

May 25, 2016

John B. King, Jr.
Secretary of Education
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Secretary King,

As the U.S. Department of Education (the Department) continues its work to implement the Every Student Succeeds Act (ESSA), New Leaders strongly encourages the Department to develop and release Title II guidance to support state and district efforts to leverage these resources to strengthen teaching, leading, and learning in classrooms and schools across the country. We also encourage you to use the variety of non-regulatory policy tools at your disposal—technical assistance, targeted communications, resources, and other support—to clarify, reinforce, and elevate the importance of school leadership.

New Leaders is a national nonprofit organization dedicated to providing all children with a high-quality education that prepares and inspires them be successful in college, career, and citizenship. To achieve this critical goal, we develop transformational school leaders to serve the nation’s highest-need communities and we advance the policies and practices that enable and empower great leaders across the country to build schools where teachers thrive and students excel. Since 2001, we have developed 2,500 leaders who are currently supporting 450,000 students.

Principals are responsible for strong implementation of all education policies, and investments in school leadership will be particularly critical during the transition to ESSA. ESSA introduces a new era of local control, making it more important than ever that our nation’s schools are led by individuals capable of designing and carrying out effective improvement strategies and successfully implementing other federal provisions at the school level. **To enable strong implementation of ESSA, it is critical that the Department encourage every state and district to have a plan to ensure every school has great leadership.**

Everything that happens in schools—setting high expectations for students, helping teachers grow and improve their practice, engaging families, managing change, *everything*—depends upon the caliber of our nation’s 90,000ⁱ principals.

Yet the importance of school leadership has historically been overlooked and significantly underfunded. Principals were not adequately addressed following the passage of No Child Left Behind and, as a result, more than two-thirds of districts do not invest any Title II funds on professional development for school leadersⁱⁱ—a missed opportunity. Fortunately, ESSA has taken significant steps to elevate the importance of school leadership. In implementing the statute, the Department has the opportunity to provide important information to states, districts, and other stakeholders on opportunities within the new law to further prioritize school leadership—both as it relates to Title II use of funds as well as Title I and other federal, state, and local decisions to improve outcomes for all students.

Research shows—and our experience confirms—that well-prepared, well-supported principals can have a huge influence on their students. School leaders account for one quarter of a school’s effect on student learningⁱⁱⁱ, and a highly effective principal can increase student achievement by as much as 20 percentage points^{iv}. Clearly, strong leadership and student success go hand in hand.

In addition, 97 percent of teachers say school leadership significantly affects their career choices.^v To recruit, develop, and retain effective teachers in high-need schools—and thus ensure equitable access to excellent teachers—we have to focus on school leadership quality. Moreover, modernizing and elevating the teaching profession—making it the best job in the world—will require that we ensure our teachers get to work for a great boss who provides them with opportunities and support to lead and grow professionally.

Finally, we know that the best principals do not conduct their critical work alone. Great principals build and are supported by teacher leaders and leadership teams and, together, these educators achieve stronger results for teachers and students. When supported by a supervisor who understands their needs, principals are even more effective. Advancing leadership in the 21st century requires that we rethink both the leadership continuum and the ecosystem of supports necessary for principals and other school leaders to be successful.

As we—along with the American Association of School Administrators (AASA), the National Association of Elementary School Principals (NAESP), the National Association of Secondary School Principals (NASSP), and the Wallace Foundation—called for in a letter dated March 23, 2016, **ESSA guidance on school leadership is critical for fostering a greater focus on and stronger investments in leadership at the state and local levels.** To aid your work in the busy months ahead, we are attaching to this message our ideas for meaningfully incorporating leadership into forthcoming non-regulatory resources and other federal supports for states, districts, and schools.

Detailed guidance can help states, districts, and other stakeholders implement the new law and directly address how states, districts, and schools—in partnership with external partners, as appropriate—can leverage Title II. Given the intersection of leadership across Title I and Title II, we have also included comments on Title I and other cross-cutting provisions to encourage a coordinated strategy to support the success of teachers and students. In particular, we want to highlight the following critical priorities (noted throughout the attachment) for non-regulatory guidance:

- Use of the optional 3 percent set-aside to strengthen school leadership
- Fostering effective teacher leader, principal, and principal supervisor roles
- Evidence-based leadership interventions and relevant outcomes
- School leader data collection and use

In addition to major levers outlined in this document, we would be excited to support the Department in thinking about other ways to promote and strengthen school leadership.

Thank you, as always, for your consideration of our recommendations. Please do not hesitate to reach out to policyteam@newleaders.org if New Leaders can be of further assistance.

