

January 30, 2015
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:

On behalf of the School of Education at Syracuse University, I am responding to 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.

The Federal government plays a central role in supporting our research and educator preparation. NSF and IES funding has incentivized research in teaching and teacher education. Federal student loans, TEACH grants, and Race to the Top projects have made it possible for us to recruit and retain a more diverse student body. However, by proposing to restrict students' access to TEACH grants based on a rating scheme tied to P-12 data systems, value-added teacher evaluations, and employer surveys in within-state systems, the government threatens our ability to prepare teachers who are willing and able to work in our most complex schools. The proposed system also shows limited insight regarding how mobility patterns will skew ratings. Finally, the system creates undue financial burden for states and institutions that train teachers.

That we are a mid-sized, student-centered research university means that our classes and programs reflect cutting-edge, research-based teacher education practices. With many institutions across the country, we are growing our clinically rich fieldwork that our P-12 partners find helpful, and this includes partners in high-needs schools in Syracuse and New York City. Our educator preparation faculty members are active researchers in these contexts. Our students are excellent: we require above average SAT scores for admissions, a 3.0 average for admissions and ongoing degree progress, and a rigorous array of Arts and Sciences courses. Our graduates have built successful education careers throughout the U.S. and across the globe for decades.

Our educator preparation programs already employ multiple, rigorous accountability mechanisms to ensure our candidates' professional readiness. In addition to ongoing internal assessment, we participate in several national accreditation programs, including the Council for the Accreditation of Educator Preparation (CAEP), to foster ongoing program review and improvement. This process involves us in working with P-12 partners to train and evaluate candidates, as well as track their successes after graduation. We also attend to our students' performance on newly revised New York State Teaching Standards and their more rigorous certification tests, including the new Teacher Performance Assessment (edTPA).

In New York State, P-12 assessment systems produce results that are too general and delayed to be of much value to schools' ongoing curriculum development, and they provide no new insights for policy: we already know that students who live in poverty do not usually perform well on such tests. When already contentious results are tied to value-added teacher evaluation, as they are in New York State, the

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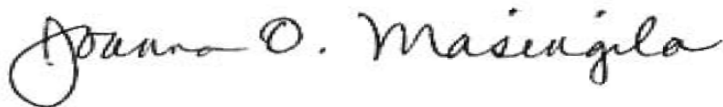
adjustments made for differences in children's living circumstances cannot be nuanced enough to account for economic disparity among schools and the children who attend them. Excellent teachers are being punished for test scores over which they have only limited control. To compound this error by tying these scores to teacher education ratings is to dissuade us from encouraging our students to work in the most complex and rewarding settings. Programs, like many of ours, that produce educators who work with marginalized populations, such as teachers who work with special education, literacy, and English language learners, are especially at risk.

Our state's schools and regulatory agencies are already spending quite a bit of money to respond to unfunded Federal mandates. This legislation will create added State expense for planning, evaluating, and designing data entry systems, and on data entry and clean up. Our institutions of higher education and the P-12 partners who hold our outcome data will incur parallel new costs. All are resources that could be spent more judiciously on program development and delivery.

Many of our students are from outside New York State, and fewer plan to stay here given the general jobs situation in upstate New York. Because the new teacher education rating systems will not be required to speak to each other across state lines, most of the institutions in our state—institutions that are well respected regionally, and, in cases like ours, nationally—will not receive an accurate rating because a large portion of students will not be included in the tracking systems. Such a system shows limited insight about the mobility patterns of college enrollment and post-graduation job seeking of today's young people.

I urge you to withdraw the U.S. Department of Education's proposed regulations for teacher preparation programs. Instead, we ask that you work with Congress and us to strengthen Title II with a meaningful accountability system that incentivizes our reform efforts. I will be pleased to respond to any questions that you or your staff may have or to provide any additional information regarding this response to the proposed regulations on teacher preparation programs. I can be reached at (315) 443-4751 or via e-mail at jomasing@syr.edu.

Sincerely,



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