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February 7, 2017

The Honorable Virginia Foxx
Chairwoman
Committee on Education and the Workforce
U.S. House of Representatives
Washington, DC 20515

The Honorable Bobby Scott
Ranking Member
Committee on Education and the Workforce
U.S. House of Representatives
Washington, DC 20515

Re: Approval of H.J. Res 58 – Teacher Preparation Issues

Dear Chairwoman Foxx and Ranking Member Scott:

The National School Boards Association (“NSBA”), working with and through our state associations, represents nearly 14,000 school districts and more than 90,000 local school board members across the country. NSBA represents the interests and viewpoints of a uniquely diverse constituency of local school board members who are directly responsible for educating more than 50 million students nationwide. As you consider the repeal of the U.S. Department of Education’s recently finalized rule relating to teacher preparation issues, NSBA urges members of Congress to provide regulatory relief for local education leaders in a way that recognizes the impact of the rule on local school districts.

H.J. Res. 58 will prevent this federal intrusion.

It is important to establish at the outset that oversight of teacher preparation programs is and should be the responsibility of state governments. Education is the largest single component of most state budgets, as well as being responsible for administration and policy. The federal role providing and safeguarding federal investments in education is an important one, but should not supersede state and local authority. Although the rule is directed to States and teacher preparation programs, any accountability system has profound implications for local school districts:

- Local school districts provide the clinical settings necessary for pre-service teachers to gain needed classroom experience. According to the Office of Postsecondary Education, only 50% of teacher candidates currently receive supervised clinical training. Demand for clinical training will increase substantially under the rule, which requires state assurances that each teacher preparation program provides quality clinical preparation and meets other rigorous criteria.

The definition of ‘quality clinical preparation’ has immense implications for school district hiring, professional development and other personnel practices – responsibilities that historically and in current practice are matters of local governance and jurisdiction.

- Vast new data collection and reporting requirements will result in fiscal and operational burdens not acknowledged or supported by the rule.

NSBA recognizes the Department's revision to the proposed rule to include local school board members in the list of stakeholders with which states must consult as they develop procedures for assessing and reporting teacher preparation programs. Overall however, the rule fails to fully support new requirements on school districts, provide flexibility or defer to local authority.

Public school districts employ approximately 3.3 million teachers, prepared in a variety of settings, including traditional and alternative certification routes. So while NSBA applauds and shares the Department's goal to ensure that every student receives instruction from an effective teacher, the impact of the rule at the local level is largely overlooked and unsupported.

Sincerely,

A handwritten signature in black ink that reads "Thomas J. Gentzel". The signature is written in a cursive style with a large, stylized initial "T".

Thomas J. Gentzel
Executive Director, NSBA