November 28, 2012

Jim Merriner, Chair
Alaska State Board of Education
8600 Shebanof Avenue
Anchorage, AK

Dear Chairman Merriner:

The Alaska Association of Secondary School Principals (AASSP) thanks the Alaska State Board of Education for accepting and reviewing our comments regarding proposed changes to regulation 4 AAC 04.200.

AASSP is a professional association consisting of about 275 K-12, middle and high school principals, assistant principals, aspiring principals and other education leaders in Alaska. The purpose of our letter is to offer comment on the proposed changes to regulation 4 AAC 04.200. In this letter we:

- Clarify our support for some of the proposed regulation changes
- Pose several questions that should be addressed
- Share concerns about the proposed regulation changes
- Offer suggestions that will strengthen the regulations.

AASSP is committed to ensuring continuous improvement of school leaders as the foundation for school reform that improves student achievement. AASSP therefore supports developing improved teacher and principal evaluation systems in school districts in Alaska. Effective principals are catalysts for shaping school improvements, and their role is pivotal to ensuring all students are provided with the best environment for learning. Any regulation, policy or evaluation system related to principal evaluation should be based on valid, fair and reliable measurements if principals are to perceive evaluation favorably.
Recently the National Association of Secondary School Principals (NASSP) published a document entitled, *Rethinking Principal Evaluation*. This report notes the complex role of principals and related issues that measure principal effectiveness. The report reveals that research on principal evaluation however is limited and varies widely. The research does suggest that the quality of “how” principal evaluations are implemented may be more important than the content of what the evaluation instrument is intended to measure. In other words, principal evaluations are inconsistently administered and performance is therefore inconsistently measured.

The proposed changes to regulation 4 AAC 04.200 were developed void of any significant voice of current practicing principals in Alaska charged with implementing school reform efforts in Alaska. Principals need to be active contributors in the process of designing any district evaluation system of principals. To realize the potential of principal evaluation as a strategy for strengthening leadership and improving schools, practicing principals need to be part of any conversation that shapes an effective principal evaluation system, so any new evaluation system serves to develop their leadership capacity to support achievement in their schools.

NASSP identifies the following key domains should be incorporated into any new principal evaluation system. We highly encourage the proposed regulation contain a clear statement encouraging the use of the below domains to ensure school districts design better evaluation systems and professional support for principals.

- Domain One - Professional Growth and Learning
- Domain Two - Student Growth and achievement
- Domain Three - School planning and progress
- Domain Four - School culture
- Domain Five - Professional qualities and instructional leadership
- Domain Six - Stakeholder support and engagement

School principals expect to be held accountable for increased student achievement and don’t shy away from this responsibility. However, improved teaching cannot be achieved through establishment of a performance appraisal system alone, even when tied to student data. Improved achievement is a collective responsibility of teachers, principals, district office staff, superintendents, school boards and parents.
The rush to incorporate student growth data into performance evaluations, as proposed in the regulation, ignores a significant amount of current research that cautions about relying on student test scores as a valid metric. Using student data has some utility, but like using batting averages this data is at best an approximate indicator. At best, rating teachers and principals on value-added growth models predict only 25% of the variances such as who is assigned to a teacher’s class and what conditions a teacher must teach in.

Research conducted by the National Research Council and the Education Testing Service each conclude that ratings of teacher effectiveness based on student test scores is too unreliable and often measures variables beyond the control of classroom teachers. It should be noted as well that there is little research that links principals directly to student achievement, as many teacher and student variables that influence high academic achievement in a given year are outside the direct control of a principal.

It is imperative to take into account contextual factors related to student growth, including school, student and faculty demographics, the surrounding community, the school district and personal factors such as a teacher or principals experience overall and their longevity at a particular school. There are other factors that may also positively or negatively impact student performance and growth. Variables that can impact student data include: the number of students with limited English proficiency; the number of students with learning disabilities, and student attendance and mobility rates. If student-learning data is to be used as part of any evaluation system, controlling for these variables must be ensured.

4 AAC 19.050 (b) proposes that school districts “adopt evaluation procedures that incorporate student learning data into the evaluation process”. There are inherent problems using student assessment data to evaluate teacher and principal effectiveness. 4.AAC 19.099 (1) defines “student learning data” as objective, empirical measurements of student’s growth in knowledge, understanding or skill while being taught by a teacher. This language is too vague to provide adequate guidance to school districts, particularly since 4 AAC 19.050 (c) stipulates that student learning data must account for at least 20% of teachers’ and administrators’ overall performance ratings. Principals recognize there are a myriad of factors that contribute to student achievement. Teachers and principals require substantive feedback about much more than outcome measures related to student performance. The proposed regulation needs to include more clarity about what student learning data is to be used, and how “student learning data” is to be incorporated into evaluations of teachers and
school principals. There must be assurances that multiple measures are used to encompass the entirety of a student’s learning experience.

The use of value-added measures requires technical understanding of data and the many factors that must be controlled. Often student assessment data is not available for analysis until the start of the year following test administration, yet summative evaluations of teachers and principals typically occur each spring. There are other factors that are difficult to measure that may weigh positively or negatively on student achievement, such as availability of (or lack of) support personnel for special needs and second language learners.

There is still much to be learned about the efficacy of relying on student performance data to improve performance. AASSP supports the proposed 20% requirement, provided it is based on the collection and analysis of a comprehensive set of data gathered from multiple sources. In addition to test scores, measures. Any decision to base teacher and principal performance by greater than 20% of "student performance data" is best left to each publicly elected school board.

Attached are some questions and concerns we have regarding the proposed regulation 4 AAC 04.200.

Thank you for your work on behalf of Alaska’s children and for taking time to consider the comments we have included in our letter.

Sincerely,

[Signature]

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