Thank you for the opportunity to comment on the Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs.

New Leaders is a nonprofit organization that develops dedicated, skilled leaders at every level of our education system—from teacher leaders to principals and superintendents—equipping them to elevate instruction and achievement across classrooms, schools, and districts. Since 2000, we have trained 3,200 great school leaders who reach 500,000 students annually. We have active partnerships in over 30 cities and with over 150 charter schools. Our leaders—64 percent of whom are people of color—overwhelmingly work with America's highest-need students: 78 percent of students served come from low-income families and 87 percent are children of color. And an independent study by the RAND Corporation found that students who attend New Leader schools outperform their peers by statistically significant margins specifically because of the strong leadership of their New Leader principal.[1]

Overall, we believe that a focus on school leadership— included in "Proposed Priority 8: Promoting Effective Instruction in Classrooms and Schools"— is critical for the success of students, teachers, leaders, and schools.

More than a decade of research shows—and our experience confirms—that well-prepared, well-supported principals have a huge influence on teacher practice and student success. School leaders account for 25 percent of a school's impact on student learning,[2] and an above-average principal can improve student achievement by 20 percentage points.[3] Moreover, like workers in any other profession, the best teachers want to work for the best bosses. Outstanding school leaders attract and retain great educators: fully 97 percent of teachers list principal quality as critical to their retention and career decisions—*more than any other factor*.[4] And school leaders transform the lowest-performing schools, where the positive effects of strong leadership on student achievement are most pronounced.[5] In fact, a landmark study found "virtually no documented instances of troubled schools being turned around without intervention by a powerful leader."[6]

We have several recommendations to strengthen the Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs with regards to school leadership.

Most important, recognize the critical and distinct role of principals by including a separate priority specifically aimed at improving the effectiveness of principals and other school leaders. By combining teachers, principals, and other school leaders into a single priority, the Department fails to recognize the specific challenges facing

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[1] Gates, S., Hamilton, L., Martorell, P., et. al. (2014). *Preparing Principals to Raise Student Achievement: Implementation and Effects of the New Leaders Program in Ten Districts.* The RAND Corporation. Retrieved from http://www.rand.org/pubs/research_reports/RR507.html.

[2] Leithwood, K., Seashore Louis, K., Anderson, S., & Wahlstrom, K. (2004). How leadership influences student learning: A review of research for the Learning from Leadership Project. New York, NY: The Wallace Foundation. Retrieved from http://www.wallacefoundation.org/knowledge-center/Pages/How-Leadership-Influences-Student-Learning.aspx

[3] Marzano, R. J., Waters, T., & McNulty, B. A. (2005). School leadership that works: From research to results. Alexandria, VA: Association for Supervision and Curriculum Development.

[4] Scholastic Inc. (2012). Primary Sources: America's Teachers on the Teaching Profession. New York, NY: Scholastic and the Bill and Melinda Gates Foundation. Retrieved from http://www.scholastic.com/primarysources/pdfs/Gates2012_full.pdf.

[5] Seashore Louis, K., Leithwood, K., Wahlstrom, K., & Anderson, S. (2010). Investigating the links to improved student learning. Washington, DC: Wallace Foundation. Retrieved from http://www.wallacefoundation.org/knowledge-center/Pages/Investigating-the-Links-to-Improved-Student-Learning.aspx.

[6] Leithwood, K., Seashore Louis, K., Anderson, S., & Wahlstrom, K. (2004).

today's principals. The importance of school leadership has historically been overlooked, and leadership is consistently underfunded. For example, during each of the past several years, more than two-thirds of districts have invested zero federal professional development funds in school leaders.[7] Without a targeted focus and investment in school leadership, principals and other school leaders are consistently forgotten. Teaching and leading are different roles that require distinct knowledge and skillsets, with school leadership focused on school-wide initiatives and culture, managing adults, and supporting teachers to ensure strong, consistent instructional practice in every classroom, every year. There is an urgent need to prioritize investments in school leadership in order to meet other efforts aimed at improving teaching, learning, and achievement across the country, and especially in low-income, high-need schools and communities.

