January 20, 2016

Ms. Deborah Spitz  
U.S. Department of Education  
400 Maryland Avenue, SW  
Room 3E306  
Washington, DC 20202

RE: Comments from The Wallace Foundation on Evidence Regarding Leadership, per Request for Information on Implementing Programs under the Elementary and Secondary Education Act

Dear Ms. Spitz,

I am writing on behalf of The Wallace Foundation in response to the Secretary’s Request for Information regarding implementing programs under the Elementary and Secondary Education Act (Docket ED-2015-OESE-0130).

The Wallace Foundation seeks to develop and share credible evidence that can help practitioners and policymakers in the fields we work enhance their effectiveness. Our knowledge products – all available for free on www.wallacefoundation.org – were downloaded 677,000 times in 2015. Since 2000, one of our main goals has been to provide reliable, credible evidence on the role of instructional leadership in school improvement and ways to improve principals’ performance.

We are writing this brief letter to provide the Department with a record of some critical evidence regarding leadership that we hope and believe will be helpful in its implementation of and related decisions regarding the new Every Student Succeeds Act (ESSA).

- New evidence produced in the 15 years since NCLB’s passage has provided considerable clarity on the role of principals in improving student achievement, and has identified effective approaches that states and districts can take to improve principals’ performance.
  - Leadership is second only to teaching among school-related factors in improving student achievement.¹ Among school-related factors that explain the variation in students’ achievement, school leadership explains about one-quarter and teachers explain more than one-third.²
  - There is no evidence of school turnaround without an effective leader.³
  - Principals are multipliers of effective teaching.⁴

¹ Leithwood et al., Review of Research: How Leadership Influences Student Learning, Univ. of Minnesota and Univ. of Toronto, 2004.
² Seashore Louis et al., Learning from Leadership: Investigating the Links to Improved Student Learning, Univ. of Minnesota and Univ. of Toronto, 2010.
³ Ibid.
⁴ Ibid.
Strengthening leadership is a highly cost-effective approach to improving education\(^5\). Those implementing ESSA and writing its regulations should be aware of this important body of evidence, which is described in more detail in our slide presentation of Jan. 19, 2016 available at [www.wallacefoundation.org/ESSA](http://www.wallacefoundation.org/ESSA), and which includes full citations of the relevant research.

- Principals can be a key lever to achieve educational equity, both because there is an inequitable distribution of highly-qualified principals, with proportionately fewer in high-needs schools,\(^6\) and because 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.\(^7\) In addition, principals are responsible for ensuring equal educational opportunity for students.\(^8\)

- Under previous law, Title II lacked clarity on the specific use of funds to support principals and their supervisors. We can now take advantage of research in recent years that has identified effective strategies for supporting principals and their direct supervisors; high among them are:
  - Training for principals focused on instructional leadership;\(^9\) including leadership academies;\(^10\)
  - On-the job support for principals, including mentoring;\(^11\)
  - Focusing the job of, and providing training for, principal supervisors to support principals in their role as leaders of instructional improvement in their schools.\(^12\)

- These important programs (e.g., training and mentoring for principals, and strengthening principal supervision) are vulnerable to reductions in periods of financial constraints. Federal funds can help supplement these programs in order to ensure their effectiveness and sustainability.

- It may be useful to consider illustrative examples of states and districts where many of the above approaches are being successfully adapted to the local context. These include,

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but are not limited to, the states of Delaware, Florida, Illinois, North Carolina, and districts including Hillsborough County, FL; Prince George’s County, MD; Charlotte-Mecklenburg Public Schools, NC; and Denver Public Schools, CO.\(^1\)

The good news is that ESSA expressly strengthens references to leadership throughout the law, and also broadly promotes evidence-based actions. Therefore, as the Department sets priorities for ESSA implementation, regulations and guidance, we encourage you to consider the evidence regarding principals and other leaders and how it can inform Department implementation in several ways, including:

- Making clear in all regulations related to human capital that principals are an express allowable use of funding under ESSA.
- Clarify that state and local reporting and plan requirements related to equitable access to effective teachers includes access to effective teachers and principals and other school leaders.
- Ensure that state and local plans for relevant ESSA funds address how states will increase the quality of school leadership through evidence-based strategies.
- Ensure that school improvement plans and activities explicitly address evidence-based strategies for improving leadership in low-performing schools.
- Clarify that principal supervisors are included in the definition of “school leader.”

Many of the intended outcomes of ESSA can be achieved through a focus on leadership, which is a high-leverage and feasible strategy for equitable school improvement, and for which extensive evidence is now available (see the citations in the slide presentation). Thank you for your consideration.

Sincerely,

Will Miller
President, The Wallace Foundation

cc: John B. King Jr., Acting Secretary