

Public Testimony – February 21 & 22, 2012

My name is Dr. Jacqueline Kelleher and I am a resident of Bridgeport, CT. I have had four children in Connecticut public schools including twin sons attending Bassick High School in Bridgeport. I am a professor of Education at Sacred Heart University and specialize in assessment, educational psychology, and special education. In full disclosure, I was recently appointed the Connecticut coordinator/liaison to the National Center for Fair and Open Testing, an organization aimed at advancing quality education and equal opportunity by promoting fair, open, valid and educationally beneficial evaluations of students, teachers and schools. I'm excited by the energy and focus the Education Committee brings this session along with the forward thinking of our new Commissioner. We're on the move! I wish to share my concerns over this legislation in hopes they can be clarified further or addressed somehow in the next iteration. Best of luck in your work – this is extremely critical to our future. I have hope. Jacqui Kelleher

Concerns for Teachers/Administrators

- Professional certification: There are many initial certificate holders who have completed beginning educator training and have tenure under the current system who have not applied for the professional certificate because they are completing thirty semester hours beyond the bachelor's degree, a required mandate by the CSDE for provisional holders. These are practicing teachers currently matriculated in the higher education system who were of the understanding coursework led to advancement. They have been misled. Will they have to wait to obtain tenure under the new evaluation system?
- Master Educator Certificate and Professional Certificate - the holder must have a master's in an evaluation-informed course of study. What does that even mean? I can get an MBA in Strategic Planning...I guess that counts. What is the rationale for this provision? How do we know a Master's in an evaluation-informed area leads to improved outcome for students or makes for a better teacher? Further, the proposed legislation under Professional Certificate says that if a person has fewer than three exemplary or proficient evaluations in a five-year period, such certificate can only be renewed if the holder obtains 30+ grad credits in an evaluation-informed course of study. Again - what does this mean and what is the rationale? Also, someone in this situation has to have the evaluation-informed course of study approved in advance by both the State Board of Ed and the superintendent.
- No language on how this works for those practicing in untested areas or specific to those who work with kids under the MAS or Checklist assessment system. Scores on these assessment are often recorded as Below Basic, which could impact a teacher's evaluation rating.
- Still just requiring the 3 credit hour SPED course for initial certification...nothing more. Same goes with assessment. We do not require assessment to be a part of educator preparatory coursework.
- There is great emphasis on alternate route programs that are not currently part of the national accreditation process or held to national standards - an initial certificate will now be awarded to those who successfully complete an alternate

- route to certification program to those who may or may not have had any experiences with children or meet the GPA requirement. A 90-day temporary certificate - a trial run - is currently in place. To apply for an initial educator certificate, one must successfully teach under the temporary before being eligible for an initial. We don't know the quality of alternate route programs and yet we are providing a three-year certificate before they have to demonstrate their knowledge, skills, and dispositions concerning children and youth.
- What are the standards and monitoring for the Beginning educator program? What are the criteria for those proposing support to new teachers? This is written to be a program that leads to teachers achieving competency, a word that has been changed in the proposed legislation to effectiveness. There are no proposed changes that reflect how content, procedures, and oversight aligns with new expectations. The new regulations also state teachers will be required to complete instructional modules. What are these? Who develops?
 - What is effectiveness? How is this defined – for teachers? Administrators? Silent on how school-based staff other than teacher/admin is evaluated but allude to effectiveness as the indicator. There are huge concerns over the definitions, proficiencies observed, strength of evaluation instruments, fairness of combined evaluation criteria, and expertise of those conducting the evaluations under the four level rubric approach proposed.
 - “Developing” is a horrible term for something this high stakes in nature. All professionals are developing. This field is developing.
 - Professional development provided by the district – how will quality be monitored? How will districts without capacity or professional expertise address this in areas like special education and English Language learners? Will teachers be able to sue the district over PD needs not being met? Higher education has served as a provider and delivers quality PD under programming accredited through NCATE. PD is written in as 18 hours for all certified staff – annually? Over five years? At some point in the employment?
 - The elimination of CEUs eliminates approved CEU activities. School-based personnel earn CEU credits through professional activities, which include very valuable, hands-on learning for adult learners. **Activities Involving Application of Learning in School-based Settings:** e.g., action research, study teams, curriculum development, teacher visitations, problem-solving groups, extended curriculum-based learning, school-wide improvement initiatives, and professional development activities which meet the criteria of **enhancing the ability of educators to increase student learning.**
 - Why are there no requirement regarding instrument design, validation, and inter-rater reliability and training regarding the teacher and administrator evaluation process?
 - A person licensed for social work may satisfy the PD requirements? Why is there a different standard for social work in 20-195u?

