

January 21, 2016

Ms. Deborah Spitz
U.S. Department of Education
400 Maryland Ave. SW
Room 3E306
Washington DC 20202

Re: Request for Information Docket ID ED-2015-OESE-0130 *Implementing Programs under Title I of the Elementary and Secondary Education Act*

Dear Ms. Spitz:

On behalf of the National Association of Elementary School Principals (NAESP) and the National Association of Secondary School Principals (NASSP), who collectively represent the nation's Pre-K–12 elementary, middle level, and high school principals and school leaders, the following comments are provided related to the Request for Information on operating programs under Title I of the Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act (ESSA) P.L. 114-95.

Given the recent passage of ESSA in early December 2015, the nation's principals are just beginning to understand the provisions contained in the new law and thinking about how the potential shifts in policy related to Title I will impact their schools. Consequently, NAESP and NASSP have and will continue to collect information from the field to inform the rulemaking process on the impact of the new Title I in greater detail, and share this information on an ongoing basis with policymakers. As the rulemaking process and decisions on technical assistance and guidance to states and districts moves forward, principals urge the Department, as a matter of priority, to emphasize that the principals' perspective on efforts related to accountability, assessment, and allocation of Title I funds for schools. Further, based on the lessons learned from No Child Left Behind as well as the explicit intent of ESSA, we encourage the Department to focus on providing guidance and technical assistance where possible in lieu of regulations to ensure that states and districts, and therefore schools, may take full advantage of the flexibility to determine new plans related to accountability and assessment systems.

At the time of submission, the nation's principals are optimistic about the opportunities provided under ESSA to reset and refocus accountability systems according to student growth and multiple measures of school performance. Meanwhile, schools will be able to operate under the leadership of principals with the ability to direct resources to meet the needs of students. However, this will require time for educators to meet with state and local leaders to determine how to best reorient current systems in ways that will minimize disruptions to school planning, operations, and certainly instruction and student learning.

While educators, particularly principals, are eager to start working on implementation of new policies related to accountability and assessment, we urge the Department to limit regulation and instead focus on allowing states; districts; educators, including teachers, principals, parents, and families; along with other stakeholders sufficient time to collaborate and agree on how to proceed under the new law relying on technical guidance.

Based on recent data collected by NAESP and NASSP through a survey of 65,000 Pre-K–12 principals related this request for comments, our organizations offer the following initial input related to regulation, guidance, and technical assistance on Title I.

I. State Accountability Index, Indicators, and Assessment

Principals are pleased that the new law calls on states to work directly with educators to set an accountability index that may include multiple measures of student progress based on growth and provides a system that meaningfully differentiates school performance. While the new law urges states to set high standards for the achievement of every student, we recommend that the Department pay special attention in any guidance that student progress can be measured in a more holistic way, and, based on the data, help schools target resources and interventions to meet the needs of students from disadvantaged backgrounds. Principals remain concerned that many states may choose to continue to use an all-or-nothing yardstick for measuring school and student performance because it is less complicated and cumbersome. One of the most important lessons learned from the past decade of education reform has unfortunately been placing punitive labels and misidentifying schools as “failing” or “underperforming” due to across-the-board, single snapshot-in-time state summative assessment test scores. It is time for all states to adopt accountability systems that will consider the many factors that influence student learning, such as poverty and scarce resources in schools, and place higher regard on growth measures to accurately capture student progress.

Principals value the annual assessment of all students for accountability purposes; however, a continued reliance on summative assessments attached to labels in a differentiated system, regardless of whether or not a student is actually making academic gains over a sufficient period of time, will continue to be counterproductive and do little to reduce the environment of over-testing. Principals and school leaders urge the Department to support, to the greatest extent possible, state and local assessment audits and collaboration among educators to set a testing regimen that will reduce unnecessary and burdensome interim and benchmark assessments. We believe this is the best way to relieve the pressure on teachers and principals who are spending an inordinate amount of instructional time preparing students for standardized tests.

