



NBPTS[®]

National Board for
Professional Teaching Standards

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September 7, 2010

The Honorable Arne Duncan
Secretary, U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Secretary's Priorities for Discretionary Grant Programs (Docket ID: ED-OS-2010-0011)

Dear Secretary Duncan:

Thank you for the opportunity to comment on the Department's August 5, 2010 Federal Register Notice regarding the Secretary's Priorities for Discretionary Grant Programs. We commend the Department's goal to focus Federal resources on areas of greatest educational need. In particular, we are pleased to see the emphasis the Department has placed on teacher and principal effectiveness and leadership in the proposed priorities, a longtime focus of the National Board for Professional Teaching Standards (NBPTS).

NBPTS is an independent, nonprofit, nonpartisan and nongovernmental organization. NBPTS advances the quality of teaching and learning by developing professional standards for accomplished teaching; creating and administering National Board Certification, a voluntary system to certify teachers who meet those standards; and integrating National Board Certified Teachers into educational reform efforts. NBPTS, over its twenty-three year history, has continually explored the connection between accomplished teaching and student learning, as guided by a single premise: The hallmark of successful teaching *is* student learning.

The National Board now seeks to meet the challenge of transforming the nation's schools by expanding the concept from classroom-based teachers to whole school reform. The focus of the National Board is expanding from individuals achieving National Board Certification into a systemic movement that changes the culture of classrooms, schools and districts by leveraging National Board Certified Teachers to build human capital – especially in high-need schools.

Accordingly, NBPTS submits the following comments regarding the definitions of "highly effective principal," "highly effective teacher," and "student achievement" proposed in the

guidelines for the Secretary's Priorities for Discretionary Grant Programs. We believe that these proposed definitions can be strengthened as stated pursuant to our comments below.

Proposed Highly Effective Principal Definition

The proposed notice defines a highly effective principal as a principal whose students, overall and for each subgroup, achieve high rates (e.g., one and one-half grade levels in an academic year) of student growth. Applicants may supplement this definition as they see fit so long as principal effectiveness is judged, in significant measure, by student growth.

We agree that an effective principal is critical to the success of any school. Research has shown that leadership is second only to classroom instruction among school-related factors that influence student learning. School principals, who are largely responsible for improving school, teacher, and student performance, have significant responsibilities in recruiting and retaining the best teachers and in creating a culture of learning. As such, two years ago, NBPTS began to develop a new voluntary National Board Certification for Educational Leaders (NBCEL) to evaluate and identify effective principals and school leaders. Currently, the core framework has been completed; the standards have been adopted; and the assessment design is underway. NBPTS expects to pilot principal certification in 2011 (after commencing a field test this year) and then to fully launch the leadership certification in 2012.

We are pleased that the proposed notice recognizes that an assessment of principal effectiveness must be based on multiple measures of student growth and other supplemental indicators, which may include evidence of strong instructional leadership and supportive teaching and learning conditions. In the process of developing NBCEL, NBPTS has adopted nine key standards for highly effective principals and school leaders that would parallel many of the multiple criteria of student learning and leadership skills provided in the definition:

- 1. Leadership for Results.** Effective principals lead with a sense of urgency to achieve the highest results for all students and adults. They build organizational capacity by developing leadership in others. These dynamic, forward-thinking principals lead collaborative organizations that realize and sustain positive change to enhance teacher practice and improve student learning.
- 2. Vision and Mission.** Effective principals lead and inspire the learning community to develop, articulate, and commit to a shared and compelling vision of the highest levels of student learning and adult practice. These principals advance the mission through collaborative processes that focus and drive the organization toward the vision.
- 3. Teaching and Learning.** Effective principals ensure that teaching and learning are the primary focus of the school. As stewards of learning, these principals lead the implementation of a rigorous, relevant, diverse curriculum and appropriate

assessments of student learning. They know a full range of pedagogy and make certain that all adults have the knowledge, skills, and dispositions necessary to support student success.

