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*Testimony Submission for House Education Committee on SB751/HB1607*  
*(Teacher Evaluation)*

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### **Section 1: Teacher Evaluation Overview & General Concerns with Senate Bill 751**

Over the past 7 years, educators in urban districts have been voicing their concerns with the highly punitive system of evaluation. We have been calling for a system that is less focused on test scores and arbitrary standards. The system is in desperate need of an overhaul, and one that is inclusive of the unique viewpoints of educators and lawmakers from municipalities that are deeply impacted not only by the evaluation system but also by years of systemic disinvestment in public education.

We do not believe that SB751 adequately reflects the concerns of Philadelphia's educators and educators in urban areas around the state. Essentially, this legislation does not get to the crux of our concerns with how educators are evaluated.

Additionally, our concerns regarding overuse of standardized testing data, as well as the continued implementation of a deeply flawed PVAAS measure, remain very concerning. The legislation also appears to open the door for increased employer discretion regarding 10% of the evaluation, replacing a current 20% employee driven metric.

While we appreciate that the observation moves from 50% to 70% of a teacher's rating, we still are left with 30% of a rating that is based on unproven metrics that are so often implemented in a deeply punitive way.

Additionally, it is a glaring inequity that charter school educators remain exempt from this evaluation system in this proposed legislation.

#### **What follows is a closer look at the following:**

- A look at "test scenarios" utilizing SB751 as well as the challenge multiplier
- An analysis of the legislation
- Recommendations for legislative amendments

### **Section 2: Test Scenarios Using SB751 metrics**

*Quite simply, the legislation proposed in SB751 does not move the needle for a significant number of educators.*

- Out of 348 sample scenarios provided, we note the following:
  - Merely 16 educators (4.59%) saw an improvement in their rating.
  - Conversely, 40 educators (11.49%) saw a decrease in their rating.
  - For 84% of educators, the "test runs" yielded the same rating results.
  - We do note that the scores for which we received test runs were simply model scores and do not necessarily equate with percentages of scores as they exist. That being said, our over overall assessment remains based on the weighting of the various components.

***Further, the "challenge multiplier" is deeply flawed and unproven.*** It appears that the "challenge multiplier" is applied on the front end (to the overall building level score), and the metrics used to calculate it are murky at best. Our overall assessment, however, is that despite the implementation of a "challenge multiplier" which

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appears designed to address issues of student poverty, the multiplier yields very little shift in individual teachers' scores. **Because of the weight given to the multiplier and the method by which it is implemented, our statistical analysis shows that there will be very little impact on teachers' ratings.**

Additionally, while perhaps well-intentioned, the "challenge multiplier" begs the question of how we appear to be codifying the narrative of failing students, educators, and communities. The evaluation of poverty as having a truly significant role in our children's education is not to be discounted. However, to simply adopt a highly complex figure with little explanation of how it was designed is problematic.

### **Section 3: Comprehensive Analysis of SB751**

#### **3a. Assessment of Evaluation Metrics (pages 3-10):**

- Shifting the teacher observation metric to 70% for teacher performance is a move in the right direction. But, the 30% based on student performance is misguided and highly punitive.
- Analysis of 30% student performance-based measures:
  - 10% of that depending on building level is unacceptable. The multitude of factors affecting a building score have tremendously punitive effects on educators. Additionally, data collected to calculate a building level score tends to perpetuate a system of shaming under-resourced schools, communities, and the educators who dedicate their service in underfunded schools.
  - 20% of that depending on teacher specific data is also problematic.
    - 10% of the performance-based measures based on assessments selected by the employer. This takes teacher agency out of the equation nearly entirely. This again shifts what should be the overall goal of an evaluation system—to supporting and developing educators—back into a potentially punitive component. It appears to further open the door for employers to add even more weight to standardized test scores and other metrics with little pedagogical evidence of supporting student growth.
      - P.25: There seems to be some acknowledgement that the building level data is deeply flawed. After a first unsatisfactory rating, building level data is removed, and an evaluation shifts to using 30% data selected by the employer, which is another flawed metric.
      - When a teacher is "not data available," which is a majority of teachers, these employer driven measures shift to a full 30% of the evaluation.
    - 10% based on deeply flawed data including unproven PVAAS measures and standardized test scores. Additionally, basing evaluation on the achievement of IEP goals leaves many unanswered questions as well.

#### **3b. Additional Observations:**

- Page 5: It is inappropriate for a professional development plan to be evaluative in nature. It weaponizes a system that should be designed to support teachers and grow their practice. Additionally, we are deeply concerned that principals would be given unilateral authority to change a teacher's rating cycle year from a professional development year into an observation year. We also remain skeptical of the process allowing teachers to opt out of PDP years; while we absolutely support individual agency of educators, we are unclear as to the objective of this component.
- Page 13: In a similar way that professional development should be used to foster teacher growth, so too should classroom walkthroughs by administrators. Informal observations and walkthroughs are currently non-evaluative and present opportunity for feedback and collaboration with educators. To shift this to an evaluative component is problematic.

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- Page 20: We are unclear as to the policy and procedures established to enable a school district to utilize a different system from the one outlined in the law.
- Page 20: As currently written, Act 82 states that two unsatisfactory ratings within 10 years may result in an employee's termination. That window is far too long, and we support the reduction of that to 4 years as written in SB751.
- Pages 23-25: We are unclear as to whether PDE's establishment of professional development programs is intended to address solely professional development surrounding the evaluation program. The language appears to set the stage for increased PDE control over a broad spectrum of professional development topics and requirements, while perhaps the intention is to simply establish programs designed to inform and educate teachers about the evaluation system. Regardless, we have concerns about the establishment of professional development under PDE without input from educators. Similarly, the language indicates that teachers will be required to repeat a condensed version of an induction program every 7 years. Educator retention is a major issue in urban school districts across the Commonwealth. Requiring a repetition of induction is misguided. Our efforts must be laser focused on providing meaningful growth, training, and support opportunities to incentivize teacher retention. This misses the mark greatly.

#### **Section 4: Recommendations/Conclusion**

##### **The PFT recommends the following amendments:**

- The elimination of the building level data as a multiple measures metric used to evaluate teachers. We would support a further increase in the teacher observation being utilized as an evaluative metric.
- Moving the "challenge multiplier" component to a regulatory statute that is yet to be developed. We have no data outlining how the metric would or would not affect individual teacher observations.
- The restoration of the teacher specific data being driven by a teacher-controlled metric such as the SLO. SB751 appears to remove teacher agency and professionalism.
- Charter school educators must be subject to the same evaluation system.

We look forward to continuing to work with you on this issue and so many other critical issues facing our schoolchildren and educators. Thank you for the opportunity to provide our insight into this critical issue.