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Written Testimony of

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Connecticut Education Association

Before the Education Committee

Re: HB 6980 AAC The Timing of Teacher Performance Evaluations

March 11, 2015

Good morning, Senator Slossberg, Representative Fleischmann, and members of the Education Committee. My name is Mark Waxenberg, Executive Director of the Connecticut Education Association. I am testifying today regarding HB 6980 An Act Concerning The Timing of Teacher Performance Evaluations.

HB6980 seeks to do three primary things: change the evaluation reporting and local board of education plan approval timeline for districts, codify the ability of the Performance Evaluation Advisory Council (PEAC) to revise the teacher evaluation guidelines, and increase the State Board of Education's (SBE) control over local district teacher evaluation plans. CEA has strong concerns with several elements in this bill, and supports one provision of it.

Extending the timeline from September 1 to October 15 for local boards of education to approve their teacher evaluation plans provides the Professional Development and Evaluation Committee (PDEC) time to make changes early in the school year, based on lessons learned the previous year and any feedback received from the State Department of Education (SDE). With the current September 1 approval deadline, changes have to be completed over the summer, which is a difficult time for many PDECs to meet and come to mutual agreement on the plan, as required by statute. Therefore, CEA supports extending this timeline.

Extending the timeline for district reporting to the SDE provides administrators more time to complete their evaluation paperwork, but doesn't get to the root of the time-related problem they face.

Many district evaluation plans are work-laden due to the practices used in the evaluation process itself. Many of these time-consuming practices are taken from the state evaluation model – SEED – but aren't required by the guidelines themselves. They require redundancy that can be eliminated if the district PDEC adopts more effective and efficient evaluation practices. Rather than work harder, districts can work smarter within the current timelines.

CEA's strongest concerns pertain to giving the State Department of Education more control over local teacher evaluation.

As you know, educator evaluation guidelines were developed by PEAC, which consists of boards of education, educators, and higher education faculty familiar with sound and research-based educator evaluation strategies. The guidelines developed, and periodically amended by PEAC, are required to be approved by the State Board of Education.

This bill proposes to require all district plans to be approved by the SBE, and would give the commissioner authority to approve or reject a plan based on the commissioner's determination that the plan is "*consistent*" with the teacher evaluation guidelines developed by PEAC. It also gives the commissioner the sole authority to grant waivers from the guidelines if the plan is in "*substantial compliance*" with the PEAC guidelines. This is a significant change from current statute.

Current statute makes it incumbent on the local board of education to implement district plans that are "*consistent with*" the PEAC guidelines. The authority for SDE to approve or reject a plan has never been required by statute; it has been assumed by the SDE itself. Granting the State Board of Education authority to *approve* all plans, and to grant waivers from the guidelines, opens the door for such approval or waiver to be arbitrary and highly subject to the State Department of Education's interpretation of the guidelines, which may not be consistent with the intentions of PEAC. As a result, there are high-quality research-based plans, developed collaboratively and implemented by local school boards that could be immediately nullified based on arbitrary decisions.

We believe that a better system would be for all plans to be submitted to the department for review (as they are now), with the potential recommendations to be requested by the commissioner. In the event that there is disagreement between the commissioner and a local board regarding a plan's compliance with the PEAC guidelines, the disputed issue should be referred to PEAC. CEA believes that final interpretations of guidelines should not be left up to the commissioner of education, but should be deliberated and decided by PEAC itself.

Under the bill as drafted, local district control over the practices in the evaluation plan could be significantly decreased, flexibility to conduct evaluation more effectively and efficiently could be compromised, and evaluation could become more focused on compliance than on promoting educator growth and student learning. This is not beneficial to districts, educators, and the students they serve.

We believe that our proposal is a better solution, and one that ensures quality while balancing the importance of local control with assurance of compliance with state goals.