

MCEAP Statement on APPR Regulations Promulgated June 2011 by the New York State Regents

**Moving Toward Systemic Accountability and Capacity Building for Schools and School Leaders**

*"Education is not the filling of a pail, but the lighting of a fire."*

*-William Butler Yeats*

The Metropolitan Council of Education Administration Programs (MCEAP), a membership organization of college and university educational leadership preparation programs in the greater New York City area, strongly objects to the new APPR regulations approved by the New York State Board of Regents on May 16, 2011. With our statewide organization, CADEA (Collegiate Academy for Departments of Educational Administration, a group which has endorsed this statement), we represent over 50 university-based leadership preparation programs that prepare almost 2500 school leadership certified candidates annually. Our aim is to prepare high quality aspiring leaders (as defined by national standards) who will gain experience and effectiveness as new and continuing school and district leaders. As university faculty and researchers, who work "in the trenches" with school leaders and teachers on both preparation and school improvement, we find the newly adopted teacher and principal evaluation system to be based on the wrong drivers for school reform. We believe this plan has greater potential to seriously harm, rather than improve, student learning. We find that the new regulations fall far short of providing meaningful solutions to the complex and profound challenges of improving public education in New York State.

The proposed APPR evaluation system, with its high-stakes approach, depends on grossly flawed and unnecessarily complex statistical models that few can understand. What's worse, the convoluted calculus of this new system is being rushed into implementation without the benefit of prior field testing or commentary from independent, outside experts. The system's lack of proven methods and measures and its limited attention to formative assessment and development will almost certainly have negative consequences on school leaders and their capacity to improve schools. We believe this new evaluation system will likely discourage aspiring, qualified candidates from entering into or remaining in the field, and we contend it will tie the hands of those who remain in school leadership positions from being as effective as they otherwise could be in working with their faculty toward continuous, meaningful school improvement.

Our position – which we have entitled, "Moving Toward Systemic Accountability and Capacity Building for the Schools," - is outlined below.

- **We need a purpose-driven system which builds capacity, not a numbers-driven system which narrows a school's focus, is divisive, and engenders fear.**

While a numbers-driven accountability system with severe penalties imposed on those who do not “make” their numbers may have wide intuitive appeal to the public, this approach will not service the need to improve our schools systemically. High-stakes consequences will yield more *compliance* and less *commitment*. For the long term, a system that seeks a deep-rooted capacity for change and growth will need the commitment from those who lead it. The purpose of a meaningful and effective evaluation system is primarily to build capacity and not to reward and punish.

- **We need evaluation methods that recognize the complexities and uncertainties of leading, teaching and learning processes, not formulas that are weighted to student test scores, using flawed formulas, assessments and attribution.**

Results on test scores yield an understandable and quick measure that can be used to rank and sort teachers and principals. However, the literature and research are replete with examples criticizing the validity problems with value-added/growth models and their high error rate. Considerable evidence has been put forth by leading authorities that concludes that using standardized test scores to measure teacher effectiveness (and similarly, principal effectiveness) does not yield valid, reliable or stable results. Similarly, New York State is building its teacher and leader evaluation systems based on statewide assessments that it has publically criticized for lacking sufficient rigor and being too broadly focused. How then can these assessments be appropriate for teacher and principal evaluation? Additionally, these admittedly flawed tests, and other assessments that districts are encouraged to use, have not been validated for personnel decision making. Many factors influence quality leading, teaching and learning processes. These factors must be central in any long-term solution to evaluating and improving our schools. Schooling has become a shared enterprise, with many teachers, leaders and other staff contributing to student learning, particularly for high needs students. Yet, the state’s assessment model, attributing student learning outcomes to individual teachers and principals, may very well undermine these collaborations.

- **We need a new evaluation system that is phased in over time with appropriate training for all personnel involved, not one that is forced posthaste with little or no time to reflect and understand how the system will improve practice.**

Evaluators (and those being evaluated) in any system which seeks meaningful growth and development need time to understand and process any new measures of performance. The current model is being thrust upon the 700+ districts with no pilot testing and little guidance. A method installed in a rush is likely to inhibit reform, create misinformation, and lead to superficial, rather than substantive change. Instead, a sustained and thorough professional development initiative is needed for any new approach to evaluation. By coming on line so quickly, the current approach, with its immediate, high stakes consequences is sure to backfire.

New York State is squandering its opportunity to transform its teacher and leader evaluation system by not providing clear direction (through the use of standards), support and feedback (through valid and reliable methods and measures). All other Race to the Top (RTTT) funded states are taking two to three years to get their evaluation systems right, working out sound methods and measures, training evaluators, and getting districts ready, before applying consequences. Why is New York State rushing ahead ill-equipped and unprepared?

- **We need an initiative that enhances the aims of long-term systemic change, not one that displaces meaningful goals with short-term distractions and superficial findings.**

The cumbersome system being foisted upon schools imposes a myriad of duties and responsibilities on teachers and principals that distract them from the more important work of education. Deciding who will be the “teacher of record” in classes taught by multiple instructors, focusing on security issues to minimize cheating and “gaming the system,” parsing evaluation wording to conform to rubric categories, and dealing with the inevitable complaints, grievances and lawsuits filed over the implementation of the regulation all threaten to divert professional time and energy away from authentic teaching and supervision of learning. Long-term systemic change should not be riddled with distractions because of bureaucratic process issues, but rather simplified through understandable protocols developed by and implemented within a professional learning community.

- **We need an evaluation system that is developmental, focused on capacity-building and continuous growth, not a punitive one whose sole purpose seems to be to sort out ineffective teachers and leaders.**

While the primary purpose of the state’s new evaluation system is supposedly to create a culture of continuous improvement, its design, processes, and emphasis are skewed toward identifying and removing the least effective teachers and leaders. Research on consequential and capacity-building evaluation models demonstrates that personnel evaluation becomes a method of school improvement primarily through its role in capacity building and supporting continuous growth and development; the greatest district gains come from this approach. By contrast, New York State—with its emphasis on consequential personal decision making-- is driving districts to implement models that will yield limited results, missing the dividends that could be forthcoming with a more thoughtful and robust approach.

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MCEAP members have registered our concerns previously regarding the new APPR regulations through our participation in the New York State Task Force on Teacher and Principal Effectiveness (see our letters from March 11, , April 13, and April 22, 2011). In addition, we

support the points made in the May 15, 2011 letter to the New York State Board of Regents from a group of researchers and scholars including Eva Baker and Linda-Darling-Hammond who urges the Regents to “reject proposals that would place significant emphasis on this untested strategy that could have serious negative consequences for teachers and for the most vulnerable students in the State’s schools.” Despite these attempts to encourage the Regents to reconsider their positions on teacher and principal evaluation, we now find ourselves on the threshold of a school year in which an ill-conceived and unsustainable model for reviewing the value of professional educators’ work will be inaugurated.

In closing, we stand ready to work with the Regents to change the course of this initiative. The Regents have taken action in response to a federally funded program (RTTT) that induced our state officials to make dramatic and rapid changes during a period of intense national debate about public schooling philosophy and practice. Though their policy choices may satisfy the decision-makers in Washington, D.C. which fund this initiative, we must think about the greater cost to New York. The stakes are too high to allow a faulty policy initiative to take hold in our schools. It is not too late to revise these plans to foster positive teacher and leader development and school improvement, and we are ready to inform this revision work.