

**Written Comments Submitted to the
State Board Office**

September 14 - 22, 2011

(SB 191 Rulemaking)



September 14, 2011

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

Please accept this written submission for my verbal comments at the State Board of Education meeting on September 14, 2011.

First of all, I want to thank the individuals involved in crafting the revisions to the educator effectiveness rules, which take into account key recommendations made by CASE that reflect the opinions of school and district leaders. Our association is committed to improving student achievement and ensuring educators have the resources necessary to help all Colorado kids learn. Because we represent Colorado school administrators who are closely engaged in this work, we offer a unique expert perspective in this very important conversation. CASE appreciates the regional superintendent groups that have provided detailed feedback on the proposed rules, including the Denver Area School Superintendents Council, as well as the work of other organizations such as the Colorado Association of School Boards, the Colorado Federation of Teachers, and the Colorado Education Association.

The State Council for Educator Effectiveness has worked hard to carefully consider and recommend a new educator effectiveness system, and we are grateful for their thoughtful approach. CASE also appreciates the CDE staff members who have worked to incorporate feedback from the field while trying to strike a delicate balance of state guidance and local control. Our state's school districts and Boards of Cooperative Services (BOCES) represent a wide array of rural, urban, suburban and small town settings that should be reflected in the development of rules to govern the new Licensed Personnel Evaluation Statute.

CASE is committed to the process of moving towards full implementation of the provisions from SB 10-191 and we will continue to offer opportunities (such as the upcoming CASE Superintendents Conference) for information sharing, feedback to the State Board of Education, and discussion among our members. Here are a few key items of feedback from our members related to the proposed rules that I would like to formally highlight:


- **Flexibility:** In order for a new educator effectiveness system to really take hold in Colorado, there must be some flexibility built into the system. We have 178 districts and some 20 BOCES that must have the ability to innovate, experiment and customize based on the unique needs and circumstances of their student populations and communities. CASE appreciates the movement toward assurances articulated in Section 6.04 of the rules, instead of a one-size-fits-all state mandate. In addition, we see a concerted effort to honor local conditions and decision-making authority in the new draft of the rules. CASE is very aware of and sensitive to the differences among rural, urban and suburban districts and local funding conditions.

CASE Departments

- **Funding:** This remains an incredibly difficult issue to surmount in the current budget environment. CASE appreciates that so many districts have been selected for state pilot projects to begin testing how districts can meet new standards, but it will be very important to really listen to districts, assess the results of the pilots, and accurately reflect the funding needs for full implementation. We are particularly concerned about the workload for principals. These are jobs that are already so demanding, and we need principals to provide feedback on what makes the most sense for making progress on student achievement, which is at the root of this new law. The bottom line is that successful implementation of a new educator effectiveness system will require resources, and highlights funding crisis faced by public educators in Colorado.
- **Data:** Section 5.01 of the rules clarifies how data shall be used in a Principal Professional Performance Plan. Ultimately, the use of proper data elements will be very important to the success of Colorado's push for educator effectiveness. CASE supports local determination of which models, or survey data, to use, in a way that would honor existing investments in materials and training and local priorities. This is an area that will change over time, so Colorado should be careful not to put too much emphasis on any one defined data source.

Thank you again for all of your efforts on behalf of the students of Colorado.

Sincerely,



Bruce H. Caughey
CASE Executive Director

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

Dear Members of the State Board of Education:

As an educator who has provided training in teacher evaluation for twenty years at both the in-service and pre-service levels, and who has closely followed the implementation of SB191, including the proposed rules, I am extremely concerned about section 5.03 as it is currently written. First of all, I do not believe it addresses the requirements of the revised Licensed Personnel Performance Evaluation Act regarding the training requirements of evaluators. The statute requires very specific skills and the rules do not mention these. While many administrators will have received instruction in this area in their licensure programs in Colorado, many will have come from other states and not have the requisite skill set.

Second, as currently worded, it only speaks to requiring school districts and BOCES to provide training that ensures that administrators and teachers have an understanding of their local evaluation system and its implementation. This essentially requires that evaluators only know about their local system, not that they have the skills and knowledge to implement it. SB191, in order to be successful, will require much more than this. I would strongly recommend restoring sections 5.03(B) and 5.03(C) to the rules. I would also suggest amending section 503(A) as follows:

School districts and BOCES shall provide training to all evaluators ~~and educators~~ (this is addressed in other sections) to ensure that they have ~~an understanding of their local evaluation system and its~~ **THE SKILLS AND KNOWLEDGE REQUIRED FOR ITS EFFECTIVE implementation.**

Finally, I was unable to locate the language allowing for evaluators who do not hold administrative licenses to perform evaluations and the training that would be required for them to do so. This may be my oversight but I have looked closely. It may have been inadvertently omitted with the elimination of the previous section 5.03(C).

Without the support of adequate training, SB191 with its rigorous evaluation requirements will not be able to come close to realizing its stated purposes. I sincerely hope that the State Board of Education considers these training issues carefully and makes sure that the final rules ensure that those who are evaluating educator effectiveness in this high-stakes environment have the professional training to do so. I appreciate the opportunity to share these concerns.

Sincerely,

Barbara J. Conroy, Ed.D.
Retired Assistant Superintendent, Boulder Valley School District

A former elementary and high school administrator, I now teach and supervise student teachers and alternative licensure candidates at the University of Colorado Colorado Springs. My colleagues and I have followed the evolution of the proposed Colorado Teacher Quality Standards with interest and appreciation. Although we have informally agreed on the observations below, I am writing only as an individual here, not on behalf of my department or college.

These new standards and elements provide us teacher-educators with substantive language for focusing on content knowledge, differentiation, planning, instructional delivery, reflective practice, leadership, and responsibility for Student Academic Growth. However, they seem to stop short of explicitly mentioning one skill common to effective teachers, and that is classroom management. Classroom management is certainly implied under Standards II and III, but language like "acceptable student behavior," "efficient use of time," "sound disciplinary practices," and "appropriate intervention strategies and practices," so helpful in the current Performance-Based Standards for Colorado Teachers, seems conspicuous by its absence from the CTQS. Was there an underlying rationale for that omission?

If not, I would like to suggest the addition of an element under Standard II, with language similar to that in the current PBSCT, such as

Teachers create a learning environment characterized by acceptable student behavior, efficient use of time, and appropriate intervention strategies.

Thank you for your thoughtful deliberations.

Sincerely,

Beth Cutter

Curriculum and Instruction Department

UCCS College of Education

1420 Austin Bluffs Pkwy

Colo Spgs CO 80918

W: 719-255-4184

C: 719-337-5002

Burdsall, Elizabeth

Subject: FW: DPS Comments to SB191 Draft Rules
Attachments: 11.9.16 DPS Comments to SB191 Rules.docx

From: Spalten, Shayne [mailto:SHAYNE_SPALTEN@dpsk12.org]
Sent: Saturday, September 17, 2011 8:35 PM
To: Colorado State Board of Education Relations
Cc: Boasberg, Tom; Dorland, Tracy; Dodds, Kady
Subject: DPS Comments to SB191 Draft Rules

Dear Colorado State Board of Education:

Please find the attached comments to the draft SB191 Educator Effectiveness rules submitted on behalf of the Denver Public Schools.

Shayne Spalten
Chief Human Resources Officer
Denver Public Schools

2.00 PRINCIPALS: DEFINITION OF EFFECTIVENESS, QUALITY STANDARDS AND PERFORMANCE EVALUATION RATINGS

2.01 Definition of Principal Effectiveness. 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 schools' primary instructional leaders, 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 schools' ability to promote equity and to continually improve their positive impact on students and families.

