

**Nassau and Suffolk County Principals
Long Island's High Schools, Middle Schools and Elementary Schools**

*An Open Letter of Concern Regarding New York State's APPR Legislation
for the Evaluation of Teachers and Principals*
www.longislandprincipals.org

Over the past year, New York State has implemented dramatic changes to its schools. As building principals, we recognize that change is an essential component of school improvement. We continually examine best practices and pursue the most promising research-based school improvement strategies. We are very concerned, however, that at the state level change is being imposed in a rapid manner and without high-quality evidentiary support.

Our students, teachers and communities deserve better. They deserve thoughtful reforms that will improve teaching and learning for all students.

It is in this spirit that we write this letter, which sets forth our concerns and offers a path forward. We believe that it is our ethical obligation as principals to express our deep concerns about the recently implemented Annual Professional Performance Review (APPR) regulations. These regulations are seriously flawed, and our schools and students will bear the brunt of their poor design. Below we explain why we are opposed to APPR as it is presently structured.

Background

In May 2010, the New York State Legislature—in an effort to secure federal Race to the Top funds—approved an amendment to Educational Law 3012-c regarding the Annual Professional Performance Review (APPR) of teachers and principals. The new law states that beginning September 2011, all teachers and principals will receive a number from 0-100 to rate their performance. Part of that number (ranging from 20% to 40%) will be derived from how well students perform on standardized tests. At first glance, using test scores might seem like a reasonable approach to accountability. As designed, however, these regulations carry unintended negative consequences for our schools and students that simply cannot be ignored. Below we explain both the flaws and the consequences.

Concern #1: Educational research and researchers strongly caution against teacher evaluation approaches like New York State's APPR Legislation

A few days before the Regents approved the APPR regulations, ten prominent researchers of assessment, teaching and learning wrote an open letter that included some of the following concerns about using student test scores to evaluate educators¹:

- a) *Value-added models (VAM) of teacher effectiveness do not produce stable ratings of teachers. For example, different statistical models (all based on reasonable assumptions) yield different effectiveness scores.² Researchers have found that how a teacher is rated changes from class to class, from year to year, and even from test to test³.*
- b) *There is no evidence that evaluation systems that incorporate student test scores produce gains in student achievement. In order to determine if there is a relationship, researchers recommend*

¹ Baker, E. et al. (2011). Correspondence to the New York State Board of Regents. Retrieved October 16, 2011 from: http://www.washingtonpost.com/blogs/answer-sheet/post/the-letter-from-assessment-experts-the-ny-regents-ignored/2011/05/21/AFJHIA9G_blog.html.

² Papay, J. (2011). Different tests, different answers: The stability of teacher value-added estimates across outcome measures. *American Educational Research Journal* 48 (1) pp 163-193.

³ McCaffrey, D. et al. (2004). Evaluating value-added models of teacher accountability. Santa Monica, CA.; Rand Corporation.

small-scale pilot testing of such systems. Student test scores have not been found to be a strong predictor of the quality of teaching as measured by other instruments or approaches⁴.

- c) *The Regents examinations and Grades 3-8 Assessments are designed to evaluate student learning, not teacher effectiveness, nor student learning growth⁵. Using them to measure the latter is akin to using a meter stick to weigh a person: you might be able to develop a formula that links height and weight, but there will be plenty of error in your calculations.*

Concern #2: Students will be adversely affected by New York State's APPR

When a teacher's livelihood is directly impacted by his or her students' scores on an end-of-year examination, test scores take front and center. The nurturing relationship between teacher and student changes for the worse.

