



February 2, 2015

The Honorable Lamar Alexander
Chairman
Health, Education, Labor and Pensions
Committee
U.S. Senate
Washington, D.C. 20510

The Honorable Patty Murray
Ranking Member
Health, Education, Labor and Pensions
Committee
U.S. Senate
Washington, D.C. 20510

Dear Chairman Alexander and Ranking Member Murray:

The American Federation of School Administrators (AFSA), the National Association of Elementary School Principals (NAESP), and the National Association of Secondary School Principals (NASSP), which collectively represent principals and other school leaders leading schools from prekindergarten to grade 12 in the nation's 115,000 elementary, middle, and high schools, are pleased to provide comments on Senator Lamar Alexander's discussion draft to reauthorize the Elementary and Secondary Education Act (ESEA).

Principals play a unique role in ensuring that our nation's students are college and career ready. To quote Dr. Christine Handy, principal of Gaithersburg High School in Gaithersburg, MD, who testified before your Committee last week, "Today's principals are expected to be visionary leaders, instructional experts, building managers, assessment specialists, disciplinarians, counselors, social workers, community builders, and more; they are also held directly responsible for student achievement in our nation's schools." All principals, from prekindergarten to grade 12, must meet the demands and responsibilities related to effective school leadership. ESEA must acknowledge the vital role of principals and provide them with appropriate professional support to ensure high academic achievement for all students. This is necessary given the support that principals must provide to teachers in order to ensure high-quality classroom instruction.

A growing body of research has proven that second only to a great teacher, a principal and effective school leadership will improve student achievement. However, the No Child Left Behind Act (NCLB) and the U.S. Department of Education's ESEA "flexibility" waivers both fail to recognize that states and school districts must recruit, train, and support principals in ways that are very different from other contributors to the educational process and in the improvement of student learning. Under current law, there is no recognition of the unique role of principals compared to that of teachers; rather, teachers and principals are "bundled" together within Title II's provisions and, therefore, principals receive no dedicated or distinct allocation of appropriate resources to support their leadership of schools. Despite the failure to provide principals with professional development opportunities unique to their positions, NCLB still held them accountable if their schools' proved unable to meet adequate yearly progress (AYP) thresholds by mandating school turnaround models that called for, or presupposed, their terminations.

In addition, when the U.S. Department of Education required that states establish principal evaluations as preconditions for receiving waivers from NCLB's accountability provisions (and for receiving School Improvement Grants and Race to the Top awards), it set no ceiling on the weight of student assessment scores in those evaluations, allowing some districts to judge principal performance almost entirely based on student performance. This clearly defies well-documented research that calls for multiple measures to be used to evaluate principals based on the complexity of their role and the factors within their control that directly and indirectly impact student achievement.

The draft released by Chairman Alexander and the Committee's work to reauthorize ESEA offers a tremendous opportunity to ameliorate these issues by bolstering the nation's principals— and, in doing so, America's teachers and students. Our three groups support many provisions and policies advanced in this draft, including the removal of one-size-fits-all accountability; the elimination of the "school turnaround" models; the addition of extended-year graduation rates; and the maintained requirement for data disaggregation.

However, we assert that the current draft does not go far enough in meaningfully differentiating the role principals play in schools serving children from prekindergarten to grade 12 and providing them appropriate support. Towards that end, we urge the Committee to add the provisions contained in the School Principal Recruitment and Training Act sponsored by Senator Al Franken (D-MN). Further, we support changes to the current draft that would:

- Clearly define a school leader as the individual responsible for the daily instructional leadership and managerial operations in the school building;
- Provide a set-aside for principal professional development in Title II;
- Restore the School Leadership program
- Establish a principal residency requirement to balance the draft's proposed teacher residency program
- Establish adequate parameters for state and districts that are implementing principal evaluation systems to fairly evaluate principals and promote their effectiveness
- Prohibit out-of-field principal recruitment without teaching experience
- Maintain the existing 50 percent fund transferability rule rather than increasing to 100 percent transferability between Title II and Title IV

In addition to the principal-specific concerns noted above, our groups object to the draft's proposed elimination of the maintenance-of-effort provision and of programs to enhance literacy, digital learning, and school counseling. We also oppose the addition of a portability provision for Title I funds as it might actually exacerbate the inequities faced by disadvantaged students and schools—the very inequities ESEA seeks to remedy.

