

WI
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September 14, 2015

The Honorable Roger Tilles
NYS Education Department Building
89 Washington Street
Albany, NY 12234

Re: 3012-d Public Comment

Dear Regent Tilles:

Please accept this correspondence as formal submission of comments in opposition to the proposed rule-making entitled EDU-27-15-00019-P, published in the NY Register on July 8, 2015. It is anticipated that the proposed rule will be presented for adoption at the Regents meeting to be held on September 16 and 17, 2015. The West Islip School District opposes permanent adoption of the proposed APPR regulation as it is our opinion that the statutory provision adopted as Education Law Section 3012-d is irretrievably flawed.

The district firmly believes in the power of public education and its fundamental link to the success of a thriving community and democratic government. The district also regards the purpose of evaluations as one method by which it may improve teaching and school leadership by giving the district information to make sound personnel decisions and give educators feedback to improve their day-to-day performance. However, while SED takes the position that state assessments must be tied to teacher evaluations for accountability purposes, we believe that these assessments, as utilized in the proposed APPR model, do not capture all that is important to the teacher/principal evaluation process. Additionally, the angst it has created in the eyes of the public has marred the use of valuable assessment data for the purpose of informing student instruction.

We know unequivocally that the rigor of a student's coursework is the single most important factor in achieving high academic standards. We also know that standardized testing is important to gathering data and improving outcomes, but only when tests are developmentally appropriate, are actually designed to measure knowledge, and are used for the purpose for which they are designed. Section 3012-d, in its current form, does not fully develop these factors in its plan.

In order to create an improved evaluation system for teachers and principals, Section 3012-d should be repealed and replaced by a law which allows school districts the tools to more effectively evaluate their employees and make employment decisions based upon additional legitimate measures of educator effectiveness. We urge you and the Board of Regents to reject the APPR regulations proposed for permanent adoption and to vote "No" at the September meeting.

Respectfully submitted,



Steven D. Gellar
President, Board of Education



Bernadette M. Burns
Superintendent of Schools