

**Responses to Written Comments on Draft SB 191 Rules
Received September 23 — October 5, 2011**

	Comment/Question	CDE Response
1	<p>Please accept this letter as opposition to BOCES involvement in SB 191. Integrating licensed BOCES personnel into the initiative will create a level of administration far beyond any direct impact such personnel will have on student growth.</p> <p>It's not been clear what they will be held accountable for, individual student or classroom. If individual student growth, IEP's now hold related service providers/BOCES (AU) accountable. If classroom, so many elements come into play that create an invalid assessment of a provider's performance, and level of complexity to a point of no return. Either approach makes little sense.</p> <p>Consider the following points:</p> <ul style="list-style-type: none"> • Many related service providers have no instructional role, i.e., school psychologists, social workers, and nurses. Others, such as speech pathologists, and low incident providers have case loads that span over three or four schools, at all grade levels. Typically the amount of time with students is less than one hour a week. • BOCES personnel are not held to Teacher Compensation and Dismissal Act. Probationary and non-probationary status does not exist. They are at-will employees. • Also consider the difficulty in hiring related service providers in rural areas. We could be put in a position of terminating a provider we could not replace, and setting precedence. We prefer remediation, intense remediation to improve performance. We have the flexibility of termination now, being at-will; SB would restrict such flexibility if performance is inadequate. 	<p>The state board does not have the authority to not include BOCES in the rules concerning requirements for personnel evaluation systems. Statute requires that "all school districts and boards of cooperative services that employ licensed personnel...shall adopt a written system to evaluate the employment performance of school district and board of cooperative services licensed personnel, including all teachers, principals, and administrators..." (Section 22-9-106 (1), C.R.S.).</p> <p>S.B. 10-191 required the State Council to make recommendations and the State Board to adopt rules concerning performance standards for each category of licensed personnel to be evaluated and the criteria to be applied in assigning educators to appropriate performance standards. The law outlined specific requirements for teachers and principals, including the requirement that evaluations of teachers and principals be based 50% on student academic growth. The State Council has not yet made recommendations concerning the performance standards and criteria that should be applicable to other categories of licensed personnel (i.e., school psychologists, social workers, and nurses). The department will carefully consider the unique characteristics of these other categories of licensed personnel before making recommendations about the performance standards and evaluation criteria for these individuals.</p> <p>The department recognizes that probationary and nonprobationary status does not apply to BOCES personnel that are at-will employees. The draft rules, at section 3.03 (D), state, "The following status implications shall apply for each Teacher Performance Evaluation Rating. These status implications shall not apply to at-will employees."</p>

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	<ul style="list-style-type: none"> Some BOCES operate schools. BOCES is written in the language throughout the rules. I suggest that each reference to BOCES in the language be following with "those that operate schools." Adding BOCES that do not operate schools creates an overload on providers and administrators for little or no effect. Common sense need prevail!! 	
2	<p>We understand that all districts in Colorado may not be interested in using peer evaluations, but we believe the state guidelines around teacher evaluations ought to include the groundbreaking peer evaluator work that districts like Jeffco have been exploring. As a result, our 1338 Council is requesting that you reinstate 5.03 (C) into the SB 191 implementation guidelines.</p>	<p>The draft rules currently include the following language:</p> <p>5.03 (B) As required by section 22-9-106 (4) (a), C.R.S., all performance evaluations must be conducted by an individual who has completed a training in evaluation skills that has been approved by the Department. Teachers may fill the role of an evaluator if they are a designee of an individual with a principal or administrator license and have completed a training on evaluation skills that has been approved by the Department. The Department shall develop a process for approving education and training programs for evaluators that is consistent with the approval process previously developed pursuant to section 22-9-108, C.R.S.</p> <p>5.03 (C) School Districts and BOCES are encouraged to provide training to Teachers, so that Teachers may conduct peer coaching observations in order to support other Teachers by providing actionable feedback on Professional Practice.</p>
3	<p>I understand you are considering whether Colorado's new teacher/principal evaluation system should be "statewide," or if districts should evaluate educators using local systems. As a high school English teacher of 17 years, 10 in Woodland Park High School, I strongly encourage you to use a statewide system. Statistics prove that principals on average rotate every 3 years. Teachers do not.</p>	<p>While the department values the importance of establishing consistent expectations for all teachers across the state, statute also requires that local evaluation systems satisfy quality standards "in a manner that is appropriate to the size, demographics, and location of the school district or BOCES." (See section 22-9-104, C.R.S.). The department believes that the current version of the draft rules will allow for both statewide consistency and comparability and local flexibility. All districts will conduct evaluations using the same definitions of</p>