2.02 Principal Quality Standards. All School Districts and BOCES shall base their evaluations of their Principals on either the full set of Principal Quality Standards and associated Elements included below, or shall adopt their own locally developed standards that are substantially similar to the Principal Quality Standards and Elements. School Districts and BOCES may also include additional standards or elements that meet the needs of particular student populations within the context of their local communities. School Districts and BOCES that adopt their own locally developed standards shall crosswalk those standards to the Principal Quality Standards and Elements, so that the School District or BOCES is able to report the data required by section 6.04 of these rules.

2.02 (A) Quality Standard I: Principals demonstrate strategic leadership.

2.02 (A) (1) Element a: School Vision, Mission and Strategic Goals: Principals collaboratively develop the vision, mission, values, beliefs and goals of the school, collaboratively determine the processes used to establish these foundations, and facilitate their integration into the life of the school community.

2.02 (A) (2) Element b: School Unified Improvement Plan: Principals ensure that their schools' Unified Improvement Plan supports improved academic achievement and developmental outcomes for all students, and provides for data-based progress monitoring.

2.02 (A) (3) Element c: Leading Change: Principals collaborate with staff and their school community to implement strategies for improvements and changes which result in improved achievement and developmental outcomes for all students.

2.02 (A) (4) Element d: Distributive Leadership: Principals create and utilize processes to distribute leadership and support collaborative efforts throughout the school among teachers and administrators.

2.02 (B) Quality Standard II: Principals demonstrate instructional leadership.

consistent with federal and state laws, district and board policies, and negotiated agreements where applicable.

2.02 (F) (3) **Element c: Advocacy for the School:** Principals develop systems and relationships to leverage the district and community resources available to them both within and outside of the school in order to maximize the school's ability to serve the best interest of students and families.

2.02 (G) **Quality Standard VII:** Principals demonstrate leadership around Student Academic Growth.

2.02 (G) (1) **Element a: Student Academic Achievement and Growth:** Principals take responsibility for ensuring that all students are progressing toward postsecondary and workforce readiness standards by high school graduation. Principals prepare students for success by ensuring mastery of Colorado Academic Standards, including 21st century skills.

2.02 (G) (2) **Element b: Student Academic Growth and Development:** Principals take responsibility for facilitating the preparation of students with the skills, dispositions and attitudes necessary for success in work and postsecondary education, including democratic and civic participation.

2.02 (G) (3) **Element c: Use of Data:** Principals use evidence to evaluate the performance and practices of their schools, in order to continually improve attainment of Student Academic Growth. They take responsibility for ensuring that staff is knowledgeable in how to utilize the data to inform instructional decision making to maximize the educational opportunities and instructional program for every child.

2.03 Performance Evaluation Ratings for Principals. The following four Performance Evaluation Ratings for Principals shall be used statewide: ineffective, approaching effective, effective, and highly effective. Further information regarding the definition of these categories will be provided following the Pilot Period. School Districts and BOCES may choose to use different terms to describe each of these evaluation ratings, but shall ensure that they are able to report the data required by section 6.04 of these rules.

2.03 (A) During the Pilot Period described in section 6.03 of these rules, the Department shall develop a personnel evaluation framework to aggregate evidence collected systematically on multiple measures of a Principal's performance on Principal Quality Standards I-VI (Professional Practice) into a single score and to aggregate evidence collected systematically on multiple measures of a Principal's performance on Principal Quality Standard VII (Student Academic Growth) into a single score. School Districts and BOCES may use this framework as an example, or may adopt other methods for ensuring that each of the Quality Standards is reasonably represented in the principal evaluation process.

2.03 (B) During the Pilot Period, the Department also shall develop a statewide performance scoring matrix to assign Principals to one of four Performance Evaluation Ratings once a year,

using the single Professional Practice score and the single Student Academic Growth score identified in section 2.03 (A) of these rules. School Districts and BOCES may use this matrix as an example, or may adopt other methods for ensuring that each of the Quality Standards is reasonably represented in the principal evaluation process.

2.03 (C) The Department shall develop model rubrics and tools for School Districts and BOCES to use in measuring each individual Principal's performance against the Principal Quality Standards. The Department also shall provide technical guidance lines, based on research and best practices that emerge from the pilot of the State Model system and the implementation of other district systems during the Pilot Period, for School Districts and BOCES to use in developing their own rubrics and tools if they choose to develop their own distinctive personnel evaluation system.

~~2.03 (D) A Principal shall be rated as ineffective if his or her Professional Practice and impact on Student Academic Growth both fall below minimal expectations.~~

~~2.03 (E) A Principal shall be rated as approaching effective if either his or her Professional Practice or his or her impact on Student Academic Growth falls below minimal expectations.~~

~~2.03 (F) A Principal shall be rated as effective if his or her Professional Practice and his or her impact on Student Academic Growth both meet expectations.~~

~~2.03 (G) A Principal shall be rated as highly effective if his or her Professional Practice and his or her impact on Student Academic Growth both exceed expectations.~~

Comment [WU1]: Four categories of performance should be included as per 2.03, but performance categories not be defined until after the Pilot Period, as we learn more about how these measures combine, as the state model system and other district multiple measures systems are piloted and implemented.

3.0 TEACHERS: DEFINITION OF EFFECTIVENESS, QUALITY STANDARDS, AND PERFORMANCE EVALUATION RATINGS

3.01 Definition of Teacher Effectiveness. Effective Teachers in the state of Colorado have the knowledge, skills, and commitments needed to provide excellent and equitable learning opportunities and growth for all students. They strive to close achievement gaps and to prepare diverse student populations for postsecondary success. Effective Teachers facilitate mastery of content and skill development, and employ and adjust evidence-based strategies and approaches for students who are not achieving mastery and students who need acceleration. 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.

3.02 Teacher Quality Standards. All School Districts and BOCES shall base their evaluations of licensed classroom Teachers on the full set of Teacher Quality Standards and associated detailed Elements included below, or shall adopt their own locally developed standards that are

substantially similar to the Teacher Quality Standards and Elements. School Districts and BOCES may also include additional Quality Standards or Elements appropriate to the size, demographics and location of the School District or BOCES. School Districts and BOCES that adopt their own locally developed standards shall crosswalk those standards to the Teacher Quality Standards and Elements, so that the School District or BOCES is able to report the data required by section 6.04 of these rules.

3.02 (A) Quality Standard I: Teachers demonstrate knowledge and expertise in the content they teach.

3.02 (A) (1) Element a: The elementary Teacher has a deep conceptual knowledge of literacy and mathematics, as required by standards one and two in Colorado's Standards for the Approval of the Program Content of Professional Education and Professional Development of Teachers and Special Service Personnel, CCR 2260.5-R-5.00, and is knowledgeable in all other content that they teach (e.g., science, social studies, arts, physical education, or world languages). The secondary Teacher has a deep conceptual knowledge of literacy and mathematics, as required by standards one and two in Colorado's Standards for the Approval of the Program Content of Professional Education and Professional Development of Teachers and Special Service Personnel, CCR 2260.5-R-5.00, and is an expert in his or her content endorsement area(s).

3.02 (A) (1) Element a: Teachers provide instruction that is aligned with the Colorado Academic Standards and their District's organized plan of instruction; and is aligned with the individual needs of their students.

3.02 (A) (2) Element b: Teachers demonstrate knowledge of the content, central concepts, tools of inquiry, appropriate strategies and specialized character of the disciplines being taught.

3.02 (A) (3) Element c: Teachers utilize content knowledge to ensure student learning.

3.02 (A) (4) Element d: Teachers make instruction and content relevant to students and strive to connect students' background and contextual knowledge with new information being taught.

3.02 (B) Quality Standard II: Teachers establish a respectful learning environment for a diverse population of students.

3.02 (B) (1) Element 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.

3.02 (B) (2) Element b: Teachers demonstrate a commitment to and respect for diversity in the school community and in the world.

3.02 (B) (3) Element c: Teachers value students as individuals.