- a) *With a focus on the end of year testing, there inevitably will be a narrowing of the curriculum as teachers focus more on test preparation and skill and drill teaching⁶. Enrichment activities in the arts, music, civics and other non-tested areas will diminish.*
- b) *Schools will have an incentive to place struggling students in lower-level classes without standardized assessments. School systems may hesitate placing students in Regents classes beyond the basic five needed for graduation so that their performance on Advanced Regents examinations will not negatively impact evaluations. If schools use Advanced Placement (AP) or International Baccalaureate (IB) scores, as suggested by Commissioner King, schools might be more reluctant to challenge students upward for fear that poor test performance might result in teachers being unfairly penalized.*
- c) *Teachers will subtly but surely be incentivized to avoid students with health issues, students with disabilities, English Language Learners or students suffering from emotional issues. Research has shown that no model yet developed can adequately account for all of these ongoing factors⁷.*
- d) *The dynamic between students and teacher will change. Instead of "teacher and student versus the exam," it will be "teacher versus students' performance" on the exam.*
- e) *Collaboration among teachers will be replaced by competition. With a "value added" system, a 5th grade teacher has little incentive to make sure that her incoming students score well on the 4th grade exams, for incoming students with high scores would make her job more challenging. When competition replaces collaboration, every student loses.*

⁴ See Burris, C. & Welner, K. (2011). Conversations with Arne Duncan: Offering advice on educator evaluations. *Phi Delta Kappan* 93 (2) pp 38-41.

⁵ New York State Education Department (2011). *Guide to the 2011 Grades 3-8 Testing Program in English Language Arts and Mathematics*. Retrieved October 18, 2011 from <http://www.p12.nysed.gov/apda/ei/ela-math-guide-11.pdf>.

⁶ Committee on Incentives and Test-Based Accountability in Education of the National Research Council. (2011). *Incentives and Test-Based Accountability in Education*. Washington, D.C.: National Academies Press.

⁷ Baker, E. et al (2010). Problems with the use of test scores to evaluate teachers. Washington, D.C. Economic Policy Institute. Retrieved October 16, 2011 from: http://epi.3cdn.net/b9667271ee6c154195_t9m6iij8k.pdf;

Newton, X. et al. (2010). Value-added modeling of teacher effectiveness: An exploration of stability across models and contexts. *Education Policy and Analysis Archives*. Retrieved October 16, 2011 from <http://epaa.asu.edu/ojs/article/view/810/858>.

; Rothstein, J. (2009). Student sorting and bias in value-added estimation: Selection on observables and unobservables. *Education Finance and Policy*, 4(4), 537-571.

Concern #3: Tax Dollars Are Being Redirected from Schools to Testing Companies, Trainers and Outside Vendors

School budgets must now be built within the constraint of New York State's 2% Tax Cap law. Due to the details of the APPR regulations, district funds must be funneled to staff development and outside scoring even as New York State taxpayers' precious dollars are funneled to testing companies and other vendors. At a time of economic crisis, this leaves fewer and fewer dollars for our classrooms. According to a recent report by the New York State Superintendents entitled, *At the Edge*⁸, 81% of all superintendents are worried that they will not have the funds to implement APPR in a way that would best serve their students' needs.

- a) *As recommended by the Regents reform agenda, all building principals receive ten days of training and superintendents receive seventeen days of training during the first year of implementation. Taxpayer funds to these outside training sessions are typically \$120 per day per person. Conservative estimates put the state-wide mandated costs for this training in the range of several millions of taxpayer dollars. Recognizing that many other supervisors will be required to attend this training in order to evaluate teachers, these costs will continue to balloon.*
- b) *The need for a rapid turnaround in test scores (so they can be included in end-of-year evaluations) coupled with an increased emphasis on exam security will result in increased costs for districts. Tax dollars will be diverted to outside companies in the areas of test development, exam security and data analysis. These dollars diverted to testing companies may well range into the hundreds of millions of dollars statewide at the same time that funding for instruction is cut.*

