



February 2, 2015

The Honorable Lamar Alexander
Chairman
Senate Committee on Health, Education,
Labor and Pensions
Washington, DC 20510

The Honorable Patty Murray
Ranking Member
Senate Committee on Health, Education,
Labor and Pensions
Washington, DC 20510

Dear Chairman Alexander and Ranking Member Murray:

On behalf of the American Federation of School Administrators (AFSA), the National Association of Elementary School Principals (NAESP), and the National Association of Secondary School Principals (NASSP), who collectively represent the nation's 115,000 elementary, middle level, and high school principals and school leaders, the following comments are provided related to assessment, accountability and other provisions of the Elementary and Secondary Education Act (ESEA) as authorized by the No Child Left Behind Act (NCLB). We applaud your work to renew the law and respectfully request the Committee to consider the following comments related to Title I of ESEA.

Principals believe the appropriate federal role in education is to promote equity and provide targeted resources to assist states and local districts that, in turn, must support educators to meet the learning needs of students, especially those that are considered "high-need". While NCLB prodded states to set high standards for every student, and help schools learn more about the unique needs of students from disadvantaged backgrounds to target learning strategies, the all-or-nothing yardstick for measuring school and student performance is simply flawed. As a result of NCLB accountability, many successful schools have faced punitive labels and continue to be misidentified as "failing" or "underperforming". These punitive labels placed on schools and educators are an inaccurate indicator or measure of student performance because they are gleaned from an across-the-board, single snapshot-in-time assessment and an accountability system that has no regard for the many factors that influence student learning, such as poverty and scarce resources in schools. This approach to accountability continues to be challenging despite the U.S. Department of Education's "ESEA flexibility waivers".

Principals value annual assessment of all students for accountability purposes, however summative assessments that are attached to high-stakes and a punitive label regardless of whether or not a student is actually making academic gains and growth is counterproductive. This has led to an untenable environment of over-testing, and forced educators to spend less time on instruction in order to prepare for standardized tests.

To address these issues, principals urge the Committee to base guidelines on state accountability systems on multiple measures and incentives for states and districts to use growth models instead of high-stakes assessments. Principals believe that this expansion of assessment systems will provide a reasonable solution to effectively put more balance, fairness, and accuracy in measuring student and school progress and performance.

More importantly, it will also lead to ending high-stakes, up-down, pass-fail punitive NCLB accountability and allow systems to be replaced with better indicators of what we believe will build capacity in our nation's public schools and improve student academic achievement. This requires several goals on the part of Congress: clear support for educators to help combat the effects of poverty, incentives for states and districts to create comprehensive assessment systems that truly reflect a student's progress toward academic achievement— not whether or not they have hit an arbitrary bar, and providing educators with achievement data that can be used to make instructional decisions. This also relies on Congress to provide sufficient funding for ESEA and increasing the authorization levels appropriately so that educators can better meet the needs of students.

Principals continue to face school-based challenges to overcome the impact that poverty has on student achievement, which is expected to increase in the coming decade and beyond unless they are better supported to meet the varied student needs related to learning. Principals are expected to ensure that schools perform at ever-higher levels with ever-shrinking budgets, juggle or adhere to often conflicting state and district guidelines, priorities, and various translations of federal education requirements, while receiving little to no support for their role as instructional leaders. Despite these challenges, principals remain committed to preparing all students to succeed regardless of the child's socio-economic status.

In light of these issues, our organizations oppose any and all efforts to transform Title I funding, which is designed to assist public schools with high concentrations of poverty and high-need students, into a private school voucher. Many portability proposals would clearly lead to vouchers as they allow the funds to move to both public and private schools. Some Title I portability proposals have been limited to public school portability, but they are designed to make it easier to implement private school vouchers as a next step. Accordingly, we oppose attempts to include any provisions supporting Title I public school portability in a reauthorized ESEA—even if it limits portability to public schools.

Additionally, AFSA, NAESP, and NASSP strongly oppose tuition tax credits and education voucher plans that divert public monies to private institutions. Our organizations believe that the welfare of this nation is dependent on a strong public education system. Tuition tax credits reduce gross tax revenues designed to support public education for all. Furthermore, we oppose the diversion of public monies to private institutions which are not bound to the same public accountability standards that all public schools must meet, including those in Title IX, the Individuals with Disabilities Education Act (IDEA) and ESEA.

