



Statement by the Music Education Policy Roundtable on U.S. Department of Education’s Proposed Teacher Preparation Regulations Overhaul

In light of the U.S. Department of Education’s newly proposed teacher preparation regulations protocol, the Music Education Policy Roundtable would like to take this opportunity to commend the Department for its efforts to develop a robust and effective teacher preparation system, but also to express our deep concern with the methodology recommended to accomplish this vision. While holding programs accountable for producing excellent teachers in music and all subjects is a goal that member-groups of the Music Education Policy Roundtable strongly stand behind, doing so in a manner that creates needless burden on institutions of higher learning, while giving short shrift to music and other important areas of learning, is a losing proposition. To that end, the Roundtable has three major concerns regarding the Department’s proposed teacher preparation regulations overhaul, which should be addressed prior to the finalization of any new such protocol:

- The proposal’s emphasis on student outcomes has no provision preventing music educators or any of the other 70% of non-math and language arts teachers from being held accountable for scores that do not accurately measure their effectiveness.
- The proposal’s restriction of federal funds to future teachers will make recruiting a diverse, representative set of future music educators significantly more difficult.
- The proposal’s unfunded mandates place an unnecessary burden on states, institutions, and programs.

With all of this in mind, it is the Roundtable’s sincere hope to work closely with the Department, in order to develop a more inclusive, less taxing system for how our shared goal of implementing a better teacher preparation protocol can be achieved, for the tens of thousands of music educators, nationwide, as well as for all other teachers serving in subject areas other than math or language arts.

Student learning is the end goal for all highly effective teachers. Unfortunately, music educators are often evaluated ineffectively as a result of “one size fits all”-style approaches to assessment. Across the nation, music teachers—like [Kevin Strang of Boone High School in Florida](#)—are evaluated based on the use of “value-added” models of assessment (VAMs). Organizations such as the American Statistical Association and the American Institute of Research have routinely criticized VAMs for not measuring math and language arts teachers’ true impact. For music teachers, the problems with VAMs can range from improper methodology to total irrelevance. The value of evaluating teachers devoted to teaching music, art, or

any other subject based on VAM or similar models is entirely unsubstantiated, yet continues to be touted in tandem with its use in many states. Scores obtained in this manner do not accurately reflect the subject being taught and ultimately hinder the end goal of effectively evaluating teachers.

With regard to the Department's newly proposed teacher preparation regulations, tying federal funding to these faulty measurements could create seriously negative consequences for music teacher preparation, including even the possibility of incentivizing some programs to send recent graduates to less challenging schools, or states with meaningful systems of evaluating music education.

To develop and implement an effective system of teacher preparation regulations, the evaluation of teachers and teacher preparation programs alike must be based on the subject taught by the teacher. The music education community has developed and published protocols for the effective evaluation of music teachers, [available here](#), and the Roundtable strongly encourages the Department to review them as part of its information feedback collection process. As a reasonable element of any teacher's evaluation is the achievement of students under that teacher's tutelage, we have also worked on ways to help measure that achievement to deal with the fact that in music, traditional testing models do not effectively measure what a rigorous music education provides. Much more on that effort [can be found here](#).

During the Department's [comment period](#), we strongly encourage all members of the music education higher education community to supplement this statement with their own input on the merits of appropriate teacher preparation regulations for music education, and to include their own suggestions for improving the current proposal.

To submit individual comments on the general regulations, visit the [Federal Register's](#) Notice of Proposed Rulemaking, and click "Submit a Formal Comment" OR visit the [comment page for this proposed rule](#) on regulations.gov. The official comment period closes on February 2, 2015.

To submit comments on only the proposed state and institutional report cards, please email comments directly to OIRA_DOCKET@omb.eop.gov. Note that the deadline for emails to OMB is January 2, 2015, one month before the official comment period closes.

We thank the Department for its consideration of our concerns, and look forward to further dialogue.

Sincerely,

The Music Education Policy Roundtable

American String Teachers Association
National Association for Music Education
American Choral Directors Association
American Orff-Schulwerk Association
American School Band Directors Association
Barbershop Harmony Society
Chorus America
College Band Directors National Association
Drum Corps International
Education Through Music
El Sistema USA: A National Alliance of El Sistema
Inspired Programs
The Gordon Institute for Music Learning
Guitar and Accessories Marketing Association, Inc.
iSchoolMusic.org

Jazz at Lincoln Center
Little Kids Rock
Music for All
Music Teachers National Association
Music Publishers Association
National Association of Music Merchants
National Association of Music Parents
National Music Council
Organization of American Kodály Educators
Percussive Arts Society
Phi Mu Alpha Sinfonia
Quadrant Arts Education Research
Strathmore Hall Foundation
VH1 Save The Music Foundation