Sincerely,



Jackie Gran
Chief Policy Officer
New Leaders

NEW LEADERS RECOMMENDATIONS

TITLE II

“So many times under Title II guidance, leadership is not included. You have to look all over the world for funding for principals. Explicit uses of funds for school leadership and clearer direction from the federal government would help districts leverage funds to help principals create the best learning environments for all students.”

—New Leader Michelle Pierre-Farid^{vi}

State Reservation for School Leadership

ESSA presents states with an unprecedented opportunity to prioritize school leadership. We encourage the Department to provide information, guidance, and best practices to states on using the optional 3 percent set-aside in Title II.

In particular, we urge the Department to focus on statutory requirements and opportunities outlined in the following sections:

- [Section 2101\(c\)\(3\)](#) allows states to “reserve not more than 3 percent of the amount reserved for subgrants to local educational agencies under paragraph (1) for one or more of the activities for principals or other school leaders that are described in paragraph (4).”

Therefore, we believe the Department should:

- **CRITICAL PRIORITY:** Provide guidance on allowable activities to support states in developing robust, multi-year plans to take advantage of the optional leadership set-aside to pursue a range of activities related to school leadership, such as improving preparation and licensure, developing systems of meaningful support, and piloting new initiatives with LEAs. In addition:
 - Clarify that initiatives to recruit, support, and retain principals, assistant principals, and principal supervisors, as well as initiatives that develop teacher leaders specifically as a bench of future principals and assistant principals, are allowable.
 - Clarify that states can use the set-aside to fund school leadership projects in one or more high-poverty districts across their state, including projects that develop successful models that can be scaled statewide.
 - Clarify that states may use set-aside funds for state initiatives, district initiatives (including piloting models as noted above), and external partnerships to support state or district initiatives.
- Provide technical assistance or other resources or support regarding the optional leadership set-aside. For example:
 - Coordinate a school leadership event for states and other stakeholders interested in the leadership set-aside opportunity to learn from experts and share ideas and best practices.
 - Convene an ongoing community of practice for states that have opted to use the leadership set-aside.

State Plans & Related Implementation Support

In addition, we encourage the Department to include a focus on school leadership in states’ Title II plans and to provide related implementation guidance and support.

In particular, we urge the Department to focus on statutory requirements and opportunities outlined in the following sections:

- [Section 2101\(c\)\(4\)\(B\)\(ii\)\(II\)](#) allows states to deliver or assist districts to provide “training to principals, other school leaders, coaches, mentors, and evaluators on how to accurately differentiate performance, provide useful and timely feedback, and use evaluation results to inform decision-making about professional development, improvement strategies, and personnel decisions.”
- [Section 2101\(c\)\(4\)\(B\)\(v\)\(II\)](#) allows states to assist districts in providing “training and support for teacher leaders and principals or other school leaders who are recruited as part of instructional leadership teams.”
- [Section 2101\(c\)\(4\)\(B\)\(xii\)](#) allows state to set aside funds for “establishing or expanding teacher, principal, or other school leader preparation academies.”
- [Section 2101\(d\)\(2\)\(A\)](#) requires that states provide the Department with a “description of how the State educational agency will use funds received under this title for State-level activities described in subsection (c).”
- [Section 2101\(d\)\(2\)\(B\)](#) requires that states provide the Department with “a description of the State’s system of certification and licensing of teachers, principals, or other school leaders.”
- [Section 2101\(d\)\(2\)\(F\)](#) requires that states provide the Department, if applicable, with “a description of how the State educational agency will work with local educational agencies in the State to develop or implement State or local teacher, principal, or other school leader evaluation and support systems that meet the requirements of subsection (c)(4)(B)(ii).”
- [Section 2101\(d\)\(2\)\(M\)](#) requires that states provide the Department with “a description of actions the State may take to improve preparation programs and strengthen support for teachers, principals, or other school leaders based on the needs of the State, as identified by the State educational agency.”

Therefore, we believe the Department should:

- **CRITICAL PRIORITY:** Provide guidance on how states, independently or by supporting districts, can help principal supervisors effectively evaluate, manage, develop, and support principals and other school leaders. When district leaders are aligned and well-supported, they can lead effective performance management cycles for school leaders that lead to improved teaching and learning.
- **CRITICAL PRIORITY:** Provide guidance on how states can support districts to develop teacher leader roles and ensure all principals and other school leaders are prepared to foster teacher leaders and instructional leadership teams at the school level. Career advancement opportunities enable outstanding teachers to expand their impact and teacher leaders can serve as a bench of future principals and other school leaders.
- **CRITICAL PRIORITY:** Encourage states to describe the activities they plan to pursue under Title II that will support principal or school leader effectiveness. Specifically, each state should identify their role and plan to support great leadership in every school, and particularly struggling schools. By asking states to describe leadership activities (in addition to activities focused on teachers), the Department can encourage them to put greater focus on and allocate sufficient resources to support the success of the school leaders responsible for creating conditions for great teaching and learning.
- Provide guidance on effective statewide teacher, principal, or other school leader academies. These academies are a potentially powerful tool for the development of high-quality school leaders and it is critically important that—prior to the implementation process—states have access to information on best practices to encourage effective implementation.
- Provide guidance on how states can use principal and other school leader certification and licensing processes to strengthen leadership statewide, including activities described under section 2101(c)(4)(B)(i) to reform principal or other school leader certification, recertification, licensing, or tenure systems as well as preparation program standards and approval processes.
- Provide guidance on how states can support districts to carry out activities that provide teachers, principals, and other school leaders with access to timely, relevant information on their performance and the performance of their

