

TO: Members of the Indiana State Board of Education
FROM: Jessica Conlon, Project Director, Strategy, Systems and Policy, TNTP
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DATE: January 23, 2015
RE: Final Recommendations for Changes to Indiana’s Evaluation System

Introduction

Four years ago, Indiana set out to establish a teacher evaluation system that would recognize excellent teaching, support educators to improve their practice, and encourage the equitable distribution of effective teachers across the state. The underlying philosophy of the system was – and remains – to ensure students have effective teachers so that student learning will increase.¹ The resulting system has been in effect for over two years and is a model for states and districts around the country.

We cannot overstate how much Indiana has accomplished over the last two years in regards to teacher evaluation policy and implementation. On the whole, Indiana’s laws and policies continue to reflect best practice and a high standard for teacher evaluation. Additionally, there are already indicators that these policies are positively influencing how corporations and schools address teacher quality. As with any bold initiative, there have been obstacles to successful implementation and lessons learned over the last two years. Because of its commitment to a high-quality teacher evaluation system, Indiana’s State Board of Education (SBOE or the Board) recently engaged TNTP to make recommendations for how it might strengthen its system to address these challenges.

TNTP has a long history of supporting Indiana’s teacher quality initiatives. From 2010 to 2012, TNTP worked with the Indiana Department of Education (IDOE or the Department) to design and implement a multi-measure teacher evaluation system that develops, supports, and recognizes excellent teaching. The result of these efforts is the State’s model evaluation system: RISE 2.0, which TNTP helped to pilot across three corporations. To add to this knowledge and experience with Indiana’s model plan, over the last two months, we have immersed ourselves in learning about the current state of Indiana’s evaluation system. We first closely examined the State’s law, policies and practices related to teacher evaluation. Then, we conducted a targeted stakeholder engagement effort that was designed to build off the findings of the Indiana Teacher Appraisal and Support System (INTASS)² survey to further guide our research and analysis of the current state of evaluation.³ We then used this local context to supplement our deep experience designing and implementing teacher evaluation systems and knowledge of best practices.

This memorandum represents the culmination of these efforts as well as our final recommendations for strengthening Indiana’s laws, regulations, and implementation practices. It is our belief that should the Board adopt our recommendations, Indiana will not only be able to address the implementation challenges that have been identified, but it will be able to establish a clear vision for a best-in-class evaluation system that supports and recognizes educators and ultimately contributes to improved student outcomes.

¹ Indiana ESEA Waiver Application at 262, retrieved from http://www.doe.in.gov/sites/default/files/esea/indiana_amended_clean_copy_waiver_6-30-14.pdf.

² Indiana Teacher Appraisal and Support System survey results, retrieved from http://www.in.gov/sboe/files/2014-09-26_INTASS_PPT.pdf.

³ See Appendix A for TNTP Focus Group Findings Report.

Background & Context

As mentioned above, Indiana's evaluation policies were designed to meet a variety of human capital goals, including:

- Recognizing excellent teaching
- Providing high-quality and actionable feedback to educators
- Supporting educators to improve their practice
- Enabling school leaders to have actionable data about their teaching staff
- Ensuring all Indiana schools have an equitable distribution of high-performing teachers.⁴

More recently, in its Strategic Plan, the Board identified one of its strategic priorities is to recruit, develop and retain excellent teachers.⁵

The emphasis on evaluation as a way to achieve these human capital goals is aligned with best practices.⁶ Because teaching is the most influential in-school factor affecting student performance, being able to recruit, develop and retain great teachers will help to improve student outcomes.⁷ It is impossible to meet these goals without first being able to provide accurate evaluations to every teacher.

Current State of Evaluation in Indiana

The current state of Indiana's evaluation system reveals two recommended areas of focus. First, the ratings distributions over the last two years suggest that there are opportunities at the state and corporation level to improve completeness and accuracy of teachers' ratings. Second, current policies and practices at the state level are creating obstacles to successful implementation. These implementation challenges may be the cause of at least some of the accuracy and completeness issues with the State's results.

Inaccurate or Incomplete Ratings

In order to achieve the goals of recognizing excellent teaching, supporting the continuous improvement of its teachers, and ensuring every student has an effective teacher, Indiana must first be able to provide accurate evaluations to every teacher. Without an accurate assessment of teacher performance, school and corporation leaders can neither reward teacher excellence nor support a teacher's development.⁸

⁴ Indiana ESEA Waiver Application at 262, retrieved from http://www.doe.in.gov/sites/default/files/esea/indiana_amended_clean_copy_waiver_6-30-14.pdf.

⁵ Indiana State Board of Education Strategic Plan at 15, retrieved from http://www.in.gov/sboe/files/2014-07-03_INSBEO_Strategic_Plan_Version_07.01.2014.pdf.

⁶ David Keeling, Jennifer Mulhern, Susan Sexton & Daniel Weisberg, TNTP, *The Widget Effect: Our National Failure to Acknowledge and Act on Differences in Teacher Effectiveness*. (2009); TNTP, *Teacher Evaluation 2.0*. (2010).

⁷ Eric A. Hanushek, John F. Kain & Steven G. Rivkin, *Teachers, Schools, and Academic Achievement*, 73(2) *ECONOMETRICA* 417, 443-51 (2005) (identifying teacher quality as having a greater impact on student learning than other in school factors, including teacher experience and class size).

⁸ David Keeling, Jennifer Mulhern, Susan Sexton & Daniel Weisberg, TNTP, *The Widget Effect: Our National Failure to Acknowledge and Act on Differences in Teacher Effectiveness*. (2009).

During the first two years of the new evaluation policies, Indiana has reported that nearly 90 percent of teachers were rated Effective or Highly Effective, and less than half of one percent of teachers across the state were rated Ineffective.⁹ This is true even in schools that earned an “F” rating.¹⁰

In stakeholder discussions, some corporation leaders explained that the low percentage of teachers rated in the bottom two categories is a result of removing these teachers from the classroom over the last two years. Ensuring students are taught by effective teachers is difficult work, and administrators taking actions to ensure their schools and corporations are filled with high-quality talent should be recognized and supported. However, school and student performance do not correlate with these rates of effective teaching. For instance, schools earn an “F” grade at eight times the rate that teachers earn an Ineffective rating.¹¹ Additionally, nearly a quarter of all schools that received “D” or “F” grades reported no teachers being rated Improvement Necessary or Ineffective.¹²

Likewise, overall student performance does not reflect the reported levels of teacher quality. For example, last year 74 percent of students passed the ISTEP+ exam, which is up one percent from the prior year.¹³ While any amount of student growth should be celebrated, these levels of growth and achievement are inconsistent with the reported level of teacher quality.