Our Recommendations

1. School-wide achievement results should be used as part of every teacher's and principal's evaluation.

Schools are learning communities. An evaluation system that even partially bases an individual teacher's evaluation on his or her students' scores ignores the reality that student success is often predicated on the work of many adults in a school, as well as out-of-school factors that are actually more responsible for student success⁹. Non-classroom-teacher factors account for roughly 85-90% of the statistical variation in students' test scores¹⁰. Reading teachers, resource room teachers and ELL teachers provide critical skill support to our students. Guidance counselors, social workers, psychologists and deans provide social-emotional support for students. Thus, student scores reflect the work of many school personnel, as well as the influence of families and the effort of students. Schools operate best when there is cooperation among all faculty members and when all are accountable for every student's learning¹¹. If students' test scores must be used as part of educators' evaluations, we recommend that a score be used in a global manner. That is, that one index which incorporates school-wide achievement results be developed and used as part of each teacher's and principal's evaluation. Districts, based on the needs of their students, should have the final say in what achievement factors comprise that index.

⁸ The Council of School Superintendents. (2011). *At the edge: A survey of New York State School Superintendents on fiscal matters*. Retrieved on October 16, 2011 from: <http://www.nyscoss.org/pdf/upload/AttheEdgeSurveyReportFINAL.pdf>

⁹ Goldhaber, D., Brewer, D. & Anderson, D. (1999). A three-way error components analysis of educational productivity. *Education Economics* 7 (3) pp 199-208.

¹⁰ See Hanushek, E., Kain, J. & Rivkin, S. (1998). *Teachers, schools and academic achievement*. Retrieved October 16, 2011 from http://www.cgp.upenn.edu/pdf/Hanushek_NBER.PDF.

¹¹ DuFour, R., & Eaker, R. (1998). *Professional learning communities at work. Best Practices for enhancing student achievement*. Bloomington, IN: National Educational Service.

2. Pilot and adjust the evaluation system before implementing it on a large scale.

Any annual evaluation system should be piloted and adjusted as necessary based on field feedback before being put in place state-wide. In other words, the state should pilot models and then use measures of student learning to evaluate the model. Delaware spent years piloting and fine-tuning their system before putting it in place formally state-wide.

3. Use broad bands, not numbers, for the evaluation of teachers and principals.

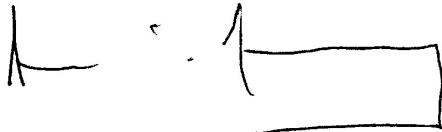
Evaluation should be about improvement, not sorting and selecting. A number between one and one hundred simply cannot describe the complex work of an educator. Neither is it realistic to think that the difference between a teacher score of 86 and 87 would have meaning or validity. The four performance bands (ineffective, developing, effective and highly effective) are the only evaluation ratings that should be used.

We, Principals of Long Island schools, conclude that the proposed APPR process is an unproven system that is wasteful of increasingly limited resources. More importantly, it will prove to be deeply demoralizing to educators and harmful to the children in our care. Our students are more than the sum of their test scores, and an overemphasis on test scores will *not* result in better learning. According to a nine-year study by the National Research Council¹², the past decade's emphasis on testing has yielded little learning progress, especially considering the cost to our taxpayers.

We welcome accountability and continually strive to meet high standards. We want what is best for our students. We believe, however, that an unproven, expensive and potentially harmful evaluation system is not the path to lasting school improvement. We must not lose sight of what matters the most—the academic, social and emotional growth of our students.

Prepared by

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Principal, The Wheatley School

Carol C. Burris, Ed.D.



Principal
South Side High School

¹² Committee on Incentives and Test-Based Accountability in Education of the National Research Council. (2011). *Incentives and Test-Based Accountability in Education*. Washington, D.C.: National Academies Press.

