October 8, 2014

Ms. Elizabeth Ross
US Department of Education
400 Maryland Avenue, SW
Room 3C116
Washington, DC 20202

Docket ID: ED-2014-OESE-0079

Dear Ms. Ross:

On behalf of the nation’s 115,000 elementary, middle, and high school principals, assistant principals, and other school leaders, the American Federation of School Administrators (AFSA), the National Association of Elementary School Principals (NAESP), and the National Association of Secondary School Principals (NASSP) appreciate the opportunity to offer comments and recommendations on the US Department of Education’s (ED’s) Notice of Proposed Requirements for the School Improvement Grants (SIG) issued September 8, 2014. Under this program, the nation’s lowest performing schools receive additional resources and support to implement turnaround efforts designed to improve outcomes for all students.

Great schools do not exist apart from great leaders, and strong school leadership is essential for ensuring student success. For more than a decade, the Wallace Foundation has sponsored rigorous research on school leadership, which has led to the finding that there is an “empirical link between school leadership and improved student achievement” (Wallace Foundation, p. 3). Researchers Louis, Leithwood, Wahlstrom, and Anderson concurred with this assessment, stating that “leadership is second only to classroom instruction among all school-related factors that contribute to what students learn at school” (2004, p. 5). However, principals working alone to improve schools will not succeed. Therefore, it is absolutely critical that principals receive high-quality, ongoing professional development and support to enable them to provide the leadership necessary for schools to be successful.

I. Removal of the Principal

Our three organizations understand that to turn around schools in challenging circumstances, each school must be considered in its unique context with a strong principal working to foster collaborative leadership and ongoing professional development that continually improves curriculum, instruction, and assessment in an environment that is personalized for each student. Consequently, in 2009, AFSA, NAESP, and NASSP formally shared their opposition to current SIG regulations that require the principal’s removal in each of the four school turnaround models as a condition for receiving SIG funding. The leadership of each of our individual organizations adamantly believes this requirement should never be the initial step in turning around any school. Typically, the existing principal and supervisory staffs have deep ties within the community and a unique understanding of the surrounding community and local culture. Rather than immediately replace them, all principals and staff should first have the opportunity to be evaluated and provided with the necessary support to lead the successful school turnaround. In
addition, all current school-related factors must be considered when evaluating the performance of the current principal.

*Early Learning Intervention Model*

For the same reasons expressed above, AFSA, NAESP, and NASSP oppose ED’s proposal to replace principals who led their schools prior to the implementation of the newly proposed *Early Learning Intervention Model* (Section I.A.2(f)). Instead, we urge ED to mandate that all principals and staff, not just new principals and staff, receive “rigorous, transparent, and equitable evaluation and support systems for teachers and principals, designed and developed with teacher and principal involvement” (Federal Register, p. 53258), along with “ongoing, high-quality, job-embedded professional development such as coaching and mentoring that is aligned with the school's comprehensive instructional program and designed with school staff to ensure they are equipped to facilitate effective teaching and learning and have the capacity to successfully implement school reform strategies” (Federal Register, p. 53259).

Our organizations do support a reorientation of the SIG program toward early learning in elementary schools where a school culture and vision embrace high-quality early learning programs to improve student outcomes. Early learning programs provide a student-centered, personalized, and well-rounded approach that should be a part of every child’s education from age three to eight or grade three, also known as PreK–3 education. High-quality early learning programs and school disposition to bolster Pre-K–3 leadership and education are an essential investment to ensure that children do not begin formal K–12 education behind their peers, particularly low-income or children who are at-risk. More than a dozen economic analysis research studies show that investments in early learning experiences help to decrease referrals for special education services and decrease grade retention, while increasing high school completion and improving student achievement beginning in the early grades. Elementary principals must be supported as part of the model to align prekindergarten programs through K–3, including setting standards, curriculum, and developmentally appropriate assessments to ensure a high-quality and seamless continuum of learning from age three to grade three (National Association of Elementary School Principals. Leading PreK–3 Learning Communities: Competencies for Effective Principal Practice (2014)).

*State-Determined School Improvement Intervention Model*

AFSA, NAESP, and NASSP, however, are pleased that the additional intervention models proposed would not mandate that *the principal and at least 50 percent of staff* be replaced as is required currently in the Turnaround, Transformation, and School Closure models. Specifically, our organizations support the proposal found in Section I.A.2(g) “to allow an LEA to use SIG funds to implement, in one or more SIG-eligible schools, a state-determined intervention model that has been developed or adopted by its SEA and that has been approved by the Secretary.” In addition, our groups concur with the requirement that a state-determined intervention model would be aligned with the turnaround principles established under ESEA flexibility, while requiring a “review of the performance of the current principal,” and only requiring replacement of the principals if “such a change is necessary to ensure strong and effective leadership; and requiring the LEA to provide the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget.” We believe it is critical that school districts examine quantitative and qualitative data pertaining to both academic and nonacademic indicators, such as students’
social and emotional learning needs, in their evaluation of principals. According to the Coalition for Teaching Quality’s *Excellent Educators for Each and Every Child: A Policy Roadmap for Transforming the Teacher and Principal Professions*, “school districts must establish capacity-building principal evaluation systems that are: created in collaboration with practitioners; based on the domains of effective instructional leadership and key abilities, such as cultural responsiveness; considered within a school's context along with the individual principal's experience and grade-level responsibilities; and tied to a personalized professional growth plan.”

