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John D'Agati  
Deputy Commissioner  
Office of Higher Education  
New York State Education Department  
99 Washington Ave  
Albany, NY 12234

Dear Deputy D'Agati:

On behalf of the School Administrators Association of New York State (SAANYS), which represents over 7000 members, I would like express my appreciation for the request for feedback on the recommendations developed by the Principal Preparation Project Advisory Team. The work of the team and the New York State Education Department (NYSED) on this important initiative is to be commended. We offer this feedback to your questions below, with the hope that our suggestions will provide additional information for moving this effort forward. The important work of the Advisory Team, and others, may need to continue before action is taken on recommendations.

“Do the beliefs and recommendations move in the proper direction?”

Yes, we believe that the recommendations do provide a partial direction for forward movement. The charge to the Principal Preparation Project Advisory Team was “to study whether it is possible to improve the preparation of aspiring school building leaders and the support provided to current school principals.” A critical component of the charge was to consider “issues related to professional development, supervision, and evaluation.” In our opinion, the recommendations fall short in this area and, as a result, present a fairly narrow primary focus on school leader preparation. Six of nine statements in the “Insights” section pertain to preparation of potential school leaders, but not support to current practitioners. Increased attention needs to be placed on the needs of current school leaders to be more faithful to the articulated goals. Continuation of the work of the Advisory Team would present an opportunity to more comprehensively address the full array of needs of current and future school leaders.

“Do the recommendations have the potential to improve preparation and support for school building leaders?”

Yes, the recommendations have the potential for improving preparation. However, as indicated, we believe there needs to be additional focus on support for current leaders. Also, we have five areas of concern regarding wording, or concepts, in a number of these recommendations.

**Some recommendations need clarification.**

As currently written, recommendations pertaining to micro-credentials, non-public funding, pilot projects, and non-pecuniary incentives are not clear and are in need of further discussion and definition.

The concept of micro-credentials may be appropriate and helpful for identifying additional school leader competencies for focused areas of specialization. However, they also have the potential for creating splintered approaches to certifying highly qualified school leaders. Further discussion is needed on how school leader preparation programs, and the foundational SBL certification, could be impacted. These micro-credentials, if employed, should not become required, but could be valuable additions to the base SBL certificate for many school leaders.

The use of non-public funding and non-pecuniary incentives are mentioned in two recommendations, but lack definition and clarity of application to support the identified goals and initiatives for improving building leadership in New York. Further development of these concepts could also be more clearly tied to the needs and development of current school leaders.

**Some recommendations could increase tracking and accountability requirements.**

Several recommendations have the potential for creating additional accountability measures (not included in ESSA) and subsequently, are far more burdensome than helpful for school districts.

Recommendation IX provides an example of one such requirement. The recommendation suggests that school districts will be required to set goals and report on progress to “recruit, select, develop, and place individuals from under-represented populations within the rank of school building leaders.” Much of the substance of this is outside of the control of school districts. Seeking qualified, under-represented educators is clearly an area where some districts could show increased effort. Having candidates actually apply and accept positions, however, is outside of the control of school districts. It would not be beneficial to layer new accountability indicators, and ensuing improvement plans or sanctions, where goals are not met. Any that are in addition to those that exist, or have been discussed in planning for the ESSA state plan, would be unwise.

Another example is mentioned in Recommendation X, which would require the identification and tracking of non-public funds to improve a district’s ability to recruit talented school leaders.

**Recommendation overreach.**

Some recommendations go beyond the overall goals of the project and should be not be included in the final set of recommendations.

One example is Recommendation VII, which suggests revising CTLE requirements to require that principals “demonstrate acquired knowledge, skills, and dispositions.” This implies another new, unnecessary layer of school leader evaluation. Additionally, it imposes added restrictions to the fulfillment of the CTLE requirement for a Professional SBL Certificate that are beyond the current acceptable parameters. We are in the initial phase of implementation of this new provision of law and regulation and there is still confusion in the field. We should not add to the complexity of this certification requirement.

Recommendations that increase accountability measures, as indicated in the above section, are also examples of overreach within the document. We are much more supportive of the type of district flexibility built into the NYS ESSA State Plan. More nuanced and customized district approaches are needed to address the very complex area of the rapidly changing demographics of students and families in our state.

**Some recommendations are not fully aligned to practice and field experience.**

Recommendations III and IV suggest different pathways for internships and pairing internships with coaching and mentoring that extend throughout the first full year of, or beyond, a school leader’s experience. In reality, these recommendations could cover three distinct and unrelated settings: an internship, an initial administrative position, and the first year in a principal position. It would be very challenging, if not impossible, to implement the pairings recommended in three different and non-congruent settings.

Likewise, Recommendation X suggests the use of P-20 partnerships (as do other recommendations). P-20 collaborations have long been held as a promising concept, but very few have been able to realize the anticipated return on the investment. The reality is that many educational programs in institutes of higher education do not have the capacity to undertake the collaborative efforts needed to sustain effective P-20 collaborative endeavors. Nor do many school districts, when considering relationships with multiple colleges and universities, both near and far.

Some of the recommendations embedded in the paper mention the use of deploying non-public funding for such purposes. Many of these strategies are long-term endeavors and not aligned to current capacity or contexts. We would suggest that any funding potentially available to support P-20 partnerships be redirected to provide direct and customized professional development to school districts in support of school leaders.

**Recommendations to adopt PSEL Standards.**

Recommendations I and II suggest adoption of the PSEL standards, which represent some major shifts in educational administration and leadership. They must be considered only after extensive input from the field. The PSEL standards place much emphasis on building global competencies and extensively emphasize the role of principal as an instructional leader, even recommending separation of the roles of instructional leader from operational leader. While such standards are commendable in their vision, they need to be thoroughly considered in the context of state and federal reforms, as well as local

school district/community expectations regarding school management and climate. NYS principals will not easily be removed from major operational responsibilities in most districts. Additionally, these new standards may lack a balanced approach between competency and knowledge-based learning objectives.

Overall, the work of the Advisory Team provides an important beginning point for further work. We feel the recommendations need further clarification and reexamination. The recommendations, although headed in a positive direction, lay out an ambitious long-term agenda, but may not yet adequately support the short-term outcomes needed. We at SAANYS have appreciated being a part of this initial work and stand ready to continue our support of the work of the Advisory Team.

Sincerely,

A handwritten signature in cursive script that reads "Kevin S. Casey".

Kevin Casey, Executive Director

cc:

MaryEllen Elia  
Ken Turner

*Affiliate with NAESP & NASSP*