The following are additional recommendations to Title I that principals recommend and believe must be addressed in any reauthorization bill to refocus and improve assessment and accountability systems according to the goals stated above.

Sec 1111(b)(2)(B)(i-iii; vi) and subpart (D) (pgs. 17-24) -- State-Designed Academic Assessment System

While state assessment systems must be aligned to college- and career-ready state academic content standards, they must tie to local assessments that provide timely information about student attainment of and growth towards such standards. Assessment data must be valid and reliable, and most importantly, involve multiple measures of student academic achievement and growth that takes into account individual student success and progress.

Assessments play a vital role in the teaching and learning cycle and include various types of tests: summative, formative, interim, benchmark, and diagnostic. Multiple assessment types exist and provide valuable information at different times within a student's learning progression. Using a comprehensive assessment system will provide a complete picture of student achievement and growth, not an up or down, pass-fail, standardized test score that has no regard for the multitude of ways that students' progress. The assessment system under NCLB has produced a one-dimensional view of the child, the teacher, the principal, and the school.

State plans regarding assessment must be required to assure that the cornerstone of their assessment system will measure student academic growth through the use of effective growth models, as well as a variety of measures. State and local districts must work together with educators (teachers and principals) to develop assessment systems that acknowledge or measure the variety of ways in which children succeed, and accurately capture their emotional and social development, language fluency and comprehension, creativity, adaptability, critical thinking and problem-solving skills, in addition to proficiency in the core academic content areas.

This type of collaboration is necessary to provide for a more robust and meaningful assessment system, and to inform educators, parents and students about learning and progress towards student objectives. We encourage the Committee to include S. 197, the Support Making Assessments Reliable and Timely (SMART) Act, which would provide states incentives to conduct assessment audits and review to get a clear picture on their testing regimes, the time spent on test-taking and test preparation, and how to improve the quality of assessments for purposes of informing instruction and learning.

Sec 1111(b)(3) – State Plans and State Accountability Systems

Principals believe the reauthorization of ESEA must focus on changing the definition of accountability that is too narrowly focused on student test scores. Principals support state systems that include a variety of indicators that identify true progress of schools and students. Principals urge the Committee to direct states to develop accountability systems that reflect student academic growth based on multiple measures of student progress.

Perhaps the most important work that a state must do is define what “student growth” means in any accountability system. As the key feature of a state plan on accountability, each state must provide an assurance that it will work with districts and local school stakeholders, such as teachers, principals and parents, to determine progressive student growth, as opposed to targeting “grade level” equivalency. Basing student growth on annual grade level equivalency proficiency targets undermines the inherent definition of “growth” that must be captured on a case-by-case basis, or calibrated to the student and his or her progress towards learning objectives.

In addition, we encourage the Committee to include provisions of S. 37, the “Core Opportunity Resources for Equity and Excellence (CORE) Act”, which encourages states to put in place accountability systems that include indicators for state and local investment in key areas for learning that are proven successful. Such indicators would include:

- The provision of early childhood programs and focus on intervention of learning strategies that are developmentally appropriate in grades Pre-K-3;
- The provision of high-quality instructional teams in schools, including licensed, credentialed, and profession-ready teachers, principals, school librarians, counselors, and education support personnel;
- Comprehensive, job-embedded professional learning for teachers and principals that is tailored and geared towards the individual roles that they serve in schools related to effective classroom instruction and school leadership;
- Up-to-date instructional materials, technology, and supplies, including textbooks, computers, mobile devices, and access to broadband;
- Effective school library programs;
- School facilities and technology, including physically and environmentally sound school buildings and well-equipped instructional spaces, including laboratories and libraries;
- Specialized instruction support teams, including school counselors, school social workers, school psychologists, school nurses, and other qualified professionals involved in providing assessment, diagnosis, counseling, educational, therapeutic, and other necessary services; and
- Effective programs for family and community engagement in education.

These core indicators of a state accountability system must be determined through a process the state engages in with local districts, and allows input by schools and educators, including teachers and principals, parents and local community stakeholders to take into account the local contextual needs of students. This will help states create and set systems that would accordingly individualize accountability, and gear it towards helping schools meet the needs of the students and learning.

