



Parent input to NYSED/ Board of Regents learning Summit  
May 7, 2015

Good afternoon. I am Bonnie Russell, president of the NYS Congress of Parents and Teachers or PTA. With me is Rick Longhurst, NYS PTA's Executive Administrator. Also with us to respond to your questions are Catherine Romano, NYS PTA Education Coordinator and Co-chair of the NYS Family Engagement Coalition, Natasha Capers of the NYC Coalition for Educational Justice, Jamaica Miles of the Alliance for Quality Education, Matt Barnum of Educators 4 Excellence (E4E), Lisa Rudley of NYS Allies for Public Education (NYSAPE), and Sam Pirozzolo of the New York City Parents Union. On behalf of NYS PTA, I would like to thank you for the invitation to coordinate input to the NYS Board of Regents as you embark on the task of shaping regulations to implement new educator evaluation statutes included in the 2015-16 state budget. I'd like to briefly describe the process we used to develop the comments that Rick will share with you in a moment.

When we received the invitation from Sr. Deputy Commissioner Ken Wagner on April 23<sup>rd</sup> to coordinate parent input, we initially reached out to eighteen organizations that represent interests of public school parents throughout the state and conducted a brief survey of our PTA members. We shared questions that had been posed to us by Sr. Deputy Wagner and asked each group to respond with their positions and suggestions. We then looked for areas of commonality and difference and invited each group to join us in a face to face discussion before finalizing our comments. We found the task to be both interesting and challenging with far more that unites than divides us. We found that what parents seek is relatively simple.

- We want instruction that challenges our children while encouraging them to creatively apply what they learn
- We seek an environment where educators can collaborate with parents, communities and each other to prepare our students to lead rich and productive 21<sup>st</sup> Century lives
- We look for fair, unbiased and reliable information to determine the effectiveness of our schools, the efforts of staff, and the performance of our students
- We look to the Board of Regents to lead the dialogue when initiating policy and reform, and to advocate for the services and resources that will make those reforms reality

Of those who replied to our invitation, we discovered that we basically agree in our support of student and educator assessment, however most are uncomfortable with what currently exists. We are not opposed to student testing but we demand good, fair tests that support education of the whole child, suggest meaningful instructional strategies, and drive resources rather than pointing fingers and assessing blame. We also found that where we disagree, that disagreement centers around two themes:

1. Our organizations have different purposes and operate in different ways.
2. For some, the priority is reform urgency as the essential path out of poverty. For others, the reason for urgency is recognized but, it is more important to get the reform right.

Rick will describe details of our commonalities and differences in response to questions posed to us by the department. He will then invite you to pose questions that we in turn may refer to the individual parent group representatives best able to respond.

**Good afternoon.** None of us wishes to see necessary reform stall or worse yet, to move backward. While we must credit the Governor with stimulating recent dialogue, NYS PTA and a majority of those with us today have asked the Legislature and Governor to slow down and take a time out. Students First NY whose representative couldn't be with us today sees things differently and urges the State Education Department to move forward as prescribed in the new statute. (They contributed to our remarks and you will have a copy of their input.)

The Governor and Legislature have asked the Board of Regents to accomplish a lot in a short time but there are certain things only the Legislature and Governor can make happen. To get the effort right most parent groups believe that legislation and regulations must:

- **Separate Issues.** Separate aid increases from program adoption. The pressure to meet an arbitrary deadline to secure financial certainty causes unnecessary pressure to develop important policy in a rush. Poorly developed policy will ultimately need to be re-visited.
- **Define Purpose.** The primary purpose of an educator evaluation system must be teacher and principal improvement. A majority of us believe that any rating must also point to an improvement strategy.
- **Provide Time for Engagement.** Whether for educator evaluation plans or reforms for struggling schools, ensuring adequate time for meaningful two-way engagement of all stakeholders is of utmost importance to ensure that schools, teachers and students succeed.

You have posed specific questions to us. Collectively, we offer a parent perspective on the specific regulations you are considering for the new APPR. We will do this in three ways:

- Describe where there is consensus
- Describe where there are differences
- Invite your questions

**1. Scoring Ranges for the Sub-Components of the Student Performance and Observation**

**Categories:** As a whole our group is not prepared to comment on subcomponent scoring with any technical expertise. We seek performance measures that are equitable, free of bias, and fair to all. At the same time, we believe that the primary purpose of a revised evaluation system must be to improve educator effectiveness.

