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Acting Commissioner  
Executive Deputy Commissioner  
New York State Education Department  
89 Washington Avenue  
Albany, New York 12234

Dr. Ken Wagner  
Senior Deputy Commissioner  
New York State Education Department  
89 Washington Avenue  
Albany, New York 12234

Dear Drs. Berlin and Wagner,

We welcome the opportunity to share the perspective of educators on the best way to implement New York State’s new teacher evaluation system. Below, we have listed the overarching principles that we think the system should work towards and the specific regulatory guidance that would move towards these principles. In order to create a fair and rigorous evaluation system that supports teachers’ growth and development, the system should:

- x Be both a formative tool for teacher development and a summative tool for teacher evaluation. The regulations should require:
  - o Both school administrators and independent evaluators to provide teachers with feedback within five school days of an observation.
  - o Districts to limit the number of competencies being assessed to a manageable number and ensure teachers have a voice in selecting at least some of the competencies being assessed.
- x Ensure that principals are their buildings’ primary instructional leaders. The regulations should require:
  - o Principals are given the largest weight on the observations portion of the matrix. We recommend that the principals’ weight be 75–90% of that section.
  - o School administrators observe classrooms at least four times per year for at least fifteen minutes each visit.<sup>1</sup>
- x Evaluate teachers based on high standards and factors within their control. The regulations should require:
  - o The student growth component of th

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- o Ensure that independent evaluators are able to fairly assess teachers' performance by limiting whom they can observe based on content knowledge and appropriate grade span experience. For example, it would likely be inappropriate for an elementary school principal to evaluate a high school calculus teacher.
- x Give significant autonomy to districts – such as New York City<sup>4</sup> – that have already achieved meaningful differentiation in their evaluation systems. The regulations should:
  - o Allow districts to use locally created growth models to meet SLO requirements.
  - o Allow New York City to use its series of performance assessments, and provide support for districts interested in using growth models in lieu of goal setting.
  - o Give local flexibility to districts to keep aspects of the current evaluation system that are working – it is crucial that teachers are given some degree of stability and that the hard work to implement the evaluation system is not wasted.
- x Support districts in reducing over-testing. Because many teachers and parents are justifiably concerned about over-testing, the regulations should:
  - o Provide guidance to districts that want to use multiple measures for the student growth subcomponent. Specifically, guidance should include options for including a second measure – such as subgroups within the first test – that does not create additional assessments and focuses attention on the students who have the greatest need.
- x Provide options to consider student and family feedback in the evaluation system.
  - o Although state law prohibits the use of an 'instrument' for using student and family feedback, SED should consider creating a standardized rubric (as opposed to instrument) for collecting and evaluating student feedback, which has been shown to be a valid measure of teacher performance, and is correlated with value-added student achievement data.<sup>5</sup>

Thank you for considering these ideas during this important phase of public feedback. It is incredibly important that as another new system is implemented, the voice of educators and practitioners is considered and acted upon. Educators for Excellence-New York teachers stand ready to participate in this process and will continue to push for the evaluation system that all teachers deserve.

Sincerely,

Evan Stone  
Co-CEO and Co-founder, Educators for Excellence

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