3.02 (E) (2) **Element b:** Teachers contribute knowledge and skills to educational practices and the teaching profession.

3.02 (E) (3) **Element c:** Teachers advocate for schools and students, partnering with students and families as appropriate.

3.02 (E) (4) **Element d:** Teachers demonstrate high ethical standards.

3.02 (F) **Quality Standard VI:** Teachers take responsibility for Student Academic Growth.

3.02 (F) (1) **Element a:** Teachers promote high levels of Student Academic Growth and academic achievement.

3.02 (F) (2) **Element b:** Teachers demonstrate their ability to utilize multiple data sources and evidence to evaluate their practice, and make adjustments where needed to continually improve attainment of Student Academic Growth.

3.03 Performance Evaluation Ratings for Teachers. The following four Performance Evaluation Ratings for Teachers shall be used statewide: ineffective, approaching effective, effective, and highly effective. . Further information regarding the definition of these categories will be provided following the Pilot Period. School Districts and BOCES may choose to use different terms to describe each of these evaluation ratings, but shall ensure that they are able to report the data required by section 6.04 of these rules.

3.03 (A) During the Pilot Period described in section 6.03 of these rules, the Department shall develop a personnel evaluation framework to aggregate evidence collected systematically on multiple measures of a Teacher's performance on Teacher Quality Standards I-V (Professional Practice) into a single score and to aggregate evidence collected systematically on multiple measures of a Teacher's performance on Teacher Quality Standard VI (Student Academic Growth) into a single score. School Districts and BOCES may use this framework as an example, or may adopt other methods for ensuring that each of the Quality Standards is reasonably represented in the teacher evaluation process.

3.03 (B) During the Pilot Period, the Department also shall develop a statewide personnel evaluation scoring matrix to assign both Novice and experienced Teachers to one of four Performance Evaluation Ratings once a year, using the single Professional Practice score and the single Student Academic Growth score identified in section 3.03 (A) of these rules. The matrix shall address the statutory requirement, outlined in section 22-5-117, C.R.S., that teachers formerly employed by a School District and hired by a BOCES must retain the employment status they attained prior to their transfer to the BOCES. School Districts and BOCES may use this matrix as an example, or may adopt other methods for ensuring that each of the Quality Standards is reasonably represented in the teacher evaluation process..

3.03 (C) The Department will develop model rubrics and tools for School Districts and BOCES to use in measuring each individual ~~Teacher~~Principal's performance against the ~~Teacher~~Principal

Quality Standards. The Department also will provide technical guidance, based on research and best practices that emerge from the pilot of the State Model system and the implementation of other district systems during the Pilot Period, ~~lines~~ for School Districts and BOCES to use in developing their own rubrics and tools if they choose to develop their own distinctive personnel evaluation system.

3.03 (D) ~~School Districts and BOCES shall use the indicators below for determining a~~ The Teacher's Performance Evaluation Ratings of ineffective, approaching effective, effective and highly effective shall have the following implications. ~~and the implications for such a rating.~~ The status implications described below do not apply to at-will employees.

Comment [WU2]: Four performance categories should be identified as per 3.03, but not be defined until after the Pilot Period, as we learn more about how these measures combine, as the state model system and other district multiple measures systems are piloted and implemented.

3.03 (D) (1) **Ineffective.**

~~Indicator: A Teacher whose performance indicates that his or her Professional Practice and impact on Student Academic Growth both fall below minimal expectations.~~

3.03 (D) (1) (a) *Implication for support:* A Teacher whose performance is rated as ineffective shall be considered as being in need of support. Data about that Teacher's performance shall be shared with the educator in a manner that facilitates improvement and the educator shall be provided with additional professional development and supports in a timely manner.

3.03 (D) (1) (b) *Implications for earning or losing nonprobationary status:* Beginning in July 2013, for probationary Teachers, a rating of ineffective shall not count towards the accrual of years towards nonprobationary status. Beginning in July 2014, a nonprobationary Teacher who is rated as ineffective for two consecutive years shall lose nonprobationary status.

3.03 (D) (2) **Approaching Effective.**

~~Indicator: A Teacher whose performance indicates that either his or her Professional Practice or his or her impact on Student Academic Growth falls below minimal expectations.~~

3.03 (D) (2) (a) *Implication for support:* A Teacher whose performance is rated as approaching effective shall be considered as being in need of support. Data about that Teacher's performance shall be shared with the educator in a manner that facilitates improvement and the educator shall be provided with professional development and supports in a timely manner.

3.03 (D) (2) (b) *Implications for earning or losing nonprobationary status:* (i) Beginning in July 2013, for a Novice Teacher, in his or her first year of service, a rating of approaching effective shall be considered the first of three consecutive years of effective performance needed to earn nonprobationary status. Nonprobationary status in this instance shall only be earned if the Teacher is subsequently rated effective or above in the following two consecutive years. For a Novice Teacher in his or her second or third year of service, a rating of approaching effective will not count towards the accrual of three years of effectiveness needed to reach nonprobationary status.

(ii) Beginning in July 2013, for a non-novice probationary Teacher, a rating of approaching effective shall not count towards the accrual of three years of effectiveness needed to reach nonprobationary status.

(iii) Beginning in July 2014, for a nonprobationary Teacher, a rating of approaching effective shall be considered the first of two consecutive years of ineffective performance that results in loss of nonprobationary status. Nonprobationary status in this instance shall only be lost if the Teacher is subsequently rated approaching effective or ineffective during the following year.

3.03 (D) (3) Effective.

~~Indicator: A Teacher whose performance indicates that his or her Professional Practice and his or her impact on Student Academic Growth both meet expectations.~~

3.03 (D) (3) (a) *Implication for support:* Effective Teachers will be evaluated and receive supports as appropriate to support their ability to remain effective or to become highly effective.

3.03 (D) (3) (b) *Implications for earning or losing nonprobationary status:* Beginning in July 2013, a probationary Teacher shall receive a performance standard of effective for three consecutive years to earn nonprobationary status. Beginning in July 2014, a nonprobationary Teacher must maintain an effective rating to retain nonprobationary status. Two consecutive ratings below effective shall result in the loss of nonprobationary status.

3.03 (D) (4) Highly Effective.

~~Indicator: A Teacher whose performance indicates that his or her Professional Practice and his or her impact on Student Academic Growth both exceed expectations.~~

3.03 (D) (4) (a) *Implications for support:* Highly effective Teachers will be evaluated and receive supports as appropriate to support their ability to remain highly effective.

3.03 (D) (4) (b) *Implications for earning or losing nonprobationary status:* For the purposes of gaining or losing nonprobationary status, a rating of highly effective shall have the same implications as a rating of effective.

4.00 [Reserved: MEASURING PERFORMANCE OF OTHER LICENSED PERSONNEL]

4.01 [Reserved: Definition of Effectiveness for Other Licensed Personnel]

4.02 [Reserved: Performance Evaluation Ratings for Other Licensed Personnel]

5.0 LOCAL PERFORMANCE EVALUATION SYSTEMS: DUTIES AND POWERS OF LOCAL SCHOOL BOARDS AND BOARDS OF COOPERATIVE EDUCATION SERVICES

5.01 Required Components of Written Local Evaluation System. Every School District and BOCES shall adopt a written evaluation system that shall contain, but need not be limited to, the following information:

5.01 (F) (2) **Method for Evaluating Performance on Professional Practice.** No later than July 2013, a description of the method for evaluating Principals' Professional Practice, which method shall include data collection for multiple measures on multiple occasions.

