# Written Comments Submitted to the State Board Office

# August 25 – September 13, 2011

# (SB 191 Rulemaking)

# Memorandum

**To:** Colorado State Board of Education

**CC:** State Council for Educator Effectiveness

**From:** Anna Jo Haynes and Pat Hamill, Co-Chairs Early Childhood Leadership Commission

**Date:** 8/23/2011

**Re:** Recommended Changes to Colorado Professional Standards for Teachers and Principals

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Colorado's Early Childhood Leadership Commission (ECLC) is pleased to have the opportunity to comment on the draft Professional Standards for Teachers and Principals. As we work to create an aligned and collaborative P-20 system, we hope to embed language and concepts that span the entire system into planning and standards.

Specifically, the comments in this memo are in reference to section 2.02, pages 4 to 7 (Principal Standards) and section 3.02, pages 7-10 (teacher standards) in the draft SB 191 rules.

The attached documents contain suggested edits to the draft Professional Standards for Teachers and Principals. Many of these changes are simple suggestions for changes in language, such as replacing the word "student" with "child" and "families" in place of "parents". This language is more inclusive of children who are not yet in school and families of all types. Additionally, the ECLC suggests adding the word "community" along with "district" to encompass early learning settings outside of school district jurisdiction.

The ECLC recommends making changes that incorporate measurements of growth and development for preschool-aged children along with the academic and social measures used for older children. For instance, the ECLC is currently working to create statewide Early Learning and Developmental Guidelines. These Guidelines can be used in the same way teachers are asked to use state and district content standards and can be added to the plan as a way to measure the growth of young children.

Finally, the ECLC is recommending that the use of observational assessment be added to the Standards. When working with very young children observational assessment is critical as is the assessment of developmental growth along with academic learning.

The ECLC's P-3 Professional Development Advisory Group is working with the State Council for Educator Effectiveness to create alignment and collaborative efforts when possible. We believe that the recommended changes make great strides toward a robust and strong P-20 system.

Thank you for your time and consideration. If you have questions or require more information please feel free to contact us. We are excited about this opportunity to align standards for P-20 education professionals.

## Colorado Professional Standards for Teachers

## DRAFT March 7, 2011

**NOTE: Bold language is Council recommendation for required components of evaluation system; non-bolded text is descriptive of the required elements.**

***Effective teachers of Colorado's children, from birth to postsecondary, ~~in the state of Colorado~~ have the knowledge, skills, and commitments that ensure equitable learning opportunities and growth for all students. They strive to support growth and development, to close achievement gaps and to prepare diverse student populations for postsecondary success. Effective teachers facilitate mastery of content and skill development, and identify and employ appropriate strategies for students who are not achieving mastery. They also develop in students the skills, interests and abilities necessary to be lifelong learners, as well as for democratic and civic participation. Effective teachers communicate high expectations to students and their families and find ways to engage them in a mutually-supportive teaching and learning environment. Because effective teachers understand that the work of ensuring meaningful learning opportunities for all students cannot happen in isolation, they engage in collaboration, continuous reflection, on-going learning and leadership within the profession.***

**Effective teachers in the state of Colorado demonstrate excellence against the following professional standards:**

**Standard I: Teachers demonstrate knowledge of the content they teach**

**a. Teachers provide instruction that is aligned with the Colorado Academic Standards and their district's/communities' scope and sequence; and is aligned with the individual needs of their students.**

Teachers use state and district content standards and/or early learning developmental guidelines (0-8)* to inform ~~organize~~ instruction . Where appropriate, teachers investigate the content standards and/or early learning developmental guidelines (0-8) developed by professional organizations in their specialty area. They develop and apply strategies to make the curriculum rigorous and relevant for all students,
and to provide a balanced curriculum which incorporates language development, literacy and numeracy across all content areas as appropriate.

**b. Teachers demonstrate knowledge of the content, central concepts, tools of inquiry, and structures appropriate to their teaching specialty.**

Teachers know subjects beyond the content they are expected to teach and direct children/students' natural curiosity into an interest in learning. All teachers are able to assist students in the development of critical thinking and reasoning skills, and in the discernment and evaluation of information.

**c. Teachers develop lessons that reflect the interconnectedness of development/content areas/disciplines/.**

Teachers know the developmental continuum of children/students. Teachers know the links and vertical alignment of the grade or subject they teach and the state standards/early learning developmental guidelines.. Teachers understand how the content they teach relates to other disciplines in order to deepen understanding and enable students to see the interrelationships between content areas and disciplines. Teachers promote global and cultural awareness and its relevance to subjects they teach.

**d. Teachers make instruction and content relevant to students.**

Teachers incorporate postsecondary and workforce readiness and 21st century skills* into their teaching deliberately, strategically and broadly. These skills include creativity and innovation, collaboration, strong work ethic, critical thinking and problem-solving, civic responsibility, communication, personal responsibility, global and cultural awareness, IT skills, and the ability to discern, evaluate and use information.

**Standard II: Teachers establish a respectful learning environment for a diverse population of students**

**a. Teachers are consistent in fostering a learning environment in the classroom in which each student has a positive, nurturing relationship with caring adults and peers.**

Teachers create an inviting environment that promotes mutual respect, inclusion and flexibility. They ensure that the classroom environment maximizes learning opportunities for students, and empower students to become lifelong learners by taking responsibility for their own learning.

**b. Teachers demonstrate a commitment to and respect for diversity in the school community and in the world.**

Teachers draw on diverse cultural competencies to design and implement lessons that counteract stereotypes, incorporate the histories and contributions of all cultures, and provide access and equity in the school. Teachers recognize the influence of race, ethnicity, gender, sexual orientation, religion and other aspects of culture, family and identity on a student's development and personality and respond to the relevant backgrounds of individual students and families.