Below please find our key recommendations on changes to the current draft in section-by-section order:

TITLE II

Section 2002. Definitions (pg. 124)

Our organizations are pleased to see the inclusion of a teacher residency program in the definition section found in Title II. However, because teachers and principals both play important but different roles in the educational process, we strongly urge you to add to this section a **definition of a principal residency program**. A principal residency program will help ensure that all students receive the profession-ready principals that they deserve. Our organizations believe that we have an obligation to ensure that students in high-need schools have access to fully prepared teachers and school leaders. Knowing that teacher and principal quality are the two greatest school-based factors influencing student achievement, it is critical now more than ever that federal policies support the development of a coherent, performance-based professional continuum for teachers and principals. We recommend the following definition be added:

- (3) Principal Residency Program – The term “principal residency program” means a school-based principal preparation program in which an aspiring principal — “(A) for not less than one academic year, receives hands-on instructional leadership and organizational management experiences, and coaching from an effective principal, as determined by a principal evaluation system implemented under part A (if applicable); (B) receives concurrent instruction during the year described in subparagraph (A)- (i) that is provided through an institution of higher education; (ii) through courses that may be taught by local educational agency personnel or by faculty of the principal preparation program; and (iii) that focuses on effective instructional practices, recruiting and supporting effective staff and leadership teams, developing a school vision and continuous improvement plan, addressing the needs of specific student populations, effective practices to address the nonacademic needs of students, managing school organizations, engaging parents, community members, and evaluating the impact of school policy and climate on all students and families; and (C) acquires effective leadership skills and competencies.**

Sec. 2101 Types of State Activities (pg. 129-133)

Evaluations

AFSA, NAESP, and NASSP are extremely pleased to see that Section 2101.c.3.B.ii of the draft supports multiple measures of teacher and principal effectiveness by basing evaluations “in part on evidence of student achievement” instead of “in significant part on evidence of student achievement.” Our members have expressed strong concerns that the new state and district evaluation systems place an undue amount of weight on student assessment outcomes. We believe that this issue has arisen because the U.S. Department of Education did not provide states and districts with any guidance on either the weight student assessment results should carry in evaluations or on other relevant measures that the evaluations should incorporate.

We urge the Committee to fill this void by ensuring that a newly reauthorized **ESEA encourages districts and states to include within their principal evaluation systems the six domains of effective school leadership:**

1. Student growth and achievement
2. School planning and progress
3. School culture
4. Stakeholder support and engagement
5. Professional qualities and practices
6. Professional growth and learning

Additionally, we support evaluation systems in states and districts that have models consistent with the recommendations contained in the NAESP and NASSP research that outlines the components of an effective, locally designed principal evaluation system.

Specifically, our groups suggest the following changes regarding principal evaluations to Section 2101.c.3.B.ii, Page 130, Lines 3-9 of the draft:

(ii) Developing or improving teacher and principal evaluation systems that shall be based in part on evidence of student academic achievement, **include multiple measures of student growth and may include other professional performance** measures determined by the state.

(I) for principals, evaluation systems must:

(aa) be relevant, reliable, valid

(bb) be comprehensive

(cc) take into account local contextual factors

(dd) weigh performance components appropriately to the individual principal

(ee) lead to improved practice of the instructional leader

(II) principal evaluation systems must include performance goals tied to the domains of effective principal practice that must include the following:

(aa) professional growth and learning

(bb) student growth and achievement, including student learning objectives

(cc) school planning and progress

(dd) school culture

(ee) professional knowledge, skills, and improvement in daily practice

(ff) stakeholder engagement and support

(III) no more than one quarter of a principal's evaluation shall be based on student achievement.