students to continuously improve teaching and learning across classrooms and schools. The Department can highlight the critical role principals play in carrying out meaningful teacher evaluations as well as the importance of principal supervisors in conducting evaluations of school leaders for those states and districts implementing such systems.

- Provide guidance on how states can upgrade principal preparation and support based on a needs assessment, the latest research, and best practices from the field.

District Plans & Related Implementation Support

We also encourage the Department to include a focus on school leadership in districts' Title II plans and to provide or encourage states to provide related implementation guidance and support to ensure every school is led by a well-prepared and well-supported principal.

In particular, we urge the Department to focus on statutory requirements and opportunities outlined in the following sections:

- [Section 2102\(b\)\(2\)\(A\)](#) requires that districts seeking sub-grants under Title II provide states with an application that includes “a description of the activities to be carried out by the local educational agency under this section and how these activities will be aligned with challenging State academic standards.”
- [Section 2102\(b\)\(2\)\(B\)](#) requires that districts seeking sub-grants under Title II provide an application that includes a “description of the local educational agency’s systems of professional growth and improvement, such as induction for teachers, principals, or other school leaders and opportunities for building the capacity of teachers and opportunities to develop meaningful teacher leadership.”
- [Sections 2102\(b\)\(2\)\(B\)](#), [2103\(b\)\(3\)\(G\)\(ii\)](#), [2211\(b\)\(4\)\(B\)\(ii\)\(I\)](#), and [2212\(e\)\(2\)\(C\)\(ii\)](#) all speak to the importance and development of teacher leaders and instructional leadership teams.
- [Section 2103\(b\)\(3\)\(B\)\(v\)](#) allows districts to pursue initiatives to support “the development and provision of training for school leaders, coaches, mentors, and evaluators on how accurately to differentiate performance, provide useful feedback, and use evaluation results to inform decision-making about professional development, improvement strategies, and personnel decisions.”

Therefore, we believe the Department should:

- **CRITICAL PRIORITY:** Encourage districts to describe the activities they plan to pursue under Title II that will support principal or school leader effectiveness and are aligned to challenging academic standards. Specifically, each district should identify their role and plan to support great leadership in every school, and particularly struggling schools. By asking districts to describe leadership activities (in addition to activities focused on teachers), states can encourage them to put greater focus on and allocate sufficient resources to support the success of the school leaders responsible for creating conditions for great teaching and learning.
- **CRITICAL PRIORITY:** Encourage districts to describe the systems they will establish, refine, or maintain to recruit, prepare, support, and retain highly-effective school leaders, including by expanding professional development opportunities for principals, teacher leaders, and other school leaders.
- **CRITICAL PRIORITY:** Provide guidance on how districts can support the development of teacher leader roles and ensure all principals and other school leaders are prepared to foster teacher leaders and instructional leadership teams at the school level.
- **CRITICAL PRIORITY:** Provide guidance on how districts can build the capacity of principal supervisors to effectively evaluate, manage, develop, and support principals and other school leaders.

TITLE I

“You can’t transform an underperforming school without the right people in place. The only way to move a school—or any organization for that matter—is to first get the right staff on board: an outstanding turnaround leader who can recruit, hire, support, empower, and retain exceptional, aligned teachers. Only then will we see dramatic results for all of our kids.”

—New Leader Mark Bongiovanni^{vii}

State Plans & Related Implementation Support

Given the critical role principals play in marshalling school resources to close achievement gaps and transform underperforming schools, we encourage the Department to include a focus on school leadership in states’ Title I plans and to provide related implementation guidance and support.