Additionally, there is a high rate of teachers that have received no evaluation rating at all. Undoubtedly, there are valid reasons why some teachers may not receive a summative rating, but the very large number of teachers (over 3,000) who do not fall into one of these categories is troubling.¹⁴ Particularly concerning is the high rate of first and second year teachers (more than ten percent) who have not received summative ratings. Teachers early in their practice – perhaps more than any other group of teachers – deserve regular feedback on their performance, and a summative evaluation should be the culmination to the feedback they receive throughout the year.¹⁵ Likewise, the rate of teachers in “F” schools who did not receive summative ratings is very high (over 13 percent). Teachers in poor performing schools require at least as much support as teachers in high-performing schools because of the complex circumstances that often exist in these communities. Receiving regular feedback on performance creates an opportunity for school leaders to provide support to teachers in these schools.

From our experience implementing teacher evaluation systems across the country, we have observed that addressing these questions of accuracy and completeness are ultimately a question of culture around teacher evaluation. As the National Council on Teacher Quality (NCTQ) explains: “Moving from a system that rates everyone as just fine to one that differentiates performance is daunting and requires a culture shift.”¹⁶ Looking at the data, it appears there has

⁹ Indiana Department of Education analysis of evaluation results, retrieved from <http://compass.doe.in.gov/dashboard/EducatorRating.aspx?type=state>.

¹⁰ Indiana Department of Education report to the State Board of Education on 2013-14 evaluation results, retrieved from http://www.in.gov/sboe/files/ER_Data_Presentation_to_SBOE_-_v._12.30.14.pdf.

¹¹ Indiana Department of Education report to the State Board of Education on 2013-14 evaluation results, retrieved from http://www.in.gov/sboe/files/ER_Data_Presentation_to_SBOE_-_v._12.30.14.pdf.

¹² Indiana Department of Education 2013-14 evaluation results, retrieved from <http://www.doe.in.gov/evaluations>.

¹³ Indiana Department of Education analysis of evaluation results, retrieved from <http://compass.doe.in.gov/dashboard/EducatorRating.aspx?type=state>.

¹⁴ Indiana Department of Education report to the State Board of Education on 2013-14 evaluation results, retrieved from http://www.in.gov/sboe/files/ER_Data_Presentation_to_SBOE_-_v._12.30.14.pdf.

¹⁵ Ana Menezes & Adam Maier, TNTP, *Fast Start: Training Better Teachers Fast, with Focus, Practice and Feedback*. (2014).

¹⁶ National Council on Teacher Quality, *State of the States 2013: Connect the Dots: Using Evaluations of Teacher Effectiveness to Inform Policy and Practice*. (2014).

not yet been the necessary culture shift around assessing teacher quality – one that values teacher evaluation as a tool to achieve the support and recognition teachers deserve as well as to inform human capital decisions at the school, corporation and state levels. This shift in culture starts at the top and is ultimately achieved through diligent, high-quality guidance and support.

Inadequate or inconsistent implementation across corporations

Very often issues with accuracy and completeness in evaluation ratings are a byproduct of the implementation challenges that have been reported. We suspect that may be true for Indiana. For example, according to the INTASS survey results, teachers reported a lack of confidence in their evaluators' ability to use the observation rubric, assess teacher performance, provide actionable feedback, and interpret student performance results to inform instruction.¹⁷ Many of these perceptions could be improved through improved evaluator and teacher training, which is a critical element of successful implementation. These sentiments were echoed in our conversations with educators who reported more favorable perceptions of their evaluation plan once they received full training.¹⁸ We also heard from school and corporation administrators that they did not always feel equipped to support their evaluators and teachers through training and that they lack the necessary resources and guidance to develop and implement their evaluation plans.¹⁹

This feedback from stakeholders is consistent with our examination of State policies and practices as well as review of implementation of plans across corporations. For example, a favored feature of the State's evaluation law is that it provides for a high level of local control. However, the variation in plan design and implementation practices often means that increased oversight by the state agency is necessary. Unfortunately, Indiana law does not reflect this need for checks and balances, which means that it is left up to the IDOE and SBOE to determine the appropriate level of support. Based on its own review, as documented in the State's ESEA waiver, the IDOE recognizes the need to increase its capacity to monitor and support corporation's implementation of their evaluation plans.²⁰ Increased support from the State will actually empower corporations to retain their autonomy over many evaluation plan design and implementation decisions because there will be increased confidence that all plans possess a consistent level of rigor and comparability.

Ultimately, we recognize that "no evaluation system can be perfect—in teaching or in any other profession."²¹ However, it is possible to achieve systems that yield accurate, actionable results that teachers and evaluators believe are fair. Doing this requires states to prioritize implementation in order to achieve better systems than those of the past.

Building off early successes

Despite the challenges identified above, we cannot emphasize enough the great work Indiana has already accomplished. By and large, the State's laws and policies continue to be among the strongest in the country.

¹⁷ Indiana Teacher Appraisal and Support System survey results, retrieved from http://www.in.gov/sboe/files/2014-09-26_INTASS_PPT.pdf.

¹⁸ See Appendix A at 4.

¹⁹ See Appendix A at 3-4.

²⁰ Indiana ESEA Waiver Application at 274-75, retrieved from http://www.doe.in.gov/sites/default/files/esea/indiana_amended_clean_copy_waiver_6-30-14.pdf.

²¹ TNTP, *Teacher Evaluation 2.0* at 2. (2010).

Additionally, there are successes to report about the status of implementation. First, the vast majority of corporations have adopted evaluation plans that meet the requirements of state law.²² That in and of itself is a feat to be celebrated. Second, the majority of educators understood that the old system of evaluation was not working and needed to be reformed.²³ Although not all educators feel the current system is an improvement, most of the stakeholders with whom we spoke reported that the new evaluation policies have provided educators and administrators with a common language for discussing teacher quality.²⁴ This common language is the first critical step to shifting the culture around teacher evaluation, and it lays the necessary groundwork for resolving some of the implementation challenges the State is facing.

