



**National Association
for Music Education**

NAfME Supports Congressional Action to Overturn Teacher Preparation Rules

The National Association for Music Education, in partnership with the Association's two higher education societies, the Society for Research in Music Education and the Society for Music Teacher Education, supports congressional efforts to overturn the Teacher Preparation Program Accountability Rule through its powers under the Congressional Review Act.

While the Association and our members teaching in institutions of higher education across the nation believe in accountability for music educator preparation programs, we believe such accountability must be grounded in evidence-based best practice and practical to implement. The current rules are overly standardized, overly prescriptive, and will be costly to implement. Ultimately, these rules will have the unintended consequence of harming music educator preparation in America, a reality that NAfME finds unacceptable.

NAfME's opposition to the Teacher Preparation Program Accountability Rule is based on the following concerns:

- **Over Standardization** - Given that the rules require programs graduating fewer than 25 students annually to be reported either in multiple year cohorts or in the aggregate with other training programs, the rules will wrap music education programs into the performance of much larger, and often highly removed, teacher preparation programs on university campuses. This will affect the accuracy of the reporting of music education training programs and could impact the stature of music education on a particular campus. The rule is overly standardized and does not work well for content specific teaching programs, including music educator preparation programs.
- **Over Prescription** - The regulations suggest states use evaluation systems which rarely account for differences in delivery models and evaluation needs – the very teacher evaluation systems which ESSA prohibits the Department from requiring across our nation. These evaluation systems remain unproven in terms of accurately identifying the performance level of educators, and often connect content specialists such as music educators to high stakes test results outside of the music teaching realm – such as school level reading and math test scores. Such systems will not identify novice music educators of quality – or those in need of support.
- **Cost** - NAfME reached out to the U.S. Department of Education regarding the regulations in December 2014, speaking to the burdensome nature of this accountability system, including its imposition as an unfunded mandate. According to the Department, the final additional cost estimated for states and institutions of higher education offering teacher preparation programs to meet these new regulations was in the range of \$27.7 million over a ten year period. While this amount seems large, it most likely substantially under-estimates the actual costs. Unfunded by the federal government, these costs would be borne by state departments of education, and, to a lesser extent, teacher preparation programs, including music educator programs, thereby meaning less funding for K-12 education and for teacher training.

NAfME strongly supports the congressional lawmakers who have decided to use the Congressional Review Act to relieve states and educators of these regulations and return to states the decision-making authority to determine how to effectively manage teacher preparation programs. We look forward to working with Congress on the reauthorization of the Higher Education Act to better support teacher preparation programs, including those for music educators, across the nation.