Alternative Routes to Principal Certification

Our organizations believe that in order for principals to be effective school leaders, they must have demonstrated success as teachers *and* in leading adults before entering into the principalship. To lead their schools and effectively evaluate teachers, principals must know and understand good teaching and pedagogy, which can only come through classroom experience. Therefore, we request that the Committee revise Section 2101.3.B.III.iii, Page 130, Line 10 to clarify that any **alternative route for state certification of principals must require that the**

individual have teaching experience, and demonstrate success in leading adults and in school leadership competencies. Additionally, our organizations request that the following specific changes be made to Section 2101.3.B.vi.IV, Page 132, Line 7:

- (IV) **evidence-based** induction and mentoring programs for **early career** teachers and principals that are designed to:
- (aa) improve **classroom** instruction and student learning and achievement
 - (bb) **improve school leadership competencies to improve classroom instruction and student learning and achievement**
 - (cc) increase the retention of **mid-career** effective teachers and principals

Page 132, Line 17

(vii) Providing assistance to local educational agencies for:

(I) the development and implementation of high-quality professional development programs for principals that enable the principals **to build their leadership competencies** to be effective school leaders, **support teachers**, and prepare all students to meet challenging state academic content

School Leadership Academies

Our organizations have strong reservations about the inclusion of “the development and support of school leadership academies for educational leaders” as an allowable use of Title II funds in Section 2101.3.B.vii II, Page 132, especially considering there are no parameters around the recruitment and preparation of individuals who participate in these “academies.” We believe the preparation and training programs for principals offered by the “academies” must be held accountable for the outcomes or skills that every school leader must demonstrate in order to be effective. Further, we believe that there must be requirements included that are aligned with our recommendations for a profession-ready principal: a strong instructional background and effectiveness as a teacher; an advanced degree; a robust preparation process; full licensure by the state in which they are employed; abilities related to effective school leadership competencies; and prior success in leading adults.

Training Principals on Teacher Evaluation

With states around the country developing new teacher evaluation systems, AFSA, NAESP, and NASSP urge that the Committee add language to Section 2101.3.B that would **allow states to use Title II funds to provide training for principals and other school leaders on effective evaluation of teachers.** This new language is perhaps best cited after Section 2101.3.B.viii, Page 133. Principals know—as does the rest of the educational community—that teacher quality is the single most important school-based factor in student achievement and that principal evaluations of teachers are critical to teacher growth and success. We believe that a useful teacher evaluation process is predicated on meaningful feedback, mentoring, and coaching, as well as appropriate support for principals to execute evaluation models that accomplish the goal of evaluation—to improve instruction and learning in the school building.

Residency Programs

As noted above, we believe it is critical that the final bill **support principal residency programs** as well as teacher residency programs. Therefore, we ask for the following change to the draft on Page 133, Line 14:

(x) – Supporting teacher **and principal** residency programs

State Plans

We believe that states should also consult principal professional standards entities regarding their state activities under this section. This will provide greater assurance that states will take into account the unique professional learning needs of principals when developing state professional learning programs under this title. Therefore, we suggest the following change in the draft on Page 134, Line 16:

(C) Add “**and principal**” after teacher

Section 2102 Subgrants to Local Educational Agencies

Needs Assessments

Our organizations were pleased to see in Section 2102.b.2, Page 137, Line 8 of the draft that LEAs are required to complete a comprehensive needs assessment to determine how best to prioritize Title II dollars to support students through effective teaching and leading. We recognize the specific needs of each community may differ, and we appreciate the requirement of a needs assessment to ensure states, school districts, and schools are using these funds to address specific areas in need of improvement. Additionally, we support the draft’s language requiring the consultation of teachers, principals, other school leaders, and necessitating the ongoing consultation of those stakeholders involved in the needs assessment to improve and coordinate the programs and activities occurring under the subgrant.

However, we are concerned that many high-need LEAs may lack the capacity and financial resources to conduct these assessments and ensure their reliability, thereby hindering their ability to provide accurate data to inform their plans. LEAs must be directed to work with state-level organizations dedicated to meeting the needs of principals in the state, and with principals directly to develop the needs assessments. Further, no guidance is given to states or to districts on what specific indicators must be included in a needs assessment, and we believe far too much flexibility with little accountability is given to states and districts in using these critical funds. We respectfully ask the Committee to add specific indicators that must be included in a needs assessment so states are using federal funds effectively.