4. Knowledge of Students and Adults. Effective principals ensure that each student and adult in the learning community is known and valued. These principals develop systems so that individuals are supported socially, emotionally, and intellectually, in their development, learning, and achievement.

5. Culture. Effective principals inspire and nurture a culture of high expectations, where actions support the common values and beliefs of the school. These principals build authentic, productive relationships that foster a collaborative spirit. They honor the culture of the students, adults, and larger community, demonstrating respect for diversity and ensuring equity. They create and maintain a trusting and safe environment that enhances student learning and adult practice.

6. Strategic Management. Effective principals skillfully lead the design, development, and implementation of strategic management systems and processes that actualize the vision and mission. These principals lead the monitoring and adaptation of systems and processes to ensure they are effective and efficient in support of a high-performing organization focused on teaching and learning.

7. Advocacy. Effective principals advocate internally and externally to advance the organization's vision and mission. These principals strategically seek, inform, and mobilize influential educational, political, and community leaders to advocate for all students and adults in the learning community.

8. Ethics. Effective principals are ethical. They consistently demonstrate a high degree of personal and professional ethics exemplified by integrity, justice, and equity. These principals work to establish a culture in which exemplary ethical behavior is practiced by all stakeholders.

9. Reflection and Growth. Effective principals are reflective practitioners who build on their strengths and identify areas for personal and professional growth. They adapt their paradigm and practice to improve student performance and enhance teacher instruction through reflective practices.

We recommend that evidence of these standards be included as part of the method for assessing principal effectiveness.

Proposed Highly Effective Teacher Definition

The proposed notice defines a highly effective teacher as a teacher whose students achieve high rates (e.g. one and one-half grade levels in an academic year) of student growth.

Applicants may supplement this definition as they see fit so long as teacher effectiveness is judged, in significant measure, by student growth.

The evidence-based standards and assessments of NBPTS provide teachers and schools with the tools to define and measure teaching excellence. National Board Certification embodies the very essence of what it means to be an effective teacher. In 2008, the non-partisan National Research Council issued a comprehensive study that found that National Board Certification has had a positive impact on student achievement, teacher retention, and professional development, noting that “the evidence is clear that National Board Certification distinguishes more effective teachers...with respect to student achievement.”

The National Board Certification process is a widely-accepted, multi-dimensional measurement of teacher effectiveness that reach across all teaching and content areas and developmental levels. It includes, but is not limited to, measures of student achievement. The standards and assessments process for National Board Certification of teachers is based on Five Core Propositions of effective teaching:

- 1. Teachers are committed to students and their learning.** Teachers are dedicated to making knowledge accessible to all students and believe all students can learn. They treat students equitably—recognizing the individual differences that distinguish their students from one another and taking these differences into account in their practice. They understand how students develop and learn.
- 2. Teachers know the subjects they teach and how to teach those subjects to students.** Teachers have mastery over the subject(s) they teach and have a deep understanding of the history, structure and real-world applications of the subject. They have skill and experience in teaching it, are very familiar with the skills gaps and preconceptions students may bring to the subject and are able to use diverse instructional strategies to teach for understanding.
- 3. Teachers are responsible for managing and monitoring student learning.** They deliver effective instruction; move fluently through a range of instructional techniques—keeping students motivated, engaged and focused; and know how to organize instruction to meet instructional goals. They know how to assess the progress of individual students as well as the class as a whole.
- 4. Teachers think systematically about their practice and learning from experience.** They model what it means to be an educated person. They read, question, create and are willing to try new things. They critically examine their practice on a regular

basis to deepen knowledge, expand their repertoire of skills and incorporate new findings into their practice.

5. Teachers are members of learning communities. They collaborate with others to improve student learning—including partnerships with community groups and businesses; working with other professionals on instructional policy, curriculum development and staff development; and working with parents to engage them productively in the work of the school. They can evaluate school progress and the allocation of resources in order to meet state and local education objectives.

