

**Scripts from Testimony Provided at the
June 8, 2011 State Board Meeting
(SB 191 Rulemaking)**

Rule Making Testimony SB 191
Colorado State Board of Education
Van Schoales, Education Reform Now

Good Morning, I am Van Schoales, the executive director of Education Reform Now, a national education policy and advocacy organization that works in 12 states and Washington DC. I'm also a former teacher and administrator at the elementary and high school level.

I want to thank all of you for your remarkable leadership in voting 7-0 in support of 191 and continuing to carry this trend with your wise decision to vote 7-0 in the appointment of Robert Hammond as our new commissioner.

It's rare these days to see policy makers on both sides of the aisle putting kids first.

We at Education Reform Now have been tracking this work in Colorado and around the country for the last couple of years. And we know that CO is one of the states at the forefront of this work.

While I'd like to thank all of those involved in the difficult work in pulling together the Educator effectiveness Council's recommendations, we know this is just a start. The hard work will be at CDE in fleshing out the details and with all of you in making the tough decisions on the rules for implementing 191.

With all of this in mind, I'd like to share four concerns or recommendations that I hope you and the staff at CDE can address in the work over the next four months.

- 1) Better define the elements from the Teacher Effectiveness Standards. We'd like to see fewer so that they can be useful to everyone involved. We'd also like them to be easily observable and measurable. Many of the current elements are open to interpretation, which will lead to wide variations on what counts for effective teaching. Washington DC's recently introduced Impact system provides a good example of a high quality system that is fair and useful in determining which teachers are effective and which are not.
- 2) Define exactly what an exemplary teacher effectiveness system looks like so that CDE can compare any district's system to a standard. We know that while there are all kinds of evaluation systems, we also know through studies conducted by The New Teacher Project and others that typically 98-99% of teachers are deemed effective. An effective system would broader distribution of effective to ineffective teachers along a bell curve with a percentage beyond 1% being labeled needs improvement or ineffective.

- 3) What's the role of CDE when districts are doing well or not per the standard of a good system. What incentives or sanctions will CDE issue to districts as these systems are put into place.**
- 4) Finally, make sure that the teacher effectiveness ratings are easily available to the public in and shared in all of the various forms that teachers can be grouped, i.e. by district, school, grade, subjects etc.**

Thank you for the opportunity to share our thoughts prior to your work developing the 191 rules.

State Board Members, Commissioner Hammond, I'm Tim Taylor, President of Colorado Succeeds, a non-profit, non-partisan coalition of business leaders committed to improving the state's education system. On behalf of our membership, I am here to comment on the recommendations provided by the State Council for Educator Effectiveness and the corresponding rules that the State Board will promulgate for implementing SB 191.

Colorado Succeeds supported the passage of SB 191 and closely monitored the council's work over the past year. We attended several meetings and provided feedback directly to the council on numerous occasions. We are encouraged by the council's collaboration and greatly appreciate the time they dedicated to this important work. As employers, we understand the challenges that the council faced in developing a robust performance management system that meets the demands of diverse districts statewide and want to thank them for their service and congratulate them on their success. We are very pleased with their recommendations and think they have handled much of the heavy lifting. That said, there are a few critical areas where our members would like to see the State Board advance the recommendations further and I would like to briefly describe three of them for you.

First, our members strongly advocate that the State Board promulgate rules that ensure the implementation timeline and approach meets the specifications of SB 191. Our members are supportive of the council's recommendations to create a consistent, statewide scoring matrix for rating teachers and principals. However, we are concerned that the council has requested the opportunity to change the matrix based on an analysis of pilot data in 2015. If at that time, the Council decides to change the matrix, the state would lose two years of data and violate the timeline set-forth in SB 191. We understand the need to learn about the state model system during its pilot process, but we think that those conversations can occur in 2014 after the conclusion of the pilot process. This will ensure the implementation timeline is consistent with the statute.

