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Re: Teacher and Principal Evaluations

To the Members of the New York State Legislature:

Anything worth doing at all is worth doing well. Our state's procedures for evaluating teachers reverberate in every classroom of the state. Making changes to our teacher evaluation system needs to be done with care.

We believe the most recent changes enacted through the state budget to the Annual Professional Performance Review (APPR) system of teacher and principal evaluations are deeply flawed and ***should not be implemented as enacted.***

We call on the Senate and Assembly to pass legislation to extend deadlines for compliance for ***all*** districts, both to address one of the greatest defects in the new law, and to allow time for consideration of what further amendments are needed to assure a system worth implementing.

While we debate issues in the state capital, teachers, principals, superintendents and others are trying to do their jobs. Part of their work is to comply with laws and regulations enacted here in Albany. But their true work is helping children learn. Since first enacting an APPR statute in 2010, both houses of the Legislature have passed bills to amend the system in 2012, 2013, 2014, and 2015. Implementing each set of changes is inevitably disruptive to the true work educators are called to carry on.

Expectations are now widespread that the latest changes to APPR will need to be revisited. We call on you to act, so that schools will not be disrupted twice, first to implement this year's changes and later to implement corrections. Take the time to make the right changes, to spare the time of educators and their students in implementing yet one more set of changes.

While the Assembly has approved relevant legislation (A.7303-A), we urge both houses to work together to reach a mutual agreement to accomplish these goals.

Why do evaluations? One purpose is to give to districts information to make sound personnel decisions – whom to award tenure, to promote, or to dismiss. Another is to give feedback to all educators, so that they might improve their daily performance. The true goal is to improve teaching to help all students learn.

We see two crucial flaws in the latest enacted changes. First, we believe requiring all districts to negotiate local APPR plans to comply with the newest changes by November 15 or lose eligibility for increases in state aid repeats a misguided mandate that created problems cited to justify changes enacted this year.

NEW YORK STATE COUNCIL OF SCHOOL SUPERINTENDENTS

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Districts were initially required to negotiate APPR plans and gain state approval by January 17, 2013, or lose eligibility for School Aid increases. All but four districts met the deadline. But many reported making undesired concessions on APPR, traditional collective bargaining agreements, or both. We have already heard from some superintendents that local unions have threatened there will be no discussions on APPR revisions without agreement on contract concessions first.

The latest changes in APPR laws would not only require districts to repeat this exercise, but do it even faster – by November 15. The timeline also does not allow the Board of Regents and State Education Department sufficient time to comply with standard procedures to enable public input into rule-making – the law requires SED to finalize implementing regulations by the end of this month, June 30th.

Second, the latest statutory changes undermine what has been a success story in state education policy, one that promoted effective collaboration and cultivation of good instructional practices.

Superintendents and other educators repeatedly say that since the enactment of APPR, their schools are conducting classroom observations more carefully and gaining more value as a result. In a survey we conducted, 69 percent of superintendents said the APPR component including observations is having a positive impact on efforts to improve teaching, while no more than 38 percent cited a positive impact from any of the components tied to state tests or student performance.

The new law would undermine this accomplishment, chiefly by mandating the inclusion of observations done by “independent evaluators” – principals or other professionals from outside the educator’s school. This would be a costly mandate for all schools and one which small and poor districts would find impossible to comply with at reasonable cost. These outsiders will have limited perspective on the unique challenges and priorities of the schools they visit and probably no contact with its parents. If they are current principals, the time they spend on these observations will be time spent away from the priorities of their own schools, including engaging with families.

We have other concerns, including the risk that the changes will amplify the existing excessive emphasis on state standardized test results.

It is predictable that some will criticize any call for extending timelines and making other changes. But schools were doing evaluations before the first APPR law was enacted and would continue to do so under the law that has been in place. Some would continue to find value in that system as a tool to improve day-to-day teaching. On the other hand, rushing to implement a bad law does no good for students.

Superintendents always play the lead role in translating policies enacted for the whole state into practices that can work for the diverse communities they serve – your communities. Drawing on these practical experiences, we will contribute our best ideas to improve the APPR system and our best efforts to implement whatever new policies are adopted.

Sincerely,



Robert J. Reidy, Jr.
Executive Director