

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

**September 23 – October 4, 2011**

**(SB 191 Rulemaking)**



September 26, 2011

Colorado State Board of Education  
Colorado Department of Education  
Dr. Diana Sirko, Deputy Commissioner  
201 East Colfax Ave, Room 201  
Denver, CO 80203 – 1799

To Whom It May Concern:

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.

It's not been clear what they will be 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 a level of complexity to a point of no return. Either approach makes little sense.

Consider the following points:

- Many related services 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-191 would restrict such flexibility if performance is inadequate.
- Some BOCES operate schools. BOCES is written in the language throughout the rules. I suggest that each reference to BOCES in the language be followed 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!

Thank you for your consideration.

Sincerely,

Tim Sanger  
Executive Director

TS: cl

AKRON R-1  
FRENCHMAN RE-3  
HAXTUN RE-2J  
HOLYOKE RE-1J  
JULESBURG RE-1  
LONG STAR #101  
BUFFALO RE-4J  
OTIS R-3  
PLATEAU RE-5  
PLATTE VALLEY RE-5  
WYLAZ RD-2  
YUMA-1  
NYC  
MCC



*Building Bright Futures*

**RECEIVED**

Office of the Superintendent  
1829 Denver West Drive, Building #27  
P.O. Box 4001  
Golden, Colorado 80401-0001  
phone: 303-982-6800  
fax: 303-982-6806

SEP 29 2011

**State Board of Education** September 21, 2011

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

Dear State Board of Education:

Under the auspices of a Teacher Incentive Fund Grant that Jeffco Public Schools has received from the Department of Education, we have initiated a peer evaluation program. Seven peer evaluators are partnering with Jeffco administrators to provide evaluative data for licensed professionals in Jeffco. We believe this will result in more frequent classroom observations, deeper conversations around growth-producing feedback and ultimately more effective teachers. We also believe peer evaluations are important in the work of ensuring great classroom teachers in Jeffco and across Colorado.

We understand that all districts in Colorado may not be interested in using peer evaluators, 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 Evaluation Council is requesting that you reinstate 5.03 (C) into the SB 191 implementation guidelines.

Sincerely,

A handwritten signature in blue ink that reads "Cynthia Stevenson".

Cynthia Stevenson  
Superintendent

A handwritten signature in blue ink that reads "Kerrie Dallman".

Kerrie Dallman  
President, JCEA

**Burdsall, Elizabeth**

---

**Subject:** FW: Support Statewide Evaluation System

-----Original Message-----

**From:** lbarron@coloradoea.org [mailto:lbarron@coloradoea.org]

**Sent:** Thursday, September 29, 2011 9:52 AM

**To:** Colorado State Board of Education Relations

**Subject:** Support Statewide Evaluation System

Laura-Lee Barron  
420 Allegheny Dr.  
Colorado Springs, CO 80919-1110

September 29, 2011

Board Member Paul Lundeen  
201 East Colfax Avenue  
Denver, CO 80203

Dear Board Member Lundeen:

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.

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 it's 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.

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.

Sincerely,

Laura-Lee Barron  
719-237-9132

**Burdsall, Elizabeth**

---

**Subject:** FW: Support a Statewide Evaluation System

-----Original Message-----

**From:** cameron2021don@gmail.com [mailto:cameron2021don@gmail.com]

**Sent:** Friday, September 30, 2011 3:17 PM

**To:** Colorado State Board of Education Relations

**Subject:** Support a Statewide Evaluation System

Don Cameron  
2021 East St.  
Golden, CO 80401-2456

September 30, 2011

Board Member Jane Goff  
201 East Colfax Avenue  
Denver, CO 80203

Dear Board Member Goff:

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 rule making, 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.

Good luck with the final rule making process. Feel free to ask me questions about what I mean if I'm unclear.