In particular, we urge the Department to focus on statutory requirements and opportunities outlined in the following sections of ESSA:

- [Section 1111\(d\)\(1\)\(B\)\(ii\)](#) requires that, for each school identified by the state for comprehensive support and improvement, districts develop a plan to improve student outcomes that “includes evidence-based interventions.”
- [Section 1111\(d\)\(1\)\(B\)\(vi\)](#) requires each school improvement plan developed under section 1111(d)(1)(B)(ii) be “monitored and periodically reviewed by the State educational agency.”
- [Section 1111\(d\)\(2\)\(B\)\(ii\)](#) requires that, for each school identified by the state for targeted support and improvement, schools develop a plan to improve student outcomes that “includes evidence-based interventions.”
- [Section 1111\(d\)\(2\)\(B\)\(vi\)](#) requires each school improvement plan developed under section 1111(d)(2)(B)(ii) be “monitored, upon submission and implementation, by the local educational agency.”
- [Section 1111\(d\)\(3\)\(B\)\(ii\)](#) allows states to “establish alternative evidence-based State determined strategies that can be used by local educational agencies to assist a school identified for comprehensive support and improvement under subsection (c)(4)(D)(i).”

Therefore, we believe the Department should:

- **CRITICAL PRIORITY:** Provide guidance to states that clarifies they can *and should* specifically ask districts how they will address school leadership needs as they consider evidence-based¹ strategies for improving the lowest-performing schools and closing achievement gaps. Make clear that states can encourage districts to prioritize adopting specific, alternative evidence-based leadership strategies or programs in the lowest-performing schools.
- Highlight examples—via guidance, technical assistance, webinars, speeches, or other strategic communications—of states and districts that have prioritized leadership to transform underperforming schools.
- Provide guidance, technical assistance, and other resources or support on how states can *and should* monitor districts and schools to support successful implementation of school leadership interventions.

State Educator Equity Plans & Related Implementation Support

Great teachers want to work for a great principal. Therefore, we encourage the Department to highlight the connection between school leader quality and equitable access to effective teachers.

¹ Please see section below for additional information on our recommendations regarding the definition of evidence-based interventions as it pertains to school leadership.

In particular, we urge the Department to focus on statutory requirements and opportunities outlined in the following sections:

- [Section 1111\(g\)\(1\)\(B\)](#) requires that states describe their plan for ensuring “low-income and minority children enrolled in schools assisted under this part are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, and the measures the State educational agency will use to evaluate and publicly report the progress of the State educational agency with respect to such description.”

Therefore, we believe the Department should:

- **CRITICAL PRIORITY:** Provide guidance encouraging states to describe the actions they will take to ensure all schools and students have access to effective principals and other school leaders. Though not required by statute, we believe the Department can take steps to draw the connection for states, districts, and other stakeholders between ensuring every school is led by an outstanding leader and providing students with equitable access to great teachers in every classroom, every year. For example:
 - Amend language in an updated FAQ (specifically FAQ A-2) to read: “The Department encourages an SEA to consider all educators when developing its State Plan because, although ESEA section ~~1111(b)(8)(C)~~ [1111\(g\)\(1\)\(B\)](#) focuses on student access to teachers, all educators—including principals, teacher leaders, and other school leaders—are vital to students’ success and their preparation for college or careers.”
- Highlight examples—via guidance, technical assistance, webinars (*e.g.*, the Equitable Access Support Network), speeches, or other strategic communications—of states that have included leadership in their equity plans. For example:
 - Tennessee identified “inadequate feedback, coaching, and professional learning for teachers,” all of which is influenced directly or indirectly by principals or other school leaders, and “variance in leadership skills and capacity” as key underlying issues contributing to gaps in students’ access to effective teachers.
 - Texas identified “campus leadership challenges” as one of two key root causes of students’ inequitable access to effective teachers. The plan further states, “The majority of stakeholders spoke of the critical role of the principal in creating a school culture in which teachers grow and students learn. Stakeholders noted that it is the principal who hires, develops, and supports talented teachers. It is the principal who sets the tone, articulates the vision, prioritizes what is important, and ensures implementation of policies - all of which make for a strong, positive school culture. School culture is driven by who leads, not by who attends.”

District Plans & Related Implementation Support

We also encourage the Department to include a focus on school leadership in districts’ Title I plans and to provide or encourage states to provide related implementation guidance and support.

In particular, we urge the Department to focus on statutory requirements and opportunities outlined in the following sections:

- [Section 1112\(b\)\(1\)\(D\)](#) requires that districts include in the plans they submit to states a description of how they will monitor students’ progress in meeting challenging academic standards by “identifying and implementing instructional and other strategies intended to strengthen academic programs and improve school conditions for student learning.”
- [Section 1112\(b\)\(3\)](#) requires that districts include in the plans they submit to states a description of “how the local educational agency will carry out its responsibilities under paragraphs (1) and (2) of section 1111(d).”