AFSA, NAESP, and NASSP are pleased to see that an LEA application for Title II funds, in Section 2102.b.4.D, Page 140, Line 1, must provide a description of the professional development activities for teachers and principals that will be tied to the needs assessment.

The draft's attention to professional development for principals, assistant principals, and other school leaders is vital as they are responsible for implementing a wave of new initiatives, such as more rigorous college and career ready standards, teacher evaluation systems, school improvement efforts, accountability requirements, and digital learning and online assessments. However, there must be two separate descriptions of teacher and principal professional development because teachers and principals have unique roles within a school building and require specialized professional learning opportunities to improve their practices. Therefore, we request that the language be clarified on Page 140, Line 16, to read that:

- (D) A description of the **separate** professional development activities that will be made available to **both** teachers **and** principals and other school leaders to meet needs identified by the needs assessment described in paragraph (2).

Section 2103: Local Use of Funds

Our organizations support the inclusion of the same suggested language we provide for Section 2101 on principal evaluation and the provision that alternative certification routes for principals require prior teaching experience in the following sections:

- Section 2103.b.3.A, Page 142, Line 10
- Section 2103.b.3.C, Page 143, Line 18

Instructional Coaching

In Section 2103.b.3.E, Page 144, Line 7, we also support the addition of language to provide professional development on the implementation of college and career ready standards and effective teacher evaluation and coaching strategies for principals. Research has proven that one of the most positive impacts a principal can have in his or her school occurs when they are able to focus on instructional coaching and build strong relationships with teachers. States and school districts must include training for principals on best practices for instructional coaching, including how to improve their ability to mentor and coach teachers to build their capacity to improve. Without instructional coaching, there is no mechanism to support growth and improvement of teacher performance within the evaluation systems.

Additional Programs Included

AFSA, NAESP, and NASSP are extremely disappointed about the inclusion within Sections G-J of Section 2103, Page 145, Lines 3-24 of activities not directly in support of the recruitment, preparation, professional development, and retention of high-quality and effective teachers and principals for high-need students and schools. While these activities have merit, we assert that their inclusion in this Title will dilute the limited funding available for activities that bear directly on supporting teachers and principals. With that said, we believe that Section K, Page 146, Lines 1-2, which permits support for teacher and principal residency programs, belongs in this Title as such programs contribute to teacher and principal quality and effectiveness.

Our groups also are extremely concerned about the ability to shift 100 percent of Title II dollars in Section 2103.b.3.M, Page 146, Lines 6-8. The provision would effectively allow states and districts to neglect the use of Title II funds to support teachers and principals.

While we believe a level of flexibility is important for states and school districts to address their needs, we find this provision will exacerbate the problem with current law and not provide appropriate resources for effective teaching and principal leadership.

Principals of Effectiveness

We were pleased that the draft included teachers, principals, parents, and institutions of higher education in the development and application of programs and activities to support effective teaching, leadership, and student learning. We request that the next iteration of this draft add the following bolded language to the Principals of Effectiveness section (Section 2103.c) in order to ensure that states and LEAs recognize the value of effective principals:

- 1.B.i, Page 147, Line 6 – “aimed at ensuring that all students receive a high-quality education taught by effective teachers **and attend schools led by effective principals;**”
- 2.A., Page 148, Line 6 – “taught by effective teachers **and led by effective principals and other school leaders**”

National Activities of Demonstrated Effectiveness

We remain concerned about this draft’s focus on alternative certification routes because we do not believe them to be appropriate paths for incoming principals. As we noted earlier, we believe that incoming principals must have prior teaching experience. Thus, we are concerned by language in Section 2105.c .1, Page 151, Line 10, that allows the Secretary of Education to expend National Activities funds for principals “from non-traditional preparation and certification routes to serve in traditionally underserved” LEAs and recommend its removal.