In addition, states must be held accountable for using well-designed growth models that correlate to district and school data in demonstrating individual student success. Too often schools have found individual student data that is inconsistent when reported by districts and states. NAESP and NASSP encourage the Department to address these issues, as well as the following, as states and districts move forward with implementation:

- States should receive technical assistance on how to work with educators to set and administer assessments that are the least disruptive in all public elementary and middle schools, and high schools, and focus on timely delivery of the results. While data literacy is important, as well as state reporting of data that is easily understood, the delay on student assessment results often hinders progress on instructional planning and program interventions, which in some states and districts, can take almost an entire academic year.
- Regulations must ensure that implementation of student growth measures tied to the state accountability system do not lead to additional unnecessary assessments, which must be reflected in the plans in accordance with section 1111(b)(2). The Department must regulate that states that have little to no experience implementing statewide growth measures conduct an assessment audit and evaluation as described in section 1202(a) as part of the state plan. In addition, our organizations urge the Department to refrain from regulating on any cap on the total amount of time students spend on assessments since this can be difficult to interpret and measure. Instead, states must be encouraged to take full advantage of programs made available in section 1202(a).
- Guidance should address issues related to the measuring growth of the English language learner subgroup and how states measure progress over time and consider no less than three years of individual student growth data when determining the school differentiation against the index.
- Technical assistance must be provided for states to identify effective measures of school quality, especially where such measures have not typically been used. Principals believe that the best school quality measures are grounded in school climate and safety measures, which are more reliable than teacher and student engagement measures. In fact, principals believe teacher and student engagement measures should not be used as part of the accountability indicators.
- Regulation must require states to establish a formal collaborative process that is transparent and made public to educators, including principals and teachers, to identify an appropriate list of school quality measures.

II. Definition of Select Terms

To clarify the intent of several provisions in the law, we believe it is necessary to define several terms for states and districts. This will ensure that, as state and local plans are being developed in coordination with educators, policymakers and practitioners have a shared understanding of terms. A shared understanding of terms between policymakers and educators is also critical in establishing a meaningful differentiated accountability system. In addition, within the new accountability construct, programs and permissive use of funds (within Title I and other major areas of the law) must be aligned. This will ensure that schools that are struggling receive the support and resources needed to improve, rather than sanctions and labels by a different name.

NAESP and NASSP suggest the Department provide for definitions of the following terms:

- For purposes of establishing a state accountability index as described in section 1111(c)(4)(B) and the indicators that must be annually measured, “student engagement” should be defined as a combination of student attendance rates or participation in after-school programs, participation and completion of advanced coursework, as well as other programs provided by the school for a complete and well-rounded education, such as art and STEM programs, as well as the school’s provision of positive behavior and multi-tiered systems of support. This will also call attention to the need for schools to have sufficient resources to offer these vital programs that are proven to increase student achievement.
- For purposes of establishing a state accountability index as described in section 1111(c)(4)(B) and the indicators that must be annually measured, “educator engagement” must be defined as participation in professional learning opportunities made available to teachers and principals by states and districts utilizing funds made available under section 2101 et seq.
- For purposes of equitable distribution, “inexperienced teachers” must be defined as teachers in their first or second year of teaching, which is consistent with the Department’s Office for Civil Rights Data Collection.
- Clarify that an “experienced principal” is a principal with at least three, but preferably five, years of experience in the role.

- Clarify that the definition of “school leader” is a principal, assistant principal, or other school leader within the school building, as it relates to use of the term in Title I and applicable programs, as well as state and local activities.
- Under section 1111(e)(1)(A)(i), the Parent Right-to-Know provision, ESSA regulations should clarify that parents need to be notified if a student is not taught by a fully certified teacher in order to ensure effective and consistent implementation of the provision. In addition, ESSA regulations should clarify that the term “certification” as applied to teachers, principals, and other school leaders means having met full-certification requirements, as defined by the state to allow for meaningful differentiation regarding certification status.
- For purposes of equitable distribution, “out-of-field teacher” must be defined as a teacher who is teaching outside of the subject area, grade level, or student population for which he or she is certified by the state.
- For purposes of accountability, the Department must define “consistently underperforming” subgroups in order to ensure that state accountability systems accurately portray graduation rates and achievement of traditionally underserved students over a sufficient period of time no less than three years.

III. Parent and Family Engagement

Successful principals engage families in regular, intentional, and meaningful two-way communications. Families are essential members of the learning community, and considered part of a school’s leadership team. Consequently, principals are responsible for authentic family engagement as a central component of their effectiveness. Principals know that one of the most successful strategies to improving student academic performance is a fully engaged parent and family. Guidance concerning section 1010(a) must direct local educational agencies to include principals as part of the activities surrounding evaluation of parent engagement policies in section 1010(2)(D) and (E). Principals are critical to developing, coordinating, and implementing effective parent and family engagement strategies in participating schools, and program funds must support this role with stakeholders, including local employers, business leaders, philanthropic organizations, and other entities as identified.

