August 18, 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

The Honorable John Kline
Chairman
Education and the Workforce Committee
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Bobby Scott
Ranking Member
Education and the Workforce Committee
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Alexander, Chairman Kline, Ranking Member Murray, and Ranking Member Scott:

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 in the nation's 115,000 elementary, middle, and high schools, are pleased to provide comments on the conference committee process to reauthorize the Elementary and Secondary Education Act (ESEA).

All principals, from prekindergarten to grade 12, must meet the demands and responsibilities related to effective school leadership, which research has proven is second only to a great teacher in improving student achievement. ESEA must acknowledge this vital role principals play in their schools and provide them with appropriate professional support to meet high expectations and ensure quality instruction in every classroom for every student.

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, the No Child Left Behind Act 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.

Principals support several common provisions in S. 1177, the Every Child Achieves Act, and H.R. 5, the Student Success Act, that we encourage you to preserve in the final conference report. Specifically, principals support:

- the elimination of AYP and the 100 percent proficiency requirements;
- the continued requirement for disaggregation of subgroup data;
the removal of the unworkable school turnaround models that are required under the School Improvement Grants (SIG) program and Race to the Top; and,

the clarification of the term “school leader” as the principal of an elementary, middle, or high school.

In addition, in order for a reauthorized ESEA to meet its intended goals and fully support all educators to improve student achievement, AFSA, NAESP, and NASSP strongly recommend that the following provisions be adopted as part of a final conference report:

1) School Leadership
   a. School Leader Recruitment and Support Programs: Our organizations strongly support the language in S. 1177 under Title II, programs of national significance, to reserve funds for competitive grants to improve the recruitment, preparation, placement, support, and retention of effective principals and other school leaders in high-need schools. Please preserve this language.
   b. Professional Development: Our organizations support the provision in S. 1177 under Title II, Part A that allows states to reserve not more than 3 percent of the amount reserved for sub-grants to local educational agencies for activities for principals and other school leaders. While this is a critical provision to ensure additional professional development opportunities for the nation’s principals, we recommend this be included as a required use of funding at the state level, not merely offered as an option. We also request that the conference committee remove the trigger language that only allows for the reservation if it would not result in a lower allocation to local educational agencies under section 2101, as compared to such allocation for the preceding fiscal year. Our organizations support the allowable use of local Title II funds in S. 1177 for school leader residency programs, induction and mentoring programs that are designed to improve school leadership, and support for principals and other school leaders to align and promote quality early learning experiences from prekindergarten through grade 3. We would like to see these provisions preserved in the conference report. In addition, we urge you to maintain the provision in H.R. 5 that would cap the amount of Title II funds that may be spent on class-size reduction at 10 percent, which would ensure that districts spend more of this funding to improve the quality of teachers, principals, and other school leaders.
   c. Principal Evaluation: We are extremely pleased to see that S. 1177 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. However, we request that you include the definition of “evidence of school leadership” from Rep. Scott’s substitute amendment that ensures principal evaluations developed at the state and local levels incorporate the six domains of effective school leadership:
      - Student growth and achievement
      - School planning and progress
      - School culture
• Stakeholder support and engagement
• Professional qualities and practices
• Professional growth and learning

2) **Literacy**: Our organizations support the inclusion of the Literacy Education for All, Results for the Nation (LEARN) program in Title II, Part D of S. 1177 to provide federal support to states to develop, revise, or update comprehensive literacy instruction plans that, when implemented, ensure high-quality instruction and effective strategies in reading and writing from early education through grade 12. This important program would provide training for principals to implement comprehensive schoolwide literacy initiatives that incorporate high-quality literacy instruction in all content areas, which is so vital to ensuring the students are on the path to be college and career ready. **We urge you to retain this provision in the final conference report.**

3) **Digital Learning**: Our organizations support Sec. 5008 of Title V in S. 1177 to authorize the Innovative Technology Expands Children’s Horizons (I-TECH) program. This important provision would ensure that local educational agency and school leaders have the skills required to implement and support school- and district-wide approaches for using technology to inform instruction, support teacher collaboration, and personalize learning. **We hope that this provision will be retained in the final conference report.**

4) **Early Education**: Now more than ever, principals understand the importance of early childhood education and we support aligning standards, curriculum, and instruction to help young children from prekindergarten to the third grade. **The provisions related to early childhood education alignment and associated professional development provided for educators, specifically principals and teachers, in S. 1177 must be maintained through the conference negotiations.**

5) **Middle Level and High School Reform**: Our organizations support the provisions in Title I of S. 1177 that require state plans to include information about how the state will work with local educational agencies to assist in the identification of middle level and high school students who are at risk of dropping out; ensure effective student transitions from elementary school to middle grades and middle grades to high school; ensure effective transitions from high school to postsecondary education; and provide professional development to teachers, principals, and other school leaders in addressing the academic and developmental needs of at-risk middle level and high school students. **We encourage the conference committee to ensure that funds dedicated for school improvement or local school interventions and supports encourage states and districts to develop early warning indicator systems as defined in Rep. Scott’s substitute amendment.**

6) **Title IV**: Our organizations support the authorized programs and allowable use of funds under Title IV in S. 1177 **and urge their inclusion in the final conference report.** We believe the consolidation and elimination of these programs in H.R. 5 will result in the unintended consequence of preventing children from having access to the 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 worthwhile programs that ultimately will decrease critical services for 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.

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 successful bipartisan process that renews the law and supports our 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  Gail Connelly  Diann Woodard
Executive Director, NASSP  Executive Director, NAESP  President, AFSA