Because of the momentum Indiana has around teacher evaluation, the State is well-positioned to build off its early successes and refine its evaluation system so that it can continue to lead the nation in teacher quality initiatives.

Approach to Recommendations

The remainder of this memorandum outlines our recommendations. They are organized by topic, and we identify within each topic whether our recommendations should be achieved through legislation, regulation or other implementation efforts.²⁵

Although the legal framework undergirding Indiana's evaluation system is sound and largely consistent with best practices, there are a few statutory and regulatory provisions that should be revisited and revised. These changes will create the enabling conditions for Indiana to continue the hard but critical work of implementation.

To that end, it is important to acknowledge that many of the obstacles Indiana is facing cannot or should not be resolved through legislation or rulemaking. Achieving reliable and accurate ratings for all teachers can only be achieved through a focus on high-quality implementation. Many of our recommendations are grounded in this need for improved implementation as opposed to new rules or laws because, at the end of the day, nothing can take the place of strong leadership and support during a time of change.

Recommendations

Vision-Setting and Change Management Leadership

Indiana has been a trailblazer in its approach to teacher evaluation, but the real work is in implementing the new policies and practices in a way that actually shifts the culture and conversations around teacher quality. Indiana has made strides in changing the conversation around evaluation, as some stakeholders report that the new system has equipped the State's educators with a common language for teacher quality. However, there are indications that additional clarification and support is needed – particularly in setting the tone and purpose of evaluation in Indiana.

In light of that, our first set of recommendations highlight the continued need for leadership during this time of immense change. Therefore, we offer four implementation recommendations in this area to ensure the State has

²² Indiana ESEA Waiver Application at 287, retrieved from http://www.doe.in.gov/sites/default/files/esea/indiana_amended_clean_copy_waiver_6-30-14.pdf.

²³ Indiana Teacher Appraisal and Support System survey results, retrieved from http://www.in.gov/sboe/files/2014-09-26_INTASS_PPT.pdf.

²⁴ See Appendix A at 3.

²⁵ See Appendix B for a summary and categorization of our recommendations.

established the necessary vision and aligned structures to support implementation of newly adopted policies and practices.

Recommendations

Implementation

Set a Vision and Theory of Action for evaluation

Although the SBOE and the IDOE have laid out the intended purpose of evaluation in the ESEA waiver and the Board's strategic plan, these goals have not fully penetrated to the classroom level. For example, in focus group discussions, some participants struggled to answer what the primary purpose of the State's evaluation system is. Those who did respond overwhelmingly identified the primary purpose of evaluation as supporting teacher development.²⁶ Supporting teacher development is a goal of the evaluation system, but Indiana has articulated other goals as well. Similarly, at the January 7th SBOE meeting, there was a discussion regarding the varying goals of evaluation, all of which were valid and achievable through a well-implemented system. However, the conversation revealed that there is not a commonly understood set of goals for the State's system or a clear theory of action for achieving them.

Without a universally held purpose, it will be next to impossible for Indiana to make adjustments to its current system in a coherent way. In addition to creating a sense of coherence, a clear articulation of the purpose and priorities for evaluation will help preserve the state's preference for local control. It may seem counter-intuitive, but if corporations have a clear and shared understanding of what evaluation is intended to accomplish, they can align their plans to these expectations and limit the level of State involvement.

To address this gap, we recommend the Board members agree to a statement of purpose and theory of action for evaluation as well as a set of guiding principles for supporting implementation in Indiana. It may be appropriate for the Board to revise its Strategic Plan to include the purpose, theory of action and guiding principles in Goal 2: Maximize the Potential of Human Talent. Then, using this vision for evaluation, the Board and IDOE can align all future actions regarding evaluation to their shared understanding of and goals for evaluation.

Provide leadership for change management and implementation of newly adopted policies and practices

With a clear vision articulated for the State's evaluation system, the Board will be equipped to provide the leadership necessary to navigate Indiana through changes to the evaluation system and ultimately to initiate the culture shift needed around evaluating teacher performance.

We recommend the Board call for an implementation plan to be developed to address any forthcoming changes. An implementation plan should include change management best practices, such as:

- Development of clear communications materials to explain forthcoming changes
- Identifying sponsors at all levels of the education system to lead the implementation efforts
- Establishing communication structures to support a dialogue about the new policies and practices
- Collaborative monitoring structures for the SBOE and IDOE to ensure implementation is progressing in alignment with the purpose, theory of action and guiding principles and to identify when or where adjustments are needed.

The Board may wish to establish a subcommittee to produce a plan that addresses change management and implementation priorities. One option is to charge the Stakeholder Design Committee that will be convened as part of TNTP's engagement to design this plan.

²⁶ See Appendix A at 3.

Ensure there are clear, frequent and high-quality communications and resources to support implementation

As indicated above, some of the most critical components of successful change management and implementation depend on having clear, frequent and thoughtful communication at all levels. To that end, we recommend consideration of the following actions to improve the State's communication related to evaluation.

- **Communication amongst State leaders:** To ensure the State's education leaders are fully informed about the progress and quality of implementation, the SBOE should identify the subjects on which it would like reports from the IDOE as well as the frequency of those reports. Establishing a regular reporting cycle for implementation updates allows the State's leaders to prioritize discussion of implementation at its meetings and to respond and adjust to challenges in a timely way. This approach also affords a level of predictability to the IDOE so that the Department can adequately prepare for the requested information.
- **Communication from the State to school corporations and schools:**
 - Meeting with Constituents: Constituent meetings provide an opportunity for the Board Members to take the lead on shifting the culture and conversation around evaluation and to address questions or concerns directly. The Board members will be able to align on messaging using the purpose statement, theory of action and guiding principles they will have adopted. Additionally, the Board members can use these constituent meetings to introduce the implementation plan they will have called to be adopted.
 - Review of IDOE Communications Content and Processes: The IDOE already provides updates about teacher evaluation on its website and offers a variety of resources there as well.²⁷ However, based on stakeholder feedback, it is unclear whether corporations and schools are aware of their existence or if they are completely addressing the needs of corporations and schools.²⁸ To ascertain whether the resources and communications are effectively meeting the needs of the end-users, we recommend having a group of administrators and teachers conduct a review of both the content and process for disseminating resources and information related to evaluation. Based on their feedback, the IDOE will be able to align any new communications and resources to the group's recommendations and adjust the current content and processes for sharing information, if necessary.