**c. Teachers value students as individuals.**

Teachers maintain high expectations for students of all backgrounds. Teachers communicate this vision to their students and find ways to engage students in a mutually-supportive teaching and learning process. Teachers appreciate the differences and value the contributions of each student by building positive relationships, creating opportunities for student voice, and fostering an environment that promotes mutual respect.

**d. Teachers adapt their teaching for the benefit of all students, including those with special needs across a range of ability levels.**

Teachers understand the diversity of student ability levels and strive to meet the needs of each student. Teachers collaborate with a range of support specialists to develop and use appropriate strategies and resources to adapt to the learning needs of various groups of students including those with special needs, English

language learners, and gifted and talented learners. Through inclusion and other models of effective practice, teachers engage all students to ensure that their needs are met. Teachers adequately implement student IFSPs, IEPs, IAPs and other legal requirements for the delivery of instruction.

**e. Teachers work collaboratively with the families and significant adults in the lives of their students.**

Teachers recognize that educating students is a shared responsibility involving the school, parents or guardians, and the community. Teachers communicate in a regular and timely manner to support and empower parents or guardians to playa meaningful role in the academic and developmental growth of their students.

**Standard III: Teachers facilitate learning for their students**

**a. Teachers demonstrate knowledge of current developmental science, the ways in which learning takes place, and the appropriate levels of intellectual, social, and emotional development of their students.**

Teachers understand how individuals learn, how development in all domains progresses, and how developmental changes can affect student learning. They design and implement developmentally appropriate and challenging learning experiences. Teachers keep abreast of evolving research about student learning and pedagogy. They adapt resources to address the strengths and weaknesses of their students.

**b. Teachers plan learning experiences appropriate for their students.**

Teachers collaborate with their colleagues and use a variety of data sources to guide short- and long term planning. Teachers use appropriate resources and strategies to adapt to the learning needs of groups and individual students. Teachers engage students as partners in the learning process by utilizing parent and student feedback to make the curriculum responsive, relevant and accessible to students of different cultures or with individual learning needs. Teachers monitor and modify instructional plans in real time to enhance learning.

**c. Teachers use a variety of instructional methods to meet the academic and developmental needs of their students.**

Teachers employ a wide range of techniques including learning styles, and differentiated instruction to eliminate gaps in achievement and growth. Teachers utilize observations and formative assessment practices to empower students to take ownership of their own learning and to monitor and adjust instruction as needed.

**d. Teachers thoughtfully integrate and utilize technology* into their instruction to maximize student learning.**

Teachers know when and how to use technology to maximize student learning. Teachers help students use technology to learn content, think critically, solve problems, discern reliability, find and use information, communicate, innovate, and collaborate. (includes adaptive technology)

**e. Teachers plan instruction that helps students develop critical-thinking and problem solving skills.**

Teachers support the development of students' problem-solving and critical reasoning skills by encouraging them to ask questions, think creatively, develop and test innovative ideas, synthesize knowledge and draw conclusions. They help students exercise and communicate sound reasoning; understand connections; make complex choices; and frame, analyze, and solve problems.

**f. Teachers provide students with opportunities to work in teams and develop leadership qualities.**

Teachers work with students to create a collaborative learning environment where student voice is valued and students are actively engaged in learning. Teachers organize learning teams that help students strengthen social ties; improve communication, cooperation and collaboration skills; and develop leadership qualities.

**g. Teachers communicate effectively.**

Teachers communicate in ways that are clearly understood by their students. They are perceptive and responsive listeners who are able to communicate with students in a variety of ways even when language is a barrier. Teachers help students to articulate thoughts and ideas clearly and effectively, with appropriate attention to language, grammar, spelling and writing skills.

**h. Teachers use a variety of methods to assess what each student has learned.**

Teachers understand and use multiple methods of 21st century assessment and data sources, including summative and interim assessments, to document learner progress, evaluate students' growth and development, academic growth, and gather evidence of students' postsecondary and workforce readiness skills, knowledge, and dispositions. They use formative assessment practices to monitor student learning in real time and adapt their instruction. Teachers provide opportunities, methods, feedback and tools for students to assess themselves and each other.

**Standard IV: Teachers reflect on their practice**

**a. Teachers demonstrate that they analyze student growth, development and learning and apply what they learn to improve their practice.**

Teachers think systematically and critically about student learning in their classrooms and schools: why learning happens and what can be done to improve achievement. Teachers work collaboratively with colleagues to collect and analyze student performance data using multiple methods of assessment and data sources, in order to continually evaluate their practice, and to improve classroom and school effectiveness. Teachers know when to use consultation from colleagues and specialists to support the successful learning of all students.

**b. Teachers link professional growth to their professional goals.**

Teachers are professionals committed to reflection and growth, who participate in continuous, high quality professional development that is culturally-responsive, reflects a global view of educational practices, includes 21st century skills and knowledge, and meets the needs of students and their own professional growth.

**c. Teachers function effectively in a complex, dynamic environment.**

Understanding that change is constant, teachers collaborate with colleagues to actively investigate and consider new ideas that improve teaching and learning. They adapt their practice based on research and data to best meet the needs of their students.

**Standard V: Teachers demonstrate leadership**

**a. Teachers demonstrate leadership in their schools.**

Teachers are professionals who work collaboratively with colleagues, and school personnel to create a professional learning community. They analyze and use data to develop goals and strategies that enhance student learning and teacher work conditions, and select professional development that enhance their professional growth. Teachers contribute to the development of positive working conditions in their school. Where appropriate and possible, teachers provide input in determining the school budget, participate in the hiring process and collaborate with their colleagues to mentor and support new teachers.

