



February 18, 2016

The Honorable John King
Acting Secretary
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Re: Technical assistance and guidance concerning Title II of the Every Student Succeeds Act (ESSA)

Dear Dr. King:

The American Federation of School Administrators (AFSA), the National Association of Elementary School Principals (NAESP), and the National Association of Secondary School Principals (NASSP), which collectively represent principals and other school leaders in the nation's 115,000 elementary, middle, and high schools, are writing to provide comments related to technical assistance and guidance that is needed on Title II to implement the latest authorization of the Elementary and Secondary Education Act (ESEA), or certain provisions of the Every Student Succeeds Act (ESSA).

A substantial level of research over the past decade has proven two very important facts: Effective school leadership is second only to teaching among school-related factors in improving student achievement, and strong school leadership has the greatest impact in schools with the most need. Given this evidence, Congress provided a number of critical opportunities for states and districts to better address the needs of principals and strengthen school leadership, particularly through comprehensive programs that must use effective strategies to recruit, prepare, and provide ongoing support for principals. Without additional guidance from the Department, our organizations are concerned that states and districts will overlook ESSA's principal-oriented provisions and fail to take full advantage of these unique opportunities to support the role of principals.

Toward that end, we urge the Department to provide sufficient guidance and technical assistance that: highlights these opportunities; encourages states and districts to prioritize funding for principals, assistant principals, and other school leaders to create or build meaningful support for their professions; and clarifies several important terms that are meant to bolster practitioners in the profession. Without this technical assistance and guidance, we fear that we will lose an opportunity to provide a well-prepared and supported principal pipeline, thereby addressing the problem of principal "churn."

Investing in Systems to Support Principals

As the base of research and evidence on the importance of principals and school leadership has grown, unfortunately, states and districts have not kept pace with principal recruitment, preparation, and retention or ongoing, sustained support for school leaders.

In 2013, the U.S. Department of Education's sample of local educational agency use of Title II funds under ESEA as authorized by the No Child Left Behind Act (NCLB) found that 44 percent of Title II, Part A, funds were used for professional development for teachers and principals. However, of this amount, only four percent of these funds were directed toward building or supporting the professional capacity of principals. To address this issue, Congress provided [language](#) under the School Improvement Programs section in the FY 2015 Omnibus Appropriations Act (H.R. 83) that directed the Department to provide states and districts with guidance on supporting professional development opportunities for principals to improve instructional leadership capacity, including but not limited to their role in evaluating teachers.

In 2015, our organizations met with the Department to request follow-up on the guidance and technical assistance on Title II use of funds for principals. In response to the Department's request for additional information on effective principal professional development systems, AFSA, NAESP, and NASSP conducted a survey of more than 1,000 principals across the U.S. This survey's results not only underscore the unmet needs of principals, but provide direction on how states and districts can do a better job supporting principals, assistant principals, and other school leaders. For example:

- 1) 60 percent of respondents reported spending less than one percent of their workdays per year in a state- or district-sponsored professional development (comparatively, teachers typically spend two to three percent of their total workdays in a year on state or district sponsored professional learning).
- 2) 43 percent of respondents reported that their district does not tailor professional development opportunities to meet their specific leadership needs. In many cases, principals were only afforded an opportunity to attend professional learning sessions that were created and designed for teachers.

Additionally, when asked how to improve professional development to maximize the impact on instructional leadership and student growth, principals listed the following recommendations:

- 1) Provide additional summer professional development opportunities with continuous coaching or mentorship throughout the year.
- 2) Establish state- and district-wide collaborative cohorts (similar demographics, budgets, etc.) who engage in regular professional engagement.
- 3) Increase funding for attendance at conferences and events that provide collaborative time (nationally and regionally) focused on instructional leadership (not one-day "workshops").
- 4) Provide additional training on teacher and noninstructional staff member evaluations to ensure principals fully understand the length, components, and regularity of evaluation models.

