February 9, 2015

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

Dear Chairman Kline:

The American Federation of School Administrators (AFSA), the National Association of Elementary School Principals (NAESPed), and the National Association of Secondary School Principals (NASSPed)—which collectively represent principals and other school leaders in schools from prekindergarten to grade 12 in the nation’s 115,000 elementary, middle, and high schools—are pleased that the House Education and the Workforce Committee is considering legislation to reauthorize the Elementary and Secondary Education Act (ESEA), currently known as No Child Left Behind (NCLB).

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 the Senate Health, Education, Labor and Pensions (HELP) Committee on January 27, “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, 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.
Principals support many provisions in H.R. 5, the Student Success Act of 2015, specifically the elimination of AYP and the 100 percent proficiency requirements, requiring disaggregation of subgroup data; removal of the unworkable school turnaround models that are required under the School Improvement Grants (SIG) program and Race to the Top; and the 10 percent cap on the amount of Title II funds that may be used for class size reduction.

While the bill strengthens and improves several areas of current law as authorized by NCLB, principals have many concerns with the bill as reported by the committee. Foremost, our organizations are troubled by the lack of bipartisanship within the reauthorization process despite several areas of agreement in both parties on overarching and problematic areas of NCLB. Principals are counting on the 114th 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 43 states, the District of Columbia, and Puerto Rico 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 seven states that continue to unnecessarily face inappropriate labeling and corrective actions due to the overreliance on standardized testing. Principals wish to refocus the law to help put in place state and local education systems that will provide robust, meaningful accountability based on student growth together with sufficient supports for educators and schools to improve.

Our organizations are disappointed that the bill would authorize funding for Title I at $16.2 billion for FY 2016–2021, which is the same amount appropriated by Congress for FY 2015. As the Committee’s own fact sheet notes, this amount is “lower than the Title I authorization for the last year it was authorized” under NCLB in 2001. This is obviously unacceptable for the many schools serving low-income students that are eligible for Title I funds, including the middle and high schools that never receive such funding because of the high need in their feeder elementary schools.

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.

**School Leadership**

While we appreciate the bill’s intent to define “school leader,” our organizations believe that the term “school leader” must be more clearly defined to include only principals and assistant principals working in the school building, and not superintendents and other district leaders as the language indicates. Clarifying this definition would help states and districts correctly interpret this language to mean an educator who must be located inside the school building. The Student Success Act inadvertently diminishes the role of the principal as an instructional leader in the absence of clear direction that principals are a unique and important factor to fostering high-quality instruction and learning, and second only to teachers in improving student achievement.

Our organizations have strong reservations about the inclusion of “school leader preparation academies” as an allowable use of Title II funds, 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.

Professional Development
The appropriate federal role in education is to promote equity and target resources to assist states and local districts, including programmatic resources to support educators. The emphasis on school-level outcomes and student achievement places the school leader at the center of all school reform efforts. As stated earlier, today’s principals and assistant principals are expected to be visionary leaders, instructional experts, building managers, assessment specialists, disciplinarians, community builders, and more.

Our organizations call for states and districts to provide professional development for principals on effective instructional leadership skills in our nation’s schools. An investment in principals is an investment in learning. 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. As a result, a 2013 Department of Education survey recently found 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. Research and evidence over the past 10 years substantiate the role of principals and prove that they have an impact on student performance, second only to teachers in the classroom.

We respectfully encourage you to include robust provisions in a reauthorized ESEA that will support principal professional development, including a requirement that districts who receive Title II funding allocate no less than 10 percent of the funds available for professional development for elementary, middle, and high school principals to improve instructional leadership. This must be a separate section of the reauthorized law to ensure that principals are afforded the recognition and proper support in executing their leadership role in schools successfully.

Principal Evaluation
NAESP and NASSP issued a report in September 2012 called *Rethinking Principal Evaluation*, which offers states and districts a framework for principal evaluation systems to reflect the complexity of the principalship and measure the leadership competencies that are 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, SIG program funds, as well as Race to the Top. Congress now has a responsibility to provide guidance to state and local efforts in ESEA in order to “course correct” hastily designed principal evaluation systems across the states.

Our organizations are concerned that the bill does not require the states’ school leader evaluation systems to be designed in collaboration with practitioners. We are also concerned that it should 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 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.

Our organizations represent instructional leaders from grade levels spanning prekindergarten to grade 12. As such, collectively we support strengthening coordinating services from early childhood to the early elementary grades (Pre-K-3 alignment) and providing for joint professional development between early childhood educators and early elementary educators, including principals. We also urge the Committee to address greater support for middle level and high schools and their role in the education continuum, comprehensive literacy instruction from early childhood through grade 12 with an emphasis on reading and writing across the content areas, and resources and professional development for principals and teachers to better integrate technology in instruction.

Principals believe that ESEA must address these areas in some way as part of any education reform agenda. Our organizations hope that the committee will do more to highlight the issues that are critical to principals, and look forward to working with you and your colleagues. 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 also hope that the House will 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 114th Congress.

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. 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