5.01 (F) (2) (a) **Required Measures of Principal Professional Practice.** School Districts and BOCES shall measure Principal performance against Quality Standards I–VI using tools that capture information about the following: (i) input from Teachers employed at the Principal's school, provided that clear expectation is established prior to collection of the data that at least one of the purposes of collecting the input is to inform an evaluation of the principal's performance and provided that systems are put in place to ensure that the information collected remains anonymous and confidential; and (ii) the percentage and number of Teachers in the school who are rated as effective, highly effective; approaching effective; and ineffective, and the number and percentage of Teachers who are improving their performance, in comparison to the goals articulated in the Principal's Professional Performance Plan.

5.01 (F) (2) (b) **Additional Measures of Principal Professional Practice.** In addition to the required measures of Professional Practice, School Districts and BOCES may also ~~consider~~ using other sources of evidence regarding a Principal's Professional Practice. School Districts and BOCES are strongly encouraged to use measures, where appropriate, that capture evidence about the following: (i) student perceptions; (ii) parent/guardian perceptions; and (iii) perceptions of other administrators about a Principal's professional performance. Other measures may include the following: (i) direct observations; and (ii) examination of a portfolio of relevant documentation regarding the Principal's performance against the Principal Quality Standards, which may include but need not be limited to professional development strategies and opportunities, evidence of team development, staff meeting notes, school newsletters; content of website pages, award structures developed by the school, master school schedule, or evidence of community partnerships, parent engagement and participation rates, "360 degree" survey tools designed to solicit feedback from multiple stakeholder perspectives, examination of a Unified Improvement Plan, Teacher retention data, external review of budgets, and school communications plan. The Department will develop technical guidance, ~~elines~~, based on research and best practices that emerge from the pilot of the State Model system and the implementation of other district systems during the Pilot Period, for use by School Districts and BOCES in developing their own ~~that outline criteria for ensuring that these additional~~ measures of Professional Practice ~~meet minimum standards of credibility, validity, and reliability.~~

5.01 (F) (3) **Method for Evaluating Performance Related to Student Academic Growth.** No later than July 2013, a description of the method for evaluating Principals' performance related to Student Academic Growth. The Measures of Student Academic Growth used for evaluating Principals' performance against Quality Standard VII must meet the following criteria:

5.01 (F) (3) (a) School Districts and BOCES shall ensure that data included in the school performance framework, required pursuant to section 22-11-204, C.R.S., is used to evaluate Principal performance. School Districts and BOCES may choose to weight specific components

of the school performance framework differently than they are weighted in the school performance framework, depending on the Principal's responsibilities and the performance needs of the school, so long as student longitudinal growth carries the greatest weight.

5.01 (F) (3) (b) School Districts and BOCES shall incorporate at least one other Measure of Student Academic Growth and must ensure that the Measures of Student Academic Growth selected for Principal evaluations are consistent with the Measures of Student Academic Growth used for the evaluation of Teachers in each Principal's school, as described in section 5.01 (F) (7) of these rules.

5.01 (F) (3) (c) School Districts and BOCES are strongly encouraged to involve principals in a discussion of which of the available Measures of Student Academic Growth are appropriate to the Principal's school and school improvement efforts.

5.01 (F) (3) (d) Measures of Student Academic Growth shall reflect the growth of all students, not only those in subjects and grades that are tested using Statewide Summative Assessments, and shall reflect the broader responsibility a Principal has for ensuring the overall outcomes of students in the building.

5.01 (F) (3) (e) School Districts and BOCES shall seek to ensure that Measures of Student Academic Growth correspond to implementation benchmarks and targets included in the Unified Improvement Plan for the school at which a Principal is employed.

5.01 (F) (3) (f) School Districts and BOCES shall seek to ensure that Measures of Student Academic Growth are valid, meaning that they measure growth towards attainment of the academic standards adopted by the local school board pursuant to § 22-7-1013, C.R.S. and that analysis and inferences from the measures can be supported by evidence and logic.

5.01 (F) (3) (g) School Districts and BOCES shall seek to ensure that Measures of Student Academic Growth are reliable, meaning that the measures should be reasonably stable over time and in substance, and that data from the measures will be sufficient to warrant reasonably consistent inferences.

5.01 (F) (3) (h) **Early Childhood - Grade 3.** For the evaluations of Principals responsible for students in early childhood education through grade 3, measures shall be consistent with outcomes used as the basis for evaluations for Teachers teaching these grade levels, which may include, but are not limited to, assessments of early literacy and/or mathematics shared among members of the school community that may be used to measure student longitudinal growth.

5.01 (F) (3) (i) **Grades 4 - 8.** For the evaluation of Principals responsible for students in grades 4-8, a portion of the Principal's evaluation for Quality Standard VII shall be based on the results of the Colorado longitudinal growth model, calculated pursuant to section 22-11-203, C.R.S., for subjects tested by Statewide Summative Assessments. The weight of this measure may be increased to reflect the increased proportion of subjects covered by Statewide Summative Assessments over time. A portion of the Principal's evaluation for Quality Standard VII also shall

be based on other appropriate Measures of Student Academic Growth for students in grades 4-8, which may include, but are not limited to, Measures of Student Academic Growth shared among the evaluated personnel in the school.

5.01 (F) (3) (j) **Grades 9 - 12.** For the evaluation of Principals responsible for students in grades 9-12, a portion of the Principal's evaluation for Quality Standard VII shall be based on the results of the Colorado longitudinal growth model, calculated pursuant to section 22-11-203, C.R.S., for subjects tested by state summative assessments. To account for the portion of Teachers without direct or indirect results from the Colorado longitudinal growth model, a portion of a Principal's growth determination may be based upon appropriate Measures of Student Academic Growth for personnel teaching in subjects and grades not tested by Statewide Summative Assessments, which may include, but are not limited to, Measures of Student Academic Growth shared among evaluated personnel in the school.

5.01 (F) (3) (k) For the evaluation of Principals responsible for students in multiple grade spans, School Districts and BOCES shall select a combination of Measures of Student Academic Growth reflecting the grade levels of all students in the school.

5.01 (F) (3) (l) When compiling Measures of Student Academic Growth to evaluate performance against Principal Quality Standard VII, School Districts and BOCES shall give the most weight to those measures that demonstrate the highest technical quality and rigor.

5.01 (F) (4) **Weighting of Performance on Principal Quality Standards.** No later than July 2013, a description of the manner in which performance on each of the Principal Quality Standards will be weighed in assigning Principals to a Performance Evaluation Rating.

Measures of Principal Professional Practice shall determine fifty percent of a Principal's total overall ~~performance evaluation ratingscore on an evaluation~~, and measures of Student Academic Growth shall determine the other fifty percent of a ~~Principal's overall performance evaluation ratingthe weight of the total overall score~~.

5.01 (F) (5) **Teacher Effectiveness and Teacher Quality Standards.** No later than July 2013, the definition of Teacher effectiveness, included in section 3.01 of these rules, and either the Teacher Quality Standards and associated Elements, included in section 3.02 of these rules, or locally adopted standards that are substantially similar to the Teacher Quality Standards and Elements.

5.01 (F) (6) **Method for Evaluating Teacher Professional Practice.** No later than July 2013, a description of the method for evaluating Teachers' Professional Practice, which method shall include data collection for multiple measures on multiple occasions. School Districts and BOCES shall collect Teacher performance data related to Professional Practice using observations and at least one of the following measures: (a) student perception measures (e.g. surveys), where appropriate and feasible, (b) peer feedback, (c) feedback from parents or guardians; or (d) review of Teacher lesson plans or student work samples.

The method for evaluating Teachers' Professional Practice may include additional measures. The Department will develop technical ~~guidelines~~ guidance, based on research and best practices that emerge from the pilot of the State Model system and the implementation of other district systems during the Pilot Period, for use by School Districts and BOCES in developing their own ~~that outline criteria for ensuring that these additional~~ measures of Professional Practice ~~meet minimum standards of credibility, validity, and reliability.~~

In determining how to use the data collected about Teacher performance, whether for written evaluation reports or for informal feedback and identification of appropriate professional development, School Districts and BOCES shall consider the technical quality and rigor of the methods used to collect the data, and the technical quality of the data itself.

