



June 14, 2013

The Honorable Tom Harkin
Chairman
Senate Health, Education, Labor and Pensions
Committee
Washington, DC 20510

The Honorable Lamar Alexander
Ranking Member
Senate Health, Education, Labor and Pensions
Committee
Washington, DC 20510

Dear Chairman Harkin and Ranking Member Alexander:

On behalf of the nation's 95,000 elementary, middle, and high school principals, assistant principals and other school leaders, the National Association of Elementary School Principals (NAESP) and the National Association of Secondary School Principals (NASSP) thank you for moving forward with the reauthorization of the Elementary and Secondary Education Act (ESEA).

Principals support many provisions in S. 1094, the Strengthening America's Schools Act of 2013, which would provide important guidance to states and districts that is critical to improving our nation's education system. While the bill strengthens and improves several areas of current law as authorized by the No Child Left Behind Act (NCLB), principals have many concerns with the bill as reported by the committee. Further, NAESP and NASSP are troubled by the lack of bipartisanship within the process to renew the law despite several areas of agreement in both parties on overarching and problematic areas of NCLB. Principals are counting on the 113th Congress to fully renew the outdated law, which continues to adversely impact schools through onerous sanctions and hinder principals' ability to provide the optimum conditions for teaching and learning in every school. While thirty-seven states are operating under the Administration's "ESEA flexibility" waiver plans that provide some level of regulatory relief from NCLB, there are schools in the remaining thirteen states that continue to unnecessarily face the punitive NCLB sanctions through one-size-fits-all accountability and an overreliance on standardized testing. Further, the waiver plans across states have not shown to either diminish inappropriate labeling and corrective actions on schools, or reduce the overreliance on standardized testing. Principals seek to refocus the law to help put in place state and local education systems that will provide robust, meaningful accountability together with sufficient supports for educators and schools to improve.

School Leadership

NAESP and NASSP are very pleased that S. 1094 significantly expands and improves support for principals and instructional leaders from current law by including provisions of the School Principal Recruitment and Training Act. The bill authorizes a competitive grant program to recruit, support, and prepare principals and assistant principals to improve student academic achievement in high-need schools through research-based programs. The provision would create one-year residencies to train aspiring principals, and provides ongoing mentoring, support, and

professional development for at least two years after the aspiring principals complete the residency and enter the profession. In addition, current law does not encourage states and districts to provide adequate support for principals in the field, especially during a time when the demands on instructional leadership have never been greater. Principals are required by federal regulation to lead a variety of new reform initiatives in schools and must be supported to manage the change process; evaluate teachers' practice and use of new Common Core State Standards and related initiatives in instruction; align schools' instructional focus; make key decisions on the best types of professional development to support teachers; and develop extended learning opportunities to sufficiently address the shifts that are occurring in teaching and learning as new assessment systems are put into place across the states.

Our organizations are disappointed that S. 1094 includes provisions from the GREAT Teachers and Principals Act (S. 1052) as an allowable use of funds at the state level. NAESP and NASSP oppose the GREAT Act and its intent to establish new principal preparation academies that usurp state-level authority over principal licensure and certification requirements, recruit principal candidates with little-to-no background in education or experience in a school or classroom, and provide minimal clinical experience and mentoring for new principals and assistant principals.

Principal Evaluation

NAESP and NASSP issued a report in September 2012 called *Rethinking Principal Evaluation*, which offers a framework for evaluating principals' performance—one that reflects the complexity of the principalship and measures the leadership competencies required for student and school success. Principals are concerned about the new evaluation systems being developed by states and districts that were a condition for receiving ESEA flexibility waivers, School Improvement Grant Program funds, as well as Race to the Top. Congress has a responsibility to provide guidance to state and local efforts in ESEA in order to establish effective principal evaluation systems that will lead to improved performance of principals within the domains of effective school leadership, or the areas of their role in a school that are in their direct control.