Second, our members encourage the State Board to acknowledge the significant tasks the council has amassed for CDE in supporting the rollout of the new performance evaluation system. As such, we recommend that the State Board allocate the necessary resources and expertise to ensure the department has the capacity to effectively develop the statewide model system, pilot it in diverse regions of the state, and monitor implementation to ensure it is being executed with fidelity. In pursuit of this goal, we think it is important that the State Board create a consistent, statewide reporting platform that all districts are required to use. This will provide CDE personnel the tools they need to efficiently aggregate data, monitor implementation, and research anomalies so that they can provide increased support and where necessary impose consequences.

Finally, our members suggest that the State Board develop a contingency plan for implementing the performance management system in all grades and subjects. The beauty of the proposed performance evaluation system is that it captures both qualitative and quantitative data. We know there is still a lot of work to be done to create valid and reliable measures of student growth in the currently untested grades and subjects. While CDE intends to develop more precise recommendations over the next year through district consortia, we feel strongly that a back-up plan is necessary. A contingency plan will help ensure that the performance evaluation system is implemented using mixed measures in the timeline specified by statute.

We greatly appreciate the opportunity to share these concerns and would like to reiterate that they are shared by a diverse group of stakeholders including our partners at Colorado Concern and the Denver Metro Chamber of Commerce, who were unable to join us here today. We look forward to continuing this conversation with you throughout the rule-making process and if there is anything we can do to support your efforts, please do not hesitate to let us know.



May 12, 2011

Dear Colorado State Board of Education,

My name is Amy Spicer. I am the policy director for Stand for Children Colorado. Stand for Children is an education advocacy organization that brings together parents, teachers and community members to advocate for, inform and influence education policies on the local and state level.

Stand for Children has had someone present at every meeting of the State Council for Educator Effectiveness. Prior to coming to Stand, I taught public school for eleven years, which gives me the added ability to look at policy through a practical lens.

I want to start by thanking the Council for unpacking an incredibly complex piece of legislation. The recommendations are a great starting point. One of the biggest successes was including a fourth performance category, "partially effective," because this will allow for a differentiated picture of teacher and principal performance. Another strength is the concept of the scoring matrix. This will provide a tangible way for teachers and principals to understand their ratings.

There are some key areas where we feel that you can strengthen the recommendations or set a higher bar. In my testimony, I will address the standards, student growth, and rating consistency. You will hear from some of my colleagues about other areas.

The teacher and principal professional practice standards are vague and leave room for interpretation. These standards need to be observable and measurable, and the elements underneath each one should be better defined. For example, standard 1.4, "teachers make instruction and content relevant to students," could be interpreted in many different ways.

With regard to student growth, the Council included multiple measures, but they did not recommend minimum weights for them. We know that there are different types of assessments available in different places, but the level of assessment—be it statewide like CSAP, district wide like Acuity, or school wide like a student growth objective—should be more consistent. As currently written, one district could weight CSAP predominately at 90% and another could weight it at 50%. This will not allow us to compare teacher to teacher and principal to principal, ensuring a high and consistent standard across the state with the goal of improving student learning.



Finally, we are concerned that ratings as currently recommended will not be reliable statewide. All stakeholders should feel confident that teachers and principals are held to the same high standard no matter the district or population. We have the same measurable standards for students in every subject and every grade, and teachers and principals deserve to have them, too.

Stand for Children supported this legislation because we believe that all students can learn and that they all deserve an effective teacher and principal in every school. Different teachers have different styles and districts use different curriculum, but if a student moves from Greeley to Grand Junction, she should have equal access to quality instruction. And if a highly effective teacher moves from Ft. Collins to Colorado Springs, he should feel secure that his rating will not change.

For the past year, Stand for Children has been working closely with the group of organizations that supported passage of SB 191 in the legislature to monitor the work of the Council. We realize that this is an early stage in the process for the State Board, and we appreciate the opportunity to speak with you today. We look forward to providing more input as the implementation unfolds over the summer and into the fall. We hope you we can be a resource as you take on this responsibility for the teachers, principals, and students of Colorado.

Thank you,

Amy Spicer

Colorado Policy Director
Stand for Children
1201 E. Colfax Avenue, Suite 203
Denver, CO. 80218
☎720.292.1908
✉aspicer@stand.org

Remarks to State Board on SB 191 Implementation: SCEE Report (May 12, 2011)

Ben DeGrow

Senior Policy Analyst, Independence Institute

First, we would like to commend the members and staff of the State Council on Educator Effectiveness for their hard work and commitment to fulfilling their responsibilities and producing a comprehensive report. Our greatest hope is that Senate Bill 191 and the work of the Council will lead to greater professionalization of the teacher workforce, by attracting more talented individuals to the profession; and by focusing current and future educators on the effective understanding and use of best instructional practices.