Allocate resources and personnel at the state level to ensure implementation aligns with the State's vision and theory of action

Another opportunity to lead the State in establishing a vision and pursuing a clear theory of action for evaluation is to reassess how the State allocates its resources and personnel to support educator evaluation. Allocation of resources – especially personnel – is an indication of an organization's priorities. Additionally, the commitment of time, talent and resources necessary to support effective implementation is frequently underestimated. States who are considered leaders in educator evaluation have teams of a dozen or more in their Departments of Education specifically dedicated to educator evaluation and often with specialties in data analysis, training and support, or performance-based compensation.²⁹

To adequately prioritize implementation, we recommend the IDOE reallocates its personnel to ensure it can meet the demands of high-quality implementation. This recommendation is aligned with the IDOE's stated goal in the ESEA

²⁷ Indiana Department of Education houses most of its evaluation resources on its webpage: <http://www.doe.in.gov/evaluations>.

²⁸ See Appendix A at 4 and 6.

²⁹ Colorado Department of Education outlines its structure here: <http://www.cde.state.co.us/offices/educatoreffectivenessunit>; D.C. Public Schools outlines its structure here: <http://dcps.dc.gov/DCPS/Files/downloads/ABOUT%20DCPS/SY1314%20Office%20Descriptions%20Jan%202014f11.pdf>.

waiver to increase capacity to support school corporations and schools with implementation.³⁰ We believe increasing the level of resources and staff dedicated to educator evaluation will not only alleviate the burden on current IDOE staff to support with the recommended changes to the State's policies and practices, but it will also send a message that State leaders acknowledge the importance and hard work associated with implementation.

Summary

The above recommendations are critical to ensuring the State has the necessary leadership to ensure all stakeholders are moving in the same direction on evaluation. Without a common understanding of evaluation's purpose, a plan for managing the necessary changes, appropriate communications structures and the resources and personnel dedicated to support implementation, Indiana will make little progress in overcoming its current implementation challenges and shifting the culture around teacher evaluation. Additionally, a clear articulation of the purpose and priorities for evaluation will help preserve the state's preference for local control. If corporations have a clear and shared understanding of what evaluation is intended to accomplish, they can align their plans' design and implementation accordingly.

Increased Focus on High-Quality Training

Training for evaluators and teachers is universally regarded as critical to the success of any evaluation system. As the Center on Great Teachers & Leaders has said, "[h]igh-quality training is a crucial investment in establishing and maintaining implementation fidelity as well as building educators' trust in the new process."³¹ Additionally, training addresses several of the issues Indiana is experiencing, including issues with accurate ratings for all teachers, teachers' perceptions of the system, and a lack of a shared understanding of the purpose and priorities of teacher evaluation.

While Indiana has taken steps to ensure evaluators are trained, there are opportunities for the State to improve its support of evaluators and teachers. Below we specifically outline our recommended improvements first for evaluators and then for teachers.

Administrator & Evaluator Training

Increased emphasis on evaluator training will go a long way to improving some of the most concerning issues with Indiana's current state of evaluation. First, to address the possible issues with accurate ratings, high-quality training should mitigate variability among evaluators so that a rating of Effective means essentially the same thing from school to school.³² Because at least half of every teacher's evaluation rating is based on teacher practice, it is critical that evaluators are especially well-trained in observation and normed on what effective teaching looks like. More than giving administrators the skills to assess instruction, training can also help evaluators develop the will to deliver honest feedback, have difficult conversations with low-performing teachers, and learn how to use and interpret the objective measures used in a teacher's evaluation.³³

Second, evaluator training is an ideal vehicle for building a shared understanding for the purpose and priorities of evaluation in Indiana. Reinforcing the SBOE's vision and guiding principles in these trainings could positively affect the perception of evaluation in Indiana and encourage evaluators to re-prioritize it. For example, one superintendent

³⁰ Indiana ESEA Waiver Application at 274-75, retrieved from http://www.doe.in.gov/sites/default/files/esea/indiana_amended_clean_copy_waiver_6-30-14.pdf.

³¹ Center on Great Teachers & Leaders, *High Fidelity: Investing in Evaluation Training*. (2013), retrieved from http://www.gtlcenter.org/sites/default/files/docs/GTL_AskTeam_HighFidelity.pdf.

³² Matthew Graham, Anthony Milanowski & Jackson Miller, Center for Educator Compensation Reform, *Measuring and Promoting Inter-Rater Agreement of Teacher and Principal Performance Ratings*, (2012), retrieved from http://cecr.ed.gov/pdfs/Inter_Rater.pdf.

³³ National Council on Teacher Quality, *State of the States 2013: Connect the Dots: Using Evaluations of Teacher Effectiveness to Inform Policy and Practice*. (2014).

shared that because of the laser focus on training evaluators in the early days of implementation, they are experiencing largely positive feedback on the system.³⁴

Finally, an increased emphasis on training for evaluators can actually improve teacher perception of the evaluation system. A majority of teachers lack confidence in their evaluator's ability to use their corporation's observation rubric, assess teacher quality, provide useful feedback or interpret student performance data to inform instruction.³⁵ By supporting corporations to ensure their evaluators possess all these skills, the State may see teachers' beliefs about evaluation improve.

The following recommendations suggest areas where Indiana can strengthen its current training policies and practices.

Recommendations

Regulatory Recommendations:

First, anticipating that corporations may need to amend their evaluation plans in the coming year to align with the Board or the General Assembly's actions, we recommend the SBOE issues regulations to require evaluators to be retrained whenever substantive changes are made to a corporation's evaluation plan. Although current statute requires the SBOE and IDOE to ensure ongoing training is available for evaluators and educators, without requiring school corporations to provide retraining to evaluators when changes are made there is no guarantee evaluators will be properly equipped to implement the changes. Additionally, the retraining provides the corporation an opportunity to recalibrate expectations for teacher evaluation that align with the SBOE's vision and theory of action. Finally, the retraining offers corporations a chance to monitor evaluator performance to ensure the effects of the initial trainings continue.³⁶

The SBOE has the authority to make these rule changes under IC § 20-28-11.5-5; IC § 20-28-11.5-8 (a)(1)(D) and IC § 20-28-11.5-8(a)(3).

