

OFFICE OF PUBLIC INSTRUCTION

STATE OF MONTANA

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Superintendent



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The Honorable Arne Duncan
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Secretary Duncan:

I am writing to express my concern about new reporting requirements for Teacher and Principal Evaluation data that are only now being communicated from the U.S. Department of Education to state education agencies. These new data requests are being made more than 12 months after the State Fiscal Stabilization Fund (SFSF) Assurances and Indicators were finalized and our 2010-11 state data collection completed. I am notifying U.S. Department of Education that the Montana Office of Public Instruction will not be reporting on items that were not included in the original SFSF Assurances and Indicators.

I am proud to say that when the Department released the Assurances and Indicators in late 2009, the Montana Office of Public Instruction responded promptly to notify school districts of additional data that was required for SFSF relating to the evaluation of teachers and principals. In the spring of 2010, we worked with our education partners to design a survey tool and to notify school districts of the new collection. The draft survey tool was shared with school districts in March 2010, and the actual data collection occurred in October 2010 as part of a larger collection of non-fiscal data. We designed the survey tool to go to schools in two parts in order to meet the SFSF requirements. All schools were required to respond to the first set of questions required by the SFSF, and any school system that indicated that it uses an overall performance rating in its evaluation system will receive a follow-up questionnaire this spring.

In November 2010, after we had completed our non-fiscal data collection, we received the EDEN specification for reporting Teacher and Principal Evaluation data that was released by the Department more than 12 months after the SFSF Assurances and Indicators were finalized. Specifically, I am referring to the EDEN requirements that asked for data above and beyond the items that were included in Descriptors (a)(1) and (a)(2) and Indicators (a)(3) through (a)(7). When the Assurances and Indicators were released, indicators (a)(5) and (a)(7) stated:

(a)(5) If the district's teachers receive performance ratings or levels through an evaluation system, whether the number and percentage of teachers rated at each performance rating or level are publicly reported for each school in the LEA; and

(a)(7) If the district's principals receive performance ratings or levels through an evaluation system, the number and percentage of principals rated at each performance rating or level.

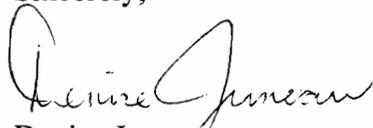
During the first collection of this data, only schools having an overall performance rating or levels in their teacher and principal evaluation system were required to report that data to the state education agency and publicly post that information. That is why my office is conducting a follow-up survey of those schools that indicated such a system.

However, according to the latest version of the EDEN reporting requirements, states are now expected to identify the number of teachers in each school and district that received evaluations. Last fall, my office notified school districts that we would collect follow-up information only from those school districts that had an overall performance rating per the federal regulations at that time. Under the more recent EDEN requirements, we would need to collect data from all school districts on the number of teachers and principals evaluated.

I intend to honor the statements that my office made to school districts last fall concerning this data collection. We will report information on the Assurances and Indicators as we committed to do in Montana's SFSF, Phase II application. However, my office will not be asking school districts to submit additional information on the numbers of teachers and principals that were evaluated in the 2010-11 school year per a request that was established 12 months after the first collection.

I am confident that Montana will meet the data collection requirements of the original Assurances and Indicators of SFSF, including reporting and posting information from schools that have an overall performance rating or level in their teacher and principal evaluation system.

Sincerely,



Denise Juneau
State Superintendent of Public Instruction