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Assistant Commissioner Neill:

The New Jersey School Boards Association (NJSBA), a federation of all the state's local boards of education, appreciates the opportunity to provide comments to the Department on the proposed readoption of *N.J.A.C. 6A:10, Educator Effectiveness*.

The NJSBA believes that boards of education have a fundamental responsibility to set policies establishing a comprehensive system of performance evaluation for all staff and a process of assessing the effectiveness of evaluation procedures. **To that end, we commend the Department for grounding this proposal so thoughtfully and deliberatively in the findings of the 2024 Governor's Task Force on Educator Evaluation and the subsequent 2025 Evaluation Working Group.** Having participated in those efforts, the NJSBA recognizes that this rulemaking proposal reflects their animating values and priorities: to reduce administrative burdens, enhance coaching and mentoring, and ensure the evaluation system's alignment with its original purpose to enhance student achievement by improving instructional quality. **We also politely request certain amendments to better reflect a board's role in setting and evaluating district evaluation policy.**

Provisions We Support:

Due to the role boards play in governance and oversight, we particularly appreciate:

- Transition from SGOs to "Measures of Student Learning": The NJSBA supports the Department's proposed definition of "measures of student learning" at *N.J.A.C. 6A:10-1.2*. We recognize and celebrate the potential for this new measure – combined with the proposed amendments at *N.J.A.C. 6A:10-4.2(c)2* requiring Measures of Student Learning to be "informed by individual, team, school, or district goals" and the proposed timeline flexibilities throughout *N.J.A.C. 6A:10-4.2(e)* – to better ensure that the student achievement measures used in educator evaluation are more authentic and instructionally relevant.
- Enhancing and Clarifying Training Requirements: The NJSBA supports the proposed amendments throughout *N.J.A.C. 6A:10-2.2(b)*, recognizing their potential to enhance

consistency, fairness, and reliability across teacher evaluations and to clarify which staff are required to receive which training programs.

Requested Amendments:

While the NJSBA supports the temporary revival of a District Evaluation Advisory Committee, we believe that direct board participation in the Committee is an important part of board oversight in the evaluation process. More importantly, we do not believe that the inclusion of a board member will detract from the Committee's desired focus on "practical classroom improvements." On the contrary, we believe that board members could enhance that goal by helping ensure that any improvements to evaluation are formally reflected in board policy. This benefit should not hinge on the discretion of a Chief School Administrator and their relationship with their board. Boards of education are also responsible for developing policies and procedures for the evaluation of chief school administrators (see *N.J.A.C. 6A:10-8.1*); therefore, requiring board representation on the Committee would ensure effective oversight of the entirety of districts' evaluation processes.

We therefore respectfully propose the following highlighted revisions to the proposed amendments at *N.J.A.C. 6A:10-2.3(b)*:

- [(a)] (b) Members of the District Evaluation Advisory Committee shall include representation from the following groups and individuals: [teachers]
1. Teachers from each school level represented in the school district; [central]
 2. Central office administrators overseeing the teacher evaluation process; [supervisors]
 3. Supervisors involved in teacher evaluation, when available or appropriate; [and administrators]
 4. Administrators conducting evaluations, including a minimum of one administrator conducting evaluations who participates on a School Improvement Panel[. Members also shall include the]; [and]
 5. The chief school administrator[, a special education administrator, a parent, and a]; and
 - 6. A member of the district board of education.**

If board members' previous participation in District Evaluation Advisory Committees hindered their efficacy, the NJSBA would be eager to engage the Department in further discussion of how to more effectively incorporate board members in this process.

Other Concerns:

The NJSBA also questions whether holding all non-SGP teachers to exactly two Measures of Student Learning at *N.J.A.C. 6A:10-4.2(e)* is necessary to "better align measures of student learning with personal, team, school and/or school district goals to ensure that educator evaluations are informed by identified areas of professional growth." Put another way, we believe it may be possible to maintain that alignment while also allowing variation in the number

of measures based on unique individual and district needs and values. Additional information in the Proposal-level Comment/Response may help the NJSBA contextualize this change for our members.

Thank you for your consideration of the NJSBA's comments on this important matter. If you have any questions or need clarification on the comments above, I can be reached at hsilver@njsba.org or (609) 278-5285.

Sincerely,



Harrison Silver
Legislative Advocate
New Jersey School Boards Association