

June 2, 2014

U.S. Department of Education
400 Maryland Avenue SW
LBJ, Mailstop L-OM-2-2E319
Room 2E115
Washington, DC 20202
Attn: Director of the Information Collection Clearance Division

Re: Response Comments; Survey on the Use of Funds Under Title II, Part A “Improving Teacher Quality State Grants Subgrants to Local Educational Agencies”; Docket Number ED-2014-ICCD-0054

To Whom It May Concern:

The National Association of Secondary School Principals (NASSP) is writing to respond to the U.S. Department of Education’s (ED) request for comments on the proposed information collection request (ICR) for the Survey On the Use of Funds Under Title II, Part A (“Improving Teacher Quality State Grants Subgrants To LEAS”).

The National Association of Secondary School Principals (NASSP) is the leading organization of and national voice for principals, assistant principals, and all school leaders in middle level and high schools from across the United States and in 36 countries. The association connects and engages school leaders through advocacy, research, education, and student programs. NASSP advocates on behalf of all school leaders to ensure the success of each student and strengthens school leadership practices through the design and delivery of high quality professional learning experiences. Reflecting its long-standing commitment to student leadership development, NASSP administers the National Honor Society, National Junior Honor Society, National Elementary Honor Society, and National Association of Student Councils.

NASSP is responding to provide public comments on two of the five questions raised in relation to the revised survey and data collection: 1) Is the collection necessary to the proper functions of the Department; and (2) how might the Department enhance the quality, utility, and clarity of the information to be collected.

- 1) NASSP believes that data collection on Title II, Part A funds is a necessary function of the Department to monitor and evaluate implementation of state and local professional development activities that are consistent with current law, and directed to meet the needs of educators to improve student outcomes.**

NASSP urges the Department to continue on-going, sustained data collection of Title II, Part A (20 U.S.C. 6601 et seq) funds available under the Elementary and Secondary Education Act (ESEA) to ensure that states and local educational agencies are implementing programs consistent with the intent of the law.

Current law requires states to support local educational agencies to:

“provide professional development activities that improve the knowledge of teachers and principals and, in appropriate cases, paraprofessionals, concerning---

- (i) one or more of the core academic subjects that the teachers teach; and
- (ii) effective instructional strategies, methods, and skills, and use of challenging State academic content standards and student academic achievement standards, and State assessments, to improve teaching practices and student academic achievement” (Sec 2123 (a)(3)(A)(i)(ii).

Further, local educational agencies must focus on improving the knowledge of teachers and principals concerning effective instructional practices to address the needs of students with different learning styles, disabilities or unique learning needs, students with limited English proficiency, and ‘provide methods of training’ improve student behavior, identify early and appropriate interventions and ‘training’ to understand and use data and assessments to improve classroom practice and student learning (Sec 2123 (a)(3)(B)(i)).

As noted in results of the Department’s 2012-13 school year Survey on the Use of Funds Under Title II, Part A released in June 2013, Title II, Part A provided states and districts with approximately \$2.33 billion for activities allowable under the law. In 2012-13, the highest poverty districts were allocated 52 percent of Title II, Part A funds, and districts with 25,000 or more students received 48 percent of funding available. While the sample of 800 school districts revealed that of the majority of Title II, Part A funds (in addition to other funding sources) are allocated to professional development activities for teachers, paraprofessionals, and administrators ¹(44 percent), and 31 percent paid for reduction in class size, only four percent of funds were dedicated to support for administrators (principals or superintendents). According to the survey, the percentage of funds spent on administrator professional development from 2002 to 2003 has only increased from two to four percent.

NASSP finds the results of the 2012-13 survey on Title II, Part A funds extremely troublesome given the unique and critical role of principals in schools. Over the past ten years, a considerable body of evidence has been gathered by leading researchers who have substantiated the effect of school leadership as second only to direct classroom instruction and a contributing factor to raising student achievement. Title II, Part A funds act as the primary federal program to improve educator performance, and as the roles and responsibilities of school leaders continue to expand, principals receive markedly fewer opportunities to engage in job-embedded, on-going professional development.

There is an urgent national need to increase access to professional development for principals, assistant principals and other school leaders to build their capacity to implement the wave of new federal, state and local initiatives, such as the implementation of college and career-ready standards, new teacher evaluation systems, school improvement models, and accountability requirements.