We also believe that the award of any National Activities funding under this Title must focus on teachers and principals. Therefore, we recommend that the next draft of this bill include within the definition of entities eligible (Section 2105.g.2., Page 153, Line 23) for National Activities support the following bolded language:

“(2) a national nonprofit or for-profit organization with a demonstrated track record of raising student academic achievement, graduation rates, and rates of high education attendance or matriculation, **or of effectiveness in providing preparation and professional development activities and programs for teachers and principals.**”

Teacher Incentive Fund

Our groups believe that any state or locally developed pay-for-performance plan must include multiple measures of school and student performance, and not be solely based on a single assessment or no more than 25 percent of student achievement data. Comprehensive compensation systems must take into account the complexities of the education profession and the principal’s multifaceted roles and the expectations of the job. A comprehensive performance-based compensation system with multiple measures will provide greater incentives for educators to focus on the instructional aspects of their daily work and have the added benefit of enhancing the recruitment and retention of talented professionals who are successful in doing so. Any pay-for-performance system for educators must have the following elements:

- States should develop the infrastructure for performance-based compensation systems and offer guidelines and financial incentives for the optional participation of local school districts.
- States and districts should collaborate to develop performance-based compensation systems for principals in conjunction with similar systems for teachers for the purpose of rewarding high-level performance of groups of educators, creating incentives for schools and their leaders to improve their performance, and/or providing recruitment and retention incentives.
- States and districts must collaborate with principals, superintendents, professional associations, and unions (where applicable) in developing and implementing performance-based compensation systems for principals.
- Performance-based compensation systems should be developed and implemented as one component of the district school improvement plan and be linked to policies for recruiting and retaining highly effective principals.
- Principals should not be required to participate in performance-based compensation systems.

In assessing principal performance, we recommend the following measurements, in addition to student indicators:

- Self-assessments
- Supervisor site visits
- School documentation of classroom observations, faculty agendas, and the like
- School climate surveys
- Teacher, staff member, parent, and student evaluations
- Teacher retention and transfer rates
- Student engagement with, and rates of participation in, co-curricular and extracurricular activities
- Stakeholder involvement in school activities, clubs, or functions.

TITLE IV

We believe the consolidation and elimination of currently authorized programs in Title IV will result in the unintended consequence of preventing children from having access to a diverse range of supports necessary to succeed. States and school districts are often forced to make tough budgetary decisions, and far too often, programs and services to support the physical and psychological well-being of students, reduce school violence, and improve overall school safety are the first to be cut. Converting Title IV into a block grant will result in a competition among programs that ultimately will decrease services to children. No school district should have to choose between offering professional development in emergency preparedness and crisis response and improving the availability of school mental health services.

Currently, only 20 percent of our nation's children with diagnostic disorders receive mental health services or see a specialist, and fewer than 10 percent of children receiving mental health services are able to for more than three months. Collaborative relationships among the school, the community, and local service providers must be supported to provide programs and services when it comes to responding to threats on the health and safety of students directly.

Federal investment in dedicated funding streams for programs such as the Elementary and Secondary School Counseling Program, Safe and Drug Free Schools and Communities, and the Carol M. White Physical Education Program have ensured many schools do not have to make this difficult decision.

TITLE V

AFSA, NAESP, and NASSP believe that, on a small scale, public charter schools have the potential to provide innovative educational strategies that can be replicated across traditional public schools. However, the recent proliferation of charter schools has been met with mixed results and the research about their effectiveness has also been mixed at best. Moreover, we believe it of paramount importance to the success of all public school students that charter schools be held to the same standards as traditional public schools, including accountability requirements, regional accreditation standards, educator effectiveness, teacher and principal certification, regulations, and financial oversight.

Our organizations were pleased that the draft would strengthen the charter authorizing process by improving their performance management, including transparency, monitoring, and evaluation of charter schools. We were also very pleased that Section 5103 (Grants to Support High Quality Charter Schools, Page 220, Line 20) of the draft would require states to provide descriptions of how they will actively monitor and hold authorized public chartering agencies accountable based on the performance of the charter schools they authorize, with particular focus on the areas of student achievement, student safety, and financial management.