Implementation Recommendations:

In addition to the regulatory change above, we recommend the following implementation actions to support corporations in their evaluator training.

- **Offer "plan agnostic" training for evaluators or trainers of evaluators:** To ensure that all corporations have the opportunity to engage on best practices for evaluating teachers we recommend providing a training based on best practices that can be applied to all evaluation plans. Regardless of the plan a corporation uses, all evaluators must possess certain skills and behaviors in order to be equipped to accurately assess teacher quality. Training on these universal skills will help evaluators become comfortable with the components of evaluations with which many evaluators struggle, like delivering honest and actionable feedback and understanding student growth to inform instruction. Additionally, because all plans must include Individual Growth Model (IGM) scores for the applicable teachers, a training specifically on this measure should be offered. This approach has been used by other states that allow for some flexibility or control at the local level.³⁷

³⁴ See Appendix A at 4.

³⁵ Indiana Teacher Appraisal and Support System survey results, retrieved from http://www.in.gov/sboe/files/2014-09-26_INTASS_PPT.pdf.

³⁶ Matthew Graham, Anthony Milanowski & Jackson Miller, Center for Educator Compensation Reform, *Measuring and Promoting Inter-Rater Agreement of Teacher and Principal Performance Ratings*, (2012), retrieved from http://cecr.ed.gov/pdfs/Inter_Rater.pdf.

³⁷ The Ohio Department of Education offers training for all evaluators despite the ability for districts use locally-created evaluation models: <http://education.ohio.gov/Topics/Teaching/Educator-Evaluation-System/Teacher-Evaluation-Training>. The New Jersey

These trainings can be offered centrally by the IDOE or they can be provided through Educational Service Centers (ESCs). However, the IDOE should develop the training content and train ESCs on it. This will ensure that the content aligns with the State’s vision and theory of action for evaluation, that all ESCs are equally equipped to train the evaluators in their regions, and that the trainings are of a consistent level of quality across ESCs.

The IDOE provides free or low-cost resources for training evaluators on its website, which it should continue to do. However, we recommend taking this commitment to supporting evaluator training one step further by ensuring that all school corporations have an in-person opportunity to learn about best practices that align with the State’s vision for teacher evaluation.

- **Leverage ESCs to provide high-quality training to school corporations.** ESCs are uniquely positioned to train evaluators because they have the ability to tailor trainings to the needs of the corporations they serve. ESCs have already been largely responsible for training school corporations on the State’s model plan – RISE 2.0. However, stakeholder feedback revealed that the quality of training by ESCs has been inconsistent.³⁸ So, the first step to leveraging these resources is to recalibrate the ESC trainers to ensure they are equipped to explain the model plan – and potentially other best practices common to all evaluation plans – to school corporations’ evaluators.

We suggest that the IDOE support the ESCs in three ways. First, ESC trainers should be retrained on the model plan – including any changes that might be made. Additionally, we suggest the IDOE train ESC trainers on the “plan agnostic” training we recommend above so they can turnkey these best practices into trainings for school corporations that use locally-created or modified RISE plans. Finally, we recommend facilitating the best practices among ESCs. In one stakeholder discussion, IDOE shared that some ESCs provide more extensive evaluation trainings.³⁹ The quality of these additional services should be assessed, and if effective, the IDOE should facilitate the sharing of practices such as these among ESCs so that all school corporations can benefit.

- **Highlight the mutually reinforcing nature of evaluator evaluation and teacher evaluation.** In addition to the recommendations above, we suggest reinforcing the expectation that school leaders be evaluated on their ability to assess teacher quality accurately. Research shows that one of the most effective tools for increasing and maintaining the accuracy of evaluators’ assessment of teacher performance is to hold evaluators accountable for the accuracy of their ratings.⁴⁰ The RISE model incorporates this expectation into the rubric on which evaluators are themselves assessed, and we believe the same expectation should be universally set for all school administrators.⁴¹

Department of Education offers trainings for evaluators and trainers of evaluators on a variety of topics, including the use of SGP: <http://www.nj.gov/education/AchieveNJ/resources/events.shtml>.

³⁸ See Appendix A at 6.

³⁹ See Appendix A at 6.

⁴⁰ Matthew Graham, Anthony Milanowski & Jackson Miller, Center for Educator Compensation Reform, *Measuring and Promoting Inter-Rater Agreement of Teacher and Principal Performance Ratings*, (2012), retrieved from http://cecr.ed.gov/pdfs/Inter_Rater.pdf.

⁴¹ Domain 1.1.2 of Principal Rubric, retrieved from <http://www.doe.in.gov/sites/default/files/evaluations/rise-handbook-principals.pdf>.

Teacher Training

Feedback from educators indicates that more deliberate training on the evaluation plan used in their corporations may improve their perception of the evaluation plan. According to the INTASS survey results, only 14 percent of teachers surveyed believe their corporation's evaluation plan positively affects teaching and learning.⁴² This may be due – in part – to a lack of understanding of the system itself.⁴³ For instance, one teacher reported that during the first year that the evaluation plan was implemented, the teacher did not receive training on the plan and did not feel positively about the evaluation plan. However, during the second year of implementation, this teacher was trained as an evaluator. Once the teacher understood the system better, the teacher's perception of the plan improved dramatically.⁴⁴

In our experience, it is critical that teachers understand and trust the evaluation system on which they are being evaluated. Providing formal training on the evaluation system ensures teachers are receiving accurate information about how their performance will be assessed, which will help build their understanding and trust. As NCTQ explained: "The grapevine is a bad way for teachers to find out what's going on, and states and corporations should never assume that teachers are getting good information about the evaluation system." In that vein, below are several steps Indiana can take to improve the training teachers receive.

Recommendations

Legislative Recommendations:

There is no explicit requirement in statute or regulation that teachers be trained on their corporation's evaluation plan. IC § 20-28-11.5-8(a)(3) requires that training and information is *available* for evaluators and "certificated employees" on the model plan, but there is no mandated training for teachers on the model plan or any evaluation plan. Simply because teacher training is not required does not mean that no teachers receive training on their corporation's evaluation plan. However, if even one corporation or school fails to explain the evaluation plan to the individuals most affected by it, that is too many.