Signed by 382 Principals Across Long Island (Updated 3 November 2011a)

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Principal	School	District
Ms. Gina Faust	Theodore Roosevelt School	Oyster Bay-East Norwich CSD
Ms. Maria Andreotti	Medford Elementary School	Patchogue-Medford UFSD
Mr. James Bertsch	Oregon Middle School	Patchogue-Medford UFSD
Dr. Randy Rusielewicz	Patchogue-Medford High School	Patchogue-Medford UFSD
Mr. Manuel Sanzone	Saxton Middle School	Patchogue-Medford UFSD
Mrs. Linda Pickford	South Ocean Middle School	Patchogue-Medford UFSD
Dr. Joey Cohen	Tremont Elementary	Patchogue-Medford UFSD
Mrs. Beth McCoy	Charles E. Schwarting Elementary	Plainedge UFSD
Mrs. Emily O'Brien	Eastplain School	Plainedge UFSD
Mrs. Carol Muscarella	John H. West Elementary	Plainedge UFSD
Mr. Robert Amster	Plainedge High School	Plainedge UFSD
Mr. Anthony DeRiso	Plainedge Middle Schools	Plainedge UFSD
Mr. Dean Mittleman	HB Mattlin Middle School	Plainview-Old Bethpage CSD
Ms. Ronelle Hershkowitz	Parkway Elementary School	Plainview-Old Bethpage CSD
Ms. Paulette Miller	Pasadena Elementary	Plainview-Old Bethpage CSD
Ms. Francine Leiboff	Plainview Old Bethpage Kindergarten	Plainview-Old Bethpage CSD
Mr. James Murray	Plainview-Old Bethpage JFK HS	Plainview-Old Bethpage CSD
Ms. Alison Clark	Stratford Road Elementary School	Plainview-Old Bethpage CSD
Mr. Ira Pernick	Paul D. Schreiber High School	Port Washington UFSD
Mr. Christopher Shields	South Salem Elementary School	Port Washington UFSD
Ms. Marilyn M. Rodahan	Weber MS	Port Washington UFSD
Mr. Thomas Ricupero	Francis F. Wilson Elementary School	Rockville Centre UFSD
Mrs. Elizabeth Pryke	Hewitt Elementary School	Rockville Centre UFSD
Mrs. Tricia Bock	Riverside School	Rockville Centre UFSD
Dr. Carol Burris	South Side High School	Rockville Centre UFSD
Ms. Shelagh McGinn	South Side Middle School	Rockville Centre UFSD
Mrs. Joan Waldman	Watson School	Rockville Centre UFSD
Mr. Darren Raymar	William S. Covert School	Rockville Centre UFSD
Mr. Stephen Strachan	Roosevelt High School	Roosevelt UFSD
Mr. Kevin Scanlon	Roslyn High School	Roslyn UFSD
Mr. Matthew Wells	Cayuga Elementary School	Sachem CSD
Mrs. Patricia Aubrey	Chippewa Elementary	Sachem CSD
Ms. Denise Kleinman	Gatlot Ave Elementary School	Sachem CSD
Mrs. Patti Trombetta	Grundy Elementary	Sachem CSD
Dr. Anthony Mauro	Hiawatha Elementary School	Sachem CSD
Dr. Danielle DeLorenzo	Lynwood Ave	Sachem CSD
Mrs. Veronica DeCicco	Merrimac School	Sachem CSD
Mrs. Gloria Flynn	Nokomis Elementary	Sachem CSD
Mr. Rory Manning	Sachem High School East	Sachem CSD
Mr. John Dolan	Sachem North HS	Sachem CSD
Ms. Mary Cavanaugh	Samoset Middle School	Sachem CSD
Mr. Frank Panasci	Sequoia Middle School	Sachem CSD
Mr. Michael Saidens	Tamarac Elementary School	Sachem CSD
Mrs. Laura Amato	Tecumseh Elementary School	Sachem CSD
Mr. Dennis Kelly	Waverly Avenue Elementary	Sachem CSD
Ms. Christine DiPaola	Wenonah	Sachem CSD
Mr. Jeff Nichols	Pierson Middle/High School	Sag Harbor UFSD
Dr. John Stimmel	Cherry Avenue Elementary	Sayville UFSD
Dr. Michele LeBlanc	Lincoln Avenue School	Sayville UFSD

