

**Testimony by Thomas J. Gosnell,
President of American Federation of Teachers Massachusetts, on
Educator Evaluation Regulations**

**Presented to the Massachusetts Board of
Elementary and Secondary Education
June 28, 2011**

Good morning. Thank you for the opportunity to comment. My name is Tom Gosnell. I'm president of the American Federation of Teachers Massachusetts

From the outset, we have said that we want to create an educator evaluation system that is good for students, fair to educators, and done collaboratively. We have also said that we want such a system to emphasize continuous improvement, not "gotcha."

So, the question is: Do the regulations before you today meet that test?

I'm pleased to say that there are many strong components to the regulations. I'll mention a few of those:

- We like that the regulations, for the most part, honor the recommendations of the Task Force.

- We like that the regulations place a premium on professional human judgment and generally avoid simple formulas or arbitrary percentages.
- We like that the regulations place an emphasis on educator self-assessment. This will give educators more ownership over the process and help promote teacher voice.
- We like very much that the regulations permit and encourage the setting of group goals, so that teams of educators can work together to improve student learning. When it comes to education, collaboration is the name of the game.
- And, finally, we are very happy that the regulations explicitly permit the creation of peer assistance and review programs. As we've said for many years, the premise of such programs is simple: Who knows better what great teaching looks like than a great teacher?

Some problems do exist, particularly around the use of student learning measures.

I want to be very clear on this point. We do believe that there is a place for evidence of student learning in a

comprehensive educator evaluation system. But we strongly believe that evidence of student learning must be broadly defined to include the kinds of assessments that demonstrate genuine and deep student understanding. These include classroom assessments and quizzes, written work, essays, portfolios, research projects, and performances. It is highly problematic to rely primarily or exclusively on narrowly conceived standardized tests such as MCAS for the purpose of either assessing student learning or judging teacher quality.

Yet, Section 35.09 of the regulations appears to do just that, favoring narrowly defined measures over the classroom-based and teacher-developed measures that should really count. In fact, this section stands in sharp contrast to the Task Force recommendations, which called for using a broad set of multiple measures. It also stands in contrast to Section 35.07, which puts forth a much more expansive definition of student learning. Why are the broader measures in 35.07 then ignored in 35.09? This discrepancy makes no sense to us, and I suspect that most educators in the field will have the same confusion.

We urge you to take a closer look at Section 35.09 so that it can be better aligned with the rest of the document and with the essence and spirit of the Task Force recommendations.

My final thought relates to implementation. Whether this initiative succeeds or fails will hinge to a large degree on the quality of implementation.

This is a complex, nuanced system, as is appropriate for a complex profession. But this means evaluators must be well-trained. Will there be support for this from the state and the Department? This will be absolutely crucial.

It will be essential that all stakeholders commit to careful monitoring of the system and make mid-course corrections as needed. It also will be essential for stakeholders to seek continuous input from educators on the front lines. Educators' voices must be heard and heeded at every step along the way.

Thank you for your time. We look forward to working with you to build a first-class evaluation system in our Commonwealth.