Therefore, we believe the Department should:

- **CRITICAL PRIORITY:** Encourage districts to specifically address the steps they will take to strengthen school leadership through evidence-based² strategies for improving the lowest-performing schools and closing achievement gaps.
- Provide guidance to districts to highlight best practices and outline steps that should be taken to bolster school leadership to improve academic programs schools as well as school conditions that lead to greater student learning.
- Provide guidance for states and districts on research and resources regarding school leadership interventions that lead to an improved school climate and better student outcomes.

² As noted earlier, please see section below for additional information on our recommendations regarding the definition of evidence-based interventions as it pertains to school leadership.

CROSS-CUTTING LEADERSHIP PROVISIONS

The success of every ESSA provision “will ultimately depend on whether each district makes a commitment to developing great school leaders... so that all schools are led by principals with the capacity to elevate instruction in every classroom and put all students on a path to success.”

—New Leader Rodney Rowan^{viii}

Evidence-Based Strategy

ESSA supports and requires states, districts, schools, and partners to invest funds in evidence-based activities to a greater degree than ever before. We encourage the Department to communicate the strong research base behind the importance of school leadership—including by sharing examples of strategies from the existing evidence base that illustrate how school leadership can improve school climate, teacher effectiveness, and student outcomes.

In particular, we urge the Department to focus on statutory requirements and opportunities outlined in the following sections:

- [Section 8101\(21\)](#) defines “evidence-based” and outlines four levels of evidence.
- [Section 8101\(21\)](#), however, requires that “when used with respect to interventions or improvement activities or strategies funded under section 1003, the term “evidence-based” means a State, local educational agency, or school activity, strategy, or intervention that meets the requirements of sub-clause (I), (II), or (III) of subparagraph (A)(i).”
- [Section 1003\(b\)\(B\)](#) allows states “with the approval of the local educational agency, [to] directly provide for these activities or arrange for their provision through other entities such as school support teams, educational service agencies, or nonprofit or for-profit external providers with expertise in using evidence-based strategies to improve student achievement, instruction, and schools.”
- [Section 1111\(d\)\(1\)\(B\)\(ii\)](#) requires that districts develop a plan to improve schools identified for comprehensive support and improvement that “includes evidence-based interventions.”
- [Section 1111\(d\)\(2\)\(B\)\(ii\)](#) requires that schools identified for targeted support and improvement develop a plan to improve that “includes evidence-based interventions.”

Therefore, we believe the Department should:

- **CRITICAL PRIORITY:** Provide guidance clarifying that “relevant outcomes” in section 8101(21)(A)(ii)(II) include outcomes predictive of or otherwise associated with improved student achievement or other student outcomes. Research demonstrates that stronger educator outcomes (*e.g.*, reduced turnover and increased retention of effective teachers and leaders) are critical for improving student outcomes. It is important that states, districts, and other partners are supported to appropriately utilize leadership interventions and other human capital strategies to implement proven practices and test promising strategies that are associated with improved student achievement or other student outcomes, including those that improve the conditions for teacher and principal effectiveness and, ultimately, student success.
- **CRITICAL PRIORITY:** Provide examples of school leadership strategies and interventions that meet the definition of “evidence-based.” In particular, it is critical that states, districts, and other partners understand that “evidence-based” is broader than purchasing curricula or materials that have evidence of effectiveness. We urge the Department to be explicit that evidence-based approaches include human capital strategies, activities, or interventions that meet the statutory definition. Given the minimal investment in school leadership following the passage of NCLB^{ix}, it is important that the Department address this insufficient focus by providing specific

examples of how building school leadership capacity can be an evidence-based strategy for improving struggling schools, including the lowest-performing schools and those with large achievement gaps. To help states and districts comply with statutory requirements, make readily available research on effective school leadership interventions and strategies aligned to the levels of evidence defined in statute. For example:

- A [recent report by the RAND Corporation](#)^x, [made available by the Wallace Foundation](#), outlines several key leadership strategies and their evidence base. It includes information on how various preparation programs—including New Leaders, the NYC Leadership Academy, and the UVA School Turnaround Specialist Program—meet higher evidence requirements of ESSA. It also highlights the specific characteristics of principal preparation programs that meet evidence requirements.
- Carefully consider how the evidence standard is applied. For example, while What Works Clearinghouse approval without reservations could be used as evidence for meeting high standards, we caution the Department from using that approval as a prerequisite for *all* higher-level evidence-based funding. Some valuable strategies, activities, and interventions, including school and district-based strategies, may be unfeasible or inappropriate to test with randomized control trials. However, researchers have been able to design and carry out high-quality quasi-experimental studies to determine the effects of such interventions on student learning and achievement—providing valuable information to the field on what works and ensuring federal dollars are spent on activities that have a record of achieving results.
- Provide guidance that encourages states and districts to carry out activities, strategies, or interventions that have strong, moderate, or promising evidence of effectiveness (v. a strong theory) to the extent practical.

