

October 20, 2016

### **Coalition Statement on Final Teacher Preparation Program Regulations**

On October 12, the U.S. Department of Education released final regulations for teacher preparation programs. While the regulations have been changed in minor ways from the proposed rule, they retain the basic structure of evaluating teacher preparation programs based on a federally mandated framework that requires student learning outcomes measurement and linking such performance to Title IV federal student aid eligibility. As a broad coalition of national organizations representing teachers, state leaders, local school leaders, institutions of higher education, and schools and colleges of education, we are particularly concerned about a federal higher education regulation placing unfunded mandates on PK-12 schools, districts, tribes, states, and institutions of higher education. The regulation encroaches on local, tribal, and state decision making, as well as on the academic autonomy of higher education.

In the midst of a serious teacher shortage—most notably for STEM, special education, and English language instruction—and a significant decline in enrollment in teacher preparation programs, these burdensome regulations will decrease the likelihood of every student having access to a fully prepared teacher. By requiring student outcome measures as one of the metrics to rate programs, they will disadvantage programs serving the communities that most need well-prepared teachers, such as those with low-income and high-minority populations and students with disabilities. The regulations will likewise impede progress toward increasing the diversity of the teaching profession—a serious challenge throughout our nation—as many teachers of color are recruited from and seek to teach in high-need schools.

Requiring every state to rate each of the 26,000 preparation programs every year using four prescribed metrics is a demanding and costly enterprise for which there is little capacity and even fewer resources at the state, local, and institutional level. Setting a precedent of tying access to federal student financial aid to a yet-to-be-determined rating system represents a monumental policy shift which deserves a full vetting with all stakeholders and Congress. In conflict with the recently enacted, bipartisan Every Student Succeeds Act, the regulations call for an expansion of student assessments to include “non-tested grades and subjects,” a policy that was clearly rejected by Congress in the new law.

We will continue to make our voices heard in policy arenas at the federal and state level in support of securing access to a well-prepared, profession-ready teacher for all of our nation’s students.

AASA, The School Superintendents Association  
American Association of Colleges for Teacher Education  
American Association of State Colleges and Universities  
American Council on Education  
American Council on Rural Special Education\*  
American Federation of Teachers  
American Indian Higher Education Consortium  
ASBO International  
Association of Education Service Agencies  
Association of Jesuit Colleges and Universities

*(Continues on back)*

Association of Teacher Educators  
Coalition of Higher Education Assistance Organizations  
Council of Academic Deans from Research Education Institutions\*  
Council for Christian Colleges & Universities  
Council for Exceptional Children\*  
Higher Education Consortium for Special Education  
Hispanic Association of Colleges and Universities  
Learning Disabilities Association of America  
National Association for Equal Opportunity in Higher Education  
National Association for the Education of Young Children\*  
National Association of Elementary School Principals\*  
National Association of Independent Colleges and Universities  
National Association of School Psychologists  
National Association of Secondary School Principals  
National Association of State Directors of Special Education  
National Council of Teachers of Mathematics  
National Conference of State Legislatures  
National Education Association  
National Governors Association  
Public Advocacy for Kids  
Rural School and Community Trust  
STEM Education Coalition  
Teacher Education Council of State Colleges and Universities\*  
Teacher Education Division of the Council for Exceptional Children  
UNCF

*\* Denotes signatory after the statement's initial release on October 20, 2016*