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	<p>Having a statewide system would allow teachers to know the expectations yearly and not have to attempt to satisfy every new principal's change in philosophy and approach. At WPHS, we had a freshman academy for at risk freshmen 1 year, then a freshmen academy for all freshmen for 2 years. Each system had its own expectations and focus. Next, we received a new principal, eliminated academies, and moved to pathways which started with sophomores. Again, the philosophy on best instructional practices and focus changed to fit the system.</p> <p>No matter the system, good teaching is good teaching. Evaluations should not change with every new system, every new principal or every new year. I strongly encourage you to focus on a state system, so that teachers can teach, and evaluators can become experts on a vetted method.</p>	<p>effectiveness for principals and teachers, using either the state's quality standards for evaluating effectiveness or locally developed standards that "meet or exceed" the state's quality standards, using evaluation methods that meet the minimum requirements established in statute and rule, and using the same evaluation rating categories to communicate about performance outcomes.</p>
4	<p>I have been watching the proceedings on the rule making on SB 191 with some interest, as I am a teacher in Jefferson County. I would like to express my support for a system that is statewide in its rulemaking, evaluation criteria, training, and licensing. I am concerned that if we do not have a statewide system then even the intent of the bill, to have a qualified teacher in every classroom, will not work. I know that Colorado is very much a home rule state and many local districts will want to have control over this process. But it will be diluted, unmanageable, and probably ineffective if someone can be declared ineffective in one district, but turn around and find a district with lower criteria in which they could be declared effective. Perhaps there are items, such as district level tests for children that will allow for local control. But most measures should be statewide in nature. Be it compliance to State Standards, education, qualifications through CDE, professional development, etc. I would like to see the majority of criteria be statewide in nature.</p>	<p>Please see row 3, above.</p>

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5	<p>I am a seventh grade special education teacher at Summit Ridge Middle School in Littleton, Colorado and I live in Denver. I am aware that the state school board is currently discussing whether the new teacher/principal evaluation system should be "statewide," or if districts should evaluate educators using local systems. I am writing to urge you to adopt rules that follow The State Council for Educator Effectiveness's recommendations. The Council for Educator Effectiveness is comprised of members of the business community, parents, school administrators, school board members, and teachers. They came to consensus on these recommendations after months of study. The proposed evaluation system will be fair, valid, transparent, and rigorous and take into consideration multiple measures. It makes sense for the state to have a state-wide evaluation system if we are going to use statewide standards and have a statewide assessment. I believe a statewide educator effectiveness system will improve my profession and make it more accountable to students, parents, and the public. Teachers, like community members, want a fair, rigorous, statewide evaluation system to make sure everyone in this state is being held to the same high standards and receiving excellent feedback on how to improve in their chosen profession.</p>	Please see row 3, above.
6	<p>CASB believes the recent revisions to the draft SB 191 Rules, issued on September 30, 2011, appropriately reflect the state and local partnership contemplated by the Licensed Personnel Evaluation Statute, as amended by SB 191. In particular, we support those changes that expressly allow districts to determine whether the State's model system and/or CDE's other guidance materials are appropriate for use in their unique circumstances.</p> <p>We recognize that some would limit local flexibility by requiring</p>	The department agrees.

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	<p>all districts to use the evaluation framework, scoring matrix, and minimum weighting requirements set forth in the council's recommendations. However, as we have previously set forth, the statute expressly requires that local districts have the flexibility currently established by the Rules. We do recognize the important role of the state's resources and support the Rules direction CDE to develop an evaluation framework and scoring matrix that will be available for use by all districts through CDE's on-line resource bank.</p> <p>A statewide framework is not required to hold districts accountable upon implementation. The primary purpose of SB 191 is to improve educator performance and student achievement through evaluations that provide meaningful feedback and opportunities for growth. As drafted, the Rules provide adequate opportunities for CDE to monitor implementation and hold districts accountable by ensuring that local evaluation systems are meeting the objectives of the law.</p> <p>Under the current Rules, CDE is required to collect data regarding the number of educators assigned to each performance rating and the changes in these numbers over time. This data will help CDE (and local boards) determine whether educators are being critically evaluated and given resources necessary for growth. CDE will also collect data necessary to analyze the correlation between student performance and educator evaluation ratings. This information will help identify problems with the integrity of the design and/or implementation of the local evaluation systems. Finally, CDE is required to analyze, among other things, "the extent to which educators understand how they are being evaluated, what they need to do to improve, and how to access resources they need to support their professional development." This data</p>	