**b. Teachers lead the teaching profession.**

Teachers strive to improve the teaching profession by collaborating with colleagues and the school community to promote growth for all educators and enhance the teaching profession. They contribute to the establishment of positive working conditions in their schools. They actively participate in and advocate for decision-making structures in education and government that take advantage of the expertise of teachers.

**c. Teachers advocate for schools and students, partnering with students, ~~and~~ families and communities as appropriate.**

Teachers advocate for positive change in policies and practices affecting student learning. They participate in the implementation of initiatives to improve the education of students, and facilitate meaningful participation by students in improving school climate, culture and academic learning.

**d. Teachers demonstrate high ethical standards.**

Teachers are professionals, committed to ethical behavior and principles including honestly, integrity, fair treatment, and respect for others.

**Standard VI: Teachers take responsibility for student growth**

**a. Teachers pursue high levels of student learning, growth and academic achievement.**

Teachers take responsibility for the progress of all students toward high school graduation, and work to ensure that students are globally competitive for work and postsecondary education.

**b. Teachers pursue high levels of student growth in the skills necessary for postsecondary life, including democratic and civic participation.**

Teachers take responsibility for ensuring that students are prepared with the skills, dispositions and attitudes necessary for postsecondary life including democratic and civic participation.

**c. Teachers use evidence to evaluate their practice and continually improve attainment of student growth.**

# Colorado Professional Standards for Principals

## March 30, 2011

**NOTE: Bold language is Council recommendation for required components of evaluation system; non-bolded text is descriptive of the required elements.**

> ***Effective principals in the state of Colorado are responsible for the collective success of their schools, including the learning, growth and achievement of both students and staff. As the school's primary instructional leader, effective principals enable critical discourse and data-driven reflection about curriculum, assessment, instruction, and student progress, and create structures to facilitate improvement. Effective principals are adept at creating systems that maximize the utilization of resources and human capital, foster collaboration, and facilitate constructive change. By creating a common vision and articulating shared values, effective principals lead and manage their schools in a manner that supports the school's ability to promote equity and to continually improve its positive impact on students and families.***

**Effective principals in the state of Colorado demonstrate a positive impact on student outcomes by demonstrating excellence against the following professional standards:**

### Standard I: Principals Demonstrate Strategic Leadership

a. **School Vision. Mission and Strategic Goals: Principals develop the vision, mission, values, beliefs and goals of the school, collaboratively determine the processes used to establish these attributes, and facilitate their integration into the life of the school community.**

   Principals engage all stakeholders in building a shared vision of student learning outcomes for the school community that reflects the State of Colorado's definition of school readiness, and Colorado's definition of postsecondary and workforce readiness, including student readiness for global citizenship. They ensure that the school's mission and strategic goals all directly support this vision of student success, in a way that is aligned appropriately (with district, family and/or community priorities.

b. **School Improvement Plan: Principals ensure that the unified improvement plan/early childhood quality improvement plan provides the structure for the vision, values, goals, and changes necessary for improved achievement and developmental outcomes for all students, and provides for tracking of progress based on data.**

   Principals ensure that the school improvement plan is an actionable, meaningful plan that includes the implementation of strategies to identify and support student engagement, healthy development, attendance and successful completion of school for all students. The plan should be reviewed frequently and revised to adjust strategies based on progress toward goals. The principal shall ensure that any school improvement plans are aligned with and mutually supportive of each other and existing district plans.

c. **Leading Change: Principals collaboratively develop a vision and implementation strategies for improvements and changes which result in improved achievement and developmental outcomes for all students.**
   Principals demonstrate the ability to effectively manage organizational change, developing and fostering a collaborative culture that inspires innovation, creativity and continuous school improvement. They model self-awareness, reflective practice, transparency and ethical behavior. Principals analyze organizational practices and make changes as necessary based on a review of data. They understand the implications of changes for the school community, and demonstrate flexibility and adaptability. Principals can clearly define and communicate challenges to all stakeholders in their school community and can implement problem-solving strategies to seek positive solutions to school challenges.
d. **Distributive Leadership: Principals create and utilize processes to distribute leadership and decision making throughout the school.**

Where appropriate, they involve staff, parent/guardians and students in decisions about school governance, curriculum and instruction . Principals build internal capacity by creating opportunities for staff to demonstrate leadership, by assuming decision-making roles both inside and outside of the school.

**Standard II: Principals Demonstrate Instructional Leadership**

a. **Curriculum, Instruction, Learning and Assessment: Principals enable school-wide conversations about standards for curriculum, instruction, assessment and data on student learning based on research and best practices, and ensure that the ideas developed are integrated into the school's curriculum and instructional approaches.**
   Principals demonstrate current knowledge of research in teaching, learning and child development, and ensure that their schools provide a comprehensive education that promotes cognitive, physical, mental, social emotional health and growth. They ensure that an age-appropriate curriculum consistent with the Colorado Academic Standards is taught and monitored through effective formative assessment practices, and the use of summative assessments. They engage staff in developing knowledge about student development, curriculum, instruction, assessment, and analysis and use of data in order to establish and achieve high expectations for students. Principals ensure high expectations for all students, including students identified as gifted, students with disabilities, and students considered "at risk" of school failure.
b. **Instructional Time: Principals create processes and schedules which maximize instructional, collaborative and preparation time.**
   They ensure that teachers and other adults working with students have time, structures, opportunities and the expectation of planning, working, reflecting and celebrating together to improve instructional practice.
c. **Implementing High-quality Instruction: Principals support teachers through feedback and appropriate professional development in order to ensure that**