Therefore, our first recommendation is to amend IC § 20-28-11.5 to require all teachers be trained on their corporation's plan. Like the evaluator training, we also recommend that the SBOE set standards for teacher training. IC § 20-28-11.5-8 (a)(1)(D) could be amended to require the SBOE to set standards for both evaluator and teacher training. Our recommendations for the standards to be included in regulation are addressed below.

Requiring corporations to train their teachers allows corporations to retain control over the process and – to a large degree – the content of trainings. Therefore, if school corporations are already providing training to teachers on the evaluation plan, then this provision would change little – if anything – for them. However, for those teachers in a corporation that does not provide evaluation training, this provision could address the anxiety and lack of clarity that they currently experience.⁴⁵

Regulatory Recommendations:

If action on the above recommendation is taken and evaluation training is required for teachers, then we recommend the SBOE set standards for the content of the trainings as it has for evaluator training. The standards can be framed broadly to allow local corporations to retain a degree of control over content; however, they should ensure that

⁴² Indiana Teacher Appraisal and Support System survey results, retrieved from http://www.in.gov/sboe/files/2014-09-26_INTASS_PPT.pdf.

⁴³ See Appendix A at 3 and 6.

⁴⁴ See Appendix A at 6.

⁴⁵ See Appendix A at 3.

across the State teachers are receiving a consistent level of training. Some content standards to consider requiring are:

- Explanation of all a plan's components
- Overview of the evaluation process
- Explanation of the Individual Growth Model
- Explanation of how all objective measures of student performance will be used the school corporation's plan

We recommend including these standards in 511 IAC §10-6-3 where the evaluator training standards are already outlined.

Implementation Recommendations:

The IDOE already provides several resources on its website that are aligned with the standards suggested above and could be adapted for a teacher training. We recommend the IDOE identify which could be most useful to corporations in training teachers and promote them accordingly.

It may also be worthwhile for the IDOE to provide a training on the model plan for teachers or to support ESCs in offering trainings. Not only will this training option help corporations that are in the early stages of implementation, but these IDOE sponsored trainings provide an additional opportunity for the IDOE to engage and support teachers.

Summary

Training on evaluation procedures, policies and best practices is so critical that if Indiana made no other changes to its policies and practices except these training recommendations, we believe Indiana would see both the perception and the results of Indiana's evaluation system improve. Because at least half of a teacher's evaluation rating is based on evaluator assessment of professional practice, it is essential that all evaluators receive high-quality training on their corporation's plan as well as on the best practices and critical skills of evaluation. Training will help ensure that evaluators are normed on what effective teaching looks like, which will increase the reliability and comparability of evaluation ratings across the state. Additionally, ensuring teachers are trained on their evaluation plan may improve their comfort-level with evaluation and their trust in their evaluator's assessment of their performance.

Objective Measures of Student Performance

As most educators have long known, teaching is both art and science – making it “too complex for any single measure of performance to capture it accurately.”⁴⁶ Research and best practice indicate that teacher evaluation systems should include multiple measures, including at a minimum observations by highly-trained evaluators and objective measures of teacher impact on student performance.⁴⁷ Both of these measures contribute to painting an accurate picture of teacher quality.

In Indiana, “objective measures” is broadly defined and can be based on a variety of assessment tools – not just state assessments. Corporations may use student portfolios, end of course exams, locally-created or teacher-created assessments as objective measures of student performance. This is important to note because much of the opposition to the use of objective measures is based on the unfounded belief that the component is limited to student performance on state assessments.

⁴⁶ The MET Project, *Ensuring Fair and Reliable Measures of Effective Teaching*. (2013).

⁴⁷ The MET Project, *Working with Teachers to Develop Fair and Reliable Measures of Effective Teaching*. (2010); TNTP, *Teacher Evaluation 2.0*. (2010); National Council on Teacher Quality, *State of the States 2013: Connect the Dots: Using Evaluations of Teacher Effectiveness to Inform Policy and Practice*. (2014).

Stakeholder perception and best practice indicate that there are opportunities for the State to strengthen its support of corporations in the use of objective measures.

Ensure corporations all utilize comparable levels of objective measures of student performance

Indiana educators overwhelmingly believe that student growth can be accurately measured and that teacher effectiveness affects student achievement.⁴⁸ Despite these beliefs, there are mixed feelings about the use of student growth and achievement data in teacher evaluations.⁴⁹ Because of the disconnect in stakeholder opinion as well as the variation in the use of student performance in corporations' plans across the state, we recommend providing a clear definition of how student performance should be used to inform assessment of teacher effectiveness.

Indiana's law requires "[o]bjective measures of student achievement and growth to significantly inform" a teacher's evaluation. However, neither statute nor regulation explicitly defines "significantly inform." It is our understanding that this language was intentionally left open to interpretation out of respect for the State's general preference to drive policy and decision-making to the local level wherever possible. Along those lines, in stakeholder discussions we heard educators express a preference for determining the weight of student performance data at the local level.⁵⁰

However, leaving this component exclusively to local decision-makers is creating inconsistency. In some cases this unfettered autonomy has led to corporations' under-emphasizing objective measures in a way that contradicts the original intent of the language "significantly inform" and undermines the integrity of the evaluation system.⁵¹ These inconsistencies create two issues.

First, because there are dramatic differences in how objective measures are weighted, corporations do not have comparable evaluation systems. This lack of comparability makes it difficult for the State to consider teacher performance as a basis for other statewide policies. For example, if a rating of Effective means something different from corporation to corporation, then it will be challenging for the State to use teacher performance to make decisions about policies like teacher licensure and preparation.

Second, because some corporations weigh objective measures so slightly, these corporations lack a point of reference for and a balance to more subjective components of the evaluation system. Essentially, these corporations are undermining the complexity of teaching by assessing teacher performance with only one measure – observation. Likewise, they are not appropriately accounting for what is arguably a teacher's primary responsibility – to contribute to student learning.

From our evaluation design and implementation work in states like Louisiana, New Jersey, New York and Tennessee among others, we have observed firsthand how the role of objective measures drive reliable and accurate evaluation results.⁵² However, objective measures are only impactful if they are weighted appropriately – neither too low nor too great.⁵³

⁴⁸ Indiana Teacher Appraisal and Support System survey results, retrieved from http://www.in.gov/sboe/files/2014-09-26_INTASS_PPT.pdf.