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	<p>will provide important information as to whether the local systems are being implemented fairly and are providing meaningful feedback and opportunities for growth. Notably, if any of the data collected by CDE indicates that a district’s evaluation system is not meeting the objectives of the law, CDE must conduct a thorough review of the district’s relevant processes and procedures to ensure compliance with the law.</p> <p>Of course, the end goal of this statute is better student achievement. In addition to the detailed monitoring obligations established by the Rules, CDE has in place an extensive accountability system to measure and compare student achievement in school districts and schools. This data, coupled with the data to be collected under the Rules as detailed above, is more than sufficient to determine whether districts are implementing SB 191 as intended. Moreover, because the Rules are currently drafted to permit some flexibility at the local level, CDE may well learn more about best practices than it would under the more rigid approach proposed by the critics of the current draft.</p> <p>CASB firmly believes that the current Rules provide sufficient opportunities for the State to hold districts accountable and ensure that local evaluation systems are meeting the primary purpose of SB 191. We do have minor concerns regarding certain details of the draft rules, which we will address with staff prior to the rulemaking hearing in November.</p>	
7	<p>Model, not mandate. Northern Colorado Superintendents support changes to 6.01(B) creating the option that, “Each School District and BOCES may adopt the State Model System or develop its own distinctive personnel evaluation system that satisfies the requirements in section 5.01 of these rules.” Many superintendents in our region envision using the state system</p>	The department agrees.

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	<p>and appreciate the support this would provide in districts that lack the extra administrative personnel to continuously develop new procedures and tools. However, superintendents in our region also value innovation and appreciate the opportunity to go above and beyond to address local needs and district missions.</p>	
8	<p>Support. Superintendents understand the balance between providing good supports for teachers to create building-wide expectations and avoid turnover with the reality of allocating scarce resources to probationary teachers who are not demonstrating the minimum qualities expected of teachers in the district. Throughout section 3.03(D) there are numerous references to providing support. The rules should clarify the differences in the district’s obligation to provide support for probationary and non-probationary teachers rather than lumping them together. As with every profession, there are some bad hires. The effective teachers in the district do not deserve having limited resources tied up with trying to “fix” probationary teachers who are clearly not meeting the standards. Attaching limited resources to fixing probationary teachers could adversely impact effective teachers. Superintendents appreciate the current process for removing probationary teachers without excessive entanglements and do not want to lose ground on the ability to make a change with probationary teachers with the adoption of these rules.</p>	<p>In order to address the concern that the S.B. 191 rules establish requirements for support that are different from the requirements outlined in statute, and in order to better align the rule language with statutory language, the department recommends revising the draft rules as follows:</p> <p>3.03 (D) During the Pilot Period, as the Department develops the State Model System’s personnel evaluation framework and decision-making structure for assigning Performance Evaluation Ratings, the Department will develop statewide definitions for the Teacher Performance Evaluation Ratings of highly effective, effective, partially effective and ineffective. SCHOOL DISTRICTS AND BOCES SHALL ASSIGN ONE OF THE TEACHER PERFORMANCE EVALUATION RATINGS TO EACH TEACHER IN A WRITTEN EVALUATION REPORT. AS REQUIRED BY SECTION 22-9-106 (3), C.R.S., ALL EVALUATION REPORTS MUST CONTAIN A WRITTEN IMPROVEMENT PLAN, THAT SHALL BE SPECIFIC AS TO WHAT IMPROVEMENTS, IF ANY, ARE NEEDED IN THE PERFORMANCE OF THE TEACHER AND SHALL CLEARLY SET FORTH RECOMMENDATIONS FOR IMPROVEMENTS, INCLUDING RECOMMENDATIONS FOR ADDITIONAL EDUCATION AND TRAINING DURING THE TEACHER’S LICENSE RENEWAL PROCESS. AS REQUIRED BY SECTION 22-9-105.5 (3) (A), C.R.S., EACH TEACHER SHALL BE PROVIDED WITH AN OPPORTUNITY TO IMPROVE HIS OR HER EFFECTIVENESS THROUGH A TEACHER DEVELOPMENT PLAN THAT LINKS HIS OR HER EVALUATION AND PERFORMANCE STANDARDS TO PROFESSIONAL DEVELOPMENT</p>