Based on these results, AFSA, NAESP, and NASSP recommend that the Department issue technical assistance and guidance in the following areas to help states and districts develop and execute plans to meaningfully support principals serving in the profession and to create robust principal recruitment and preparation programs.

Technical Assistance and Guidance to Support Principals

1) Encourage States and Districts to Prioritize Spending on Principal Leadership Activities

AFSA, NAESP, and NASSP were pleased that Section 2101(c)(3) of ESSA allows states to use up to three percent of their state allotments for statewide professional development activities. However, we believe that states must prioritize school leadership in their spending of these statewide activities dollars, creating the programs, trainings, and materials for principals and other school leaders that are so crucial to student and school success. Further, we contend that the Department's technical assistance to states should indicate that states must work to identify the needs related to recruitment and retention of principals, and that funds available under this section should be used to supplement a greater portion of state and local funds to support school leadership.

In addition, we request technical assistance for states to pursue the use of funds listed in section 2101(c)(4), including:

- Reforming certification systems or preparation program standards
- Improving the design and implementation of teacher, principal, or other school leader evaluation and support systems
- Implementing mechanisms to assist local education agencies and schools in effectively recruiting and retaining teachers, principals, or other school leaders who are effective in improving student academic achievement, establishing teacher and principal residency academies and several other important activities

Given that Title II will likely receive flat funding or sustain a funding cut next year, meeting all of the needs engendered by so large and varied a list may prove impossible. Therefore, we urge the Department to encourage states and districts to focus their funding on the traditionally underfunded but crucial areas of: identifying principal and school leader needs; investing in the most effective strategies to meet those needs; and aligning those strategies with similar efforts implemented by state boards of education and state agencies.

Further, we believe that the Department must clarify that the uses of funds in section 2101(c)(4)(B) are not necessarily listed in order of priority, and that activities must be documented according to section 2101(d)(3) before indicating a specific use of funds. Under previous iterations of the law, AFSA, NAESP, and NASSP became aware of several cases where states and districts may have misinterpreted "allowable use of funds" as an order of priority.

2) Ensure Program Outcomes Build the Capacity of Building Principals and School Leaders



AFSA, NAESP, and NASSP request explicit guidance that states and districts direct program outcomes in Title II to the benefit of the individuals defined as a school leader in the law. Sec. 8002 of ESSA defines the term “school leader” as “a principal, assistant principal, or other individual who is an employee or officer of an elementary or secondary school, local educational agency, or other entity operating at an elementary school or secondary school; and is responsible for the daily instructional leadership and managerial operations in the elementary school or secondary school building.” Recognizing that state and local efforts often fall short in providing principals and other school leaders with high quality professional learning opportunities, it seems clear to us that Congress intended to target and ESSA’s actual language does, in fact, target support to those individuals responsible for the daily instructional leadership inside the school building. Guidance from the Department to reinforce this plain meaning in the statute will help avoid confusion at the state and district levels.

We recognize that exceptions to the general definition of school leaders can and must exist. For example, many districts in rural or smaller urban districts delegate the duties of both superintendent and teacher to a principal. In such cases, we believe the term “school leader” should apply to such individuals. However, we urge the Department to make clear that states and districts must be cautious in providing program benefits to anyone who is not responsible for daily instructional leadership, which is outside the scope of the law.

In addition, our organizations note that Congress intended that the term school leader apply to a “local educational agency” for the purpose of charter school operations. Charter schools are often designated as local educational agencies for purposes of legal authority at the local level, (as the school building is not the legal authority at the district level). In the case where a school is designated as the local educational agency, we believe that the term school leader must apply to the individual who is delegated the duties and responsibilities of a principal, assistant principal, or other title denoting the site-based instructional leader in the school building, and urge any guidance from the Department to take account of that situation.

