

July 29, 2016

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

Re: Flexibility of states to use ESSA funds (especially Title I) to strengthen principals and other school leaders

Dear Secretary King:

We, the undersigned organizations, are writing to urge that the U.S. Department of Education's proposed ESSA regulations (released May 26) clarify the eligible uses of ESSA funds to support principals and other school leaders as an essential strategy to improve low-performing schools.

Importantly, unlike most regulations that might constrain what states and districts may do, offering regulations about allowable uses of Title I funding in particular (as well as Title II and other federal funds) for the improvement of principals and other school leaders is actually permissive and flexible – it provides options that states may consider that can expand their choices for improving district and school performance. We believe improving leadership is an essential ingredient in enabling states and districts to be able to implement all of ESSA effectively.

Research has established that effective principals and other school leaders are second only to teaching quality among in-school factors that affect student learning, and that “demonstrated effects of successful leadership are considerably greater in schools that are in more difficult circumstances.”¹ Yet states and districts remain uncertain about whether Title I funds may be used to improve the training and support of principals and other school leaders. One reason is that, prior to ESSA, principals and other school leaders were not identified as a separate category of “educators,” so many people think

¹ As a review of the literature noted, “...existing research also shows that demonstrated effects of successful leadership are considerably greater in schools that are in more difficult circumstances. Indeed, there are virtually no documented instances of troubled schools being turned around without intervention by a powerful leader. Many other factors may contribute to such turnarounds, but leadership is the catalyst.” For more, see *How Leadership Influences Student Learning*, Kenneth Leithwood, et al, the University of Toronto and University of Minnesota, 2004.

the term only refers to teachers. A second reason is that until now it has not been clear what leadership activities had sufficient evidence to qualify.

Given the number of times that the phrase “principals and other school leaders” is mentioned in the law, and given a recent analysis by the RAND Corp.² that identified three kinds of principal support with tiered evidence that makes them eligible for Title I funding, we are hoping that the Department will do the following to clarify how states and districts can use Title I, Title II, and other funds to strengthen principals and other school leaders.

1. Specifically identify support for school leaders as allowable uses of Title I funding, including for school improvement.

Based on our discussion with the field, it is clear that SEAs, LEAs and stakeholders do not understand that activities to support principals and other school leaders are allowable uses of Title I funds, in large part because the phrase “educators” is understood to refer to teachers, but not principals and other school leaders. We therefore urge the Department to specifically identify principals and other school leaders as eligible for support.

In addition, the Department’s proposed regulations call for states to describe in their school improvement plans how they will ensure evidence-based actions to provide supports to lowest-performing schools, and offer examples of such potential actions. Since “there are virtually no documented instances of troubled schools being turned around without intervention by a powerful leader,”³ we urge the Department to ask states what role they envision principals and other school leaders playing in school improvement, what support they need to do so, and to provide examples of this approach in action.

2. Point to principals and other school leaders in states’ consolidated plans including school improvement plans.

Consolidated state plans will likely form a critical architecture for state and local action in ESSA implementation – defining their priorities under the Act and how they will use federal funds. We urge the Department to more clearly ask states to describe in their consolidated plans their strategies for supporting excellent principals and other school leaders, in particular activities where there is evidence that doing so influences school outcomes. These include principal preparation programs, professional development and school reform activities.⁴ This should include whether and how they intend to use the optional three percent set aside for leadership activities in Title II.

² *School Leadership Interventions Under the Every Student Succeeds Act (Volume I)*, Rebecca Herman, et al, RAND, 2016.

³ “Many other factors may contribute to such turnarounds, but leadership is the catalyst.” Leithwood, et al, 2004.

⁴ Herman, 2016.

ESSA implementation presents a unique opportunity for each state to review and articulate its own theory of change and plans to improve education. The suggestions we offer would help clarify for states that they *may* choose to support the improved training and support of school leaders as a means to improve low-performing schools.

In doing so, the Department can help ensure that school improvements are likely to pay off for children – especially those in low-performing schools where the impact of leadership is greatest. All the signatories on this letter appreciate the opportunity to comment, and we look forward to working with you toward this goal.



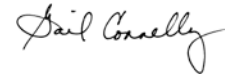
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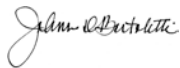
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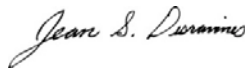
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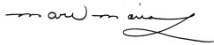
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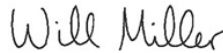
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