**rigorous, relevant and appropriate instruction and learning experiences, aligned across P-20, are delivered to and for all students.**

Principals demonstrate current knowledge of best practices in PK-20 instruction and assessment, and are able to monitor delivery of high-quality instruction. They encourage and support teachers in utilizing research-based methods to develop and employ multiple instructional approaches; developing personalized learning opportunities for diverse learners; planning lessons that allow students to apply and demonstrate learning connections in creative and meaningful ways; integrating technology and formative assessment practices into instruction to increase student engagement and learning; and using multiple methods of progress monitoring to track student learning and adjust instruction as needed. Principals ensure that the school's structures and daily schedules are supportive these instructional goals. They are good listeners and coaches and are able to give and receive feedback.

d. **High Expectations for all Students: Principals hold all staff accountable for setting and achieving optimal development and rigorous performance goals for all students, and empower staff to achieve these ambitious student outcomes.**

Principals make available to the school community, as appropriate, data about student performance. Principals actively engage the school community to interpret and respond to available data on student achievement and other performance indicators. Principals collect and analyze available data regularly to monitor progress and make appropriate adjustments designed to improve performance outcomes. Principals ensure that data are turned into meaningful information that can be used by teachers, students and parents/guardians to identify goals, implement evidence-based strategies, monitor and evaluate the impact of instructional programs, and promote organizational learning.

**Standard III: Principals Demonstrate School Culture and Equity Leadership**

a. **Intentional and Collaborative School Culture: Principals articulate and model a clear vision of the school's culture, and involve students, families and staff in creating a climate that supports it.**

Principals articulate a strong and clear vision for the school's culture, and foster broad ownership among the school community for that vision. Principals deploy school structures in a manner the supports the culture. They build relationships that create a trusting, collaborative, innovative, respectful and supportive school culture where teachers want to work, students want to learn and all families feel welcomed and empowered to help their students succeed.

b. **Commitment to the Whole Child: Principals value the cognitive, physical, mental, social and emotional health and growth of every student.**

Principals build a school culture that supports comprehensive education that promotes cognitive, physical, mental, social and emotional health and growth of students. They engage school and community-based resources to support students and their families.

c. **Equity Pedagogy: Principals demonstrate a commitment to a diverse population of students by creating an inclusive and celebratory school culture, and provide direction in meeting the needs of diverse students, talents, experiences and challenges.**

Principals ensure that all adults in the school have high expectations for all students, and believe that all students can reach those high expectations. They support the use of a variety of teaching styles designed to meet the diverse needs of individual students. Students' individual backgrounds are valued as a resource, and principals advocate for approaches to instruction and behavioral supports that build on student strengths.

d. **Efficacy. Empowerment and a Culture of Continuous Improvement: Principals and their leadership team foster a school culture that encourages continual improvement through innovation, risk-taking, and an honest assessment of outcomes.**

Principals foster a school culture which supports and celebrates on-going efforts at improvement through innovation and risk-taking. They facilitate candid discussions with the school community about student achievement and other performance indicators. They recognize the achievements of individuals and the school as a whole while acknowledging areas needing improvement by modeling self-awareness, transparency and ethical behavior.

**Standard IV: Principals Demonstrate Human Resource Leadership**

a. **Professional Development/Learning Communities: Principals ensure that the school is a professional learning community that provides opportunities for collaboration, fosters teacher learning and develops teacher leaders in a manner that is consistent with local structures, contracts, policies and strategic plans.**

Principals communicate regularly about the changing context for teaching and learning, and create a collaborative culture and overall structure for on-going learning that fosters teacher learning and develops teacher leaders.

b. **Recruiting. Hiring. Placing. Mentoring. and Dismissal of Staff: Principals establish and effectively manage processes and systems that ensure a high quality, high-performing staff, including an overall count and percentage of effective teachers that reflects the school's improvement priorities.**

Principals include in their professional development plan explicit reference to the ways in which they intend to address the counts and percentages of effective teachers in the building. They recruit, retain and support high-quality and effective teachers and staff, and implement a systemic process for comprehensive, effective, and research-based professional development, coaching and mentoring that is differentiated for adults to support student learning. As appropriate, principals create school-wide structures that ensure that teacher candidates and other educator interns provide support for students, and increase embedded professional learning opportunities for experienced educators in the school. They demonstrate the ability to dismiss

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RECEIVED
SEP 08 2011
State Board of Education

September 1, 2011

Office of the Colorado State Board of Education
201 East Colfax Avenue
Denver, CO 80203

Dear Members of the State Board of Education:

Evaluation matters! A good evaluation system is designed on the belief that the ultimate goal is to improve teaching and learning and results for students. To achieve this goal, we urge the members of the State Board to continue its support of the comprehensive statewide evaluation system proposed by the State Council of Educator Effectiveness (SCEE).

In his letter to the Commissioner dated August 11, 2011, Denver Area School Superintendents (DASSC) co-chair Dr. Ron Cabrera shares CEA's interests in having a robust educator effectiveness system when he says, "...that DASSC supports the legislation", and, "Since SB 191 is pioneering new requirements for teacher and principal evaluation, the rules regarding how the legislation will be enacted are very significant."

Furthermore, we agree with CASE Executive Director Bruce Caughey in his letter dated August 3, 2011 to the State Board of Education when he says, "Given the current evaluation processes being proposed there is no way with current job descriptions and administrative staffing that districts can do this and do it well."

Established Colorado policy initiatives including the new Colorado Academic Standards (CAS), the state assessment system which reflects the expectations of Colorado Achievement Plan for Kids (CAP4K), and The Education Accountability Act of 2009 (SB 09-163) all work in concert to hold state, district, and individual public schools accountable for performance using the same set of statewide indicators and related measures.