Data Collection

To foster continuous improvement, we encourage the Department to provide examples of leadership data to collect and how to use the data to make decisions when developing state plans, including their Title I plans, educator equity plans, and Title II plans.

In particular, we urge the Department to focus on statutory requirements and opportunities outlined in the following sections:

- [Section 1111\(a\)\(1\)\(A\)](#), which requires that states involve principals and other school leaders in the development of state plans and provides the opportunity for states to hear directly from school leaders about important metrics to consider;
- [Section 1111\(h\)\(1\)\(C\)\(ix\)](#), which requires that state report cards include data on the qualifications of teachers and principals;
- [Section 2101 \(d\)\(2\)\(K\)](#), which requires that state Title II applications include “a description of how the State will use data and ongoing consultation as described in paragraph (3) to continually update and improve the activities supported under this part.”
- [Section 2101\(d\)\(2\)\(M\)](#), which allows, as part of their applications, states to provide “a description of actions the State may take to improve preparation programs and strengthen support for teachers, principals, or other school leaders based on the needs of the State, as identified by the State educational agency.”
- [Section 2103\(b\)\(2\)\(D\)](#), which requires that district Title II applications include “a description of how the local educational agency will use data and ongoing consultation described in paragraph (3) to continually update and improve activities supported under this part.”
- [Section 2104\(a\)\(4\)](#), which requires that states report “where available, the annual retention rates of effective and ineffective teachers, principals, or other school leaders, using any methods or criteria the State has or develops under section 1111(g)(2)(A).”

- [Section 2104\(b\)](#), which requires that “each local educational agency receiving funds under this part shall submit to the State educational agency such information as the State requires, which shall include the information described in subsection (a) for the local educational agency,” and which may include additional information.

Therefore, we believe the Department should:

- **CRITICAL PRIORITY:** Provide guidance for states on school leadership data they should consider collecting, reviewing, and reporting when developing and revising their Title I, Title II, or consolidated plans, as well as other reform efforts aimed at strengthening educator effectiveness. For example:
 - Principal turnover (especially those in the role for two years or less): The percentage of school leaders who are retained in their role for two or more years.
 - Principal vacancies (especially those that exist far into the summer): The percentage of school leader positions that remain vacant until after the final day of student attendance at the end of a school year. To be clear, school districts should have systems in place to identify and fill principal vacancies as early as possible. The best school systems identify principal successors and create and begin executing transition plans in the spring before the school year in which the transition will occur—often as early as March. At a minimum, school districts should have the principal of every school identified and transitioned by the end of the previous school year as measured by the last day of student attendance.
 - Principal effectiveness: The percentage of school leaders rated effective or above based on leadership effectiveness ratings (based on a high-quality district or state evaluation system—no longer required in federal statute, but that states may continue to build— that has been shown to be reliable in differentiating between strong and weak performers). An alternative measure could be percentage of school leaders who improved student outcomes based on consistent and methodologically sound measures of aggregated individual student growth or with positive evaluations of leadership practice as assessed by, for example, 360° surveys.
 - Ratio of principal supervisors to principals: The ratio of principals to district staff who manage the principal. While it can be difficult to interpret this data point given the range of individuals who supervise principals (including superintendents who have many other duties and roles beyond evaluating and supporting principals), it is helpful for a state to know if the ratio is relatively high, particularly in large districts. If the principal is being managed by someone who has more than 20 reports, and student achievement is low, this could be a flag for the district or state to consider investigating.
 - Principal spending: The percent of funds spent at the state and district level on school leadership quality.
 - Other metrics states could explore include:
 - Equitable distribution: The percent of low-income and minority children enrolled in Title I schools who are served by ineffective school leaders (if not already included in states’ Title I plans under section 1111(g)(1)).
 - Principal compensation: The range and average school leader salary, particularly as those figures provide information on a state’s ability to attract and retain outstanding principals in the highest-need schools.
 - Principal pipeline: The number of annual school leadership openings filled compared to the number of administrative certifications issued by the state. This is not to say these figures will or should be equal every year; rather, this information can and should be used to inform a state strategy based on the number of principal vacancies that need to be filled annually and what it will take to prepare enough school leaders who are truly prepared for the job.
- Make available—through guidance, technical assistance, or other resources or supports—consensus-based resources on leadership data that is important to track. For example:
 - The [SEP³ Toolkit](#)^{xi} created by the University Council for Educational Administration (UCEA) and New Leaders offers recommendations on how states can improve principal preparation by increasing the depth

and rigor of their preparation evaluation process. Specifically, [Tool B: Annual Report Indicators, Reporting, and Interpretation of Results](#) lays out all of the data states should collect on their principal prep programs along with information and guidance on how to interpret and use to make decisions.

