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## **Re: Adoption of Proposed APPR Regulations September 16 and 17, 2015**

September 11, 2015

Dear Regent Tilles,

The recent release of the state growth scores for building principals once again exposes the folly of the assessment portion of the new APPR evaluation system. The release of these capricious and confusing numbers forces us to urge you to vote against the adoption of the proposed APPR regulations. The current policy of over reliance on test cut scores and weighting that is engrained within these regulations must be abandoned. It must be replaced with a fair and equitable plan rooted in best practices that are supported by research and input from experts, stake-holders and practitioners.

To raise further concern around the current system, the State Education Department has been unable to adequately explain the inconsistency of these scores to parents, teachers or principals. Consequently, there is little confidence among parents or practitioners that these scores actually provide a meaningful opportunity to constructively reflect on student achievement or teacher or principal performance. We would submit that if you, as the Regents don't understand the mathematical basis of the scores, your conscience should dictate that you not adopt their methods blindly.

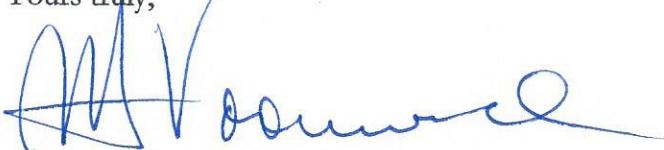
Because this new evaluation model was poorly conceived and hurried without thought to the unintended consequences it would have, it has had a significant negative impact on current and future educators. This new legislation and the emergency regulations associated with it ignore current statistical research and suggestions from professionals in the field. In truth, it was rushed through the legislature with a heavy hand, poorly designed, and implemented hastily without regard for its overall impact on teaching and learning. These recently released scores for principals based on the state assessments are in many cases wildly incongruous with past performance and appear to be arrived at out of thin air. Take for example the case of Harborfields MS, a recent Blue

Ribbon School of Excellence. This year the principal received a State Growth Score of four (4) labeling her as "Developing" only one year removed from a State Growth Score of seventeen (17) reflective of a Blue Ribbon School of Excellence. How could a highly accomplished principal of an award winning school tumble to "Developing" in just one year despite increased staff development and emphasis on the implementation of the Common Core curriculum? Sadly, this is just one example of the many drastic and unexplainable swings in Student Growth Scores being assigned to principals.

The American Statistical Association has stated research shows that teachers account for about 1% to 14% of the variability in test scores. If a teacher accounts for 14% of the variability of test scores; what percentage could then be attributed to a principal? Yet, the new APPR evaluation system increases the emphasis on test performance in teacher and principal evaluations and now ties approximately 50% of a principal's performance into assessments that even the Governor himself acknowledges are flawed.

We believe that fair teacher and principal evaluations help professionals improve their practice and improve student achievement in a much broader manner. Unfortunately, these new APPR regulations are not good for students, parents or professional educators. We hope rejecting these regulations and their failed and flawed policies and practices will result in the formulation of a thoughtfully designed and locally developed teacher and principal evaluation plan devoid of any political considerations.

Yours truly,



Albert H. Voorneveld  
President, Council of Administrators and Supervisors (CAS)

cc: Members NYS Board of Regents (via email)  
Senator John Flanagan (via email)  
Assemblyman Carl Heastie (via email)  
Senator Carl Marcellino (via email)  
Assemblywoman Kathy Nolan (via email)