Research consistently shows that teacher effectiveness is the single most important school based factor that impacts student learning. However, in several Colorado schools and districts, teacher evaluation has not changed to meet emerging needs to systematically provide data and feedback to improve teacher practice.

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Colorado's landmark law, Concerning Ensuring Quality Instruction Through Educator Effectiveness (SB 10-191) can move our profession forward by outlining the proposed State Framework for Educator Evaluation for Principals (SCEE recommendation #25- #27) and for teachers (SCEE recommendation #2-#5) to bring existing school/district evaluation processes in line with legislated Colorado requirements and the SCEE recommendations.

Educators, policymakers, and members of the public want teaching to be a results-oriented process focused on student performance outcomes that matter.

We hope you consider the importance of a statewide evaluation framework that will provide a fair, transparent, timely, rigorous and valid system that best serves the needs of educators, students, and parents alike.

Colorado's current Teacher of the Year summarizes our views succinctly: "If teachers raise questions about the proposed teacher evaluation reforms, it is not because we're reluctant to be held accountable," says, 2011 Colorado Teacher of the Year, Michelle Pearson, "but rather because we see the need for a consistent evaluation process across the state that is focused on the improvement of teaching and learning so that a teacher in Ouray and a teacher in Boulder have the same understanding of what it means to be an effective educator."

Respectfully,

Beverly Ingle

*Beverly Ingle, CEA President*

Tony Salazar

*Tony Salazar, CEA Executive Director*

**Burdsall, Elizabeth**

**Subject:** FW: Comment on Rules

**From:** Clark Maxon [mailto:clark.maxon@asd20.org]
**Sent:** Thursday, September 08, 2011 12:52 PM
**To:** Colorado State Board of Education Relations
**Subject:** Comment on Rules

In the draft rules 8/24/2011, 5.01 (F) (7) (c) states that Measures of Student Academic Growth shall include State Summative Assessment when available. For secondary schools, it is difficult to envision that availability or practical use. Science availability is obviously limited by frequency (grades 5, 8, 10). Further, secondary schools generally do not have classes that are Reading and Writing specific – rather that instruction is diffused throughout a wide range of courses. Math teachers may be the only secondary teachers that could be appropriately evaluated using TCAP. However, the reality is that in many schools, a variety of different math classes are taught at a single grade level.

**Clark Maxon**
**Director for Assessment**
**Academy School District 20**
**1110 Chapel Hills Drive**
**Colorado Springs, CO 80920**
**(719) 234-1334**

# Implementing Multiple Measures of Student Assessment under EQuITEE (page 20, rule 5.01)

## Denver New Millennium Initiative (NMI) Recommendations to the Colorado State Board of Education

Submitted on behalf of the Denver NMI by Michael Carlson, Jessica Keigan, Dana Nardello and Allison Sampish

Building on our report, *Making Teacher Evaluation Work for Students: Voices from the Classroom*, we respectfully submit the following recommendations for your consideration regarding multiple measures of teaching effectiveness as they are addressed in EQuITEE.

1. We commend the effort that is evident in EQuiTEE to align the new Colorado standards with the Common Core State Standards, as we believe these new standards push for more rigorous content understandings, higher level thinking, and processes. These standards will inform teaching and learning that must be assessed through multiple measures in flexible and nuanced ways. These measures should include:

- Student growth on the Transitional Colorado Assessment Program
- Rubrics created from the state standards measuring grade-level proficiency that can be used to gather data through a variety of *teacher-created* student assessment measures (e.g. performance tasks, student portfolios, constructed responses, multiple choice tests).
- Evaluation of teacher and student performance over time, so that it is a "process rather than event" (as noted by the State Council of Educator Effectiveness) and therefore considerate of job-embedded professional development for teacher and student growth.
- Goal Attainment Processes framed by teacher-driven goal setting with an administrator, grade level team, or department with mid-year progress checks
- Teacher evaluation by multiple evaluators that include well-trained peers, traditional observations, job-embedded coaching, and teacher directed reflection (similar to the National Board Certification Process) to ensure inter-rater reliability. As recent research makes

clear, teachers are very comprehensive, evidence-based, and growth-oriented when it comes to evaluating their colleagues.[1]

2. For effective implementation of the new standards and assessments, we commend the partnership between state and local education agencies that is being endorsed by state leaders. A scope and sequence should be developed as a key component of the partnership between the state and local education agencies to ensure realistic and effective implementation. Teams of teachers at both the state and local level should develop assessment frameworks that allow some flexibility for individual teachers but sufficient guidance to ease the transition to the new standards and evaluations.

3. We value the new standards. However, there should be more focus on the creation of rubrics that enable teachers to assess the mastery of these standards. Again, the use of various teacher-created assessments will promote teacher involvement and reflection during the evaluation process as well as provide more cost-effective measures of data collection. We recommend the development of a searchable database, possibly through SchoolVIEW, that includes sample lessons and assessments from teachers across the state with associated student exemplars or anchor papers. A team of teachers should periodically review these submissions and recommend sharing the most effective assessments and their accompanying exemplars. The database could also house frameworks for rubrics that could be scored and submitted by teacher and collaborative teams to provide additional data for both tested and non-tested subject areas. This type of database encourages the creativity and innovation of professionals while increasing state capacity to measure student growth through portfolios and performance-based assessments. Training on how to use SchoolVIEW in its current form and as a repository will be necessary to ensure effective use of its resources.

