Regulations Bad for Kids, Teachers, and Schools:
http://writerswhocare.wordpress.com/2014/12/08/proposed-regulations-bad-for-kids-teachers-and-schools/