Concerns for Higher Education

- Shuts out higher ed and teacher/admin preparation big time...no more continuing education or credits beyond the bachelor's...tenure and advancement depends on

measures of "effectiveness"...elimination of continuing education units toward advancing certification is concerning. The proposed certification regulations set for 2015 had detailed required areas like special education, cultural literacy, differentiation, and so forth.

- Higher education is not indicated as a provider or partner in the professional development programs. Further, the requirement that only 6 hours of 18 hours of professional development can be in a large group setting prevents school-based staff from taking courses in the university setting under this language. Graduate coursework is not listed. CEU providers are listed as those who can deliver – where is higher education in this? Higher ed has provided CEU equivalents.

Concern with Low Performing Schools Mandates

- The amount of authority that goes to the Commissioner, such as to select a turnaround model for a low performing school district and require specific operating and working conditions, and for Boards to enter into a turnaround agreement when we are not clear on what are criteria for said turnaround models. Research on turnaround models is mixed at best. In fact, school turnaround efforts have consistently fallen far short of hopes and expectations. Turnarounds are not a scalable strategy for fixing America's low performing urban school systems. In 2008, 52 Ohio schools were forced to restructure and fewer than one in three have been able to reach established academic goals, and less than half showed any student performance gains. The *Columbus Dispatch* concluded, "Few of them have improved significantly even after years of effort and millions in tax dollars." A 2008 Center on Education Policy (CEP) study investigated the results of restructuring in five states. In California, Maryland, and Ohio, only 14, 12, and 9 percent of schools in restructuring, respectively, made adequate yearly progress (AYP) as defined by NCLB the following year. I am concerned by research findings that are emerging on turnaround schools and have grave concerns this legislation pigeons holes us into accepting a particular framework to be determined by the Commissioner. Who will make that decision? Who will be authorized as turnaround model providers? Who will be monitoring their efforts?
- When a Commissioner Network school or district seeks or is eligible to exit, the Commissioner must determine if the Board has capacity. What does this mean? What will be examined? Is there a criterion to apply toward school board membership?
- The Commissioner may have the authority to select and employ teachers and administrators for low performing schools, although the school personnel will be paid for by BOE funds. The Commissioner will make decisions based on "exemplary" status as determined by the proposed performance evaluations. Performance evaluations are heavily weighted by student achievement on assessments.

Concerns with Charter School Focus

- Push toward charter school expansion at the cost of districts – requires an additional payment beyond what is already being distributed.
- Preference given to charter school applicants proposing an education program primarily focused on students eligible for special education? Won't this lead to segregation? Will this be in compliance with state and federal special education regulations? Enrollment lottery waivers are very concerning given there may be additional opportunities to exclude students with disabilities.

Concerns for State Accountability/Data Collection/Monitoring

- Data collection by DSS on poverty – 185% below federal poverty level – we already collect these data through the National School Lunch Program. Children from families with incomes at or below 130 percent of the poverty level are eligible for free meals. Those with incomes between 130 percent and 185 percent of the poverty level are eligible for reduced-price meals, for which students can be charged no more than 40 cents. (For the period July 1, 2011, through June 30, 2012). Aren't we more likely to have families applying for school lunch programs than we are Medicaid and WIC, which I assume to be the primary data collection vehicle for this data collection? Have you compared numbers by districts and across schools to see how it has compared with Free/Reduced lunch status?
- Proposed legislation has information on evaluating schools, teachers and administrators, but very little on evaluating the merit and worth of Commissioner actions such as the interventions, models, or requirements intended for those assigned to the Commissioner Network.
- Previously teachers and administrators dealt with the CSDE regarding Continuing Education Units and were responsible for tracking their courses and certificates. New legislation requires the district to maintain a monitoring and evaluation system of professional development programming. This requires additional human and fiscal resources on the district to collect, record, evaluate, and report to the CSDE, as well as other expenditures in response to audits and compliance requirements. The burden of monitoring completion of beginning teacher instructional modules and reporting to the CSDE will also fall to the district.
- Connecticut Technical High Schools need a better monitoring system for supporting and educating students with disabilities.
- The state application for the NCLB/ESEA waiver included a plan for randomly auditing 1% of IEP's for students with disabilities. This is necessary. There is nothing in the proposed legislation to include this action.