The proposed matrix system infers 50-50 weight of student growth and observation. Both observation and student growth subcomponents need differentiation for provision of professional development. We propose providing heavier attention to observation, with greater differentiation among the ratings to better inform professional development.

**Alternate views:**

- a. **E4E:** Growth scores should represent a Multi-year weighted average
- b. **NYSAPE:** Use of test scores to gauge the efficacy of teachers and principals should be prohibited
- c. **Students First NY:** Growth models should account for students' academic and demographic backgrounds to measure the impact teachers have on student learning

**2. Weights among Sub-Components of the Student Performance and Observation Categories:**

- a. **Performance.** Where statewide tests are administered, there is a uniform basis for growth comparison that accounts for factors outside a teachers control such as poverty.

Assessing student growth on optional performance measures and assessments of student learning objectives (SLOs) on the other hand are problematic. Where optional alternate performance and SLO measures are used, we must assume that there is a local rationale that such measures provide more useful information than the primary measure and should thus be given a higher relative weight. At the same time, we are deeply concerned with the construction and use of Student Learning Objective (SLO) measures to compare educators across districts. Many of us question how an SLO student growth measure can be equivalent to student growth on the state assessment when multiple SLO instruments and growth targets are anticipated among many subject areas and grade levels. Appropriate use of such measures will require SED to identify comparable measurement instruments and growth determination strategies. This is a monumental task and we question whether the education department has the present capacity to select or produce quality measures in the time allotted.

- b. **Observation.** Observation categories should consider annual instructional goals of each district or school as well as standard measures of effective teacher and principal performance. Ideally, a standardized statewide rubric based on NYS Teaching Standards adopted by the Regents in 2011 is needed but that rubric must be capable of assessing factors readily observable in the classroom as well as those such as knowledge of students and collaboration with parents, community and colleagues that are not. A majority of us maintain that professional growth depends on a close and knowledgeable relationship between each educator and a supervisor who functions as the instructional leader of the school therefore the weight of principal or building leader should be significantly greater than outside or peer observer.

In developing new weightings, you must also consider how the independent observer can best contribute to the outcome. While some place high confidence in the potential of the independent evaluator, most of us conclude that the independent rating should be limited to those qualities that are observable in the classroom and should be sharply curtailed after the first year and limited to teachers rated developing or ineffective or where there are significant differences between raters.

**Alternate views:**

**E4E:** Principal observer weight should be 75-90% of the observation component

**Students First NY:** Independent trained observers offer a critical perspective. Principals routinely rate their teachers in a way that's inconsistent with student growth outcomes.

3. **Parameters for Appropriate Student Growth Targets for Sub-Components of Student Performance Category** - Performance targets must recognize differing challenges facing each teacher whether through demographic characteristics of the students themselves or based on their past educational experiences. We remain concerned that teachers in non- tested grades and subjects lack valid measures of their students' progress. It is in this area that we find more disagreement among parent groups than in any other.

**Alternate Views:**

- a. **NYS PTA:** SLOs are best determined locally, based on district and school goals. PTA believes student growth measures should include non-cognitive skills (physical, social-emotional growth) that point to student growth.
- b. **Students First NY:** NYSED should set cut scores for locally determined SLOs more rigorously, as they perceive the SLO scores set locally were based on incredibly low expectations and inflated ratings in a way that undermine the validity of the system
- c. **E4E:** Provide significant autonomy to districts that have already achieved meaningful differentiation in their evaluation systems:
  - o Allow districts to use locally created growth models to meet SLO requirements
  - o Give flexibility to districts to keep aspects of the current evaluation system that are working
  - o Use a weighted multi-year student growth component to increase reliability
  - o Educators 4 Excellence proposes eliminating 'group' measures of evaluation that cause teachers to be evaluated on tests in subjects they don't teach

**4. Parameters for Optional Locally Selected State-designed Supplemental Assessments.** Optional performance measures, like assessments of student learning objectives (SLOs) are problematic. Where optional alternate performance and SLO measures are used, we must assume that there is a local rationale that such measures provide more useful information than the alternatives and should thus be given a higher sub component weight. The rationale for setting these parameters demonstrate the same strengths and weaknesses as SLO assessments, leading to the same debates as those cited for SLO assessments.