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		<p>OPPORTUNITIES.</p> <p>The following status implications shall apply for each Teacher Performance Evaluation Rating. These status implications shall not apply to at-will employees.</p> <p>3.03 (D) (1) Ineffective. 3.03 (D) (1) (a) Implication for support: A Teacher whose performance is rated as ineffective shall be considered as being in need of additional support. Whenever there is evidence that an educator is in need of support, School Districts and BOCES shall collect data about Teacher performance through observations or other methods as soon as practicable. This 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. BEGINNING WITH EVALUATIONS CONDUCTED DURING THE 2014-15 SCHOOL YEAR, AS REQUIRED BY SECTION 22-9-106 (3.5) (B) (I), C.R.S., A TEACHER WHOSE PERFORMANCE IS DEEMED INEFFECTIVE SHALL RECEIVE WRITTEN NOTICE THAT HIS OR HER PERFORMANCE EVALUATION RATING SHOWS A RATING OF INEFFECTIVE, A COPY OF THE DOCUMENTATION RELIED UPON IN MEASURING HIS OR HER PERFORMANCE, AND IDENTIFICATION OF DEFICIENCIES.</p> <p>...</p> <p>3.03 (D) (2) Partially Effective. 3.03 (D) (2) (a) Implication for support: A Teacher whose performance is rated as partially effective shall be considered as being in need of additional support. Whenever there is evidence that an educator is in need of support, School Districts and BOCES shall collect data about Teacher performance through observations or other methods as soon as practicable. This data about that Teacher's performance shall be shared with the educator in a manner that facilitates improvement and the</p>

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		<p>educator shall be provided with additional professional development and supports in a timely manner.</p> <p>...</p> <p>3.03 (D) (3) Effective. 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.</p> <p>...</p> <p>3.03 (D) (4) Highly Effective. 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.</p>
9	<p>Single Scores. Section 3.03(A) dictates that the Department shall develop a method for putting the quality standards for professional practices into one score. We believe the language should be changed to, “the Department shall develop a model personal evaluation framework districts may use to aggregate evidence collected...” Additional language should be added that Districts may develop their own methods for aggregating professional practices scores. No district should be forced to retain a teacher who does not demonstrate a commitment to and respect for diversity in the school community and in the world [3.02(B)(3)] or who do not demonstrate high ethical standards [3.02(E)(4)] regardless of how the points average out. The same is true for principals. A district should be able to remove a principal who has poor conflict management and resolution skills [2.02(E)(2)] or who is a poor communicator [2.02(E)(4)] if this is a particular strength needed for the job or a district priority. Districts need the flexibility to weight standards to the expectations of the school and community. Superintendents and their local boards are the best judge for</p>	<p>The current draft rules, in section 3.03 (A), allow districts to either use the framework and decision-making structure that is developed by the department during the pilot period, or to adopt their own framework. Districts that adopt their own framework and/or decision-making structure must meet the statutory requirement that 50 percent of a teacher or principal’s evaluation be based on student growth and must ensure that each quality standard is given sufficient weight to have a measurable influence on the teacher’s or principal’s final evaluation rating.</p>