In seeking to create a high-quality evaluation system, the Council is to be commended for its focus on balancing the concerns of statewide consistency with local flexibility. We believe it is imperative that districts with exemplary systems already meeting or exceeding requirements—such as Harrison 2 and Douglas County—should not be bound by mandate nor unduly limited in the flexibility to innovate.

However, we do have a few areas of concern about the report that should be addressed clearly going forward.

First, a key guiding principle for state implementation of the educator effectiveness law should be to set a consistent high bar in crafting a detailed evaluation system for teachers and principals. The Council has done a good job of starting this process, but among the useful features lacking are clear and concrete performance indicators by which sound and consistent evaluation judgments can be made. Filling in the gaps in the draft performance standards is one key area for CDE to impact implementation positively.

Second, the final version of Senate Bill 191 already delayed the implementation of meaningful reforms as a compromise. With Recommendation #46 the Council states: “To encourage the maximum amount of learning about the state model system, performance evaluation results should not impact the attainment or loss of non-probationary status for

Remarks to State Board on SB 191 Implementation: SCEE Report (May 12, 2011)

individual educators who are rated under the state model system during the pilot and rollout period." That period includes school years 2013-14 & 2014-15.

Yet as adopted in SB 191, Colorado Revised Statutes 22-9-105.5(10)(a)(IV)(B) & (V)(B) state that "DURING THE 2013-14 SCHOOL YEAR [and 2014-15 SCHOOL YEAR], TEACHERS SHALL BE EVALUATED BASED ON QUALITY STANDARDS. DEMONSTRATED EFFECTIVENESS OR INEFFECTIVENESS SHALL BEGIN TO BE CONSIDERED IN THE ACQUISITION OF PROBATIONARY OR NONPROBATIONARY STATUS."

Third and finally, while the Council's report issued recommended state policy changes for educator licensing, data, preparation, and professional development, it neglected another key area of policy to promote educator effectiveness. Missing is any recommendation for districts and schools – with incentives and technical assistance provided by the state – to craft performance-based compensation systems that make use of a strengthened evaluation system and robust student growth data. SB 191 lays the groundwork for effective teacher and principal compensation reforms – as modeled most effectively by Harrison 2 and Eagle County – to lead to more productive use of education tax resources and to promote excellent outcomes through quality classroom instruction and school leadership. It is my hope that CDE will be empowered in the near future to play a role in advancing meaningful educator compensation reform in Colorado.

Thank you for your time and consideration.

Total Time: 3:00

May 11, 2011 **Public Comment to the State Board of Education** by Jeanette Cornier

Thank you Mr. Chairman and Members of the Board for the opportunity to provide input prior to the development of Rules for the Administration of the Licensed Personnel Performance Evaluation Act (SB191).

I appreciate the immensity of the charge to the State Council for Educator Effectiveness to come to consensus on multiple recommendations for state policies that will improve teacher evaluation systems and increase teacher effectiveness. Overall, I am happy to see the thoughtful and thorough recommendations that they have presented to you.

My comments today are focused specifically on recommendations related to state board policy changes regarding review and approval of teacher preparation program content. [See 22-9-105.5 (3)(h) "state board policy changes, as appropriate, that will ensure that the standards and criteria applicable to teacher and principal licensure and the accreditation of preparation programs are directly aligned with and support the preparation and licensure of effective educators"]

I agree with the Council's recommendation that "a thorough review of current statutes, rules and policies that govern the preparation, induction, and licensure of Colorado educators should be completed as quickly as possible" to ensure alignment of the standards for the approval of teacher preparation program content with the new quality standards.

I do not agree with the Council's recommendation on page 22 of the report that "CDE and CDHE anticipate **replacement** of the existing Performance Based Standards for Teachers and the existing Performance Based Standards for Principals with the Colorado Teacher Quality Standards and the Colorado Principal Quality Standards".

