

**DOCKET ID: ED-2021-OPEPD-0054-0001**

July 28, 2021

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

**RE: Comments from The Wallace Foundation on *Proposed Priorities and Definitions: Secretary's Supplemental Priorities and Definitions for Discretionary Grants Programs***

Dear Secretary Cardona:

I am writing on behalf of The Wallace Foundation in response to the invitation to submit comment letters on the Notice of a Proposed Rule published on June 30, 2021 titled *Proposed Priorities and Definitions: Secretary's Supplemental Priorities and Definitions for Discretionary Grants Programs*.

The Wallace Foundation seeks to develop and share credible evidence that can help practitioners and policymakers in the fields we work enhance their effectiveness. Since 2000, one of our main goals has been to provide reliable, credible evidence on the role of leadership in school improvement and ways to improve principals' performance.

The proposed rule includes six priorities—all of which, we believe the Department would agree, require the leadership of principals and other school leaders in order to be effectively planned and implemented. In fact, research commissioned by Wallace reinforces this important link – that effective principals and principal pipelines in large urban districts have been demonstrated to produce statistically significant improvements in student achievement at all grade levels in math and in elementary and middle grades in reading.<sup>i</sup> In fact, regarding the creation of comprehensive, aligned principal pipelines, the researchers from RAND concluded that “we know no other intervention that has resulted in districtwide student achievement gains of this magnitude.”<sup>ii</sup>

***Our primary recommendation is for the Department to use the words “teachers, principals, and other school leaders”— language that is consistent with the Elementary and Secondary Education Act and subsequent Department regulations and guidance – throughout the proposed priorities in place of the term “educators.”***

It would be very helpful for the Department to make explicit that “principals and other school leaders” are important components of all six priorities. Using the same language (“teachers, principals, and other school leaders”) would help to send a consistent message to the field about the impact that high-quality school leaders can have in efforts to improve schools. It would also signal that investing in improved principal effectiveness is a permissible use of funding, something which state and local officials might not conclude from use of the more general term “educators.”

Although uses of the term “educator(s)” might be understood to include school leaders as well as teachers, wording that appears under Proposed Priorities 1-4 would lead a careful reader to conclude that “educators” should be understood as a synonym for “teachers” and therefore that the Department will encourage the submission of applications relevant to teachers, but not to school leaders. Examples of the potential for this interpretation include:

- The Background section for Proposed Priority 1 refers to “administrators, educators, and faculty,” differentiating between educators and administrators (such as school leaders).
- Under Proposed Priority 2, priority area (b)(5) says, “so that educators are better prepared to address bias in their classrooms.” In ordinary usage, it is teachers and not school leaders who are said to have classrooms.
- The Background section for Proposed Priority 3 includes the clause, “when students of color and educators of color share the classroom,” implying that an educator is a teacher.
- The same section ends with a sentence about the purpose of Priority 3 that refers twice to “teachers” and then summarizes with a reference to “educators,” implying that the terms are synonymous.
- Similarly, priority area (b) under Proposed Priority 3 equates teachers with educators, with the phrase: “Increasing the number of teachers with certification in an educator shortage area ....”
- Priority area (f) item (3) under Proposed Priority 3 specifically distinguishes between educators and school leaders. It reads: “Developing data systems, timelines, and action plans for promoting inclusive and bias-free human resources practices that promote and support development of educator and school leader diversity.”
- Under Proposed Priority 4, the description of priority area (i) uses the phrase “looping educators” to refer to teachers assigned to the same class of students for more than one grade.

Of the terms currently in the notice, “educator(s)” appears 65 times, “teacher(s)” appears 40 times, and “leader(s)” appears only twice. None of these terms is defined in the proposed priorities.

To sum up, we would urge the Department to replace all references to “educators” throughout the proposed priorities with “teachers, principals and other school leaders,” unless the sentence is meant to refer only to “teachers” or only to “principals and other school leaders.”

We would be happy to answer any questions you may have. Thank you very much.



Jody Spiro  
Director of Education Leadership  
The Wallace Foundation  
jspiro@wallacefoundation.org

---

<sup>i</sup> [How Principals Affect Students and Schools: A Systematic Synthesis of Two Decades of Research](#), Jason A. Grissom, Anna J. Egalite, Constance A. Lindsay, The Wallace Foundation, 2021; [Principal Pipelines: A Feasible, Affordable, and Effective Way for Districts to Improve Schools](#), Susan M. Gates, Matthew D. Baird, Benjamin K. Master and Emilio Chavez-Herrerias, RAND, 2019.

<sup>ii</sup> [Principal Pipelines: A Feasible, Affordable, and Effective Way for Districts to Improve Schools](#), Susan M. Gates, Matthew D. Baird, Benjamin K. Master and Emilio Chavez-Herrerias, RAND, 2019.