

Dear DOE,

I wish to register a strong objection to these regulations. As a former federal official (I was Assistant Secretary of Education in 1991-92), I object to the coercive nature, in which the federal government is dictating education policy to the states. But of great importance, the policies you are dictating are not based on evidence.

You want states to tie teacher evaluations to test scores, but you present no evidence that doing so improves achievement; instead you rely on economists who project that it might do so. To achieve this goal, you tell states that they must roll back laws they have passed. This oversteps the bounds of federal authority in education.

Similarly your pressure to open charter schools goes beyond any evidence that charter schools are superior to regular public schools. The recent Stanford study by Margaret Raymond found that only 17% of charter schools were better than nearby public schools. Why then should schools eliminate their caps on charters?

I think the DOE should respect the requirements of federalism and look to states to offer their best ideas rather than mandating policies that the current administration likes, even though there is no evidence to support them.

Humility is sometimes the best policy, especially when you are not on firm ground with your remedies.

Diane Ravitch