5.01 (F) (7) Method for Evaluating Teacher Performance Related to Student Academic Growth. No later than July 2013, a description of the method for evaluating Teachers' performance related to Student Academic Growth.

School Districts and BOCES shall categorize Teachers into appropriate categories based on the availability and technical quality of student assessments available for the courses and subjects taught by those Teachers. School Districts and BOCES shall then choose or develop appropriate Measures of Student Academic Growth to be used in the evaluation of each personnel category. The Department will develop technical guidance, based on research and best practices that emerge from the pilot of the State Model system and the implementation of other district systems during the Pilot Period, for use by School Districts and BOCES in developing their own ~~elines for ensuring that the selected~~ Measures of Student Academic Growth, including ~~guidelines for ensuring that such Measures of Student Growth~~ meet minimum standards of credibility, validity, and reliability.

Measures of Student Academic Growth shall be generated from an approach or model that makes design choices explicit and transparent (e.g., in a value-added model, transparency about student- or school-level factors which are statistically-controlled for) and has technical documentation sufficient for an outside observer to judge the technical quality of the approach (i.e., a value-added system must provide adequate information about the model). Measures of Student Academic Growth shall be generated from an approach or model that presents results in a manner that can be understood and used by educators to improve student performance.

Student Academic Growth shall be measured using multiple measures. When compiling these measures to evaluate performance against Teacher Quality Standard VI, School Districts and BOCES shall ~~consider the relative technical quality and rigor of the various measures~~ ~~strive to ensure that the most weight is given to those measures that demonstrate the highest technical quality and rigor.~~

Measures of Student Academic Growth shall include the following:

5.01 (F) (7) (a) A measure of individually-attributed Student Academic Growth, meaning that outcomes on that measure are attributed to an individual licensed person;

5.01 (F) (7) (b) A measure of collectively-attributed Student Academic Growth, whether on a school-wide basis or across grades or subjects, meaning that outcomes on that measure are attributed to at least two licensed personnel (e.g., measures included in the school performance framework, required pursuant to section 22-11-204, C.R.S.);

5.01 (F) (7) (c) When available, Statewide Summative Assessment results; and

5.01 (F) (7) (d) For subjects with annual Statewide Summative Assessment results available in two consecutive grades, results from the Colorado Growth Model.

5.01 (F) (8) Selection of Additional Measures for Evaluating Teacher Performance Related to Student Academic Growth. The method for evaluating Teachers' performance related to Student Academic Growth may include Measures of Student Academic Growth in addition to those described in section 5.01 (F) (8) of these rules. The additional measures shall meet the following criteria:

5.01 (F) (8) (a) School Districts and BOCES shall seek to ensure that Measures of Student Academic Growth are valid, meaning that the measures shall be aligned with the academic standards adopted by the local school board pursuant to § 22-7-1013, C.R.S. and that analysis and inferences from the measures cannot be supported by evidence and logic;

5.01 (F) (8) (b) School Districts and BOCES shall seek to ensure that Measures of Student Academic Growth are reliable, meaning that the measures should be stable over time and in substance and that data from the measures will be sufficient to warrant reasonably consistent inferences;

5.01 (F) (8) (c) School Districts and BOCES shall seek to ensure that Measures of Student Academic Growth are comparable among Teachers; and

5.01 (F) (8) (d) For Teachers teaching two or more subjects, individual Measures of Student Academic Growth shall include Student Academic Growth scores from all subjects for which the Teacher is responsible.

5.01 (F) (9) Weighting of Performance on Teacher Quality Standards. No later than July 2013, a description of the manner in which performance on each of the Teacher Quality Standards will be weighted in assigning Teachers to a Performance Evaluation Rating. Measures of Teacher Professional Practice shall determine fifty percent of a Teacher's total overall score on an evaluation, and measures of Student Academic Growth shall determine the other fifty percent of the weight of the total overall score.

5.01 (G) The **frequency and duration of the evaluations**, which shall be on a regular basis and of such frequency and duration as to ensure the collection of a sufficient amount of data from which fair and reliable conclusions may be drawn, and which shall meet the following requirements;

5.01 (I) (2) Principals shall be held accountable for progress against the goals laid out in the Principal Professional Performance Plan and School Districts or BOCES shall continually monitor Principal performance goals, provide feedback and adjust support for the Principal as needed.

5.01 (I) (3) The Principal Professional Performance Plan shall include the following:

5.01 (I) (3) (a) Goals ~~addressing- for increasing~~ the number and percentages of effective Teachers in the school, and the number and percentage of Teachers who are improving, in a manner consistent with the goals for the school outlined in the school's Unified Improvement Plan;

5.01 (I) (3) (b) Goals addressing school climate and working conditions, developed with reference to a working conditions or school leadership survey (for example, the state-funded biennial Teaching, Empowering, Leading, and Learning (TELL) initiative survey, required pursuant to section 22-2-503, C.R.S), and other appropriate data, including conditions highlighted in comprehensive appraisal for district improvement (CADI) and school support team (SST) diagnostic reviews facilitated by the Department; and.

5.01 (I) ~~(4)(c)~~ ~~School Districts and BOCES are also strongly encouraged to include g~~Goals related to staff participation in the TELL initiative survey, required pursuant to section 22-2-503, C.R.S., ~~or other culture and climate or school leadership surveys~~, and use of survey results to guide improvement efforts.

5.02 Process for Developing Written Local Evaluation System. Colorado statute outlines requirements for various entities to be involved in the development of local personnel evaluation systems. School Districts and BOCES shall collaborate with these entities in developing systems that meet the minimum requirements for evaluation systems described in section 5.01 of these rules.

5.02 (A) Each School District shall have a ***School District advisory personnel performance evaluation council***, which shall, at a minimum, consist of the following members to be appointed by the local school board:

5.02 (A) (1) One Teacher;

5.02 (A) (2) One administrator;

5.02 (A) (3) One Principal from the school district;

5.02 (A) (4) One resident from the school district who is a parent of a child attending a school within the school district; and

5.02 (A) (5) One resident of the school district who is not a parent with a child attending school within the school district.

6.01 (C) (5) implementation support;

6.01 (C) (6) initial and ongoing training for evaluators on the use of the State Model System rubrics, tools and templates; and

6.01 (C) (7) guidelines for implementation of the State Model System and for training on implementation.

6.01 (D) The Department shall develop technical ~~guidance~~ ~~lines~~ regarding the development and use of various Student Academic Growth approaches ~~by Districts or BOCES~~, which shall be updated as research and best practices evolve. Approaches to be addressed within these ~~guidance documents~~ ~~lines~~ include, but are not limited to:

6.01 (D) (1) the development and use of Teacher-, school- or district-developed assessments;

6.01 (D) (2) the use of commercially available interim, summative and pre- and post- course assessments;

6.01 (D) (3) the development and use of Student Academic Growth objectives;

6.01 (D) (4) the development and use of other goal-setting approaches; and

6.01 (D) (5) piloting of new and innovative practices.

6.01 (E) The Department shall develop and/or provide examples of the following:

6.01 (E) (1) approaches to categorizing personnel for the purposes of measuring individual Student Academic Growth; and

6.01 (E) (2) approaches to categorizing personnel for the purposes of joint attribution of Student Academic Growth; and

6.02 Development of Online Resource Bank

6.02 (A) The Department shall create an online, searchable resource bank where School Districts can find resources to implement the State Model System or to develop their own local performance evaluation system.

6.02 (B) The Department will seek input from interested parties on a regular basis to ensure that the resource bank is meeting user needs.

