



# PHILADELPHIA *FEDERATION of TEACHERS*

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**TO: MEMBERS OF THE GENERAL ASSEMBLY  
CC: GOVERNOR TOM WOLF  
SECRETARY OF EDUCATION PEDRO RIVERA**

**FROM: JERRY JORDAN, PRESIDENT, PHILADELPHIA FEDERATION OF TEACHERS**

**RE: REQUEST FOR DELAY ON TEACHER EVALUATION LEGISLATION**

**JUNE 14, 2019**

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## **Section 1: Teacher Evaluation Overview**

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 have had numerous discussions with lawmakers on the impacts of teacher evaluation, and we urge you to read Philadelphia's comprehensive report on the pitfalls of this problematic system. It is incumbent upon lawmakers to rethink how these measures are implemented and to fully examine how teacher evaluation affects educators.

Now that a new evaluation bill has been drafted without the input of educators from the Commonwealth's largest municipalities, we wanted to ensure that our position is clear and our recommendation to hold the new bill is articulated.

## **Section 2: General Concerns with Senate Bill 751**

We do not believe that SB751 adequately reflects the concerns of Philadelphia's educators and educators in urban areas around the state. There was not input from educators in Philadelphia, Pittsburgh, nor from our Union as a whole in the crafting of the legislation to ensure that the concerns that we have identified are adequately addressed.

Essentially, this legislation does not get to the crux of our concerns with how educators are evaluated. While we have identified a number of potential positives in the bill, including a calculation for the impact of poverty, we are not able to say that these provisions will definitively and positively impact the teacher evaluation protocol.

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.

### **Section 3: Recommendation**

Because the issue of teacher evaluation has such an enormous impact on urban educators, it is imperative that representatives from AFT Pennsylvania locals, and the elected officials representing the schools where they teach, are given ample time to weigh in and craft legislation surrounding evaluation metrics.

SB751, while well intentioned and containing a number of positive shifts, does not encompass the lived experiences of our educators. To that end, [the AFTP, the Philadelphia Federation of Teachers, and the Pittsburgh Federation of Teachers, request a delay of any evaluation legislation movement until such time as true and representative stakeholder input is incorporated into the process.](#)

To further articulate our rationale behind this recommendation, we provide below an additional in-depth analysis of SB751.

### **Section 4: Comprehensive Analysis of SB751**

#### **4a. Assessment of Evaluation Metrics (pages 8-10):**

- 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 system that weaponizes a component that could be utilized to provide teacher agency and autonomy. 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.

#### **4b. 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.
- 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 5: Conclusion**

As elected officials, your insight into this process, in partnership with our input and the input of our members, will be critical. We welcome your thoughts on SB751, and we urge a delay on this legislation while more educator feedback and input is considered.

We look forward to continuing to work with you on this issue and so many other critical issues facing our schoolchildren and educators.