Further, investing in the success of school leaders is a cost-effective and impactful way to invest in the success of all of the teachers and students in their school. According to a recent national analysis, the average cost to recruit, prepare, and hire a new principal is $75,000.[8] Because 12 percent of principals leave the profession every year, replacing each requires significant resources—upwards of $200M for the nation's high-need schools. That same analysis found that the average cost of principal support is $16,500—requiring more than $350M annually to mentor and support the leaders of high-need schools. Though these figures at first appear large, investments in leadership are extremely cost-effective when you consider that investing in one principal is actually an investment in the 25 teachers and 500 students she, on average, supports. In fact, a National Governors Association report describes how increasing educator investments toward principals is a smart way to improve school working conditions to foster stronger teaching and better outcomes for kids.[9] The Department has an opportunity to specifically encourage such cost-effective investments through adding a separate leadership-focused priority.

Recognize the critical and distinct role of principals by including a separate priority specifically aimed at improving the effectiveness of principals and other school leaders such as:

"Proposed Priority 9—Promoting Effective Leadership across Classrooms and in Schools.

Background:
More than a decade of research shows that well-prepared, well-supported principals have a huge influence on teacher practice and student success. School leadership is second only to classroom instruction in importance among school-based variables affecting student achievement with school leaders accounting for 25 percent of a school's impact on student learning.[10] An above-average principal can improve student achievement by 20 percentage points.[11] Moreover, like workers in any other

[7] U.S. Department of Education (2015). Findings from the 2014-15 Survey on the Use of Funds Under Title II, Part A. U.S. Department of Education (2014). Findings from the 2013-14 Survey on the Use of Funds Under Title II, Part A. U.S. Department of Education (2013). Findings from the 2012-13 Survey on the Use of Funds Under Title II, Part A. All retrieved from http://www2.ed.gov/programs/teacherqual/resources.html.

[8] School Leaders Network. (2014). Churn: The High Cost of Principal Turnover. Retrieved from http://connectleadsucceed.org/sites/default/files/principal_turnover_cost.pdf#page=1&zoom=auto,-15,792.

[9] National Governors Association. (2015). *Improving Educational Outcomes: How State Policy Can Support School Principals as Instructional Leaders.* Washington, DC: National Governors Association. Retrieved from https://www.nga.org/files/live/sites/NGA/files/pdf/2015/1506SupportingPrincipals.pdf.

[10] Leithwood, K., Seashore Louis, K., Anderson, S., & Wahlstrom, K. (2004). How leadership influences student learning: A review of research for the Learning from Leadership Project. New York, NY: The Wallace Foundation. Retrieved from http://www.wallacefoundation.org/knowledge-center/Pages/How-Leadership-Influences-Student-Learning.aspx

[11] Marzano, R. J., Waters, T., & McNulty, B. A. (2005). School leadership that works: From research to results. Alexandria, VA: Association for Supervision and Curriculum Development.

profession, the best teachers want to work for the best bosses. Outstanding school leaders attract and retain great educators: fully 97 percent of teachers list principal quality as critical to their retention and career decisions—*more than any other factor*.[12] And school leaders transform the lowest-performing schools, where the positive effects of strong leadership on student achievement are most pronounced.[13] In fact, a landmark study found "virtually no documented instances of troubled schools being turned around without intervention by a powerful leader."[14]

In particular, this priority seeks to develop evidence on effective professional development and programs that support teacher leaders, principals, and other school leaders as they prepare for and serve in their leadership roles, different leadership pathways for educators in and out of the classroom, increased diversity through strategic recruitment, innovative staffing models, and retention of top talent.

Proposed Priority:
Projects that are designed to address one or more of the following priority areas:
(a) Supporting the recruitment, development, or retention of principals and other school leaders (including assistant principals and principal supervisors) who are effective and increase diversity (including, but not limited to, racial and ethnic diversity).
(b) Promoting innovative strategies to increase the number of students who have access to effective principals or school leaders in schools with a large proportion of low-income students.
(c) Developing or implementing innovative staffing or compensation models to attract and retain effective principals or other school leaders, including by providing them operational flexibility.
(d) Increasing the opportunities for high-quality preparation of, or professional development for, principals and other school leaders to improve instruction in science, technology, engineering, and math subjects."

