



May 25, 2016

The Honorable John King
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington DC, 20202

Re: Non-regulatory Guidance Addressing Education Leadership in Title II of the Every Student Succeeds Act (ESSA)

Dear Secretary King:

The undersigned organizations – AASA, the School Superintendents Association (AASA); the Council of Chief State School Officers; and The Wallace Foundation (Wallace) – encourage the U.S. Department of Education (the Department) to consider issuing guidance to further clarify provisions of Title II. The purpose of this letter is to urge the Department to take that step and to clarify permissible uses of Title II to further the development of “principals and other school leaders.” The evidence¹ clearly shows that increasing their effectiveness is a central factor leading to improvements at the state, district and school levels and the promotion of equity for the nation’s highest needs schools.

Importantly, unlike regulation or prescriptive guidance that might constrain what states and districts may do, offering guidance about allowable uses of Title II funding for the improvement of principals and other school leaders is actually permissive and flexible – it provides options that states may consider that can expand their choices for improving district and school performance. We believe improving leadership is an essential ingredient in enabling states and districts to be able to implement all of ESSA effectively.

Research shows that effective school leadership is second only to teaching among school-related factors in improving student achievement, explaining about one quarter of the variation in student outcomes;² principals are multipliers of effective teaching;³ and effective school leadership has a particularly significant impact on high-poverty schools⁴. However, while Title II has traditionally allowed attention and funding to go toward both teachers and leaders, leadership is often not at the core of Title II use.⁵

¹ Rebecca Herman et al., *School Leadership Interventions Under the Every Student Succeeds Act (Volume I)*, RAND Corporation, 2016.

² Kenneth Leithwood et al., *Review of Research: How Leadership Influences Student Learning*, Univ. of Minnesota and Univ. of Toronto, 2004, and Karen Seashore Louis et al. *Learning from Leadership: Investigating the Links to Improved Student Learning*, Univ. of Minnesota and Univ. of Toronto, 2010.

³ Paul Manna, *Developing Excellent School Principals to Advance Teaching and Learning: Considerations for State Policy*, The Wallace Foundation, 2015.

⁴ Karen Seashore Louis et al., 2010.

⁵ Manna, 2015.

Given the wide range of evidence showing that improving the preparation and support of principals and other school leaders can be a high-leverage strategy for school improvement, we believe it is important that the body of evidence⁶ inform state and district work under Title II. We are often asked questions about this use of Title II. It would be very helpful to state and district leaders for the Department to clarify that they have this flexibility.

In order to be as specific as possible about the type of questions we are asked, and therefore, to reach the level of clarity that would be most useful, we offer the attached outline for a “frequently asked questions” (FAQ) document together with our advice about what points would be most helpful for the Department to clarify. Should the Department want more detail, we would be happy to provide that.

ESSA presents a significant moment in time for states and districts to use the evidence base on leadership in efforts to improve schools, and the Department has an important role to play in calling attention to it and shaping the context for state and district action. In order to encourage and inform state and local action on how Title II can be used to strengthen principals and other school leaders consistent with ESSA’s new clarity and focus on leadership, and for the evidence base to be most useful to states and districts, we urge you to include the information in the attached FAQs should you decide to issue guidance on Title II. Under separate cover, Wallace and AASA have commented on the importance of including principals and other school leaders in the states’ consolidated plans under Title I.

We stand ready to provide further information the Department might need in regard to the “FAQs,” and throughout the transition to and implementation of ESSA, all with the goal of benefiting the field of K-12 public education and the students who are served by it.

Sincerely,



Daniel A. Domenech
Executive Director, AASA



Chris Minnich
Executive Director, CCSSO



Will Miller
President, The Wallace
Foundation

⁶ See also Rebecca Herman et al., 2016.

SAMPLE “FAQs” FOR EDUCATION LEADERSHIP IN TITLE II UNDER ESSA

Question: How does ESSA address supporting leadership?

A focus on principals and other school leaders is more prominent and explicit in ESSA than in previous versions of ESEA. There are multiple references to principals and other school leaders in the law.

Question: Why might a state or district consider using principals and other school leaders as a way to achieve the overall ESSA purpose of addressing the needs of students who find themselves in high poverty, high needs schools and members of racial/ethnic minorities?

The Department could offer a supporting rationale for the heightened emphasis throughout ESSA on support for principals and school leaders, including references to research that states can use to support their overall focus of their consolidated plans relative to teacher and leader quality priorities. Among these might be: that principals and other school leaders are second only to teaching among school-related factors in improving student achievement, explaining about one quarter of the variation in student outcomes;¹ principals are multipliers of effective teaching;² and effective school leadership has a particularly significant impact on high-poverty schools.³ In addition, strengthening leadership is a highly cost-effective approach to improving education.⁴ Research in education leadership reviewed by RAND offers additional evidence on the effects of interventions focused on principals.⁵

Question: How can principals and other school leaders contribute to integrating the state’s equity plans and aspirations for high needs schools and students into the work of the LEA?