**Evidence-Based Whole-School Reform Strategies**
AFSA, NAESP, and NASSP also support an LEA using SIG funds to implement an evidence-based Whole-School Reform strategy found in Section I.A.2(e) of the proposed requirements. In addition to improving student academic achievement, our organizations are pleased that any Whole-School Reform strategy that an LEA selects must address the “training and support for teachers and school leaders” as a required part of this intervention. As stated in the Coalition for Teaching Quality’s *Excellent Educators for Each and Every Child: A Policy Roadmap for Transforming the Teacher and Principal Professions*, “professional learning and growth systems for principals must be based on the domains of effective instructional leadership which include: student growth and achievement; school planning and progress; school culture; stakeholder support; professional qualities and practice; and professional learning and growth.”

**II. Rural Flexibility**

The memberships of AFSA, NAESP, and NASSP all include a significant number of principals, assistant principals, and administrators that work in schools located in rural areas. Rural schools and communities face unique challenges, and, therefore, we are pleased to see the additional flexibility for rural LEAs. Specifically, our organizations support the proposal to add a provision in Section I.B.6 that would permit an LEA eligible for services under subpart 1 or 2 of part B of Title VI of ESEA “to modify one element of the Turnaround or Transformation model so long as the modification meets the intent and purpose of the original element.” Allowing rural schools receiving SIG funds to alter one element of the two most popular turnaround models allowed by ED will enable rural LEAs to implement strategies that best meet the individual needs of the school and community. In addition, AFSA, NAESP, and NASSP support the proposal to add Section I.A.4(a)(9) (Evidence of strongest commitment), which would require the SEA, when considering the strength of the LEA’s commitment, to evaluate the extent to which a rural LEA will meet the intent and purpose of the original element it has chosen to modify in either the Turnaround or Transformation models. In this way, if an LEA chooses to maintain its principal, it must put forth a plan as to how it will support a strong leadership position in the SIG-funded school.

**III. Allowing Five-Year Awards**

AFSA, NAESP, and NASSP are pleased with ED’s recognition of the time-consuming and difficult work of school improvement efforts. Specifically, we strongly support the extension of the awards to five years, as research has demonstrated that turning around a school involves three-to-five years of time-consuming, resource-intensive, and hard work. We support the proposed requirement to Section II.A.3 that would allow one school year for LEA planning and
pre-implementation activities to fully assess school leadership, staff capacity, and needs before selecting a turnaround intervention.

**IV. Modifying the Teacher and Principal Evaluation and Support System Requirements Under the Transformation Model**

Lastly, our organizations support the proposed changes to Section I.A.2(d)(1)(A)(ii) that would revise the current requirements and would require an LEA implementing the Transformation model to implement a teacher and principal evaluation and support system that meets the requirements for these systems under ESEA flexibility. In 2011, NAESP and NASSP created a joint Principal Evaluation Committee to develop a framework for principal evaluation to be used as a guide for improving professional practice that leads to increased student learning. This framework identifies six key domains of leadership responsibility that fall within a principals’ sphere of influence including: professional growth and learning; student growth and achievement; school planning and progress; school culture; professional qualities and instructional leadership; and stakeholder support and engagement. Additionally, in 2012, AFSA commissioned the American Institutes of Research (AIR) to study principal performance evaluation design that resulted in the report, *The Ripple Effect*. The report found that “principal evaluation systems should not be based solely on student achievement gains, but rather on the quality of a principal’s school-level leadership and performance.” AFSA, NAESP, and NASSP strongly support ED’s proposed changes to this section as they mirror ESEA flexibility requirements that stipulate teacher and principal evaluation systems are to be designed and developed with teacher and principal involvement and be used for continual improvement of instruction; meaningfully differentiate performance; use multiple valid measures in determining performance levels; evaluate teachers and principals on a regular basis; provide clear, timely, and useful feedback to guide professional development; and be used to inform personnel decisions.

**V. Conclusion**

In conclusion, the current emphasis on school-level outcomes and student achievement places the school leader at the center of all school reform efforts. Today’s principals and assistant principals are expected to be visionary leaders, instructional experts, building managers, assessment specialists, disciplinarians, community builders, and more; they are also the ones ultimately held responsible for student achievement. Recruitment, rigorous preparation, professional growth, and leadership opportunities are worthy of intentional focus and increased investment by federal, state, and local policymakers to help principals succeed. While AFSA, NAESP, and NASSP appreciate the proposed improvements to current SIG regulations as noted above, the required removal of the principal in each of the original four school turnaround models as a condition for receiving SIG funding leaves us greatly concerned about the ultimate success of this critical program. Thank you for considering our positions.

If you have any questions or concerns regarding our recommendations, please contact Nicholas Spina, AFSA’s Director of Operations & Government Affairs, at nspina@afsaadmin.org; Kelly Pollitt, NAESP’s Associate Director of Policy, Public Affairs, and Special Projects, at kpollitt@naesp.org; and Amanda Karhuse, NASSP Director of Advocacy, at karhusea@nassp.org.
Sincerely,

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