While we believe that a separate priority specifically focused on principals and other school leaders is critical, at minimum, we suggest making the following edits to "Proposed Priority 8: Promoting Effective Instruction in Classrooms and Schools":

First, emphasize training for teacher leaders. In order to be successful, teacher leaders need high-quality training to prepare them for their new leadership responsibilities. If the point of instructional leadership is to improve teaching and learning, thrusting high-performing teachers into leadership roles without quality training does a double disservice: it takes teaching time away from top educators, and then undermines their potential to lead colleagues to similar success. Great teaching does not automatically translate to great leadership. As we outline in *Untapped*, our report and suite of resources on teacher leadership, providing training that develops *both* instructional and adult leadership skills will equip excellent teachers with concrete skills to lead their colleagues to similar success.[15]

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[12] Scholastic Inc. (2012). Primary Sources: America's Teachers on the Teaching Profession. New York, NY: Scholastic and the Bill and Melinda Gates Foundation. Retrieved from http://www.scholastic.com/primarysources/pdfs/Gates2012_full.pdf.

[13] Seashore Louis, K., Leithwood, K., Wahlstrom, K., & Anderson, S. (2010). Investigating the links to improved student learning. Washington, DC: Wallace Foundation. Retrieved from http://www.wallacefoundation.org/knowledge-center/Pages/Investigating-the-Links-to-Improved-Student-Learning.aspx.

[14] Leithwood, K., Seashore Louis, K., Anderson, S., & Wahlstrom, K. (2004).

[15] Valdez, M., Broin, A., and Carroll, K. (2015). Untapped: Transforming Teacher Leadership to Help Students Succeed. New York, NY: New Leaders. Retrieved from http://newleaders.org/research-policy/untapped/.

- We recommend amending Priority 8(a) to read: "(a) Developing new career pathways for effective ~~educators~~ <u>teachers and train them</u> to <u>successfully</u> assume leadership roles with the option to maintain instructional responsibilities and direct interaction with students.

Second, support the recruitment, development, and retention of effective teachers, principals, and other school leaders to strengthen and diversify the teaching and school leadership professions. It is critical that we encourage school systems to take steps to strategically recruit and retain the best aspiring and sitting school leaders to pursue careers in the schools most in need of strong leadership. To ensure that these teachers, principals, and other school leaders continue to grow in their role, we encourage the Department to prioritize projects that pair these efforts with strategies aimed specifically at developing excellent educators already in these schools. Moreover, 80 percent of teachers and school leaders are white, and just 6 percent of superintendents are people of color, yet we know that all students, and especially children of color, benefit academically when they have access to diverse educators. Research has long shown such benefits for students of color who have teachers with similar backgrounds. For example, a study from the W.E. Upjohn Institute finds that when evaluating the same black students, black teachers are 30 percent more likely than non-black educators to believe those students will graduate from college.[16] Emerging research is finding similar benefits pointing to an urgent need to diversify the school leader corps, too. Another recent study published in *The Elementary School Journal* finds that black students are more likely to be nominated for gifted and talented programs, where they are woefully underrepresented, when they attend a school led by a black principal.[17] In short, strengthening and diversifying the teaching and school leadership professions are both critical for student success.

- We recommend amending Priority 8(b) to read: "(b) Supporting the recruitment<u>, development,</u> or retention of ~~educators~~ <u>teachers, principals, and other school leaders</u> who are effective and increase diversity (including, but not limited to, racial and ethnic diversity).

Third, prioritize initiatives that benefit the schools with the greatest need. With limited federal dollars, we encourage the Department to prioritize applications to discretionary grant programs that benefit the schools—and students—with the greatest need.

- We recommend amending Priority 8(c) to read: "(c) Promoting innovative strategies to increase the number of students who have access to effective teachers, <u>principals, or other</u> ~~or~~ school leaders in one or more of the following:
  - ~~Schools generally.~~
  - Schools that are located in communities served by rural local educational agencies; or,
  - Schools with a large proportion of low-income students.

Fourth, recognize the critical role principals play in creating a great place for outstanding teachers to work, thrive, and, ultimately, get results for students. Research by the George W. Bush Institute and New Leaders[18] found that principals are most effective in leading dramatic school improvement when they have balanced

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[16] Gershenson, Seth, Stephen B. Holt, and Nicholas W. Papageorge. 2015. "Who Believes in Me? The Effect of Student-Teacher Demographic Match on Teacher Expectations." Upjohn Institute Working Paper 15-231. Kalamazoo, MI: W.E. Upjohn Institute for Employment Research. Retrieved from http://research.upjohn.org/up_workingpapers/231/.

