

Thank you for the opportunity to comment on the U.S. Department of Education’s Implementation of Title I/II Program Initiatives Study by the Institute of Education Sciences (IES).

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. New Leaders knows great leadership: we are the principal preparation program with the strongest evidence of positive impact on student achievement.<sup>[i]</sup>

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,<sup>[ii]</sup> and an above-average principal can improve student achievement by 20 percentage points.<sup>[iii]</sup> 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*.<sup>[iv]</sup> And school leaders transform the lowest-performing schools, where the positive effects of strong leadership on student achievement are most pronounced.<sup>[v]</sup> In fact, a landmark study found “virtually no documented instances of troubled schools being turned around without intervention by a powerful leader.”<sup>[vi]</sup>

The bipartisan Every Student Succeeds Act (ESSA) took significant steps to elevate the importance of leadership—and states have responded with universal agreement, including commitments in their state plans to invest federal dollars in school leadership.

As states continue their work to successfully transition to ESSA and implement their plans to comply with the federal law and advance student success, the Department has an opportunity to study these locally-driven efforts to use leadership to help advance effective, sustainable teaching, improve student outcomes, close achievement gaps, and meet other state goals for school, teacher, and student success.

To enhance the quality, utility, and clarity of the information to be collected to implement the Title I/II Program Initiatives Study, we offer the following:

#### **SEA Survey**

Support and Resources for Lowest-Performing Title I Schools – Question 1-38 asks States about the areas in which additional professional development and assistance was provided to principals in the lowest-performing schools. Similarly, question 1-50 asks about professional development and support for principals of schools that have low-performing subgroups. We believe the five available responses – (1) School improvement planning, identifying interventions, or budgeting effectively; (2) Acting as instructional leaders; (3) Recruiting, retaining, and developing more effective teachers; (4) Topic(s) chosen by the district or school; (5) Other (specify) – capture critical information on the key responsibilities of school leaders today. We encourage the Department to continue collecting this information and suggest revising option (2) to read: “Acting as instructional leaders to ensure teaching and learning are oriented toward college- and career-readiness.”

Educator Evaluation -- Questions 2-1 through 2-12 ask about educator evaluation practices within a State, including separate questions about the evaluation of teachers and the evaluation of school leaders. We endorse the inclusion of the questions on principals, but also believe that some of the questions related to teacher evaluation practices should also be asked about principal evaluations. Specifically:

- Question 2-4 asks the State education agency (SEA) about what “other factors” (that is, factors in addition to student achievement growth) are used in the State to evaluate teacher performance. Available responses include, among others, teacher self-assessments, peer assessments, student surveys, and parent surveys. We recommend that a similar question, with similar available responses tailored to school leaders, be asked about principal evaluations.
- Question 2-7 asks whether the State requires, recommends, permits, or prohibits the use of teacher evaluations for certain purposes, for example to design professional development opportunities or develop improvement plans for low-performing teachers. We recommend that the survey include a similar question on the use of principal evaluations.
- Question 2-12 asks about the required frequency of teacher evaluation in the State. There should be a similar question about principal evaluation.

Educator Preparation – Questions 2-17 through 2-21 ask about States’ efforts to improve teacher preparation programs and to strengthen or otherwise modify procedures for teacher licensure. The survey does not include similar questions about the preparation of school leaders; we recommend that they be included.

Title II State Set-Asides – Under the Title II-A program as reauthorized by the Every Student Succeeds Act, an SEA may reserve up to 5 percent of its formula allocation to carry out State-level activities, and may reserve an additional 3 percent specifically to strengthen school leadership. Question 2-24 asks about the uses of the 5 percent set-aside within the State, but there is no comparable question on whether and how the State uses the 3 percent set-aside. We strongly recommend that such a question be included, in order to provide a more complete picture of the uses of Title II-A funds within the State (including the 5 percent, the 3 percent, and the remainder flowing to LEAs).

#### **District Survey**

Low-Performing Schools – Questions 1-12, 1-23, and 1-32 inquire about professional development provided to principals. In alignment with our feedback on the state survey, we encourage the Department to continue collecting this information and suggest revising option (2) to read: “Acting as instructional leaders to ensure teaching and learning are oriented toward college- and career-readiness.”

Educator Evaluation-- Questions 2-1 through 2-18 ask about districts’ teacher and school leader evaluation practices; within that section of the survey, several questions focus specifically on school principals. We strongly support the inclusion of those questions, which will yield very useful information about practices related to school leadership. In addition, we note that Question 2-10 asks about the distribution of teachers by assessed performance level and Question 2-12 asks about the training provided to teacher evaluators. We note that there are no parallel questions on the assessment of principals and believe that the inclusion of such questions would be advantageous.

Educator Support – Question 2-22 asks about the methods that a district uses to provide professional development and other support to teachers, but there is no parallel question on support for school leaders. We recommend that one be included.

Uses of Title II-A Funds – Question 2-29 asks about whether a number of issues or needs were a focus of the district’s use of Title II-A funds, but none of the issues on the list is specifically related to strengthening school leadership. We recommend the addition of such an item.

Thank you, once again, for the opportunity to provide feedback on the Implementation of Title I/II Program Initiatives Study. If you have any questions about these comments, please contact [policyteam@newleaders.org](mailto:policyteam@newleaders.org).

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- [ii] 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>.
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- [iv] 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](http://www.scholastic.com/primarysources/pdfs/Gates2012_full.pdf).
- [v] 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>.
- [vi] Leithwood, K., Seashore Louis, K., Anderson, S., & Wahlstrom, K. (2004).