While principals are pleased to see that the evaluation systems noted in the bill would be based on more than just student test scores, we recommend that any principal evaluation focus on the six key domains of leadership responsibility within a principal's sphere of influence: student growth and achievement, school planning and progress, school culture, stakeholder support and engagement, professional qualities and practices, and professional growth and learning. The evaluation systems required in S. 1094 must be based "in significant part" on evidence of improved student academic achievement and growth, and evidence of providing strong instructional leadership, as well as support to teachers and other staff. The research contained in NAESP and NASSP's report recommends that no more than a quarter of a principal's evaluation be based on student achievement, and that the evaluation include multiple measures of performance within each of the six key domains. Further, ESEA must ensure that states and districts provide for relevant, reliable, valid evaluation systems that comprehensively evaluate principals by taking into account local contextual factors, and weighting performance components appropriately to the individual principal.

Professional Development

NAESP and NASSP strive to support instructional leadership skills of the nation's principals and other schools leaders. Professional development for principals has been largely overlooked by states and local districts. Research and evidence over the past ten years substantiate the role of principals and prove that they have an indirect impact on student performance, second only to teachers in the classroom. We are therefore pleased with the emphasis on professional development for principals in Title II of S. 1094. We strongly support the provision that requires States to use 2-5% of funds to support school districts in improving the performance and equitable distribution of principals and other school leaders, and providing technical assistance to support the design and implementation of teacher and principal evaluation systems. Many states are initiating pilot principal evaluation systems and will need significant assistance to ensure that they will lead to improved leadership performance. Part of the technical assistance would also include training for principals and other evaluators on how to evaluate teachers in order to differentiate teacher performance accurately; provide useful feedback; and use evaluation results to inform decisionmaking about professional development, improvement strategies, and personnel decisions.

Our organizations also support the provision within Title II that requires local educational agencies to use not less than 20 percent of subgranted funds for professional development for teachers serving students identified as priority schools that do not receive school improvement funds. NAESP and NASSP believe it is a significant oversight by the committee to exclude principal professional development as a required use of funds. As the key catalysts for school improvement, professional development must be provided to the principals and assistant principals serving in focus and priority schools.

College and Career-Ready Standards

The nation's principals and other school leaders are enthusiastic about the potential of rigorous, common standards that raise the bar for all students and set learning expectations from high school completion to college and career-readiness. NAESP and NASSP view implementation of these standards as a long-term improvement process to shift rigorous course content down through the grades, retrain teachers in new ways of thinking and instruction, integrate literacy across content areas, help students develop higher-order thinking and other 21st century skills, and provide the opportunity to introduce a new generation of assessments that are better able to measure student performance, and migrate from paper to online assessments.

However, NAESP and NASSP are concerned about provisions in the bill that support the transition to the new standards and aligned assessments for high-stakes accountability purposes only. Specifically, our organizations have called for a delay on penalties and sanctions related to test scores for schools, principals, and teachers. This is not a call to eliminate accountability, but to allow for a transition period so that schools have at least two years of experience with the new assessment systems. The reauthorization of ESEA must take into account the transition period to give states, districts, and educators the time needed to properly address data collection issues, which have dogged states since the inception of NCLB. Educators also need to be supported

during this adjustment period to manage what may be seismic shifts in practices and expectations in many schools, as well as deal with the acquisition of technology infrastructure and equipment.

School Improvement

NAESP and NASSP have long been concerned about the capacity of LEAs to improve our nation's lowest performing schools and the ability of school district personnel to select an effective intervention strategy under the current School Improvement Grants (SIG) program. We were therefore pleased to see that S. 1094 provides additional support for LEAs and requires them to conduct a needs analysis in priority schools to determine the most appropriate school improvement strategies to improve student performance. LEAs must also provide ongoing professional development consistent with the needs analysis and conduct regular evaluations of teachers and principals that provide specific feedback on areas of strength and where improvement efforts must be focused.