Other Recommendations for Challenging State Academic Standards, Academic Assessments, and Accountability Systems

Sec 1111(b)(1) Subpart (F) (pg. 15); Sec 1111(b)(2) and Subparts (G) and (H) (pgs. 31-32) -- English Language Proficiency Standards, Language Assessments, and Assessments of English Language Proficiency

Principals support state development of English language proficiency standards that are aligned to challenging state academic standards in reading or language arts and math, and the requirement that states identify the languages for which assessments must be available. Our organizations specifically support the provision that students who are not English language proficient may not be tested in English for at least 3 consecutive years, with an option of two additional years based on the assessment of the local districts on a case-by-case basis. Research is clear that at least 3-8 years is needed for students to master language fluency, and principals leading schools where higher percentages of the student population are English language learners strongly support English language proficiency assessment prior to any assessment in reading or language arts and math in English.

This is needed to ensure that students are truly being assessed for their abilities in subject matter content (reading or language arts and math), which educators call into question when such assessments are administered to a student that struggles with the English language. Further, the provision of “consecutive” time of no less than three years in a school is critical as principals note that English language learners are often a transient subgroup student population, particularly in border states where students often leave the country and return multiple times, which can interrupt English language acquisition.

Sec 1112 (a)(5)(b)(3)(B) (pg. 56) Local Educational Agency Plan Provisions

AFSA, NAESP and NASSP support the provisions for the local educational agency review to ensure that schools, including educators or teachers and principals, are properly supported to help all children succeed. We agree with the purpose of the review to identify how districts plan to work with schools on an individual basis to close achievement gaps, and provide targeted assistance to schools and students. Districts seeking to utilize a performance-based compensation system as one component of a school improvement plan must consult with organizations representing principals in their design and implementation in order to be successful in recruiting and retaining highly effective principals. Additionally, principals should not be required to participate in performance-based compensation systems, and should have the opportunity to opt-out.

Sec 1114 (a) (1)(A)(iii)(I-IV) School Identification and Assistance – State Identification and Assistance

Principals have long been concerned about the capacity of states and districts to intervene in the nation's lowest performing schools, and their ability to work with schools on effective intervention strategies under the current School Improvement Grants (SIG) program regulations. We support the important shifts the proposal makes to exclude any one model of school improvement and place greater emphasis on supporting schools in regard to training, expertise, resources provided, and time that has been spent in the school building to implement improvement strategies and initiatives. Principals support the measures outlined in the proposal to identify schools for additional assistance, but recommend additional indicators inserted into this section that the state educational agency must consider such as:

- School culture and climate surveys;
- Teacher attendance;
- Professional development and learning that is provided uniquely or separately for teachers and principals in the school based on the role in which they serve; and
- Allocation of resources, on a consistent basis, to a school that is proportional to the percentage of students served qualifying for Title I services.

Sec 1114 (b)(1)(A)(insert i-iii)Local Educational Agency Review and Responsibilities

Principals believe that, in addition to the areas indicated in a review of schools, local educational agencies must examine the school's data with respect to:

- (i) the number, experience, training level, responsibilities, budget and hiring authority, and stability of existing administrative, instructional, and non-instructional staff for the eligible secondary school; technical assistance and other support, including professional development opportunities, provided to school leaders and teachers;
- (ii) how federal, state, and local funds are being spent for instruction and operations at the school level for staff salaries, instructional materials, professional development, and student support services, in order to establish the extent to which existing resources need to and can be reallocated to support the school and educators in any reform activities; and
- (iii) how the local educational agency will provide consistent, substantive technical assistance including human capital, additional resources, and other assistance identified in collaboration with the school that is necessary to implement activities.

Coordinating Services for Early Childhood Education (Pre-K-3 Alignment)

Principals continue to support the bipartisan Continuum of Learning Act of 2011, legislation that would strengthen the connections between early childhood programs, school districts and elementary schools. Now more than ever, principals are leading early learning programs that are part of the K-12 systems and ESEA must require states and districts to report how Title I funds are being used for children prior to school entry. This information will help states and districts understand where the most vulnerable children are being served, and encourage school districts and schools to combine funding, where needed increase the availability of high quality care and education to support students in the early years.

States must also be directed in ESEA to take a leadership role in promoting the use of Title I dollars for early childhood programming, in coordination with the local early childhood community and elementary school principals. Further, Title I must recognize the important leadership that principals provide in Pre-K-3 alignment and helping students transition from early childhood care to educational settings, as well as their alignment of curriculum and instruction, including support for developmentally-appropriate teaching from age three to grade three, as well as state standards spanning from early childhood through K-3.

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 set a new direction for assessment and accountability that will truly measure the progress of schools and students.

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

Sincerely,



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