Operational Flexibility

In recent years, we have seen incredible results in schools where principals have accepted greater accountability in exchange for more freedom to do their best work for kids. We encourage the Department to elevate the importance of providing school leaders with operational flexibility and balanced autonomy as a key lever for improving teaching and student outcomes:

In particular, we urge the Department to focus on statutory requirements and opportunities outlined in the following sections:

- [Sections 1003\(b\)\(2\)\(C\) and 1003\(e\)\(1\)\(F\)](#) allow states to “as appropriate, reduc[e] barriers and provid[e] operational flexibility for schools in the implementation of comprehensive support and improvement activities or targeted support and improvement activities under section 1111(d)” and “as appropriate, modify practices and policies to provide operational flexibility that enables full and effective implementation of the plans described in paragraphs (1) and (2) of section 1111(d).”
- [Section 2102\(d\)\(2\)\(L\)](#) requires states to include in their Title II applications “a description of how the State educational agency will encourage opportunities for increased autonomy and flexibility for teachers, principals, or other school leaders, such as by establishing innovation schools that have a high degree of autonomy over budget and operations, are transparent and accountable to the public, and lead to improved academic outcomes for students.”
- [Section 2212\(e\)\(2\)\(C\)](#) allows grantees to use funds to provide “principals or other school leaders with—(i) balanced autonomy to make budgeting, scheduling, and other school-level decisions in a manner that meets the needs of the school without compromising the intent or essential components of the policies of the local educational agency or State; and (ii) authority to make staffing decisions that meet the needs of the school, such as building an instructional leadership team that includes teacher leaders or offering opportunities for teams or pairs of effective teachers or candidates to teach or start teaching in high-need schools together.”
- [Section 4624\(e\)\(2\)](#) requires “each eligible entity that operates a school in a neighborhood served by a grant program under this subpart for activities described in this section [to] provide such school with the operational flexibility, including autonomy over staff, time, and budget, needed to effectively carry out the activities described in the application under subsection (a).”

Therefore, we believe the Department should:

- Provide guidance, technical assistance, and other resources on how to effectively operationalize balanced autonomy or operational flexibility. [Research conducted by New Leaders and the George W. Bush Institute](#)^{xii} has found that principals are most effective when they have autonomy to make critical school-level decisions regarding staffing, budgets, and schedules, coupled with strong resources, support, and accountability from district officials. Autonomy without structure is insufficient to get results; rather, it is a balanced approach—autonomy paired with supports tailored to the strengths and needs of each school leader—that leads to stronger outcomes for kids.

Meaningful Consultation

Strong policies are grounded in strong practice. We encourage the Department to ensure (where required) and encourage (where allowable) states and districts to bring principal expertise into conversations early and often to strengthen their

plans and ongoing implementation.

In particular, we urge the Department to focus on statutory requirements and opportunities outlined in the following sections:

- [Section 1111\(a\)\(1\)\(A\)](#) requires that state educational agencies involve principals and other school leaders in the development of state plans and provides the opportunity for states to hear directly from school leaders about important metrics to consider.
- [Section 1112\(a\)\(1\)\(A\)](#) requires that local educational agencies involve principals and other school leaders in the development of local educational plans.
- [Section 1111\(d\)\(1\)\(B\)](#) requires that principals and other school leaders be consulted with regard to the development and implementation of a “comprehensive support and improvement plan for the school to improve student outcomes.”
- [Section 1111\(d\)\(2\)\(B\)](#) requires that principals and other school leaders be consulted in the development and implementation of “school-level targeted support and improvement plan to improve student outcomes.”
- [Section 1204\(e\)\(2\)\(A\)\(v\)\(II\)](#) requires that states collaborate with principals and other school leaders on the development of its application for the innovative assessment pilot. Moreover, [sections 1204\(c\)\(2\)\(A\)\(i\)](#) and [1204\(c\)\(2\)\(A\)\(ii\)](#) require that states solicit “feedback from teachers, principals, other school leaders, and parents about their satisfaction with the innovative assessment system” and that “teachers, principals, and other school leaders have demonstrated a commitment and capacity to implement or continue to implement the innovative assessment system.”
- [Section 1501\(d\)\(1\)\(G\)](#) requires that principals and other school leaders be consulted by local educational agencies if they apply to “consolidate eligible Federal funds and State and local education funding in order to create a single school funding system based on weighted per-pupil allocations for low-income and otherwise disadvantaged students.”
- [Section 2101\(d\)\(3\)](#) requires the state to consult with principals and other school leaders on the use of Title II funds.
- [Section 2102\(b\)\(3\)\(A\)](#) requires the local educational agency to consult with Principals and other school leaders on the use of Title II funds.