IV. Title I Services and Consistency

Principals encourage the Department to issue regulations ensuring states and districts establish consistency and year-to-year funding for schoolwide services. Principals continue to face school-based challenges to overcome the impact that poverty has on student achievement, which is expected to increase in the coming decade and beyond. Schools must be supported to provide consistent services for students receiving Title I services, particularly when supplementing state mandates.

States must be required to provide an assurance that supplemental funds will be provided year-to-year for no less than three years once the use of funds has been approved in accordance with regulation and guidance. As educators work to meet expectations to improve student learning aligned to higher state achievement standards, principals are faced with ever-shrinking budgets, juggle or adhere to often conflicting state and district guidelines, priorities, and various translations of federal education requirements. Now, more than ever, it is important to track and ensure that schools are able to provide services with sufficient resources on a schoolwide basis without fear of year-to-year funding.

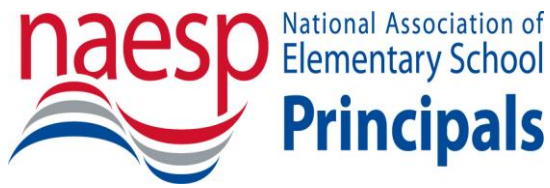
V. Early Childhood Coordinating Services

Elementary principals are pleased by the language in section 1112(b)(1)(D)(8) related to local educational agency plans that address coordination and integration of early childhood education programs at the school level. As states increase the investment in prekindergarten programs that are school-based, principals are responsible for ensuring quality early childhood education programs and supporting teachers with developmentally appropriate practice to prepare children for a formal education and lay the foundation for learning in later years. Principals have a profound understanding of the developmental and academic consequences that occur when children are not fully prepared to begin kindergarten. Now more than ever, principals also understand the significance of early childhood education and their responsibility to support a seamless continuum of learning for children coming from high-quality early childhood learning settings into the early elementary grades.

The Department must provide states and districts with guidance to recognize the authority of principals in schools serving children from pre-K through the elementary years and reinforce their role as a critical component of a Pre-K–3 learning system. State and district leaders must realize the role of principals as they work to address the learning needs of students across an early learning continuum in a system that is primarily K–12 focused, and provide them with the authority to make funding and school-based programmatic decisions related to early childhood education. In their role, principals must create intentional focus on alignment of Pre-K–3 programmatic and instructional activities, which requires greater resources and tools to engage communities to embrace a Pre-K–3 continuum, and shift programs accordingly.

VI. High Schools

When developing accountability systems, ESSA requires certain indicators to carry substantial weight. Therefore, the Department should provide guidance to states to ensure that graduation rates carry significant weight within state accountability systems in order to trigger interventions in high schools that have the lowest graduation rates in the state. In addition, the Department should encourage states and districts to use the four-year adjusted cohort graduation rate when identifying and supporting high schools where at least one third or more students do not graduate.



Guidance and technical assistance should also be provided to states and districts to support high schools tracking student performance at postsecondary institutions as well as placements in the workforce. This will help high schools increase their capacity and make instructional modifications to ensure they are providing students with the necessary skills and experiences to be college and career ready.

In relation to state assessment grants, the Department should provide guidance and technical assistance to states and districts working to evaluate student achievement through the development of comprehensive academic assessment instruments that emphasize the mastery of standards and aligned competencies in a competency-based education model. Additionally, the Department should provide technical assistance to states and districts that choose to adopt competency-based assessments as an innovative assessment system.

Lastly, as state plans are developed, the Department should provide guidance and technical assistance to states and districts implementing career and technical education curriculums within schools to ensure greater alignment among academics, the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.), and industry recognized credentials that meet the criteria established under the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).

Thank you for your consideration of these recommendations. We look forward to our continuing work to ensure successful implementation of ESSA, providing principals' feedback on other sections of ESSA, and supporting great leaders in every school who are working to improve learning outcomes for every student.

Sincerely,

A handwritten signature in black ink that reads "Gail Connelly".

Gail Connelly
Executive Director
NAESP

A handwritten signature in black ink that reads "JoAnn Bartoletti".

JoAnn Bartoletti
Executive Director
NASSP