

LOCAL SUPERINTENDENTS ADVISORY COUNCIL

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Mr. Jerry Green
Mr. D. Scott Hawkins
Mr. Trent Lovett
Dr. Henry Webb

Mr. Tim Bobrowski
Dr. James Flynn
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Ms. Nannette Johnston
Dr. Teri Cox-Cruey

March 24, 2015

Mr. Roger Marcum, Board Chair
Kentucky Board of Education
500 Mero Street
Frankfort, Kentucky 40601

Dear Chair Marcum,

The Local Superintendents Advisory Council (LSAC) met on March 24, 2015 to discuss and make recommendations on the **704 KAR 3:370, Professional Growth and Effectiveness System Guidelines**. The following recommendations for change were made:

1. **Remove Section 15 [2]** - Remove Section 15 (2) from the regulation if it was not required for USED. LSAC understands the requirement to report to USED our effectiveness ratings. This is not an issue. Our biggest concern revolves around the public reporting of effectiveness data of teachers/leaders by school and or district. The growth system was not designed for this purpose and is counter-productive to the goal and intent of the Professional Growth and Effectiveness System.
2. **Strong Concern on Accountability** - LSAC members strongly believe in the teacher effectiveness initiative and its ability to significantly improve student learning. We also believe that by making this information widely available to the public by school and district and, more importantly, including the data as a significant part of the accountability system, there will be a deleterious effect on the implementation of the growth and effectiveness system as it provides clear disincentive for evaluators to document deficiencies in educator performance.

LSAC members oppose Next Generation Professionals being a component in the accountability system. The concern is that if Next Generation Professionals data becomes a part of accountability, it will kill the purpose of the system. We expressed the same concern at the January LSAC meeting in regards to 703 KAR 5:225. LSAC has requested to address this in the waiver as well as the KAR and then remove all language that is part of this regulation related to the accountability measure.

3. **Section 5 Language** - LSAC members request that language be included in the regulation in Section 5 to address issues related to how evaluation will be

impacted by those certified staff who are not in the district for the entire school year (e.g., late hires, leaves of absence).

4. **Clarity on Goals** - LSAC members request that clarity be provided regarding the number of goals a principal must have. The current language is unclear and leads the reader to think the principal has three growth goals. LSAC requests that line 17 and 18 be removed to provide the clarity needed.

The members of the Local Superintendents Advisory Council provide these recommendations to improve **704 KAR 3:370, Professional Growth and Effectiveness System Guidelines**. We appreciate the opportunity to participate in providing input that will improve the educational opportunities for all students in Kentucky.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed McNeel', with a stylized flourish at the end.

Ed McNeel
LSAC Chair

cc: Members of Kentucky Board of Education
Members of LSAC