Principal	School	District
Mr. Ronald Hoffer	Sayville High School	Sayville UFSD
Mr. Thomas Murray	Sayville Middle School	Sayville UFSD
Mrs. Rose Castello	Sunrise Drive Elementary School	Sayville UFSD
Mr. Daniel Smith	Seaford Middle School	Seaford UFSD
Mr. John Capozzi	Elmont Memorial High School	Sewanhaka Central HS District
Ms. Kathleen Sottile	Floral Park Memorial	Sewanhaka Central HS District
Mrs. Valerie Angelillo	H. Frank Carey Jr/Sr High School	Sewanhaka Central HS District
Mr. Michael DeMartino	New Hyde Park Memorial High School	Sewanhaka Central HS District
Mr. Daniel Holtzman	Shoreham-Wading River High School	Shoreham-Wading River CSD
Mr. John Nocero	Accompsett Middle School	Smithtown CSD
Ms. Ireen Westrack	Branch Brook Elementary School	Smithtown CSD
Mr. Daniel Goitia	Great Hollow Middle School	Smithtown CSD
Ms. Arlene Wild	Mills Pond Elementary School	Smithtown CSD
Dr. Kevin Simmons	Nesaquake Middle School	Smithtown CSD
Mr. Paul Graf	Smithtown Elementary	Smithtown CSD
Mr. Edwin Thompson	Smithtown High School East	Smithtown CSD
Mr. John Coady	Smithtown High School West	Smithtown CSD
Mrs. Mary Grace Lynch	St. James Elementary	Smithtown CSD
Mr. Bernie Soete	Bellport High School	South Country CSD
Mr. Sean Clark	Kreamer Street Elementary School	South Country CSD
Ms. Faye Robins	Henry L. Stimson MS	South Huntington UFSD
Ms. Eileen Kerrigan	Oakwood Primary Center	South Huntington UFSD
Ms. Roberta Lewis	Silas Wood 6th Grade Center	South Huntington UFSD
Ms. Kathleen Acker	Walt Whitman High School	South Huntington UFSD
Dr. Timothy Mundell	Southampton High School	Southampton UFSD
Ms. Ellen O'Neill	Southold Elementary School	Southold UFSD
Mr. William Galati	Southold Junior-Senior High School	Southold UFSD
Ms. Mary Tabone	A.P. Willits	Syosset CSD
Mrs. Joanne Mannion	Berry Hill School	Syosset CSD
Mr. James Kassebaum	H.B. Thompson Middle School	Syosset CSD
Ms. Theresa Scrocco	South Grove Elementary School	Syosset CSD
Ms. Michelle Burget	South Woods Middle School	Syosset CSD
Dr. Giovanni Durante	Syosset High School	Syosset CSD
Mr. Jeffrey Kasper	Village School	Syosset CSD
Mrs. Patricia Varrone	Walt Whitman School	Syosset CSD
Ms. Marisa Redden	Arrowhead Elementary	Three Village CSD
Mr. Brian Biscari	Minnesauke Elementary	Three Village CSD
Mr. Vincent Vizzo	Murphy JHS	Three Village CSD
Mrs. Gail Casciano	Nassakeag Elementary	Three Village CSD
Mr. Gus Hueber	Paul J. Gelinas JHS	Three Village CSD
Mrs. Kathryn White	Setauket Elementray School	Three Village CSD
Dr. Alan Baum	Ward Melville High School	Three Village CSD
Dr. Nathalie Lilavois	William Sidney Mount School	Three Village CSD
Mr. Dexter Hodge	Lawrence Road Middle School	Uniondale UFSD
Dr. Lynnda Nadien	Smith Street School	Uniondale UFSD
Dr. Florence D Simmons	Uniondale High School	Uniondale UFSD
Ms. Linda Friedman	Walnut Street Elementary School	Uniondale UFSD
Mr. Frank Huplosky	Howell Road	Valley Stream 13 UFSD
Mr. Darren Gruen	James A. Dever School	Valley Stream 13 UFSD