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	determining which teachers are best for their students, not a formula that can hide deficits in the average.	
10	Evaluation Timing. While we agree that the rule is fair requiring teachers will receive a written evaluation report two weeks prior to the last class day of the school year [5.01(G)(2)], this poses particular problems when one of the measures must be results from the Colorado Growth Model [5.01(F)(7)(d)]. Do these rules suggest that teachers will always be evaluated with one-year-old data given the current CSAP/TCAP data release schedule? Again, a distinction between probationary and non-probationary teachers is necessary. Given that multiple measures will have multiple timelines, it is important that each district retains the flexibility to determine which set of data be included in an evaluation and at which time. It is important to districts that we are able to create a workable evaluation timeline that does not result in a rush of final evaluations in the last weeks of school, defeating the purpose of a meaningful evaluation process called for in the rules [5.01(A)].	The state board does not have flexibility to remove this requirement. Statute, at section 22-9-106 (1) (c), C.R.S., requires that teachers (both probationary and nonprobationary) receive written evaluation reports at least two weeks before the last class day of the school year.
11	BOCES Issues. There are BOCES that operate schools and it certainly makes sense for teachers in BOCES operated schools to fall under these rules. However, the current rules seem to include other professionals such as occupational therapists, speech therapists, and psychologists. We do not believe that was the intent of the legislation and we recognize that at-will employees like these listed, should not be included in the rules. Additional clarification of job types needs to be included in the definition of a teacher.	Please see row 1, above.
12	Unfunded Mandate. We are aware that the rules are designed to reflect the law, and that an evaluation for each teacher, every	The department concurs that funding limitations are a serious concern. While recognizing that working within existing resources is challenging, the department encourages districts to examine all possible solutions to

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	<p>year is mandatory based on the statute. However, we would like our State Board of Education to publicly recognize that there are resource issues in our state, and that while we fully support the intent of the law, it requires additional resources, including additional time for all involved in the process of the evaluations. Resources are required to realize the improvements in evaluations expected by this law.</p>	<p>ensure that all licensed personnel are evaluated using multiple, fair, transparent, timely, and credible methods and that all licensed personnel receive adequate feedback and professional development support to provide them a meaningful opportunity to improve their effectiveness. The department is working to support collaborative relationships that will allow districts to work efficiently and capitalize on one another's efforts, and is developing a resource bank to assist districts in their implementation efforts. The department is also seeking additional funding to support the department's and district's work in this area.</p>
13	<p><u>Concerns Not Included In These Rules.</u> There are multiple concerns that have not been addressed in the current set of draft rules. What is the definition of a hiring cycle? We believe that a district should be able to determine the hiring cycles that work best with the needs of each individual district. What is the appeals process? We believe that any appeal should be conducted in accordance with local Board Policy and should not involve any outside entities. This law is intended to have greater accountability focused on student achievement, not a more complicated bureaucracy that makes removing ineffective educators more complicated than what we have today. What options do districts and individuals have to accept or waive current educators' ratings when changing districts (portability)? We suggest that language be adopted which gives districts the greatest amount of flexibility in utilizing portability in hiring practices.</p>	<p>S.B. 191 authorizes the state board to promulgate rules concerning the state's system for evaluating licensed personnel, but it does not authorize the state board to promulgate rules concerning the hiring process and portability requirements outlined in article 63 of title 22.</p> <p>S.B. 191 requires the State Council to make recommendations concerning a process by which a nonprobationary teacher may appeal his or her second consecutive performance rating of ineffective. The State Council must submit such process to the House and Senate Education Committees by the first day of the first regular session of the 69th General Assembly (January 2013). (See section 22-9-105.5 (3) (e) (VII).)</p>
14	<p>As required by S.B. 10-191, the State Council on Educator Effectiveness represented a wide variety of stakeholder groups, including teachers; school and district administrators; school board members; parents/guardians; students; and members of the business community. While we all may not have supported</p>	<p>The department has relied heavily on the State Council recommendations in drafting the proposed rules. The quality standards recommended by the State Council are the standards that all districts must meet or exceed and the State Council's definitions of effectiveness for teachers and principals will be applied in all districts.</p>

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	<p>the legislation, we all support the recommendations of the SCEE—having common statewide requirements, as a necessary floor to ensure a level of quality and fairness for all educators and students statewide. The Council’s recommendations reflect a consensus of all members of the Council regarding the best way to ensure the development of evaluations at the local level that meet the standard laid out in statute passed by the General Assembly: fair, transparent, timely, rigorous and valid.</p>	<p>Additionally, many of the requirements for local evaluation systems are based on State Council recommendations and the state model system that the department is piloting will adhere to the State Council recommendations.</p>
15	<p>First, I want to express gratitude to the Department and Board for the changes that were made in the August and subsequent September revisions. Many of the changes continue to move toward allowing districts to develop evaluation systems that enact the statutory language of SB 191 without requiring that districts adopt a statewide system. The direction of the rules appear to be moving is to encourage districts to link their work to expectations in the rules, which may further be clarified as a result of the pilots, rather than by requiring districts to opt out of a state system of principal and licensed educator evaluation. This supports the intent of local control to the extent that it is practicable in a heavily regulated federal and state environment.</p>	<p>The department agrees.</p>
16	<p>In the September revision, new rules were added to clarify the extent to which teachers need to demonstrate knowledge in literacy and mathematics 3.02 (A) (2) elements b and c. While defining the extent to which teachers should be able to demonstrate knowledge of literacy and mathematics provides a high level of specificity, I wonder if this is knowledge that an evaluator will be able to ascertain through direct observation. As I reviewed the language I believe that it may require an outside assessment for an evaluator to be able to determine whether a teacher exhibits this knowledge. With this concern I encourage the department and the state board to consider</p>	

