

May 15, 2014

Susan Haberstroh, Regulation Review
Department of Education
35 Commerce Way, Suite 1
Dover, DE 19901

RE: DOE Proposed Administrator Appraisal Process Regulation [17 DE Reg. 1021 (May 1, 2014)]

Dear Ms. Haberstroh:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Department of Education (DOE) proposal to adopt revisions to its standards for administrator appraisals. Council would like to share the following observations.

First, in §2.0, the definition of "credentialed evaluator" requires a district superintendent to be evaluated by members of the local board of education. Council recommends modifying the definition to read "...A superintendent or charter school principal shall be evaluated by member(s) of the Board..." The definition of Board includes a charter school board of directors. In other regulations, the DOE refers to the chief executive officer of a charter school as the principal. See, e.g., 14 DE Reg. 211.

Second, in §6.2.2, Council recommends modifying the reference to read "...and a Satisfactory or Exceeds rating in the Student Improvement Component." Otherwise, an administrator with an Effective or Highly Effective rating in three of the first four appraisal components and an Exceeds rating in the Student Improvement Component would not be covered.

Third, in its criteria for "Needs Improvement" and "Ineffective", the DOE is apparently giving a great deal of weight to the Student Improvement Component. For example, an administrator who scores Highly Effective in the first four appraisal components while achieving an

Unsatisfactory rating in the Student Achievement Component is given the lowest label, “Ineffective”. On the other hand, an administrator who has one Effective and three Ineffective ratings on the first four appraisal components while achieving a Satisfactory rating in the Student Achievement Component is politely labeled “Needs Improvement”. Council questions the merits of this approach.

We thank you in advance for your consideration of our comments. Please feel free to contact me or Wendy Strauss should you have any questions on our observations.

Sincerely,

Terri A. Hancharick
Chairperson

TAH:kpc

CC: The Honorable Mark Murphy, Secretary of Education
Dr. Teri Quinn Gray, State Board of Education
Dr. Donna Mitchell, Professional Standards Board
Mary Ann Mieczkowski, DOE
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