Principal	School	District
Dr. Christine Zerillo	Wheeler Avenue School	Valley Stream 13 UFSD
Ms. Stephanie Capozzoli	Willow Road	Valley Stream 13 UFSD
Mrs. Erin Malone	Forest Road	Valley Stream 30 UFSD
Mr. Anthony Mignella	Memorial JHS	Valley Stream Central HS District
Dr. Joseph Pompilio	Valley Stream Central HS	Valley Stream Central HS District
Mr. Cliff Odell	Valley Stream North HS	Valley Stream Central HS District
Ms. Maureen Henry	Valley Stream South High School	Valley Stream Central HS District
Ms. Maureen Goldberg	Forest Lake School	Wantagh UFSD
Dr. Lynne D'Agostino	Mandalay School	Wantagh UFSD
Dr. Don Sternberg	Wantagh Elementary School	Wantagh UFSD
Mrs. Carolyn Breivogel	Wantagh High School	Wantagh UFSD
Mrs. Eleanor Levy	Eleanor Levy	West Babylon UFSD
Mrs. Dawn Matrochano	Wantagh Middle School	West Babylon UFSD
Dr. Ellice Vassallo	West Babylon High School	West Babylon UFSD
Mr. Scott Payne	West Babylon JHS	West Babylon UFSD
Mr. Anthony Cali	Cornwell Avenue School	West Hempstead UFSD
Mr. Terry Ganley	George Washington Elementary	West Hempstead UFSD
Mr. Daniel Rehman	West Hempstead HS	West Hempstead UFSD
Mr. Andrew O'Farrell	Beach Street Middle School	West Islip UFSD
Mr. John Mullins	Kirdahy	West Islip UFSD
Mrs. Mary Anderson	Manetuck	West Islip UFSD
Mrs. Dawn Morrison	Oquenock Elementary	West Islip UFSD
Mr. Daniel Hunter	Paul J. Bellew	West Islip UFSD
Mr. Daniel Marquardt	Udall Road Middle School	West Islip UFSD
Dr. Anthony Bridgeman	West Islip High School	West Islip UFSD
Dr. Wanda Toledo	Drexel Avenue School	Westbury UFSD
Mrs. Dale Telmer	Dryden	Westbury UFSD
Mrs. Gloria Dingwall	Park Avenue School	Westbury UFSD
Mr. Manuel Arias	Westbury HS	Westbury UFSD
Mr. David Zimble	Westbury Middle School	Westbury UFSD
Mrs. Regina Giunta	James E. Allen Jr/Sr HS	Western Suffolk BOCES
Ms. Debra Montaruli	Western Suffolk BOCES	Western Suffolk BOCES
Mrs. Karen Bowden	Wilson Tech	Western Suffolk BOCES
Mrs. Ann Joseph	Wilson Technological Center	Western Suffolk BOCES
Mr. Christopher Herr	Westhampton Beach	Westhampton Beach UFSD
Mrs. Lisa Slover	Westhampton Beach Elementary	Westhampton Beach UFSD
Ms. Charisse Miller	Westhampton Beach Middle School	Westhampton Beach UFSD
Mrs. Eileen Filippone	Moriches Elementary School	William Floyd UFSD
Mrs. Monica Corona	Nathaniel Woodhull Elem. School	William Floyd UFSD
Mr. Keith Fasciana	William Floyd Elementary School	William Floyd UFSD
Mr. Ed Plaia	William Paca Middle School	William Floyd UFSD
Mr. Kester Hodge	Milton Olive Middle School	Wyandanch UFSD
Mr. Paul Sibblies	Wyandanch High School	Wyandanch UFSD

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