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	<p>placing these expectations in licensure rather than in evaluation. I understand that the Common Core Standards address many of these expectations and that accomplished and proficient teachers' instruction will display these characteristics. I encourage a reconsideration of the inclusion of this highly specific language.</p>	
17	<p>In previous written comments DASSC superintendents expressed concern over the language used in the performance evaluation ratings for principal and teachers in rules 2.03 and 3.03. The preference is for terms that conform to developmental characteristics as opposed to effectiveness. Consequently, it was encouraging to see that the Colorado Model Evaluation System for Principals and Assistant Principals included a rubric with terms: Not Evident, Emerging, Proficient, Accomplished, and Exemplary. In the rules that the State board adopts in November, I encourage the changes to define evaluation ratings using terms that express characteristics of professional growth.</p>	<p>Statute, at section 22-9-105.5 (3) (a), C.R.S., requires that 3 of the ratings used are "highly effective", "effective", and "ineffective." The draft rules also include a fourth rating—"partially effective"—based on recommendation of the State Council.</p>
18	<p>Finally, the enactment of SB 191, the promulgation of rules, and the implementation of new systems across the state is occurring without any consideration of new resources. Instead, districts are being asked to utilize the levels of resources available in 2008 with further reductions predicted for the next fiscal year. In our district we refer to a reciprocal accountability meaning that when we require accountability we need to consider the support required to meet the new level of expectation. Due to changes in law and rules, districts are being required to develop new evaluation systems that will require more evaluations are conducted, perhaps as many as twice the number as before. More training must be provided for evaluators to assure high levels of consistency amongst evaluators. Our district is conducting training that requires up to 65 hours of training with</p>	<p>Please see row 12, above.</p>

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	<p>skilled facilitators to assure reliability on the use of an instrument designed to provide feedback for teachers. Training and time for evaluation are increased costs districts are being asked to provide. Additionally, a different form of evaluation is being added to the evaluation system: linking performance to results. Assessments need to be developed that will show growth characteristics, when in most instances, performance to standards was considered sufficient for most classroom assessments and non-standardized tests. The State Council for Education Effectiveness Report and Recommendations indicated that Poudre School District will need to expend \$1.8million to enact the legislation each year and the costs for on-going expenses would likely be similar. In all its deliberations, I ask that the State Board consider the additional costs to districts for developing and implementing evaluation systems as outlined by SB 191.</p>	
19	<p>We are in support of many of the rules as currently drafted. In the spring, we advocated for strengthening of the teacher and principal standards to include specific, measureable language. We are pleased to see the changes to the standards in the current draft of the rules. However, we are concerned that not all districts will follow these standards, as they are allowed to use standards that are “substantially similar.” For this system to be successful, districts must be required to meet a high bar set by the state and be given the opportunity to reach higher than that bar based on local demographics.</p>	<p>The current draft of the rules requires districts to use either the state’s quality standards or locally-developed standards that “meet or exceed” the state’s quality standards.</p>
20	<p>We also supported a strong accountability system that involved compliance monitoring of school districts and BOCES in our previous comments to the board. The current draft rules indicate that this accountability will come in the form of assurances that districts are either using the State Model System</p>	<p>The department agrees and has developed a draft of the types of assurances that it is considering collecting. This draft will be refined during the pilot period, in order for the department to begin collecting assurances in July 2013.</p>

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	<p>or meeting the requirements of the rules. For the latter case, we implore you to create assurances that are rigorous and comprehensive. Districts that wish to implement their own distinctive evaluation systems must prove to the state, and to all stakeholders, that they are meeting the requirements set forth in statute and state rule. In short, districts must meet each individual requirement that is being satisfied with the State Model System.</p>	