

May 12, 2020

Ashley Brizzo
U.S. Department of Education
400 Maryland Avenue, SW Room 3E325
Washington, DC 20202
Re: Docket ID ED-2020-OESE-0025

Dear Ms. Brizzo:

On behalf of AASA, The School Superintendents Association, representing more than 13,000 school system leaders across the country, I write today to express our opposition to the Notice of Proposed Requirements, Definition, and Selection Criteria/Teacher-Directed Professional Learning Experiences for the Education Innovation and Research (EIR) program, as published in the April 13, 2020, Federal Register.

Ensuring that educators receive high-quality, evidence-based, and tailored professional development is a critical job of the superintendent. AASA has long advocated for increased investments in Title II of the Every Student Succeeds Act (ESSA) and is generally supportive of the Education Innovation and Research grants, which are focused on improving teacher quality to improve academic achievement.

This proposal to repurpose grant funding that Congress never intended to be used for vouchers for that explicit purpose is apparently a new Department of Education trend this spring. Similar to the Administration's push to provide vouchers for students, these professional development vouchers have no research to support their effectiveness and would directly contradict the Education Innovation and Research grants as defined by Congress.

Furthermore, under ESSA, professional development is designed to be an integral part of the school and school district's strategies for providing educators with the knowledge and skills necessary to enable students to succeed. Congress defined professional development with bipartisan support as "sustained (not stand-alone, 1-day, and short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused." Using vouchers for professional development would directly contradict this.

In summary, professional development vouchers goes against the Congressional bipartisan agreement on the definition of professional development; against the Congressional bipartisan agreement on the defining uses of the Education Innovation and Research grant program; and against the Congressional bipartisan agreement to not fund professional development vouchers in the appropriations bill.

Finally, at a time when states, districts and schools are looking to manage intense educational disruption across the K-12 system, Education Innovation and Research funding is better spent on innovations that are evidence-based. We urge the Administration to reconsider this proposal and seek to better understand the Congressional intent for this grant program.

Sincerely,

Sasha Pudelski
Advocacy Director