[17] Jason A. Grissom, Luis A. Rodriguez, and Emily C. Kern, "Teacher and Principal Diversity and the Representation of Students of Color in Gifted Programs: Evidence from National Data," The Elementary School Journal 117, no. 3 (March 2017): 396-422. Retrieved from http://www.journals.uchicago.edu/doi/abs/10.1086/690274. .

[18] Ikemoto, G., Taliaferro, L., Fenton, B. and Davis, J. (2014). Great Principals at Scale: Creating District Conditions that Enable All Principals to be Effective. New Leaders and the George W. Bush Institute. Retrieved from http://newleaders.org/research-policy/great-principals-at-scale/

autonomy over school-level decisions related to their budget, school schedule, and who they hire, promote, and, when needed, transition from staff. This operational flexibility, balanced with thoughtful oversight and strong accountability for results, fosters a school environment in which teachers and leaders, together, achieve breakthrough academic performance for all students.

- We recommend amending Priority 8(d) to read: "(d) Developing or implementing innovative staffing or compensation models to attract and retain effective ~~educators~~ teachers, principals, or other school leaders, including by providing school leaders with operational flexibility."

Fifth, underscore the need for instructional leaders, including principals, to have demonstrated excellence in teaching. In order to be successful in an instructional leadership role, a school leader must have served as a teacher first. An effective school leader not only has teaching experience but also has a strong grasp on additional key skills including those related to pedagogy, instructional strategies, data-driven instruction, and adult leadership.

- We recommend amending Priority 8(e) to read: "(e) Recruiting promising students and qualified individuals from other fields to become teachers, ~~principals, or other school leaders~~, such as mid-career professionals from other occupations, former military personnel, or recent graduates of institutions of higher education with records of academic distinction who demonstrate potential to become effective teachers, ~~principals, or other school leaders~~."
- We recommend adding a new Priority 8(g) to read: "(e) Recruiting highly effective teachers who also have expertise in pedagogy, instructional strategies, data-driven instruction, and adult leadership to become effective principals or other school leaders."

Finally, we also encourage the Department to distinguish teachers and principals throughout the proposed supplemental priorities to reinforce the distinct needs of each type of educator. In particular:

- We recommend amending Priority 6(a) to read: "(a) Increasing the number of ~~educators~~ teachers, principals, and other school leaders adequately prepared and supported to deliver rigorous instruction in STEM fields or oversee a rigorous STEM curricula, including computer science (as defined in this notice), through recruitment, evidence-based (as defined in 34 CFR 77.1) professional development for current STEM ~~educators~~ teachers, principals, or other school leaders, or evidence-based retraining for current ~~educators~~ teachers, principals, or other school leaders seeking to transition ~~from other subjects~~ to STEM fields or STEM-focused schools."
- We recommend amending Priority 7(a) to read: "(a) Promoting literacy interventions supported by strong evidence (as defined in 34 CFR 77.1), including by supporting ~~educators~~ teachers, principals, and other school leaders with the knowledge, skills, professional development (as defined in section 8101(42) of the Elementary and Secondary Education Act, as amended), or materials necessary to promote such literacy interventions."
- We recommend amending Priority 7(c) to read: "Facilitating the accurate and timely use of data by ~~educators~~ teachers, principals, and other school leaders to improve reading instruction and make informed decisions about how to help students build literacy skills while protecting student and family privacy."
- We recommend amending Priority 8(f) to read: (f) Increasing the opportunities for high-quality preparation of, or professional development for, teachers ~~or other educators of~~, principals, and other school leaders to improve instruction in science, technology, engineering, and math subjects.

In conclusion, while we chose to focus our comments exclusively on priorities directly connected to school leadership, we remain concerned about the promotion of educational investments that do not have a strong

evidence base to support federal investment. We encourage the Department to focus its priorities on strategies and interventions—such as school leadership—with a proven track record of improving student achievement and other student outcomes, especially for those students with the greatest need.