6.02 (C) The resource bank will have the following characteristics:

6.02 (C) (1) it will effectively support School Districts and BOCES in the design, implementation and ongoing support of their local performance evaluation systems;

Memorandum

To: Colorado State Board of Education
From: Amy Spicer, Stand for Children
Date: 9/20/2011
Re: Revised Teacher and Principal Standards

Attachments: Revised Principal Standards 8.1.11; Revised Teacher Standards 8.1.11;

In July 2011, Stand for Children gathered input from several national literacy experts and submitted suggested revisions (attached for your reference). In the August draft rules, it was included that a reference be made to existing standards in Rules 2260.5-R-5.00 instead of including literacy explicitly in the teacher quality standards.

It was our understanding from previous State Board meetings that 2260.5-R-5.00 would be replaced by the teacher quality standards, not supplemental to existing performance-based standards. Our recommendation continues to be to include literacy explicitly in the teacher quality standards.

8.1.11 DRAFT Line Edits to Colorado State Board of Education Rules for SB10-191

2.00 PRINCIPALS: DEFINITION OF EFFECTIVENESS, QUALITY STANDARDS AND PERFORMANCE EVALUATION RATINGS

2.01 Definition of Principal Effectiveness. 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 schools' primary instructional leaders, 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 schools' ability to promote equity and to continually improve their positive impact on students and families.

2.02 Principal Quality Standards. Effective Principals in the state of Colorado demonstrate a positive impact on student outcomes, including advancing student academic growth and closing the achievement gap by demonstrating excellence against the following professional standards. All School Districts and BOCES shall base their evaluations of their Principals on the full set of Principal Quality Standards and associated detailed descriptions of knowledge and skills (also known as Elements).

2.02 (A)Quality Standard I: Principals demonstrate strategic leadership.

2.02 (A) (1) **Element a:** School Vision, Mission and Strategic Goals: Principals develop the vision, mission, values, ~~beliefs~~ **expectations** and goals of the school, collaboratively determine the processes used to establish these ~~attributes~~ **foundations**, and facilitate their integration into the life of the school community.

2.02 (A) (2) **Element b:** School Unified Improvement Plan: Principals ensure that their schools' Unified Improvement Plan provides the structure for the vision, values, goals, and changes necessary for improved **academic** achievement and developmental outcomes for all students, and provides for **data-based** progress monitoring ~~based on data~~.

2.02 (A) (3) **Element c:** Leading Change: Principals collaborate with staff and their school community ~~to develop a vision and implementation~~ **to implement** strategies for improvements and changes which result in improved achievement and developmental outcomes for all students.

2.02 (A) (4) **Element d:** Distributive Leadership: Principals create and utilize processes to distribute leadership and ~~decision-making~~ **support collaborative efforts** throughout the school **among teachers and administrators**.

2.02 (B)Quality Standard II: Principals demonstrate instructional leadership.

- 2.02 (B) (1) **Element a:** Curriculum, Instruction, Learning and Assessment: Principals ~~foster school-wide conversations regarding~~ **promote school-wide efforts to establish and implement appropriate** expectations for curriculum, instructional practices, assessment and **use of** data on student learning based on **scientific** research and **best evidence based** practices. ~~and ensure that the ideas developed are integrated into the school's curriculum and instructional practices.~~
- 2.02 (B) (2) **Element b:** Instructional Time: Principals create processes and schedules which maximize instructional, collaborative and preparation time.
- 2.02 (B) (3) **Element c:** Implementing High-quality Instruction: Principals support Teachers through ongoing, actionable feedback and appropriate professional development to ensure that rigorous, relevant and **appropriate evidence-based** instruction and **appropriate** learning experiences, aligned across P-20, are delivered to and for all students.
- 2.02 (B) (4) **Element d:** High Expectations for all Students: Principals hold all staff accountable for setting and achieving rigorous performance goals for all students, and empower staff to achieve these ambitious student outcomes.
- 2.02 (B) (5) **Element e:** Instructional Practices: Principals demonstrate a rich knowledge of effective instructional practices, **as determined by research and successful practice**, to support and guide teachers in **data-based** decision making regarding effective practices to maximize student success.

2.02 (C) **Quality Standard III:** Principals demonstrate school culture and equity leadership.

- 2.02 (C) (1) **Element 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.
- 2.02 (C) (2) **Element b:** Commitment to the Whole Child: Principals value the cognitive, physical, social and emotional health and growth of every student.
- 2.02 (C) (3) **Element c:** Equity Pedagogy: Principals demonstrate a commitment to a diverse population of students by creating an inclusive and **celebratory positive** school culture, and provide direction in meeting the needs of diverse students, talents, experiences and challenges.
- 2.02 (C) (4) **Element d:** Efficacy, Empowerment and a Culture of Continuous Improvement: Principals and their leadership team foster a school culture that encourages continual improvement through **reliance on research**, innovation, **prudent** risk-taking, high expectations for all students, and an honest assessment of outcomes.

2.02 (D) Quality Standard IV: Principals demonstrate human resource leadership.

- 2.02 (D) (1) **Element 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.
- 2.02 (D) (2) **Element b: Recruiting, Hiring, Placing, Mentoring, and Dismissal of Staff:** Principals establish and effectively manage processes and systems that ensure a **knowledgeable**, high-quality, high-performing staff, including an overall count and percentage of effective Teachers that reflects the school's improvement priorities.
- 2.02 (D) (3) **Element c: Teacher and Staff Evaluation:** Principals evaluate staff performance using the district's educator evaluation system in order to ensure that Teachers and staff are evaluated in a fair and equitable manner with a focus on improving **teacher** performance and, thus, student achievement.

2.02 (E) Quality Standard V: Principals demonstrate managerial leadership.

- 2.02 (E) (1) **Element a: School Resources and Budget:** Principals establish systems for marshaling all available school resources to facilitate the work that needs to be done to improve student learning, **academic** achievement and **overall** healthy development for all students.
- 2.02 (E) (2) **Element b: Conflict Management and Resolution:** Principals effectively and efficiently manage the complexity of human interactions and relationships, including those among and between parents/guardians, students and staff.
- 2.02 (E) (3) **Element c: Systematic Communication:** Principals facilitate the design and utilization of various forms of formal and informal communication with all school stakeholders.
- 2.02 (E) (4) **Element d: School-wide Expectations for Students and Staff:** Principals ensure that clear expectations, structures, rules and procedures are established for students and staff.
- 2.02 (E) (5) **Element e: Supporting Policies and Agreements:** Principals regularly update their knowledge of federal and state laws, and districts and board policies, including negotiated agreements, and establish processes to ensure that ~~they~~ **these policies, laws and agreements** are consistently met and implemented.
- 2.02 (E) (6) **Element f: Ensuring an Orderly and Supportive Environment:** Principals ensure that the school provides an orderly and supportive environment that fosters a climate of **safety, respect, and well-being**.

2.02 (F) **Quality Standard VI:** Principals demonstrate external development leadership.

2.02 (F) (1) **Element a: Family and Community Involvement and Outreach:** Principals design structures and processes which result in family and community engagement, support and ownership for the school.

2.02 (F) (2) **Element b: Professional Leadership Responsibilities:** Principals strive to improve the profession by collaborating with their colleagues, district leadership and other stakeholders to drive the development and successful implementation of initiatives that better serve students, Teachers and schools at all levels of the education system. They ensure that these initiatives are consistent with federal and state laws, district and board policies, and negotiated agreements where applicable.

2.02 (F) (3) **Element c: Advocacy for the School:** Principals develop systems and relationships to leverage the district and community resources available to them both within and outside of the school in order to maximize the school's ability to serve the best interest of students and families.

2.02 (G) **Standard VII:** Principals demonstrate leadership around Student Academic Growth.

2.02 (G) (1) **Element a: Student Academic Achievement and Growth:** Principals take responsibility for ensuring that all students are progressing toward postsecondary and workforce readiness standards by high school graduation. Principals prepare students for success by ensuring mastery of Colorado Academic Standards, including 21st century skills.