⁴⁹ Indiana Teacher Appraisal and Support System survey results, retrieved from http://www.in.gov/sboe/files/2014-09-26_INTASS_PPT.pdf.

⁵⁰ See Appendix A at 3 and 5.

⁵¹ Stand for Children, *Teacher Evaluation in Indiana: A Review of Public Law 90 and Its Implementation*. (2014).

⁵² La. Rev. Stat. § 3902(B)(5); N.J.A.C. § 6A:10-4.1(c)(1); N.Y. Ed. Code § 3012-c(2)(a); Tenn. Code Ann. § 49-1-302(d)(2).

⁵³ The MET Project, *Ensuring Fair and Reliable Measures of Effective Teaching*. (2013).

Recommendations

Regulatory Recommendations:

To ensure all plans have a consistent level of rigor and reliability, we recommend defining significantly inform in regulation. The definition of “significantly inform” should include minimum and maximum percentages of the summative evaluation rating that must be based on student achievement and growth.

Research shows that weighting objective measures between 33-50 percent can accurately and consistently predict teachers’ impact on student assessment gains year over year.⁵⁴ This range is appropriate for those teachers who receive IGM scores, but it may not be appropriate for all teachers. The vast majority of Indiana teachers do not teach a grade or subject with a state assessment. Therefore, they lack a piece of data that teachers who receive IGM scores receive. To account for the variation in student data available, we recommend requiring two ranges based on a teacher’s role and the assessments that are available.

- Objective measures should account for 33-50 percent of teacher evaluation ratings for teachers who receive IGM scores (Note: assessments other than the state assessment can and should be used to create this composite weight)
- Objective measures should account for 25-40 percent of teacher evaluation ratings for teachers who do not receive IGM scores.

These ranges are representative of a teacher’s substantial impact on student learning without oversimplifying the role teachers play in their students’ lives. Additionally, these ranges are aligned with the State’s model plan, which is based in research and best practice and is representative of the State’s intended definition of significantly inform at the time of the law and the plan’s adoption.⁵⁵ To that end, a majority of Indiana corporations already have adopted plans that weight objective measures within these ranges, and the IDOE is actively counseling corporations that do not have plans that meet these criteria to elevate their consideration of objective measures to these levels.⁵⁶ Thus, this policy change is aligned with what most corporations are already doing or moving towards. Finally, this approach will allow corporations to retain a level of control over how the various objective measures are weighted within this and other parameters set out in 511 IAC § 10-6-4(b) and in the way that makes the most sense for their educators and students.

One caveat to this recommendation is the fact that Indiana is transitioning to a new state assessment this year that will be aligned to the State’s new standards. One of the critiques of the implementation efforts to date has been the pace and amount of change.⁵⁷ Therefore, to avoid instituting too many changes all at once and to ensure the State successfully transitions to a new assessment, we recommend delaying the effective date of the above definition until Indiana has one year of baseline data using the new assessment.

The SBOE has the authority to define this language under IC § 20-28-11.5-8(a)(1)(B) which explicitly directs the SBOE to define “the measures to be used to determine student academic achievement and growth under section 4(c)(2).” In the alternative, if this is insufficient authority to define “significantly inform” in regulation, then we recommend amending IC § 20-28-11.5-8 to direct the SBOE to define significantly inform.

Implementation Recommendations:

⁵⁴ The MET Project, *Ensuring Fair and Reliable Measures of Effective Teaching*. (2013).

⁵⁵ Indiana Department of Education, RISE Handbook, retrieved from <http://www.doe.in.gov/sites/default/files/evaluations/rise-handbook-2-0-final.pdf>.

⁵⁶ Indiana Department of Education, Response to TNTP’s Initial Recommendations.

⁵⁷ See Appendix A at 4 and 6.

To ensure corporations are equipped to revise their plans to conform to these regulatory changes, we suggest that the IDOE build off current support structures – like resources provided online, on-site monitoring, and in-person training sessions – to help corporations revise their local definitions and understand the implications of these changes. Additionally, we recommend a review of this definition become an explicit focus of the IDOE’s monitoring protocol, as outlined in the ESEA waiver.

Ensure an appropriate level of rigor in the definition of “negative impact”

A unique strength of Indiana’s evaluation law is that it contains a provision that prohibits teachers who have a negative impact on student growth and achievement from being rated Effective or Highly Effective.⁵⁸ The Board is empowered to define “negative impact.” In regulation, negative impact is defined as when students achieve a “below acceptable” or “unacceptable” rate of growth.⁵⁹ Guidance for the acceptable rates of growth are set by the IDOE each year.

The IDOE’s current guidance states that a teacher negatively affects student growth on state assessments if:

- A teacher’s average student performance on the ISTEP+ drops by at least 15 points, **and**
- A teacher’s median student growth percentile is below 15 points.⁶⁰

As explained in a report last year, “students in Indiana averaged scale score increases of 10-15 points per year, but a teacher whose students did not grow at all over an entire year would be safe under this definition. Students would have to significantly regress...in order to meet the standard for “negative impact” on student learning.”⁶¹

For non-tested grades and subjects, the IDOE allows corporations to define “negative impact” within certain parameters, including a requirement that local definitions be based on objective measures of student achievement and growth. However, some corporations actually define negative impact in much less concrete – and even circular – terms. In some cases the local definitions probably do not meet the requirements of either the law or the IDOE’s guidance. For instance, some corporations define negative impact to mean any teacher who is rated Ineffective.⁶²

Recommendations

Regulatory Recommendations:

The definition of “negative impact” is especially pertinent because it provides an additional check on the accuracy of teacher ratings, which would in turn affect the ratings distribution. In other words, if the definition were more rigorous, then in all likelihood Indiana would have seen more than 2.11 percent of teachers rated Improvement Necessary or Ineffective last year.

Therefore, we recommend revising 511 IAC § 10-6-2 (b) to require SBOE approval of the definition of “negative impact” and guidance the IDOE issues. This review and approval by the SBOE is consistent with the statute which calls on the SBOE to define the term. It will also ensure the guidance and cut scores for “acceptable growth” are in alignment with the Board’s vision for teacher evaluation.

