

June 16, 2011

The Honorable Lillian Lowery, E.d.D.
Secretary of Education
Dept. of Education
John G. Townsend Building
401 Federal Street, Suite 2
Dover, DE 19901-3639

Dear Dr. Lowery:

Thank you for sharing the latest version of DOE's interim plan for the DPAS II Component 5 Student Growth Measures. Given the tremendous amount of work required to develop a fair, valid and reliable system that accurately reflects educator contributions to student growth, we understand and support the concept of an interim plan until the final system is developed and approved.

Looking at the current components of the interim plan, however, Part I School Wide Assessment Measure and Part II Student Cohort Assessment Measure are problematic for a number of reasons. Here's why:

1. **The Part I School Wide Measure does not reflect specific educator input into student growth.** As the interim plan is currently written, it is possible that a disproportionate percentage would attach to teachers who may not have directly impacted the students assessed. This would apply to educators new to a school or district and for which Parts II and III may not be available. It would also apply to educators in grades 11-12 who have yet to

instruct the students assessed. Student relocation is also not taken into account. There needs to be some way to acknowledge that students taking the test at one site may have received a large portion of their instruction at another site.

2. **For the Part II Student Cohort Assessment Measure, the validity and reliability of the student cohort data is questionable because,** once again, educators would be assessed using data that does not link their direct input to student growth.

3. **Monetary incentives within Delaware’s Race to the Top Plan will be awarded to “highly effective” educators in 2012-13 based on the interim plan ratings next year. This is unfair to educators in categories where measures have not been developed to accurately assess their contribution to student growth.**
Depending upon their building assignment or the cohort of students that may be attached to them, otherwise “highly effective” educators could miss out on these incentives because measures are being used that do not accurately assess their direct impact on student growth. So, despite the intention to create an interim system with no negative consequences, this is a negative consequence.

4. **Parts I and II do not meet the standards for fairness, validity and reliability, and are, therefore, not legally defensible should a district use negative ratings from Parts I and II to terminate an educator.** We urge the Department to delay the attachment of negative consequences to any educator category until specific

measures have been developed and approved in all teacher and specialist categories.

For these reasons, Part III, the development of educator-specific assessment measures, must be our top priority in order to accurately gauge teacher effectiveness for Component V. In other words, the state should strive to eliminate Parts I and II, school-wide and student cohort measures.

The development of a comprehensive list of valid student assessment measures is key to a successful Component V, key to fairly and accurately evaluating an educator's contribution to student growth. It is the hardest, perhaps even the most challenging, "reform" work. We appreciate that you are willing to seek an amendment to the state's Race to the Top application so that DSEA and its members, in collaboration with other educators, can finish this pioneering work.

As always, we look forward to our continuing collaboration to redefine Component 5 as next year's data become available, and more educator specific measures are developed and approved.

Sincerely,

Diane Donohue
President

