



**THE  
CITADEL**  
THE MILITARY COLLEGE OF SOUTH CAROLINA

ZUCKER FAMILY SCHOOL OF EDUCATION

December 19, 2014

The Honorable Nikki R. Haley, Governor  
State of South Carolina  
1205 Pendleton Street  
Columbia, SC 29201

The Honorable Molly Spearman, Superintendent-elect  
Department of Education  
State of South Carolina  
1429 Senate Street  
Columbia, SC 29201

RE: Concerns with Proposed USDOE Teacher Education Regulations

Dear Governor Haley and Superintendent-elect Spearman:

I am writing to draw your attention to concerns regarding new federal regulations being proposed by the U. S. Department of Education relative to teacher education program accountability (see *Federal Register*, December 3, 2014, pp. 71820-71892; <http://www.gpo.gov/fdsys/pkg/FR-2014-12-03/pdf/2014-28218.pdf>). The proposed 400 pages of regulations are intended to improve the federal accountability requirements for teacher preparation programs. These regulations represent undue federal intrusion into state responsibilities, and they will result in redundancy of information already available in other ways and a substantial cost to our state.

As a college administrator and professor, I am a strong advocate of accountability in the work we do. Our teacher education programs at The Citadel, along with programs at many of our other fine public and private institutions in the state, meet stringent requirements of the South Carolina Department of Education and our accrediting body, the Council for Accreditation of Educator Preparation. In addition, we are already required to file a substantial report annually to the federal government via requirements of Title II of the Higher Education Act in addition to an annual report to Columbia on our progress in meeting state requirements.

I have shared the concerns below via correspondence with our representatives in Congress (Senator Graham, Senator Scott, and Representative Clyburn) as well as the U. S. Department of Education via the federal government's website for posting comments on proposed regulations. I wanted to share them with you as well. I trust you, as our elected officials in the state will share my concerns and will exercise your influence to ward off these cumbersome and costly regulations. My specific concerns follow:



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1. *The regulations are being put forward in the absence of any new legislation or Congressional action.* It seems inappropriate for the U. S. Secretary of Education to put forward such a substantial new set of regulations without the deliberation of Congress. With the likely redrafting of the Elementary and Secondary Education Act in the next Congress, it seems much more appropriate that regulations of this type would be delayed until that act is passed.
2. *The regulations would mandate every state to develop a complex rating system to judge every teacher education program in the state.* At its own expense, every state would be forced to develop a data keeping and rating system for this purpose. One professional organization has estimated that the work to develop the system in each state would take the equivalent of two full time experts working for two years. This is not to mention the extra burden that our colleges and universities would have to take upon themselves to provide accountability data in yet another form that are already being reported in other ways. Certainly, South Carolina has better ways to spend its educational budget!
3. *The regulations would limit certain kinds of federal financial aid to students who attend a program that receives a low ranking based on the new system.* This provision is counter-intuitive and would potentially punish hard-working college students for something that is not their fault. South Carolina already has a comprehensive process, based on rigorous standards, for approving (or failing to approve) its teacher education programs. We do not need the federal government second guessing a process our state has worked hard to develop. Further, the federal government already has a system for determining which institutions and students qualify for financial aid. Additional regulations specific to one kind of academic program would not improve this system.

In sum, these proposed regulations offer nothing new or innovative relative to the assessment of the quality of teacher education programs, they would impose additional bureaucracy and expense upon the State of South Carolina, and they are being proposed in the absence of any new law or other deliberative Congressional action. I would urge you to call the federal government to task regarding these proposed regulations.

Our Education faculty at The Citadel are highly interested in issues of this type as well as a range of other issues that affect teachers, the quality of our public schools, and the general welfare of children and youth. I invite you to call on us if we can provide you information on any issue for which our expertise would be of value. Additionally, when in Charleston, you have a standing invitation to visit with us at The Citadel.

Respectfully,



Larry G. Daniel, Ph. D., Dean  
The Zucker Family School of Education at The Citadel