As I outlined in the written feedback that I submitted to you last week, if the new quality standards replace the existing "Standards for the Approval of the Program Content of Professional Education and Professional Development of Teachers", Colorado's standards will no longer require teacher preparation programs to ensure that Colorado teachers have knowledge of literacy or knowledge of mathematics.

These are the standards that the Colorado Department of Education uses to review teacher preparation program content and bring forward a recommendation to you about whether or not to approve program content.

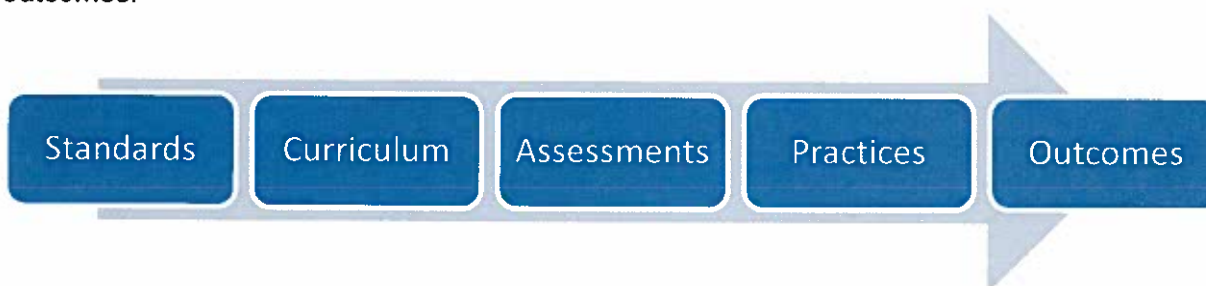
Your current standard for "knowledge of literacy" is based on a convergence of research findings on what teachers need to know and be able to do in order to teach students how to read, write and communicate. The loss of this standard would be significant.

Knowledge of the content, such as the content found in the Colorado P-12 Academic Standards, is necessary but not sufficient knowledge for teaching the content. Researchers have outlined the "pedagogical content knowledge" needed to **teach** reading and mathematics. This knowledge goes beyond understanding the concepts to the ability to accurately explain the

concepts to others, identify where student understanding breaks down, and respond with effective instruction and feedback.

I have heard it argued that Colorado should move from an “input” focused evaluation of teacher preparation content to an “output” focused one. While I agree that outputs are important, the means to the ends are also valuable. I can tell you as a parent of two elementary school children that I care about the ends, that my children become lifelong learners and productive citizens, but I also care about what they are being taught and I care about what they are learning. So, I urge you to continue to review the content of teacher preparation programs to ensure alignment with research-based standards, validate those standards against the outcomes (teacher effectiveness), and increase the rigor of licensure assessments.

An aligned system includes evaluation of: standards, curriculum, assessments, practices and outcomes.



Standards = What does research indicate teachers need to know and be able to do in order to be effective?

Curriculum = Does the content of teacher preparation and professional development align to these standards?

Assessments = Do licensure assessments align to the standards and correlate to the outcomes?

Practices = Are the practices that teachers were prepared to implement taking place in classrooms?

Outcomes = Are teachers who meet the standards effective at increasing student achievement?

In order to ensure that Colorado continues to have rigorous and research-based standards for teacher preparation, especially in the critical areas of literacy and math, consider taking one of the following actions:

- Keep the Standards for Teacher Preparation Program Content and the Standards for Teacher Effectiveness separate and ensure that they are aligned; or
- Require that Knowledge of Literacy and Knowledge of Mathematics, Standards One and Two from the current standards, be included in the new standards prior to adopting them to ensure that Knowledge of Literacy and Math remain visibly high priorities.

I have had the opportunity recently to work with several school leaders in priority improvement and turnaround schools across the state. The greatest struggle that these leaders face in changing outcomes for students who come to them with many challenges is improving the quality of instruction that every student receives.

You have the power to make a difference in the preparation and evaluation of teachers and leaders. This difference could make or break the ability of Colorado’s schools to dramatically improve student achievement outcomes for those students who struggle the most.

Thank you for your time and for your commitment to improving Colorado’s education systems.