NAESP and NASSP support the Whole School Reform strategy that allows states to present a strategy for reform with an external provider that is based on evidence or one that has a statistically significant effect on student outcomes. However, principals remain steadfastly opposed to the requirement within the bill that reinforce the Administration's "models" of improvement, specifically contained in the Transformation and Turnaround strategies that begin with replacing the principal if the instructional leader has been in the school for more than two years. Evidence has shown that school improvement, or "turning around" a school takes, at a minimum, three to five years. Further, the practice has led to superintendents dismissing effective principals under the current School Improvement Grant program in order for a district to obtain sorely needed funds. Often, and ironically, the dismissed principals are reassigned to central office operations – in many cases to oversee a district's school improvement efforts. This convoluted and counter-productive practice, perpetuated by so-called reform models, illustrates the illogical and ill-informed policy that is the basis of these models. Further, any decision to dismiss a principal should, at a minimum, be based on a fair and objective evaluation of a principal at the local level, not by the federal government.

Literacy

As active members of Advocates for Literacy, NAESP and NASSP thank you for incorporating the text of the Literacy Education for All, Results for the Nation (LEARN) Act (S. 758) into S. 1094. The "Improving Literacy Instruction and Student Achievement" provision of Title IV will provide federal support for states and LEAs to develop or improve, and implement comprehensive literacy programs from birth to grade 12. A renewed focus on comprehensive literacy education is crucial and necessary for all students to be college and career ready. These more rigorous standards will require the reorientation of literacy education as a systematic progression of skills across all grades. Specifically, college and career-ready standards will require increased text complexity and inclusion of informational text, which will require more literacy instruction and support from birth throughout all levels of education.

Early Childhood

Principals are supportive of the provisions that connect and coordinate services between early childhood education and elementary education in Title I and Title II, including joint professional development between teachers and principals from early childhood and elementary education.

The provisions related to coordinated services in Title I are essential to ensure that every school is able to put in place a continuum of learning that will support students' transition from early childhood to the early elementary grades.

Improving Secondary Schools

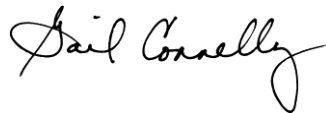
We are very supportive of the “Improving Secondary Schools” provision of Title I, which would provide low-performing middle and high schools with the necessary resources to implement innovative and effective reform strategies. Many of the provisions of this section are contained in the Success in the Middle Act (S. 708) and the Graduation Promise Act (S. 940), and we thank you for their inclusion. We are especially pleased that the bill requires LEAs receiving a grant under this section to implement an early warning indicator system to help high schools and their feeder middle schools to identify struggling students and provide them with supports to help them get on track to graduate from high school college and career-ready.

Education Technology

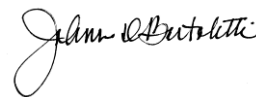
NAESP and NASSP are very pleased to see the inclusion of the Achievement Through Technology and Innovation or “ATTAIN” Act included in S. 1094. The bill would authorize grants to states to administer education technology initiatives and subgrants to school districts to ensure that school leaders and teachers are technology literate. Principals are enthusiastic about the potential of education technology to support the personalization of student learning and improve academic achievement. However, they desperately need resources in their schools to purchase hardware, software, and digital devices, and to access professional development opportunities so teachers understand how to infuse technology into their instruction.

NAESP and NASSP look forward to working with you and your colleagues in the Senate to address the problematic provisions reported in the bill that may adversely impact schools. Our goal is to help promote legislation that will meet the current needs of schools and students through a balanced and appropriate federal role in education. We hope that the Senate will continue to work on the legislation in a consensus-driven manner to garner strong bipartisan support for a bill that will ultimately achieve a full reauthorization of ESEA in the 113th Congress.

Sincerely,



Gail Connelly
Executive Director
NAESP



JoAnn Bartoletti
Executive Director
NASSP