4. We commend the work that is being done and supported by Colorado through the SMARTER Balanced Assessment Consortium. We support in-depth, critical thinking questions in any type of assessment, particularly performance-based assessments. Much can be learned from non-core subjects such as art and music for determining growth and mastery of skills through assessment. If the Transitional Colorado Assessment program can delve into deep, critical thinking questions, we support those efforts. Moreover, we support the use of teacher created student assessment measures (e.g. performance tasks, student portfolios, constructed responses, multiple choice test) partnered with 21st-century skills that are applicable beyond the classroom.

Ultimately, all of our recommendations are contingent upon a continued partnership between state and local leaders, policymakers and teachers, as all groups work together to support the implementation of these rules. We are encouraged by the direction these partnerships are headed

[1] Humphrey, D.; Koppich, J.; Bland, J.; Bosetti, K. (2011). *Peer review: getting serious about teacher support and evaluation*. SRI International and J. Koppich & Associates, 22.

and are hopeful about the future of our students' education as assessed by these rigorous measures.

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**MEMORANDUM**

**TO:** State Board of Education
**FROM:** Kenneth DeLay, Executive Director
Jane Urschel, Deputy Executive Director
**DATE:** September 13, 2011

**RE:** **Rules to Implement Senate Bill 191**

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CASB supports the positions set forth in DASSC's Recommendation Regarding Educator Effectiveness Rules dated August 17, 2011. The DASSC Recommendation identifies the key issues of concern for districts with regard to the implementation of SB 191 and highlights the importance of preserving local districts' flexibility.

The current revisions to the draft rules place an increased emphasis on local discretion and we support the changes to Rules 2.02 *(p. 4)*, 2.03(A) *(p. 7)*, 2.03(B) *(p. 8)*, 3.03(A) *(p. 12)*, 3.02 *(p.9)*, 3.03(B) *(p. 12)*, 5.01(F)(4) *(p. 19)*, 5.01(F)(9) *(p. 23)*, 5.01(H) *(p. 25)*. By allowing districts flexibility to determine whether the State's resources are suited to their unique circumstances, the rules effectively reflect the state-local partnership required by the Legislature.

The debate and the testimony in response to the most recent draft of the rules should not lead the Board or CDE to neglect earlier testimony. CASB continues to emphasize the critical points outlined in its Memorandum dated July 25, 2011.

First, SB 191 does not authorize the State Board to require districts to use a single, model evaluation system unless a district receives permission to develop its own system. Instead, the Licensed Personnel Evaluation Statute, as amended by SB 191, expressly requires that local districts have the flexibility to develop systems that meet their individual needs, so long as those systems measure effectiveness (as defined by the State) using quality standards consistent with those developed by the State. This concern is largely addressed by the revisions to draft rules 6.01(B) *(p. 29)* and 6.04 *(p. 32)*, which replace the "opt-out" requirement with a system of assurances that will allow CDE to effectively monitor implementation without imposing an undue burden on school districts that elect not to use the State model system.

Second, CASB opposes any rules requiring districts to comply with "technical guidelines" developed by CDE, because such a requirement adds an additional layer of

regulation and grants CDE unfettered authority far beyond that contemplated by the Legislature. We are unclear as to if or how this concern is addressed by the current rules, which still direct CDE to develop technical guidelines but remove the language expressly requiring district compliance therewith. (2.03(C) *(p. 8)*, 3.03(C) *(p. 12)*, 5.01(F)(2) *(p. 16)*, 5.01(F)(3) *(p. 17)*, 5.01(F)(6) *(p. 20)*, 5.01(F)(7) *(p. 21)*, 6.01(D) *(p. 29)*). More clarification is required to ensure consistency with the clearly stated legislative direction that the State must develop "guidelines" that districts "may" follow when designing and implementing their evaluation systems. C.R.S. 22-9-104(1).

In sum, CASB believes the current draft rules better reflect the state and local partnership contemplated by the Legislature and reiterates the need for the State and local districts to work together to design and implement fair and rigorous evaluation systems. We appreciate the efforts of CDE staff and look forward to continued conversations on this important issue.

STATE COUNCIL FOR EDUCATOR EFFECTIVENESS

# FEEDBACK

September 13, 2011

Dear Members of the State Board of Education:

As members of the State Council for Educator Effectiveness ("the SCEE" or "the Council"), we wish to offer a preliminary response to the draft rules posted by the Colorado Department of Education (CDE), as proposed to be revised on August 24, 2011, and currently being considered by the State Board of Education ("State Board"). We understand that CDE staff have proposed further revisions to the rules since August 24th, and plan to meet as a full Council again on September 27th for the purpose of reviewing the most current rule revisions then available in time for the State Board to consider at its October 5th rulemaking hearing.

1. **We strongly encourage the State Board to revise the rules to reflecting the central value of the pilot period, by explicitly contemplating the opportunity to review data from the pilot and to plan for future rule changes that reflect results from the pilot process.**

The Council deliberately postponed providing a recommendation about the state model system and its use across the state. At this time, the Council proposes that the State Board set some minimum criteria for districts moving ahead, and at the same time create a model system for others to pilot. The Council believes that over time, with learning that occurs from the state model system and individual districts, the state will have more clarity on the minimum requirements that are needed for all districts in order to balance the flexibility needed at the local level, with the consistency needed at the state level. This will allow our state to function in a continuous improvement model, and make changes and adjustments along the way, as we learn about this complicated work.

2. **The State Board should require use of a common statewide framework to define the minimum components for local evaluation systems in use by school districts and BOCES.**

Copies of the frameworks proposed by the Council are attached for your reference. However, it is important to note that the Council recommendations contemplated local district discretion in implementing each element of the frameworks but reached consensus that the use of the framework itself and its constituent parts should be used by all districts and BOCES statewide.

