



Joint Testimony by AFT Massachusetts and the Massachusetts Teachers Association
Board of Elementary and Secondary Education
June 27, 2016

Thank you for providing us this opportunity to voice the concerns of the more than 130,000 educators we collectively represent.

As you know, as part of the state's educator evaluation system, all licensed educators take part in a rigorous five-step evaluation process that results in an overall performance rating of exemplary, proficient, needs improvement or unsatisfactory. Our focus today is **not** on that part of the system.

Rather, we are here to call your attention to the numerous problems associated with what we and others have been calling the "impact rating mandate."

The impact rating mandate is the requirement that districts issue a separate "impact on student learning" rating of low, moderate or high to educators based on students' MCAS growth scores, and/or scores on so-called "district-determined measures" (DDMs). All licensed educators must receive this rating, including superintendents, principals, teachers, guidance counselors, nurses, speech pathologists, and so on.

This mandate resides in Section 35.09 of the educator evaluation regulations. You have the power to change these regulations, and therefore the power to provide regulatory relief to the tens of thousands of educators who want and need you to take action. We are here to urge you to take that action.

The MTA and AFT Massachusetts are hardly alone in calling for an end to the impact rating mandate.

This issue is **not** about unions or collective bargaining. And it's **not** just about implementation.

Rather, the entire education field is sending a loud and clear message: The **policy** doesn't work; it doesn't add value; and it's an enormous distraction.

Evaluators as well as educators want the mandate to go. This includes management as well as labor.

- The Massachusetts Association of School Committees voted unanimously in May to support the elimination of the impact rating mandate. Glenn Koocher, executive director

of MASC, said this about it in the *Boston Globe*: “In theory it sounded like a good idea, but in practice it turned out to be an insurmountable task.”

- The Massachusetts Association of School Superintendents has issued a one-page position statement calling for the mandate’s elimination. Tom Scott, the executive director of M.A.S.S., was quoted in a recent news article saying, “It’s virtually impossible to find a way to do this that provides the kind of valid, reliable instrument that provides any credibility to this ranking.”
- The Massachusetts State Senate voted in May to eliminate the mandate.
- Charter schools are exempt from the impact rating mandate, but they may voluntarily implement the ratings — and presumably would do so if they believed the program had value. When we inquired last week, the Department of Elementary and Secondary Education was unaware of any charter school that has voluntarily opted to implement the impact ratings.
- Even Lawrence, which is under state receivership control, has resisted the impact rating mandate and has not implemented it.

No district has implemented the mandate because they simply can’t make it work, despite spending countless hours and dollars in a good-faith effort to do so.

Consider these facts:

- The impact rating regulations were passed five years ago by this Board. (None of you served on the Board at the time of passage.)
- The Department has extended the implementation deadline three times.
- As of today, no district in Massachusetts has an operationalized impact rating program in place.
- About 40 school districts are required to report ratings this fall. We’ve made inquiries at many of them, and none appear prepared to give impact ratings for educators that have any integrity or credibility.

In our joint white paper, which you should have, we make the case for why the mandate is unworkable, harmful and lacking in value.

We’d like to take this opportunity to review some of the paper’s main points.

The mandate is unworkable because isolating the impact of an individual educator on students’ test score or DDM growth — in a way that can yield a credible rating — is impossible.

The state regulations say that the student growth percentile, or SGP, derived from student MCAS scores must if available be used as one measure in coming up with an impact rating.

- But our white paper cites research disputing the notion that the SGP is a valid and reliable measure of teacher quality.
- Stephen Sireci, an assessment expert at UMass Amherst, has co-authored a paper that says the SGP may not even be valid and reliable at the student level, let alone for use in teacher evaluations. He was quoted in the *Boston Globe* article saying, “Our research indicates that student growth percentiles are unreliable and should not be used in teacher evaluations.”
- Of course, the overwhelming majority of educators, including art and social studies and foreign language teachers, do not have SGP scores, so that leaves so-called “district-determined measures” as the basis for the ratings.
- The question of how student scores on DDMs should be converted to educator ratings has essentially been punted to school districts to figure out. This transfer of responsibility has set up educators to do the impossible. It has set them up to fail.
- Going from DDMs to ratings may sound easy to do, but it is not.
- Hopefully, during the Q&A we can explore some concrete examples of how difficult it is to measure growth among a varied group of students; characterize that growth as low, moderate, or high; and then accurately attribute that growth to an individual teacher.
- But we’ll give you one example for now. During a legislative briefing two weeks ago, a Quincy teacher described how the one-mile run, conducted at the start and end of the year, was piloted as a DDM to measure the impact of physical education teachers. I think you can quickly begin to imagine the problems you’d encounter. For starters, what is more growth: a student who goes from a 15-minute mile to a 12-minute mile, or a student who goes from an already very fast six-minute mile to a stellar 5½-minute mile? That’s just one question out of dozens that really don’t have any clear answers.

But even if the rating system were somehow workable, we believe that tying educator evaluations to student test scores in a way that yields a rating is a very bad idea educationally.

If actually implemented — *and thankfully it has not been fully implemented yet, just piloted* — such an approach would have harmful consequences for teaching and learning.

Those consequences include:

- Encouraging the inappropriate use of assessments. For example, the impact rating mandate essentially forces the use of a formal pretest, whether that makes educational sense or not. This could mean that students — in a class such as French 1 or physics —

are tested on content they've never seen before, creating unnecessary frustration and anxiety for them.

- Narrowing instruction around the DDM tests that “count,” potentially at the expense of more engaging lessons or the teaching of critical skills that aren't easily covered by a test.
- Creating disincentives for educators to work with the neediest students who might not show immediate growth on the DDM tests.
- Discouraging collaboration among educators who are incentivized to focus on the students for whom they are directly responsible.
- Demoralizing educators who are inaccurately labeled as low performers based on invalid and unreliable measures.

Our final point is one that the entire field is united on: The DDM mandate adds no value and is an enormous waste of time and resources.

In schools, time is a precious commodity.

If you're going to design a policy that takes valuable time away from what educators do with students or during planning time, there should be a strong rationale for doing so.

But the DDM mandate lacks that rationale:

- The five-step evaluation cycle that leads to a rating, from exemplary to unsatisfactory, is already as comprehensive and robust as any evaluator or educator needs it to be. It includes a student learning goal for each educator.
- State regulations require that multiple sources of evidence, including student learning measures and progress on student learning goals, be used in the five-step cycle that leads to a summative rating.
- Student learning is central to the five-step evaluation process. Evaluators already have the ability to look at common assessments and other types of evidence of student learning as part of the evaluation process.
- The impact rating mandate, therefore, doesn't provide any new useful information to evaluators or educators — it just creates bureaucratic headaches.

In closing, Governor Baker has said he is committed to reducing unnecessary regulatory burdens. In fact, he signed an executive order calling for just that.

Eliminating the impact rating mandate is the poster child for the kind of regulatory relief the governor says he is looking for.

Educators are fed up. The impact rating mandate is unworkable, unproductive and unnecessary. It adds no value to the evaluation or educational process, yet it has consumed vast amounts of time, energy and resources.

The field is looking to this Board for leadership. You have it within your power to repeal the impact rating regulations. These ratings are no longer required by the federal government and have never been required by the state Legislature. Educators need relief from the impact rating mandate so they can focus on what really matters: teaching and learning.

Thank you.