Further, research has proven that one of the most positive impacts on student learning occurs when principals are able to focus on instructional coaching and build strong relationships with teachers. States and school districts must include training for principals on best practices surrounding instructional coaching, including how to improve their ability to mentor and coach teachers. Without strong instructional coaching skills, there is no mechanism to support growth and improvement of teacher

¹ The SY 2012-2013 Survey of Title II, Part A does not differentiate the term “administrator” as meaning “principal” or “superintendent”. NASSP assumes the data would apply to principals for comment purposes.

performance within any teacher evaluation system.

Given the demands on educators and the need for reciprocal support for performance, NASSP believes that the Department must continue to strengthen data collection on Title II, Part A to not only evaluate the effectiveness of program implementation, but use it to inform policy directives that will help states and districts improve educator effectiveness, particularly for principals and to ensure continued development of core instructional leadership skills, such as evaluation, coaching and mentoring.

Further, statutory considerations concerning Title II, Part A funds requires ED to continue and expand data collection activities. Review of the 2012-2013 survey data suggests that states and districts may be interpreting a preference for allocating resources to teachers based on the order of how the terms “teacher” and “principals” appear in the law and policy guidance. Congress did not intend to explicitly direct states and districts to expend the majority of Title II, Part A funds on teacher training or class size reduction, where teachers and principals are arguably treated equal in the statute. Since both teachers and principals are both mentioned in law and guidance there should be comparable levels of support for their roles. Unfortunately, it appears that, without clear directives, states and districts are simply allocating the bulk of resources to teachers irrespective of the specific professional development that is needed to support the unique and critical role of principals and school leadership.

2) The Department must focus on collecting specific information related to principal or school leadership professional development activities to improve the quality and clarity of data.

Current social, economic and political realities require principals to accomplish ever-greater academic goals with ever-shrinking resources, prepare young people with higher order thinking skills befitting a global society, analyze and use increasingly complex data, and incorporate rapidly changing technology in instruction and learning.

To meet these demands—and many others—principals require job-specific, high-quality, forward-looking professional development.²

Becoming an effective school leader is a continuous learning process applicable to novice and experienced principals alike. While different principals will vary in skill, experience and success in achieving goals for school improvement and educational outcomes, all have the potential to improve.

In addition, heightened accountability requirements under which schools must operate have significantly increased the complexity of the work of principals³, and more specifically, over the past two years, the onus of teacher evaluation implementation calls for principals to receive dedicated professional development beyond what states and districts are currently providing.⁴

In *Learning from Leadership Project: Investigating the Links to Improved Student Learning* (Seashore Louis, Leithwood, Wahlstrom, & Anderson, 2010), a meta-analysis study conducted by the Wallace

² *Recruiting, Preparing and Building the Capacity of Effective Principals: Evidence-Based Recommendations for Federal Policymakers*, the National Association of Elementary School Principals February 2013 – Revised and Updated February 2014.

³ *Rethinking Principal Evaluation: A New Paradigm Informed by Research and Practice*, National Association of Elementary School Principals & the National Association of Secondary School Principals, September 2012. Retrieved at http://www.nassp.org/Content/158/eval_report.PDF.

⁴ *Supporting Principals in Implementing Teacher Evaluation Systems*, National Association of Elementary School Principals & the National Association of Secondary School Principals, February 2014. Retrieved at https://www.nassp.org/Content/158/NASSP_NAESP_Joint_Policy_Brief.pdf

Foundation, researchers recommend that policies and programs be developed at the state and local levels to address leadership deficits through professional development. To address this issue, NASSP as well as the National Association of Elementary School Principals (NAESP) have expended considerable effort to provide professional development resources to increase a principal's leadership capacity through trainings and workshops at annual conferences, state affiliate conferences and meetings, as well as webinars, online courses and guides to best practices.

While many states and districts offer regional and local trainings and workshops aimed at increasing principal growth and learning, principals nationwide report a severe lack of sufficient resources and more importantly, dedicated professional learning that will help them build their capacity to lead schools given the current demands on the role.

State & Local Data on Title II, Part A Funds

While the June 2013 Title II, Part A ED survey reports on professional development activities through a representative sample, the preponderance of data shows a number of teachers participating in professional development nationwide through sessions offered by districts on various topics, as well as the number of teachers who participated however, little to no specific data regarding principal professional development was provided.