3. **CDE should "meet districts where they are currently", and offer a variety of supports that reflect the differing status of their current evaluation systems. Specific supports should include:**
    a. **A complete model system for use by local districts on a voluntary basis;**
    b. **Resources for districts that choose to adapt their local systems; and**
    c. **A short and long-term communications plan to ensure that the field is kept informed about current activities, as well as planned future activities.**

**Transparent, frequent and comprehensive communications can significantly reduce the level of anxiety that is currently absorbing attention and energy that could more productively be channeled.**

Thank you for your consideration of these recommendations.

Respectfully submitted by the State Council for Educator Effectiveness,

Amie Baca-Oehlert (President, District Twelve Educators' Association)

Jo Ann Baxter (School Board President, Moffat County School District)

Bill Bregar (School Board President, Pueblo 70 School District)

Margaret Crespo (Director of Secondary Instruction, Thompson School District)

Kerrie Dallman (President, Jefferson County Education Association)

Tracy Dorland (Executive Director of Educator Effectiveness, Denver Public Schools)

Shelby Gonzalez-Parker (Student, Metro State College)

Towanna Henderson (Parent, Denver Public Schools)

Nina Lopez (Colorado Legacy Foundation)

Colin Mullaney (Principal, Cheyenne Mountain Charter Academy)

Lorrie Shepard (Dean, School of Education, University of Colorado at Boulder)

Brenda Smith (President, American Federation of Teachers)

Matt Smith (Vice President of Engineering, United Launch Alliance)

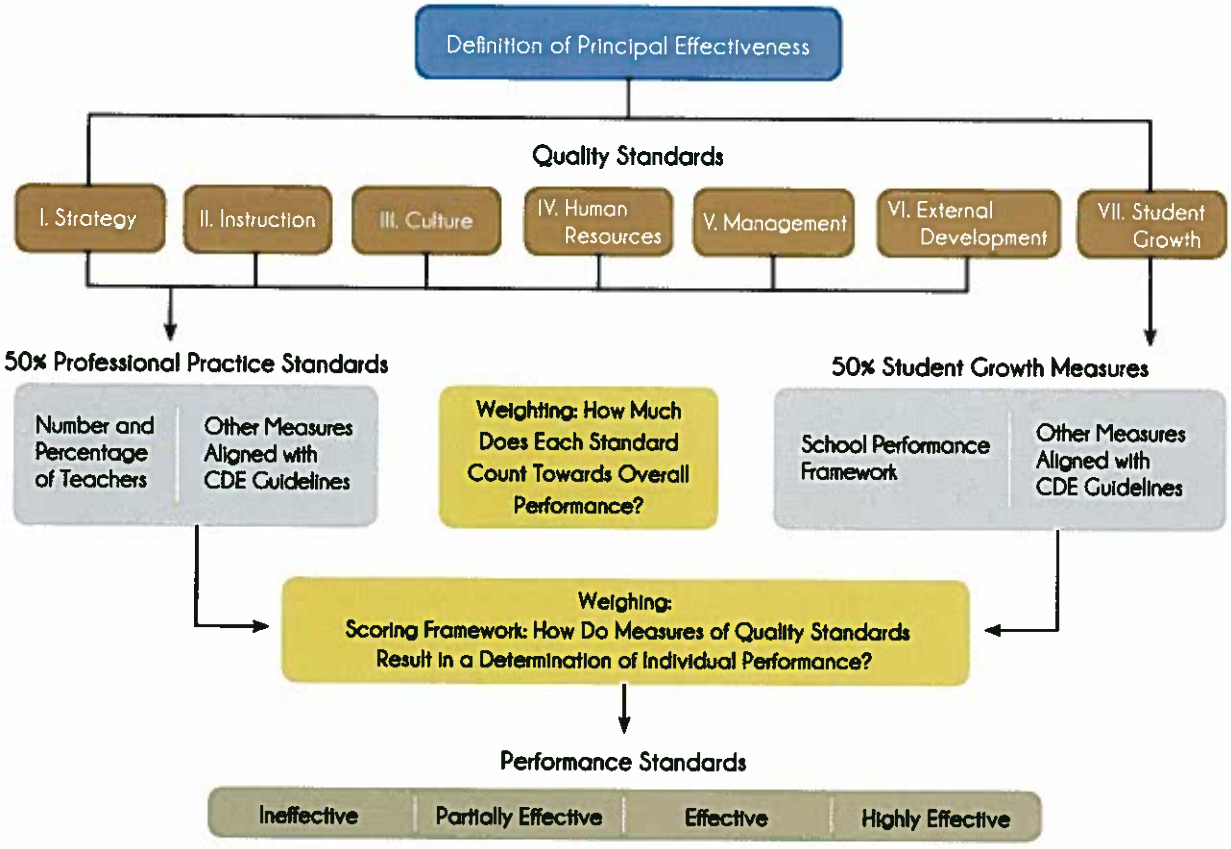
Sandra Smyser (Superintendent, Eagle County School District)

James Smyth (President, Mesa 50 Teachers Association)