Sincerely,

Don B. Cameron  
Science Teacher  
Lakewood High School  
Jefferson County, Colorado

Sincerely,

Don B. Cameron  
3035230783

**Burdsall, Elizabeth**

---

**Subject:** FW: statewide teacher/principal evaluation system

-----Original Message-----

**From:** lauraqueen@hotmail.com [mailto:lauraqueen@hotmail.com]

**Sent:** Sunday, October 02, 2011 1:58 PM

**To:** Colorado State Board of Education Relations

**Subject:** statewide teacher/principal evaluation system

Laura Nataluk  
2343 Emerson St  
Denver, CO 80205-5128

October 2, 2011

Board Member Elaine Gantz Berman  
201 East Colfax Avenue  
Denver, CO 80203

Dear Board Member Gantz Berman:

Dear Elaine Gantz Berman,

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, 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. Thank you, Laura Nataluk .

Sincerely,

Laura Nataluk

**Burdsall, Elizabeth**

---

**Subject:** FW: statewide teacher/principal evaluation system

-----Original Message-----

**From:** lauraqueen@hotmail.com [mailto:lauraqueen@hotmail.com]

**Sent:** Sunday, October 02, 2011 1:58 PM

**To:** Colorado State Board of Education Relations

**Subject:** statewide teacher/principal evaluation system

Laura Nataluk  
2343 Emerson St  
Denver, CO 80205-5128

October 2, 2011

Board Member Jane Goff  
201 East Colfax Avenue  
Denver, CO 80203

Dear Board Member Goff:

Dear Jane Goff,

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, 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. Thank you, Laura Nataluk

Sincerely,

Laura Nataluk

**Burdsall, Elizabeth**

---

**Subject:** FW: statewide teacher/principal evaluation system

-----Original Message-----

**From:** lauraqueen@hotmail.com [mailto:lauraqueen@hotmail.com]

**Sent:** Sunday, October 02, 2011 2:02 PM

**To:** Colorado State Board of Education Relations

**Subject:** statewide teacher/principal evaluation system

Laura Nataluk  
2343 Emerson St  
Denver, CO 80205-5128

October 2, 2011

Board Member Angelika Schroeder  
201 East Colfax Avenue  
Denver, CO 80203

Dear Board Member Schroeder:

Dear Angelika Schroeder,

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, 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. Thank you, Laura Nataluk

Sincerely,

Laura Nataluk



**Burdsall, Elizabeth**

---

**Subject:** FW: statewide teacher/principal evaluation system

-----Original Message-----

**From:** lauraqueen@hotmail.com [mailto:lauraqueen@hotmail.com]

**Sent:** Sunday, October 02, 2011 2:02 PM

**To:** Colorado State Board of Education Relations

**Subject:** statewide teacher/principal evaluation system

Laura Nataluk  
2343 Emerson St  
Denver, CO 80205-5128

October 2, 2011

Chair Bob Schaffer  
201 East Colfax Avenue  
Denver, CO 80203

Dear Chair Schaffer:

Dear Bob Schaffer,

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, 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. Thank you, Laura Nataluk

Sincerely,

Laura Nataluk



Colorado Association of School Boards  
1200 Grant Street  
Denver, Colorado 80203-2306  
Phone: (303) 832-1000 • (800) 530-8430  
Fax: (303) 832-1086

## MEMORANDUM

**TO:** State Board of Education  
**FROM:** Kenneth DeLay, Executive Director  
Jane Urschel, Deputy Executive Director  
**DATE:** October 4, 2011  
**RE:** Rules to Implement Senate Bill 191

---

CASB believes the recent revisions to the draft S.B. 191 Rules, issued on September 30, 2011, appropriately reflect the state and local partnership contemplated by the Licensed Personnel Evaluation Statute, as amended by S.B. 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.

We recognize that some would limit local flexibility by requiring 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 level of flexibility currently established by the Rules. We do recognize the important role of the state's resources and support the Rules directing 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.

A statewide framework is not required to hold districts accountable upon implementation. The primary purpose of S.B. 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.

Under the current Rules, CDE is required to collect data regarding the number of educators assigned to each performance rating (i.e., each level of effectiveness) and the changes in these numbers over time. Rule 6.04(C)(1)(a). 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. Rule 6.04(C)(1)(2). 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.” Rule 6.04(C)(4). This data 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. Rule 6.04(D).

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 S.B. 191 as intended. Moreover, because the Rules as currently drafted 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.

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 S.B 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.