

[Docket ID ED–2020–OESE–0025]

May 13, 2020

U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

Dear U.S. Department of Education:

On behalf of the Association for Supervision and Curriculum Development (ASCD), a nonprofit, nonpartisan membership organization comprising more than 113,000 professional educators from all levels and subject areas, we are submitting these comments in response to the notice regarding the Proposed Priorities, Requirements, Definition, and Selection Criteria— Education Innovation and Research—Teacher-Directed Professional Learning Experiences [34 CFR Chapter II [Docket ID ED–2020–OESE–0025]] as published in the April 13, 2020, *Federal Register*.

The proposal to provide teacher-directed professional learning in the form of individual stipends would significantly alter the EIR program and run counter to its evidence-based requirements, be detrimental to accountability efforts, and undermine state and local professional development activities.

Although the EIR program is intended to promote innovative strategies and programs, a crucial aspect of the program is that it requires evidence-based research or high-quality evaluation on the effectiveness of those approaches, which teacher professional development vouchers decidedly do not have. This lack of evidence is additionally concerning because recent changes to the federal K–12 federal professional development program (Title II of ESSA) included greater reporting requirements to increase the efficacy and accountability measurements of these funded activities. Separate, individual, one-off teacher-selected activities are not consistent with this increased interest in greater accountability nor are they conducive to producing valid research results for the purposes of evaluation.

The proposal to make personalized teacher professional learning preferences a funding priority also runs counter to the definition of professional development in the Every Student Succeeds Act (ESSA), which identifies effective activities as those that are “sustained (not standalone, one-day, and short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused.”

Moreover, the term “professional development” in ESSA “means activities that...are an integral part of school and local educational agency strategies for providing educators (including teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, and, as applicable, early childhood educators) with the knowledge and skills necessary to enable students to succeed in a well-rounded education and to meet the challenging State academic standards.” The concept of teacher-directed professional learning is the antithesis of the systemic alignment, coordination, and support that are the requisite elements for both student and adult learning and sustained school success.

Indeed, the proposal acknowledges this systemic primacy when it suggests (1) teachers can use “an SEA offering a broad and comprehensive menu of pre-selected options for teachers to choose from that reflect additional options beyond what was available prior to the stipend program” and (2) that the “LEA is critical in coordinating teacher professional learning opportunities and managing the stipends teachers would receive.” In fact, the reliance on state and local agencies in offering or leveraging professional

learning opportunities for the benefit of educators recognizes the existing and effective reality and suggests that the proposed teacher-selected option is a solution in search of a problem.

Thank you for the consideration of our comments regarding the proposed changes to the priorities, requirements, definitions, and selection criteria of the Education Innovation and Research program.

Cordially,

A handwritten signature in black ink, appearing to read "David Griffith". The signature is written in a cursive, somewhat stylized font.

David Griffith  
Senior Director of Advocacy & Government Relations