AASSP questions and concerns regarding proposed regulation 4 AAC 04.200.

1. The proposed regulation lacks definitions about acceptable other measures of student outcomes beyond test scores.
2. The regulation lacks clarity about the **six domains of principal leadership** we noted, and a requirement that these be incorporated into a principal evaluation system.
3. The proposed regulation fails to address that not all principals and assistant principals have the same roles, responsibility, authority or autonomy in the school. How will student data be used in their evaluations?
4. The proposed regulations fail to adequately address how teachers/principals of district correspondence schools will be evaluated using student data, often when the instruction is the responsibility of parents.
5. How will teachers and principals be evaluated using student data in non-traditional (career & technical, vocational, special education, etc.) schools where students transfer in 11-12th grades, lag behind peers in credits, the curriculum is not in core subjects such as Burchell HS, Whaley School, King Career Center, and other special program or alternative schools?
6. If school districts are to determine what data they will use as part of teacher/principal evaluations, will the data they choose to use need prior approval from DEED?
7. What flexibility will evaluators have when using multiple student data sources?
8. What assurances are there that evaluators will be provided with adequate training and devote sufficient time to collect and analyze a comprehensive set of real-time data from multiple sources?
9. The proposed regulation fails to acknowledge there are widely accepted standards of practice for principals with different roles. It is recommended that the regulation contain more clarity about these standards of practice and also encourage the use of collaboratively established goals.
10. The proposed regulation could contain stronger language that states employment decisions must rely on multiple sets of evaluation data over time, and not a one-time supervisory visit.

11. The proposed regulation could contain stronger language and guidance that ensures an emphasis on providing timely and appropriate feedback to teachers and principals beyond outcome measures of student performance.

12. The proposed regulation lacks definition that allows evaluators to consider key contextual factors we have noted that are outside the control of teachers and principals.

13. What assurances are in place to involve teachers and principals in the development of the appraisal systems? Up to now, neither group has played a role in conversations about development of Alaska’s NCLB waiver or this proposed regulation.

14. How will new teachers and principals be evaluated in schools where there is near 100% turnover?

15. The regulation does not address how student data is to be used in very small village schools where there is high transiency of students?

16. What guidance will be provided by DEED to ensure multiple measures are incorporated into a districts evaluation system?

17. When districts develop their performance appraisal systems for teachers and principals, will they need approval from DEED?

18. Will linking 20% student data to teacher and principal evaluation result in fewer teachers and principals seeking employment in low performing schools?

19. What assurances will be in place to ensure results used by school district evaluators are interpreted with regard to the many contextual factors noted in our letter?

20. Will current teachers and principals working in low performing schools transfer to schools where there is high student performance?
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21. Will teachers and principals working in school districts with differing appraisal systems leave to work in districts that have what is perceived as a more fair and balanced appraisal system?

22. Will teachers and principals working in smaller districts leave for larger districts where there are greater resources devoted to teacher and principal professional development and support?