To address this matter, NASSP, NAESP and the American Federation of School Administrators (AFSA) reached out to several state and local associations and affiliates to gather data on the percentage of their state's Title II funding that directly supports principal professional development, the providers of that professional development and topics and/or types of professional development opportunities offered.

Following are examples of various state and district findings:

Alabama

The state currently receives two Title II- Part A funding sources: Title II-Part A State-Level Activities funds and Title II-Part A allocations that go to each local school district. While a portion of the state level activities specifically support principal professional learning programs, the Alabama State Department of Education did not have data on the amount of funds allocated or the topics of professional development provided at the district level for school leaders.

Iowa

"The proviso on all of this is that districts are likely doing this more than is reflected in the CAR. They don't really have to code this one in this way, so results are very spotty. It is likely they included some administrators in the general expenditures for teachers without coding to PD for admin or non-instructional staff. So I think these data are not accurate. Total expenditures in Title IIA for 2013 is \$17,516,728.86. The amount coded to Function 2574, Staff Development for non-instructional staff is \$19,891.36. There are only 3 districts coding to this."

Kansas

"Title II A money is pushed from the state to local school districts, so KSDE has no information on how the money is spent for professional development. The state is required to keep 3% of the Title II money that is used for Superintendent and Principal meetings that are held by KSDE throughout the state."

Maryland

According to MDSE, funds allocated to school leadership professional development are distributed across LEA's and there are no figures on how much actually goes to principals. Upon the request of our national organizations, MDSE indicated they would try to do a better job reporting as they gear up to offer potential summer sessions.

New York City

In a May 2013 memo on Federal Title II, Part A Supplemental guidance, the NYC Department of Education noted the first priority is to use funds to reduce class size in a grade. The letter went on to note that funds are provided to increase student's academic achievement by improving the quality of teachers and principals. The program can be carried out in multiple ways including: increasing the number of highly qualified teachers in classrooms (i.e., class-size reduction); increasing the number of high quality assistant principals; and increasing teacher and principal effectiveness. However, the expectation is that schools continue to prioritize use to reduce class size and pupil teacher ratio.

Texas

The Texas Education Agency reports that the state does not collect or track data on Title II, Part A since it is federal funds.

Washington

The Washington State Department of Education reports that no funds have been directed to districts to expend on principals.

NASSP is concerned by the overwhelming lack of collection or reporting on the use of Title II, Part A funds specifically for principal professional development and growth by states and districts. To address this concern, the following recommendations are provided to improve the quality and clarity of Title II, Part A data collection.

- NASSP urges ED to continue to collect specific data on Title II, Part A expenditures at both the state and local levels to determine if FY 2014 or the 2013-2014 school year funds are being allocated to programmatic activities that meet not only statutory requirements and directives, but the needs of schools and students. To accomplish this, NASSP urges the Department to use the term "principal" as opposed to "administrator" when referring to building-level leaders. We believe the term must be used to apply to principals, assistant principals or individuals who--
(A) are an employee or officer of a school; and
(B) are responsible for--
(i) the daily instructional leadership and managerial operations of the school; and
(ii) creating the optimum conditions for student learning.
- NASSP recommends that the overall survey be adjusted include a stratified random sample of principals -- exclusively. Given the importance of school leadership, it is appropriate that principals receive a dedicated reporting collection on critical activities that must be implemented by local education agencies to help principals meet the needs of both teachers and students.
- At a minimum, separate data must be collected regarding principals regarding key areas of education reform or those that are having the greatest impact on student learning. For example, Question 10 must be added to gather comparable data (description of activities, frequency, and number of) on whether or not professional development activities are provided for principals related to 1) implementation of college-and career ready standards; and 2) training for principals to evaluate teachers.
- NASSP recommends Question 11 to collect comparable data on district level principal mentoring programs or activities that are specifically designed to meet the needs of principals as instructional leaders. One or more questions must be clear to avoid any district level "joint" professional development programs.

Thank you for consideration of the above comments and recommendations for the upcoming Survey on the Use of Funds Under Title II, Part A (Improving Teacher Quality State Grants – Subgrants to LEAs). NASSP looks forward to working with the Department to support additional data collection as it will reinforce the importance of meaningful professional development for all educators, especially principals.