2.02 (G) (2) **Element b: Student Academic Growth and Development:** Principals take responsibility for facilitating the preparation of students with the skills, dispositions and attitudes necessary for success in work and postsecondary education, including democratic and civic participation.

2.02 (G) (3) **Element c: Use of Data:** Principals use evidence to evaluate the performance and practices of their schools, in order to continually improve attainment of Student Academic Growth. They take responsibility for ensuring that staff is knowledgeable in how to utilize the data to inform instructional decision making to maximize the educational opportunities and instructional program for every child.

8.1.11 DRAFT Line Edits to Colorado State Board of Education Rules for SB10-191

It is recommended that highlighted rules language be made more measurable and objective.

3.01 Definition of Teacher Effectiveness. Effective Teachers in the state of Colorado have the knowledge, skills, and commitments that ensure ~~that they are able to provide excellent and~~ equitable learning opportunities and growth for all students. They strive 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 employ and adjust evidence-based strategies and approaches~~ 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.

3.02 Teacher Quality Standards. Effective Teachers in the state of Colorado demonstrate a positive impact on student outcomes, including advancing student academic growth and closing the achievement gap by demonstrating excellence ~~against within~~ the following professional standards. All School Districts and BOCES shall base their evaluations of licensed classroom Teachers on the full set of Teacher Quality Standards and associated detailed descriptions of knowledge and skills (also known as Elements):

3.02 (A) Quality Standard I: Teachers demonstrate ~~mastery of knowledge and expertise in the content they teach, and knowledge about student literacy development in reading, writing, speaking, viewing, and listening.~~ The elementary teacher is expert in literacy and mathematics and knowledgeable in all other content that they teach (e.g. science, social studies, arts, physical education, world languages). The secondary teacher is knowledgeable in literacy and mathematics and expert in their content endorsement area(s).

3.02 (A) (1) Element a: Teachers provide instruction that is aligned with the Colorado Academic Standards and their District's scope and sequence; and is aligned with the individual needs of their students.

3.02 (A) (2) Element b: Teachers demonstrate knowledge of literacy.

Early Childhood and Elementary teachers shall be knowledgeable about student literacy development in reading, writing, speaking, and listening. The teacher demonstrates the ability to:

1. Plan and organize reading instruction based on ongoing assessment.
2. Develop phonological and linguistic skills related to reading including:
 - Phonemic awareness.
 - Concepts about print.
 - Systematic, explicit phonics.
 - Other word identification strategies.
 - Spelling instruction.
3. Develop reading comprehension and ~~promotion of independent~~ reading fluency including:

- Comprehension strategies for a variety of genre.
 - Literary response and analysis.
 - Content area literacy.
 - ~~Student-independent~~ Reading fluency.
4. Support reading through oral and written language development including:
 - Development of oral English proficiency in students.
 - Development of sound writing practices in students including language usage, punctuation, capitalization, sentence structure, and spelling.
 - The relationships among reading, writing, and oral language.
 - Vocabulary development.
 - The structure of standard English.
 5. Interpret student errors and monitor student progress in the essential skills of reading, writing, and communicating.

Secondary school teachers shall be knowledgeable about student literacy development in reading, writing, and communicating. The teacher demonstrates the ability to:

1. Make content accessible to all students, including those who struggle with reading, writing, and communicating.
2. Use evidence-based strategies for reading, writing, and communicating in the content areas.
3. Teach content specific vocabulary, text structures, and academic language conventions related to the discipline.
4. Enhance content instruction through a thorough understanding of the P-12 Academic Standards for reading, writing, and communicating.
5. Understand the critical role that phonological and phonemic awareness, decoding and spelling, fluency, vocabulary, and text comprehension play in the development of literacy skills.
6. Identify students' reading, writing, and communicating abilities in order to differentiate instruction to accommodate diverse learning needs and refer students who are struggling or advanced for additional intervention or enrichment.

3.02 (A) (3) Element c: Teachers demonstrate knowledge of mathematics.

Early Childhood and Elementary teachers shall have a deep conceptual knowledgeable of mathematics and understand how to promote student mathematics development in numbers and operations, algebra, geometry and measurement, and data analysis and probability. The teacher demonstrates the ability to:

1. Plan and organize math instruction based on ongoing assessment.
2. Develop students' mathematical comprehension and fluency through:
 - a. Number sense, properties, and fluency with operations.
 - b. Patterns, functions, and algebraic structures.
 - c. Data analysis, statistics, and probability.
 - d. Shape, dimension, and geometric relationships.
3. Use mathematically appropriate, accurate, and useful definitions and explanations.
4. Support mathematics comprehension through mathematical modeling and visual mapping of ideas and operations from physical to symbolic representations.

5. Pose mathematical questions and problems that are productive for students' learning.
6. Monitor student progress, interpret and make mathematical and pedagogical judgments about students' questions, solutions, problems and insights, and respond productively.

Secondary school teachers shall be knowledgeable about student mathematics development in numbers and operations, algebra, geometry and measurement, and data analysis and probability. The teacher demonstrates the ability to:

1. Make content accessible to all students, including those who struggle with mathematics and analytical skills.
2. Use content area numeracy and analytical skills to enable students to problem solve, interpret and use data and numerical representations.
3. Enhance content instruction through a thorough understanding of the P-12 Academic Standards for mathematics.
4. Identify students' mathematical abilities in order to differentiate instruction to accommodate diverse learning needs, and refer students who are struggling or advanced for additional intervention or enrichment.

3.02 (A) (2) **Element b d:** Teachers demonstrate knowledge of the content, central concepts, tools of inquiry, ~~and appropriate strategies~~ and specialized character of the disciplines being taught ~~appropriate to their teaching specialty.~~

3.02 (A) (3) **Element e e:** ~~Teachers develop lessons that reflect and help students to understand the specialized character of the disciplines being taught (e.g., mathematics, history, English, science), and the interconnectedness of content areas/disciplines.~~ Teachers utilize content knowledge to ensure student learning.

3.02 (A) (4) **Element d f:** Teachers make instruction and content relevant to students and strive to connect students' background knowledge with new information being taught.

3.02 (B) **Quality Standard II:** Teachers establish a **respectful learning environment** for a diverse population of students.

3.02 (B) (1) **Element 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.

3.02 (B) (2) **Element b:** Teachers **demonstrate a commitment** to and respect for diversity in the school community and in the world.

3.02 (B) (3) **Element c:** Teachers **value students** as individuals.

3.02 (B) (4) **Element d:** Teachers adapt their teaching for the benefit of all students, including those with special needs across a range of ability levels.

3.02 (B) (5) **Element e:** Teachers ~~provide timely and appropriate reports to families about student progress and~~ work collaboratively with the families and significant adults in the lives of their students.

3.02 (C) **Quality Standard III:** Teachers ~~facilitate learning for their students.~~ plan and deliver effective instruction.

- 3.02 (C) (1) **Element 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.
- 3.02 (C) (2) **Element b:** Teachers plan and consistently deliver instruction that draws on results of student assessments , is aligned to academic standards, and advances students' level of content knowledge. learning experiences appropriate for their students.
- 3.02 (C) (3) **Element c:** Teachers demonstrate a rich knowledge of evidence-based effective instructional practices to meet the academic needs of their students, including those practices specifically proven effective by research for literacy and mathematics such as the development of phonological and linguistic skills related to reading in the primary grades (e.g., phonemic awareness, concepts about print, systematic and explicit phonics, other word identification strategies, and spelling instruction) reading comprehension and promotion of independent reading (e.g., promotion of comprehension for a variety of genres, literacy response and analysis, content-area literacy, and student independent reading), and the support of reading through oral and written language development.
- 3.02 (C) (4) **Element d:** Teachers thoughtfully integrate and utilize technology into their instruction to maximize student learning.
- 3.02 (C) (5) **Element e:** Teachers have high expectations for all students and plan instruction that helps students develop critical-thinking and problem solving skills.
- ~~3.02 (C) (6) **Element f:** Teachers provide students with opportunities to work in teams and develop leadership qualities.~~
- 3.02 (C) (7) **Element g:** Teachers communicate effectively making learning objectives clear and providing appropriate models of language.
- 3.02 (C) (8) **Element h:** Teachers use a variety of sound and appropriate methods to assess what each student has learned, including formal and informal assessments, and use results to plan further instruction.