We recommend that evidence of these Five Core Propositions be included as part of the method for assessing teacher effectiveness. Specifically, we recommend that the notice be modified to reflect that applicants must examine multiple academic and nonacademic indicators in their evaluation of teachers. In measuring a teacher’s performance based on student academic indicators, applicants should use multiple assessments that: (1) are aligned with a common standard; (2) include performance-based measures; and (3) measure individual student growth year-to-year. Tested grades and subjects should include a student’s score on the State’s assessment required under the Elementary and Secondary Education Act (ESEA), but applicants should also be required to include multiple measures of other academic and nonacademic indicators, including National Board Certification or evidence of meeting the standards and process underlying such Certification, such as evidence from student work; student performance on other objective pre- and post-assessments of student knowledge and skills; written self-assessment and analysis; teacher portfolios; videos of teacher practice; supervisor site visits; school documentation of classroom observations and faculty meeting agendas; working conditions surveys; teacher, peer, parent, and student evaluations and feedback; teacher retention and transfer rates; teacher and student attendance rates; comprehensive personal academic or graduation plans; and opportunities for student engagement through co-curricular and extracurricular activities and rates of participation. A teacher of non-tested subjects should also be evaluated on these multiple measures of academic and non-academic indicators, including National Board Certification or the standards and process underlying such Certification.

Proposed Student Achievement Definition

There is critical distinction between student achievement, which presents a snapshot of subject matter knowledge, skills and understanding at one point in time, and student learning, which measures growth in subject matter knowledge, understanding and skills over time.

It is important that measures of student learning be explicitly linked to effective teaching and classroom practice. Learning gains should always be interpreted in the context of the instruction that was provided. The process by which teachers correlate learning gains over time with their instructional plans and strategies also allows them to adapt their teaching practice to address specific student needs.

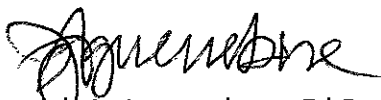
As such, we are concerned that the “as applicable” clause in the definition of student achievement for tested grades and subjects would allow an evaluation of teacher effectiveness to be made based solely on one test score. Recent reports have echoed this concern, including an Institute for Education Sciences report published earlier this year entitled *Error Rates in Measuring Teacher and School Performance Based on Student Test Score Gains*.

NBPTS recommends instead that student achievement be considered a factor in a larger definition of multiple measures that assess student learning. While current standardized tests of student knowledge typically measure student achievement, it is student learning that is relevant to defining and assessing effective teaching. When multiple measures of accurately reflect growth in student progress over time, they can serve as part of a broader range of tools that capture information about both student learning and teaching practice. A single achievement measure, by contrast, reveals only a snapshot of student understanding at one point of time – not the full picture about the teacher’s impact on individual students in their classroom.

Accordingly, we recommend that the notice be modified to reflect that applicants must examine multiple academic and nonacademic indicators in the definition of student achievement. In measuring a teacher’s performance based on student academic indicators, applicants should use multiple assessments that: (1) are aligned with a common standard; (2) include performance-based measures; and (3) measure individual student growth year-to-year. Tested grades and subjects should include a student’s score on the State’s assessment required under the Elementary and Secondary Education Act (ESEA), but applicants should also be required to include multiple measures of other academic and nonacademic indicators, such as evidence from student work; student performance on other objective pre- and post-assessments of student knowledge and skills; written self-assessment and analysis; teacher, peer, parent, and student evaluations and feedback; teacher and student attendance rates; comprehensive personal academic or graduation plans; and opportunities for student engagement through co-curricular and extracurricular activities and rates of participation. Non-tested grades and subjects should also be evaluated on these multiple measures of academic and non-academic indicators.

Thank you for the opportunity to weigh in on this important initiative. NBPTS stands ready to assist with the monumental task of ensuring a high quality education for all children.

Sincerely,



Joseph A. Aguerrebere, Ed.D.
President and CEO

National Board for Professional Teaching Standards