**5. Minimum Number of Annual Observations Including Frequency, Duration, and Any Other Parameter -** We agree that a minimum of two observations by a building administrator of at least fifteen to twenty minutes is necessary. For teachers or principals rated Developing or Ineffective, additional formal observations should be required. Whether announced or unannounced, observations should require both a verbal and written summary of findings and suggestions for improvement within as short time of the observation but in any case prior to any subsequent observation. All observations should be as unobtrusive as possible.

**Alternate views:**

- a. **NYS PTA:** Ratings by outside observers should not be required for all teachers rated Effective and Highly Effective in the prior year. The use of an Outside observer comes at a staffing cost, whether direct or through substituting leaders from other schools.
- b. **E4E:** Allow for the use of video cameras for observations to ease the traveling load on independent evaluators. Ensure that independent evaluators are able to fairly assess teachers' performance by limiting whom they can observe based on content knowledge and appropriate grade span experience.
- c. **Students first NY:** Independent observers may also safeguard against the rare circumstances in which principals are unfair or unreasonable in their evaluations of teachers.

**6. Observation Rubrics:** Much of the media attention has been paid to the assessments, however we believe attention to the observation component provides the greater potential to enhance professional development and practice that positively affects student performance by its nature. We strongly urge attention to the quality and inter-rater reliability of observation rubrics. We

all favor an implementation strategy that uses several observations where the observer is focusing on a limited number of instructional qualities at one time. Observation should be broadly defined to include qualities observable in the classroom as well as others described in the NYS teaching standards which cannot be. Danielson and NYSUT rubrics both reflect this and are widely used. These rubrics make allowance for parent input and student portfolios, an essential aspect of overall evaluation but that the statute prohibits outside of approved rubrics. We recommend the legislature remove the ban on student and family input.

**Alternate views:**

- a. **NYS PTA:** A productive rubric cannot be one size fits all. Classroom instructional practice must also be aligned with building and district goals. Effective instruction demands effective performance on certain qualities that apply to all teachers but others that focus specifically on the environment and priorities of a particular district, school or classroom.

7. **Alignment of the Principal Evaluation System to the New Teacher Evaluation System Established in Education Law S30112-d:** Principals should be held accountable for student growth performance, overall building performance, a review of teacher growth based on observation, and professional characteristics.

**Alternate views:**

**NYS PTA:** Asks, where will parent outreach and family engagement in student success principles/standards be reflected in Principal evaluation? Research indicates strong family engagement and school support is tied to student success, how will these principles of high aspiration and collaboration with parents and the community be reflected in both evaluations?

8. **Parameters of Potential Waivers from the General Prohibition Against Assigning a Student to a Teacher Rated Ineffective for Two Consecutive Schools Years:** Ideally, there should be no waivers that permit a student to be assigned to an ineffective teacher two years in a row. There are however, times where this may be unavoidable particularly in rural areas where small student populations make alternatives unattractive or impossible. Where waivers are granted, and of necessity, a strong professional development requirement should accompany that waiver.

**Alternate views:**

**Students First NY:** SED should act with urgency to require that districts implement their evaluation systems within the time frames prescribed in the state budget. Waivers should only be granted in extraordinary circumstances.

9. **The Extent to Which Provisions in Education Law S3012-c Should Apply to the New Evaluation System:** Constant change is typically disruptive to the educational process. Aspects of 3012-c that are not addressed in 3012-d should be generally be maintained in their present form, subject to local control.

**Alternate views:**

**NYS PTA:** Flexibility in applying student performance to teachers must be required when teachers have inconsistent service or change grade level or schools.

**10. Other Relevant Comments and Recommendations:** Some among us believe that reform urgency requires immediate implementation. Recent events have led to strong mistrust of the current 3-8 testing system. Parents, teachers and the general public question the reliability and composition of student growth measures, the process used to set cut scores, delayed and incomplete return of test results, and the appropriateness of the test instrument, especially where test questions are inaccessible to principals, teachers and parents. Most believe that the legislatively imposed process fails to address this mistrust and is a rush to judgment with virtually no opportunity for public input or comment. We conclude that this is not the best way to achieve productive and lasting reform and ask that you object to the limited opportunity for rational dialogue and study in the strongest manner possible.

**Alternate views:**

**Students First** maintains the urgency in implementing stronger APPR elements will serve the most underserved student populations.

We thank you again for this opportunity to provide input to this important effort and we invite your questions.