



## *National Association of State Directors of Special Education, Inc.*

*225 Reinekers Lane, Suite 420, Alexandria, VA 22314*

*Tel: 703/519-3800 Fax: 703/519-3808 www.nasdse.org*

May 2, 2016

The Honorable John B. King, Jr.  
Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Secretary King:

The National Association of State Directors of Special Education (NASDSE) appreciates the opportunity to comment on the proposed rule to implement requirements for the teacher preparation program accountability system, and the regulations governing the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program.

NASDSE is the national nonprofit organization that represents the state directors of special education in the states, the District of Columbia, the federal territories, the Freely Associated States and the Department of Defense Education Agency. Students with disabilities constitute approximately 10-15 percent or more of a local school district's student population.

Consequently, we have been, and continue to be, concerned with any aspect of the education system that impacts the readiness and number of teachers in general and special education. We are pleased that the Department has recognized the growing trend toward distance education for teachers and the importance of ascertaining the level of overall performance and effectiveness in preparing future educators.

However, these concerns are not adequately addressed by this proposal. Access to valid and reliable data that inform program improvement is critical, and we want to work with the Department to achieve this goal. The proposal would not achieve this end, but rather it distracts from essential reform work. We believe it would be more appropriate to first determine how many full and alternative certification distance programs exist and how they operate (e.g., cross-state; international, etc.) before establishing an accountability system.

NASDSE supports accountability and oversight for teacher preparation programs. But this proposal could inadvertently lead to disproportionate and inconsistent standards across states. For example, if each state can set the weight of the four proposed metrics to determine program ratings, one program could be highly rated in one state and labeled low-performing in another, thus leading to confusion over the true quality of the program. As a result, this rule has the potential to unintentionally exacerbate personnel shortages by decreasing the number of distance learning programs available to future educators, and potential financial aid.

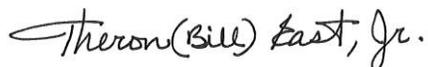
Also of concern, the current definition of distance education could apply to standalone courses as well as complete academic programs. Moreover, alternative certification and regular certification programs could be combined, thus skewing the data. Standardization is necessary in order to truly measure effectiveness.

Furthermore, the proposed rule is not in alignment with the recently adopted Every Student Succeeds Act (ESSA). It refers to No Child Left Behind (NCLB) waiver language and other aspects of the previous law related to teacher evaluations. In addition, the Department may be underestimating the time needed by all stakeholders to implement the new aspects of the proposal. Consequently, the cost estimate and labor analysis may be unreliable.

Rather than implementing a regulation that is out of synch with ESSA and with the reauthorization of the Higher Education Act (HEA) pending in Congress, we urge the Department to hold off on moving forward with a regulation that may have to be significantly changed in the very near future. In the meantime, the Department could work with stakeholders to develop valid and reliable strategies for obtaining meaningful data and determine what steps might be taken prior to the reauthorization of the HEA to improve the efficacy of teacher preparation distance learning programs.

Again, NASDSE thanks you for this opportunity to provide feedback to the Department. Should you have any questions about our comments, please feel free to contact NASDSE's Director of Government Relations, Nancy Reder, at [nancy.reder@nasdse.org](mailto:nancy.reder@nasdse.org),

Sincerely,



Theron (Bill) East, Jr., Ed.D.  
Executive Director