## Appendix A

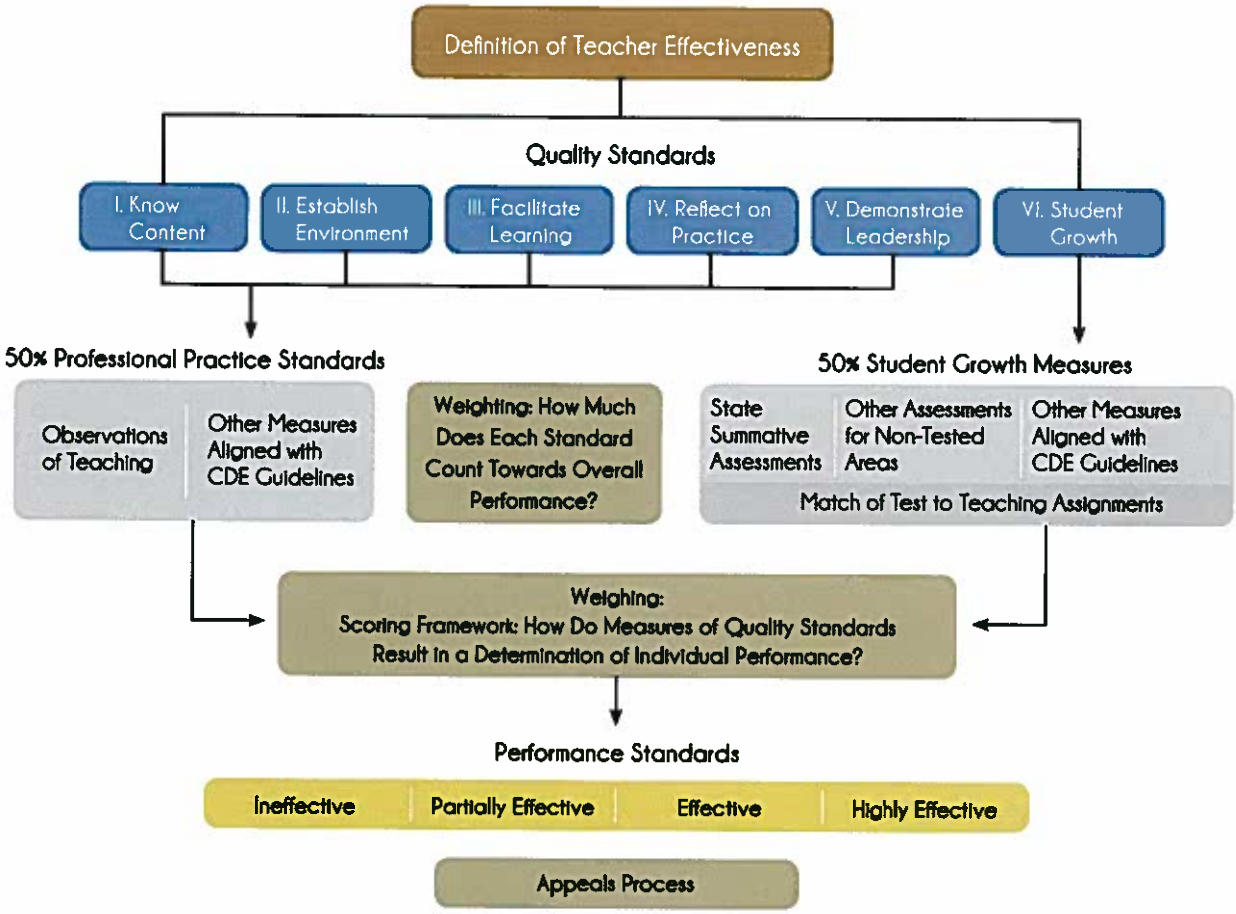
STATE COUNCIL FOR EDUCATOR EFFECTIVENESS

# Framework for System to Evaluate Principals



STATE COUNCIL FOR EDUCATOR EFFECTIVENESS

# Framework for System to Evaluate Teachers



## APPENDIX B

**Background for the State Council Comments:**

Senate Bill 191 charged the SCEE as follows:

> *The purpose of the Council shall be ... to consider options and make recommendations to the State Board and the General Assembly that seek to ensure that all licensed personnel are:*
>
> *(I) Evaluated using multiple fair, transparent, timely, rigorous and valid methods, at least fifty percent of which evaluation is determined by the academic growth of their students;*
>
> *(II) Afforded meaningful opportunity to improve their effectiveness;*
>
> *...and to develop and recommend to the state board guidelines for adequate implementation of a high-quality educator evaluation system that shall address, at a minimum, the following issues:*
>
> *(I) On-going training ...*
>
> *(II) Evaluation results that are normed to ensure consistency and fairness;*
>
> *(III) Evaluation rubrics and tools that are deemed fair, transparent, rigorous and valid;*

As required by SB 191, the State Council represents a wide variety of stakeholder groups, including teachers and teacher associations and federations; school and district administrators; school board members; parents/guardians; students; and members of the business community. The recommendations submitted to you in April 2011 reflected a consensus of all members of this Council regarding the best way for the State Board, CDE and local districts to ensure the development of evaluations at the local level that meet the standard laid out in statute: fair, transparent, timely, rigorous and valid.

The SCEE recommendations were informed by a significant amount of debate, research and experience, including over 25 full-day meetings, participation in over a dozen regional and national conferences, and other information including readings and summaries of visits to half a dozen districts in Colorado that are already doing work around educator evaluation. Council members also had the benefit of consultation and conversation with national and state experts on the issues entailed in creating and implementing evaluations for teachers and principals that will allow high-stakes decisions around employment and status to be made in the fairest manner possible.

The Council debated all of the issues which have been raised during the public comment period:

- the importance of local control in Colorado and the need for local districts to own the process of implementing and systematizing the process of evaluation;
- the need to learn from innovative approaches taken by individual districts and to integrate these lessons into state level guidance, and to disseminate such practices statewide;
- the conflicting values raised by the high-stakes nature of this evaluation that sometimes pit local districts' need to tailor evaluations to local needs against the need to ensure a consistent quality of evaluations statewide;
- the challenges entailed in validly measuring student growth for 70% of licensed teachers, and 100% of all "other licensed personnel";
- the lack of existing data to guide decisions around many issues related to student growth, the relative merits of a statewide system, and implications for teachers.