Therefore, we believe the Department should:

- Provide guidance clarifying for states and districts what meaningful consultation looks like. In order for engagement of principals or other school leaders to be “meaningful,” we believe it must occur at the earliest possible stage—prior to the development of a program, initiative, or policy to ensure families, communities, and stakeholder views are integrated. Moreover, it should be ongoing and include feedback loops, be oriented toward building consensus or agreement, and include measurable outcomes related to the effectiveness consultation.
- Solicit, encourage, and create opportunities for successful principals and other school leaders to provide input on ESSA implementation at the federal, state, and local levels. This engagement can be accomplished by leveraging the Principal Ambassador Fellows and key partners in the school leadership sector, as well as by communicating directly with principals and other school leaders to share key information (*e.g.*, the dates and location of input sessions) and encourage them to use their expertise to strengthen policy and practice at the federal, state, and local levels. We also encourage states and districts to identify and engage principals who have been successful not only at maintaining excellent schools, but also leaders who have transformed low-performing schools into successful schools.

Strong Partnerships

We encourage the Department to reiterate that high-quality outside partners with proven records of measurable results for students can be valuable resources for states and districts when it comes to strengthening school leadership, particularly in school systems that have not previously focused on leadership and may lack necessary infrastructure and technical expertise. In addition to delivering programs and services, such partners can build state and district capacity by sharing their expertise and helping school systems revamp policies and practices.

In particular, we urge the Department to focus on statutory requirements and opportunities outlined in the following sections:

- [Section 1003\(b\)\(B\)](#) allows states to “with the approval of the local educational agency, directly provide for these activities or arrange for their provision through other entities such as school support teams, educational service agencies, or nonprofit or for-profit external providers with expertise in using evidence-based strategies to improve student achievement, instruction, and schools.”
- [Section 1111\(d\)\(3\)\(A\)\(iii\)](#) and [section 1111\(d\)\(3\)\(B\)\(i\)](#) allow states to provide technical assistance to districts serving large numbers of schools identified for comprehensive or targeted support and improvement and to intervene in the event adequate improvement does not occur.
- [Section 1114\(d\)](#) allows “the services of a schoolwide program under this section [to] be delivered by nonprofit or for-profit external providers with expertise in using evidence-based or other effective strategies to improve student achievement.”
- [Section 1115\(d\)](#) similarly allows the services of a targeted support and improvement program to “be delivered by nonprofit or for-profit external providers with expertise in using evidence-based or other effective strategies to improve student achievement.”
- [Section 2101\(c\)](#) allows states to set-aside funds to support a comprehensive leadership agenda. We urge the Department to clarify for states that they may use this funding to partner—through grants or contracts—with external providers, including non-profit organizations.
- [Section 2101\(c\)\(4\)\(A\)](#) allows states to carry out activities described in [section 2101\(c\)\(4\)\(B\)](#) through a grant or contract with an external partner.
- [Section 2103\(a\)](#) allows district to carry out activities described in [section 2103\(b\)\(3\)](#) through a grant or contract with an external partner.
- [Section 2211\(b\)\(1\)\(D\)](#), [section 2244\(f\)\(1\)\(E\)](#), and [section 4611\(b\)\(6\)](#) allow states, districts, and other eligible entities to apply for funding to support leadership investments in partnership with external providers.

Therefore, we believe the Department should:

- Provide guidance for states and districts on how they can leverage outside partners to provide direct support for struggling schools, including those identified for comprehensive or targeted support and improvement.
- Provide guidance, technical assistance, or other resources or supports on how states can use outside partners to build necessary capacity to support and take action in partnership with districts with a significant number of identified schools—particularly when it comes to “establishing alternative evidence-based strategies” for ensuring each school identified for comprehensive support and improvement is led by a well-prepared, well-supported principal, as provided for in [section 1111\(d\)\(3\)\(B\)\(iii\)](#).
- Provide guidance, technical assistance, or other resources or supports on how states can support districts to partner with high-quality providers—particularly to provide “professional development and other activities for teachers, paraprofessionals, and other school personnel [including principals and other school leaders] to improve instruction and use of data from academic assessments, and to recruit and retain effective teachers, particularly in high-need subjects,” as provided for in [section 1114\(b\)\(7\)\(A\)\(iii\)\(IV\)](#).

- Provide guidance, technical assistance, or other resources or supports on how states and districts can support schools to partner with high-quality providers—particularly on “providing professional development...to teachers, principals, other school leaders, paraprofessionals, and, if appropriate, specialized instructional support personnel,” as provided for in section 1115(b)(2)(D).
- Provide guidance to districts encouraging them to engage with partners with a proven record of strengthening leadership and improving student outcomes.

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