May 25, 2016

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

Dear Secretary King:

On behalf of the Association of Texas Professional Educators (ATPE), a member-owned, member-governed professional association of more than 100,000 Texas educators, we are writing to urge you to carefully consider the construction of federal guidance and regulations regarding two pieces of the Every Student Succeeds Act (ESSA): the innovative assessment pilot and the teacher, principal or other school leader preparation academies.

ATPE provided comments to Congress on both issues as it began to consider bills to reauthorize the federal education law in early 2015. In comments on testing and accountability to the Senate Committee on Health, Education, Labor and Pensions (HELP), ATPE outlined its recommendations for giving states “more flexibility to innovate and choose assessment methodologies that better suit the needs of their students, parents, and educators.” As we stated in those comments, the high-stakes testing regime currently seen throughout the country, including in Texas, is ineffective and even harmful for students. As showcased in Texas this spring, testing related issues have been so problematic and systemic that they have resulted in complaints, questions, and even lawsuits.

We are pleased that ESSA ultimately provided states with assessment flexibility. Under the innovative assessment pilot, there is particular opportunity for valuable movement beyond the problematic high-stakes testing regime. As the Department of Education (ED) continues its work to outline the constraints and limitations of the new pilot, we hope you will carefully consider the
attached recommendations ATPE provided to Congress.

ATPE also provided input to the Senate HELP committee on “initiatives to encourage more selective recruitment of educators by setting high standards for educator preparation and certification.” Studies support ATPE’s belief that raising standards across-the-board for teacher preparation will have a positive ripple effect on the profession and student learning.

While ATPE supports alternative routes to certification, which have become the most common pathway to the teaching profession in Texas in recent years, we recognize that high standards are especially important for these expedited paths where candidates are placed in the classroom as the teacher of record prior to completing all certification requirements. For example, this post-baccalaureate pathway depends on candidates entering the program with strong content knowledge; it is critical that these candidates demonstrate an excellent understanding of their content prior to entering the classroom as the sole individual responsible for students’ learning.

ATPE encourages ED to outline high preparation standards for states to use when evaluating all programs receiving funding as a teacher, principal or other school leader preparation academy. We do a disservice to our teachers and students by placing ill-prepared teachers in the classroom and expecting them to achieve excellence. As ED focuses on assisting states in their endeavors to develop preparation academies and innovative testing systems, we hope you will also help to ensure that the methodologies adopted by states are scientifically valid.

ATPE appreciates your careful consideration of the issues addressed and all of your continued work to fairly and efficiently implement ESSA. Please do not hesitate to contact us if ATPE may provide any additional information during this process.

Sincerely,

Cory Colby
State President