However, Section 5103's language raised some important concerns for us that we would like to see corrected in the next draft. First, while we appreciate that implementing teacher, principal, and other school leader professional development programs is listed as an allowable use of funds, we believe that the use of such funds for those purposes should be mandatory and not permissive (Section 5103.4, Page 239, Line 21). Principals are key catalysts for change in their schools and we believe it of the utmost importance that they have the knowledge, skills, and resources necessary to improve school and student performance.

Second, we appreciate that the draft prioritizes eligibility for funds to those who serve a significant number of students from low-income families (Section 5103.3.A, Page 241, Line 1). We strongly believe, though, that charters should be expressly prohibited from discriminating on the basis of race, sex, religion, socioeconomic status, or disability, and urge you to include these additional eligibility requirements in the next draft.

Third, we are concerned with language in Sections 5101.4 (Page 218, Line 16) and 5103.2.B (Page 237, Line 22) that would, respectively, encourage states to provide financing to charter school facilities commensurate with that provided to traditional public schools and give funding priority to states that ensure charter schools receive equitable financing as compared to traditional public schools. It is critical that federal, state, and local policymakers not divert funding from traditional public schools, and we fear that these provisions will push states in that direction.

Fourth, the draft is silent on the public process for authorizing charter schools. We urge that the next draft include requirements for a meaningful local review of the impact of charter schools on individual districts and for charter school applicants to hold no fewer than three public hearings to receive public feedback and address any taxpayer and community concerns. Section 5102.b. (Page 220, Line 4) might be the appropriate section to add such language.

TITLE VI

Our groups are extremely concerned by language in this title that would allow states to transfer all of their state funds between Title II and Title IV. Professional development for principals has been largely overlooked by states and local districts because NCLB or current statute “bundles” teachers and principals together in a lengthy “laundry list” or “use of funds” under Title II. A 2013 Department of Education survey bears this out, finding that districts use only an average of 4 percent of these dollars for principal professional development, falling far short of what states and districts should be doing to support principals to meet the increased demands as instructional leaders of schools. Recognizing a lack of principal-specific supports in Title II, the Explanatory Statement of the FY2015 Consolidated and Further Continuing Appropriations Act called for the Department of Education to “... recognize that the roles and responsibilities of principals continue to expand, including the implementation of state-led teacher evaluation systems, college and career ready standards, and new online assessments, so they must be afforded specialized opportunities for professional learning and growth targeted to their role as instructional leaders. Therefore, the Department should provide guidance to SEAs on ensuring that sufficient professional development opportunities are provided to principals in order to help them improve instructional leadership capacity.”

Allowing this additional funding flexibility will only further decrease the delivery of specific professional learning opportunities for principals. Therefore, we urge you to strike this language and maintain current law, which already allows up to 50 percent of funds to be transferred between titles.

Title IX

Definition of School Leader

AFSA, NAESP, and NASSP express strong concerns regarding the definition of school leader included in the discussion draft. As currently crafted, this definition fails to make clear to state and school districts that a school leader is an individual who runs the operations and instructional programs **within a school building**. As a result, states and districts could interpret this definition to apply to an assistant superintendent of curriculum or instruction, or a subject matter content specialist who oversees instructional practices within an LEA but is not in a school building on a daily basis. Therefore, our organizations urge you to include in Section 9101.10.31 (Page 353, Line 10) the language bolded below:

SCHOOL LEADER.—The term “school leader” means a principal, assistant principal, or other individual who is—“(A) an employee or officer of an elementary school or secondary school, local educational agency, or other entity operating the elementary school or secondary school; and (B) responsible for the daily instructional leadership and managerial operations **in the building** of the elementary school or secondary school.

Thank you for considering the comments herein which reflect the perspective of the nation’s elementary, middle level, and high school principals and school leaders. Our organizations are hopeful that your efforts will result in a bipartisan, comprehensive process to renew the law, particularly to address the law and its shortcomings related to support for the nation’s principals and school leaders.

We look forward to continuing to work with you on the reauthorization of ESEA so that we can better support educators and improve our nation’s schools.

Sincerely,



JoAnn D. Bartoletti
Executive Director, NASSP



Gail Connelly
Executive Director, NAESP



Diann Woodard
President, AFSA