It would be useful for states and districts to know that principals can be a key lever to achieve educational equity. Research shows that there is “no evidence of school turnaround without an effective leader.”⁶ In addition, there is an inequitable distribution of highly-qualified principals, with proportionately fewer in high- needs schools. Since a good principal is the single most important determinant of whether a school can attract and keep the high-quality teachers necessary to turn around schools,⁷ principals are responsible for ensuring equal educational opportunity for students.

¹ Kenneth Leithwood et al., *Review of Research: How Leadership Influences Student Learning*, Univ. of Minnesota and Univ. of Toronto, 2004, and Karen Seashore Louis et al. *Learning from Leadership: Investigating the Links to Improved Student Learning*, Univ. of Minnesota and Univ. of Toronto, 2010.

² Paul Manna, *Developing Excellent School Principals to Advance Teaching and Learning: Considerations for State Policy*, The Wallace Foundation, 2015.

³ Karen Seashore Louis et al., 2010.

⁴ Leslie M. Anderson and Brenda J. Turnbull, *Building a Stronger Principalship, Vol. 4: Evaluating and Supporting Principals*, Policy Studies Associates Inc., 2016.

⁵ Rebecca Herman et al., 2016.

⁶ Leithwood, et. al., 2004.

⁷ Darling-Hammond, *Education Leadership: A Bridge to School Reform*, The Wallace Foundation, 2007.

⁸ Rebecca Herman et al., 2016.

Question: Is there evidence that preparing and supporting principals and other school leaders results in improved student achievement and other school effects?

It would be useful for the Department to reference for states and districts the April 2016 report⁸ from RAND where the authors reviewed the evidence in education leadership and found evidence in Tiers II and III to support the relationship between effective principal preparation and principal professional development and improved effects for schools and students.

It would also be useful, citing the same report, to explain the Tier IV evidence requirements under Title II and the “logic model” chain that may be used by states and districts when exploring Tier IV resources to bring to bear in planning support for principals and other school leaders under Title II.

Question: Which leadership positions are permissible to be supported under Title II?

It would be helpful for the Department to clarify the specific positions that are eligible for services under Title II. In particular, it would be helpful to specify that the definition of “principals and other school leaders,” includes support for principal supervisors, who mentor and coach principals to improve teaching and learning and perform their evaluations.

Question: What types of supports for improved leadership may be funded under Title II?

It would be helpful for the Department to offer examples of coherent strategies districts may consider to attract, prepare, assess, support and retain effective leaders through such activities as:⁹

- **Standards** for leaders that specify the capabilities and performance that districts want in principals and other school leaders. Districts can use the standards to align their leadership policies and practices, including criteria for hiring and evaluating principals, as well as determining the on-the-job support to address any gaps between standards and performance. Principal preparation programs can use the standards in admissions and in instruction.
- **Pre-service preparation** programs for aspiring leaders, whether lodged in universities, nonprofit organizations, or districts themselves. Effective pre-service programs can be designed to meet research-based standards such as: admissions criteria and program curricula aligned with district standards; ongoing program improvement based on data about the quality of graduates’ preparation; and, for programs based in universities or nonprofits, a partnership that would give the district a substantial role in shaping the program.

⁸ Rebecca Herman et al., 2016.

⁹ *Ibid.*

- **Hiring and placement**, rigorous processes of selection and matching candidates with school placements. These can include differentiated requirements for specific schools, “real world”-based selection procedures that are aligned with district standards, and assigning new principals and other school leaders only to schools for which their particular strengths are a good match.
- **On-the-job evaluation and support** for principals and other school leaders that are also aligned with standards. This can include systematically evaluating principals’ instructional leadership capabilities, giving them feedback, and, on the basis of the evaluation results, providing professional development and skilled mentoring to support them in further developing their needed capabilities.

And other districtwide supports such as:

- Data systems such as **Leader Tracking Systems**, as a repository for individual-level, longitudinal information about aspiring and novice leaders. The system can include data on the individual’s preparation and certification history, positions held and the schools in which he or she had held them, assessed skills and performance in each position, and participation in professional development and coaching.
- Programs for **principal supervisors** with the aim of more intensively supporting principals as instructional leaders.

Question: How might the optional 3% set-aside be used for activities focused on leadership?

We encourage the Department to suggest that expenditures under the optional 3% set-aside are well-aligned to the highest priorities in the state relative to school leadership, and detail examples such as:

- Leadership preparation academies focused on high-needs schools.
- Mentoring, coaching and other professional development programs for principals and principal supervisors.

Question: Are there examples of states and districts that use Title II funds well to improve leadership?

There are several examples of how states and districts currently use Title II funds to support principals and other school leaders. It would be useful for the Department to provide several as illustrations.