3.02 (D) Quality Standard IV: Teachers reflect on their practice.

3.02 (D) (1) **Element a:** Teachers demonstrate that they analyze student learning and apply what they learn to improve their practice.

3.02 (D) (2) **Element b:** Teachers link professional growth to their professional goals. (Example: Teachers reflect critically upon teaching experience, identify areas for further professional development as part of a professional development plan that is linked to grade level, school, and district goals, and is receptive to suggestions for growth.)

3.02 (D) (3) **Element c:** Teachers function effectively in a complex, dynamic environment.

3.02 (E) Quality Standard V: Teachers demonstrate leadership.

3.02 (E) (1) **Element a:** Teachers demonstrate leadership in their schools.

3.02 (E) (2) **Element b:** Teachers contribute knowledge and skills to educational practices and the teaching profession.

(Example: Teachers maintain knowledge of current theories, research, and developments in the academic discipline and exercise judgment in accepting implications or findings as valid for application in classroom practice.)

3.02 (E) (3) **Element c:** Teachers advocate for schools and students, partnering with students and families as appropriate.

3.02 (E) (4) **Element d:** Teachers demonstrate high ethical standards.

3.02 (F) Quality Standard VI: Teachers take responsibility for Student Academic Growth.

3.02 (F) (1) **Element a:** Teachers pursue promote high levels of Student Academic Growth and academic achievement. [This statement seems like it should be the standard and the elements would be: set clear expectations, frequently assess student progress, plan instruction based on data, evaluate & adjust, communicate results.]

3.02 (F) (2) **Element b:** ~~Teachers pursue high levels of Student Academic Growth in the skills necessary for postsecondary life, including democratic and civic participation.~~

3.02 (F) (3) **Element c:** Teachers demonstrate their ability to utilize multiple data sources and evidence to evaluate their practice, and make adjustments where needed to continually improve attainment of Student Academic Growth.

With regards to the 8.24.11 draft rules for the implementation of SB 191, I would add the following suggestions and areas in which clarity is needed:

- ? 1.20 and 5.01 (F)(8)(C): "... that are rigorous and comparable across classrooms" and "... comparable among teachers." It is important to clarify if this means across classrooms/teachers within a school or across schools. This may become an issue if differences exist between schools (e.g., Innovation Schools).
- ? 2.03 (E) and 3.03 (D)(2): Both of these require a disjunctive model (matrix) that evaluates Professional Practice and Student Academic Growth separately. This means that if a teacher or principal is only slightly below the growth criterion, s/he will be rated as less than effective, regardless of the strengths seen in professional practice (the same holds true in the reverse).
 - o For example, let's imagine a 100 point scale with 50 points for professional practice and 50 for growth. Let's also say that the minimum score to achieve Effective is 30 points on each. As written, a teacher or principal obtaining 50 points for professional practice and 29 points for growth would not be considered Effective.
 - o If this person is a teacher, 3.03 (D)(2)(A) requires that s/he receive support even though the teacher obtained the highest value possible on the Professional Practice dimension.
 - o For principals, this sends the message that their ratings/observations do not matter if the growth scores are not high enough.
 - o Looking at this another way, imagine a pool of teachers and principals who have been rated Effective or Highly Effective on Professional Practice. A proportion of this pool will be designated as less than effective due to growth measures and will therefore be at some level of risk. Since we do not know how big this proportion is, we cannot estimate the human capital implications.
 - o I know of no other large scale system that takes this approach. Other systems allow for an evaluation of the total score, so in the example above, if the minimum score was 60, the teacher or principal would exceed this with a 79. While there are certainly limits that should be in place with a compensatory or additive system, such a system is far more reflective of the actual performance of individuals.
- ? 5.01 (F)(7)(A): "... measures are attributed to an individual licensed person." The attribution of scores is a very large measurement challenge, however in the context of RTI, Special Education, ELL Resource assistance, etc., this requirement appears untenable. It could be argued that such language could preclude measures that are not attributable to an individual. I do not believe that this is the intent, however it may be the outcome.
- ? 5.01 (F)(8)(d): "... shall include Student Academic Growth scores from all subjects for which the Teacher is responsible." Given the resource constraints at both the state and district level, this requirement may exceed capacity in terms of providing measures for all subjects by the implementation deadline. I believe the state and most districts are thinking in terms of a phased approach wherein they consider development over time while ensuring that the majority of courses/subjects are considered. This requirement at the outset may not be plausible.

Thank you for considering these points, particularly the 2nd major bullet dealing with a disjunctive or matrix approach. The messages it sends, the work it will impose on schools and districts, and the risks in terms of human capital implications all argue for a more balanced approach. Please note that while I am

relying on my experiences gained as an educator and assessment leader, my comments are offered as an individual and are not intended to necessarily represent those of Denver Public Schools.

Respectfully submitted,

Robert (Bob) Good, Ed.D.
Sr. Manager, Assessment & Academic Support
Accountability, Research, & Evaluation
Office of Teacher Learning & Leadership
Denver Public Schools
900 Grant St., Ste. 610
Denver, CO, 80203
720.423.3657
robert_good@dpsk12.org

9-19-2011

To Whom it May Concern:

Shame on me. I was not paying attention when they construed and voted in this new law -Senate Bill 191. Now I am considering getting **out** of the teaching *business*, as are many teachers I know in this field.

Priorities: maybe the legislature needs to take a look at reconstructing **HOW** teachers are paid and if it is keeping up with the economy/ work force. I know I am making a whopping 30k a year, and on a salary freeze for the last 4 years. Now you want to base 50% of my evaluation, job and pay, on scores? I am in a wonderful district, teach 5th grade, good parents, and for the most part- great kiddos. During a MAP test (how they are considering future CSAP testing), I had a young man, 10 years old, sit and simply push buttons and was done with the test in 10 minutes. I am paying for 2 kid's lunches right now (parents keep *forgetting* to send money), and I had a parent call and tell her boy during class that she and his dad were going to get in a terrible custody battle over him. Yea, that was the end of that day for that kiddo. ☹

I've been told I have to teach 2 more subjects now in my day, and my standards are always changing, to the point where I am confused about **WHAT** I am supposed to be teaching. Also, I need at least another hour now to teach civics and economics in my day? **AND** my scores depend on it. OH wait, we have no money for curriculum for this, so I have to make it up on my *own* time. \$30,000 a year. Yea. I have parents that complain, whine, and are angry because their "baby" got a bad grade and was playing sports and/or video games all night and didn't get homework done.

My daughter wanted to be a teacher. She has since changed her mind, as I told her this is a not a field she should get into as **EVERYONE** has their fingers-in-the-pie and seems to know what kids need. We are barely making it financially, while my best friend, same amount of education, same college (Univ. Northern Colorado), and triples my pay as a nurse.

Teaching is not a *calling* folks, it is a paycheck. I am **NOT** for tenure, and there are some good points to this 'law,' but you **CANNOT** base our pay and jobs on scores of kids who don't care, or parents who don't care!! I ask each one of you to go ask a parent, **WHAT** their kids are learning in any particular class. 99% of the time they will have no clue.

Sincerely,

Mora Luke
Ale.ranch@myawai.com
Singing Hills Elementary