3) Provide Technical Assistance to Support Principals and Other School Leaders

Our organizations request that the Department provide technical assistance to states and encourage that states make funds available in section 2101(d)(3)(A) to determine statewide structures that would support instructional leaders, as well as district level activities to coordinate, align, and meet the needs of principals identified through meaningful consultation. As noted earlier, sec. 2101 et seq. of ESSA can greatly help states build comprehensive, dedicated systems that support principals, assistant principals, and other school leaders, and assist local educational agencies with implementing activities that will contribute to a robust principal pipeline. These efforts are essential to retain effective principals and recruit and prepare strong leaders who have the potential to excel in the profession. This level of work requires states and districts to look at how to develop systems, and then define roles and responsibilities within state- or district-level structures, such as for any principal supervisory roles. Technical assistance from the Department will be most helpful here, as well as in calling out activities under the law where such systems can be developed.

In addition, to the extent that principal supervisors are working in schools on a daily basis and inside school buildings, we encourage guidance and technical assistance to help states and districts define this evolving role. In our experience, principal supervisors help improve communication and collaboration between site- or school-based instructional leaders and the central office, particularly in large urban districts. As a district-level position, principal supervisors oversee clusters of schools and provide site-based principals with shoulder-to-shoulder coaching, mentoring, or indirect instructional leadership support. To the extent practicable, the Department should help states and districts define and support this role explicitly and separately from that of a school leader.

4) Clarify Definition of ‘Experienced Principals’

Section 8002 of ESSA describes the formation of partnerships with institutions of higher education to establish school-based teacher, principal, and other school leader training programs that provide prospective teachers, novice teachers, principals, and other school leaders with opportunities to work under the guidance of experienced teachers, principals, and other school leaders. We support opportunities for principals and other school leaders to work with experienced principals; however, the term “experienced principals” is not defined. Therefore, we request that the Department provide explicit guidance to states, clarifying that an “experienced principal” is a principal with at least three, but preferably five, years of experience in the role.

5) Leadership in Early Childhood Education

Our organizations request that the Department issue technical assistance to states and districts implementing programs under section 2101(c)(4)(B) to consider state efforts related to pre-K expansion that is school-based, and ensure that principals are supported to tailor instructional leadership in ways that support the learning of young children. Further, in states that are focused on expansion of pre-K, we believe that districts must address the needs of principals and teachers in the early grades, as well as parents and families of young children, in accordance with allowable activities under section 2103(b)(3)(G)(i-ii).

Research over the past 30 years indicates two important conclusions: Strong school leadership indirectly influences student achievement, and this is second only to teaching among school influences on student success. Recent studies also show that instructional leadership in early childhood education, or from pre-K to grade 3, is increasingly important to address achievement gaps that appear early, and may widen over the years that children are in school if not addressed. Further, principal leadership is needed to sustain investment and a higher rate of return on high-quality early learning experiences and student progress across a pre-K to grade 3 continuum of learning, which will ultimately lead to a reduced burden on schools in remediation, a reduction in crime rates, enhanced college attendance and graduation rates, as well as workforce productivity.

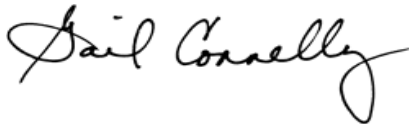
Building an education system that supports high-quality learning for young children calls for successful pre-K through grade 3 alignment, or alignment of standards, curriculum, and instruction. As instructional leaders, principals must ensure that schools have the ability to provide a developmentally appropriate curriculum through grade 3, or a curriculum that is mindful of child development and social and emotional learning, where all schools and classrooms can be organized and operated in ways that foster the development and growth of young children; assessment practices are developmentally appropriate and useful to teachers for instruction, and teachers are supported to deliver a carefully aligned pre-K through grade 3 curriculum.

Thank you for considering the comments herein, which reflect the perspective of the nation's elementary, middle level, and high school principals and school leaders from pre-K through grade 12. We look forward to supporting the U.S. Department of Education's efforts to support states and districts with the transition and implementation of ESSA.

Sincerely,



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