⁵⁸ IC § 20-28-11.5-4(c)(6).

⁵⁹ 511 IAC § 10-6-2(b).

⁶⁰ Indiana Department of Education, Evaluation Guidance: Negative Impact on Student Learning, retrieved from <http://www.doe.in.gov/sites/default/files/evaluations/updated-negative-impact-guidance.pdf>.

⁶¹ Stand for Children, *Teacher Evaluation in Indiana: A Review of Public Law 90 and Its Implementation*. (2014).

⁶² Indiana Department of Education, 2012-13 Locally Developed Evaluation Plans: <http://www.doe.in.gov/evaluations/evaluation-plans>.

Implementation Recommendations:

To support corporations to make the necessary revisions to their plans to conform to these regulatory changes, we again suggest that the IDOE build off current support structures. Additionally, because it appears there are some corporations that may be out of step with the IDOE's current guidance, we recommend a review of this definition become an explicit focus of the IDOE's monitoring protocol, as outlined in the ESEA waiver.

Leverage IDOE expertise to support SBOE and corporations to understand assessment guidance

Indiana statute requires locally created assessments to be included as objective measures of student performance for all teachers.⁶³ Locally created assessments can be a valuable tool, but it can be challenging for corporations to design valid, reliable and comparable assessments. Through our focus group discussions, we heard that corporations and schools appreciate the ability to create their own assessments, tailored to their schools' and students' needs.⁶⁴ Ensuring that corporations and schools have the resources and skills necessary to develop valid and reliable local assessments empowers them to continue to use these measures to supplement state assessments, where appropriate.

To address the importance and challenge of creating assessments, we offer the following implementation recommendations.

Recommendations

Our recommendations in this area are intended to capitalize on the IDOE's expertise in this area and to support both corporations and Board members in their respective duties.

- **Support corporations to create valid, reliable and comparable assessments:** We recommend the IDOE ensure that assessment guidance for creating local assessments is clearly and prominently provided to corporations. It may be worthwhile for the IDOE to provide training to corporations and schools on how to create high-quality assessments. Again, this type of a training could be delivered through ESCs if those entities are in the best position to tailor training to local considerations. Additionally, the IDOE should facilitate school and corporation collaboration on best practices. Stakeholders reported that a cohort of corporations have collaborated on creating assessments for use in SLOs.⁶⁵ This type of collaboration should be encouraged and expanded.
- **Ensure the SBOE is informed about assessment guidance:** Because of the prominence of locally developed and procured assessments in all evaluation plans, the SBOE should be familiar with the assessment guidance. To support the SBOE with understanding the policy implications of assessment guidance, we recommend the IDOE provide an initial report to the Board on current assessment guidance, including model assessments recommended by the IDOE, instructions for creating or procuring assessments, and recommendations on how local assessments should be used by schools. Thereafter, the IDOE could provide semi-regular reports when changes or additions to assessment guidance are made.

Summary

Teaching is too complex to rely solely on one measure of performance to assess a teacher's skills and impact. Objective measures of student performance help to create a more complete picture of a teacher's practice. These additional data points provide a balance to skilled evaluators' assessment of a teacher's performance. Establishing clear definitions of "significantly inform" and "negative impact" will ensure that there is a level of reliability and

⁶³ IC § 20-28-11.5-4(c)(2).

⁶⁴ See Appendix A at 5

⁶⁵ See Appendix A at 4-5.

comparability across all corporation's evaluations. The recommended definitions are framed to balance the need for consistency with the preference for local control.

The recommended definition for "significantly inform" ensures that corporations can retain control over the assessment tools and how much to weigh the measures within certain boundaries. This recommendation also accounts for the fact that the State is in the midst of transitioning to a new assessment, and therefore any definition should not go into effect until one year of baseline data exists.

Our recommendation for defining "negative impact" maintains the State's current approach to have the SBOE and IDOE define the term. At the same time, it will ensure that the State is adopting a sufficiently rigorous definition and in turn supporting corporations to define the locally created provisions with equal rigor.

Finally, our recommendations to support both the SBOE and corporations to understand the IDOE's assessment guidance and resources empowers local corporations to utilize locally-created assessments that are valid and reliable, while ensuring that the Board understands the implications of assessment guidance on the State's policies.

Educator Engagement

Teacher involvement is essential to the design process. It ensures that teachers' perspectives – as the ultimate stakeholders – are represented in the system and that teachers feel invested in the system's success. Teacher engagement at the design stage is a best practice that TNTP prioritizes whenever we partner with a state or district to design a new evaluation system.

Indiana law attempts to encourage teacher involvement by requiring 75 percent of voting teachers to approve of a corporation's modified or locally-created plan.⁶⁶ However, this provision falls short of meaningfully engaging teachers in two ways. First, this section appears to require a vote only if the IDOE requests to review the corporation's plan. Therefore, teacher approval can be avoided if the IDOE does not request to review the plan. Second, a vote of approval does not itself ensure teachers were involved in the design process – especially when the vote is required only when the IDOE requests review of the corporation's plan.

These shortcomings are reflected in teachers' feedback on their evaluation plans. According to the INTASS survey results, only 14 percent of teachers believe their corporation's plan has a positive impact on teaching and learning. And, only 33 percent believe their corporations' evaluation plans are aligned to professional development. If teachers were more involved in the design process, teacher satisfaction with evaluations could improve.⁶⁷ Anecdotally, in stakeholder discussions, educators in corporations that prioritized teacher and community involvement in the design stage reported they have higher levels of satisfaction in their schools and corporations.⁶⁸

To address these concerns, we recommend the changes below.

Recommendations

Legislative Recommendations

To ensure teachers are meaningfully engaged in the design process, IC § 20-28-11.5-8(c) should be revised to require corporations that do not adopt one of the pre-approved plans to employ structures and processes that involve teachers in the design of locally-created or modified plans. This teacher engagement process should also be used

⁶⁶ IC § 20-28-11.5-8(c)

⁶⁷ Indiana Teacher Appraisal and Support System survey results, retrieved from http://www.in.gov/sboe/files/2014-09-26_INTASS_PPT.pdf.

⁶⁸ See Appendix A at 5.

whenever a corporation seeks to make changes to its plan. The teacher engagement process should replace the 75 percent approval requirement, as that has not proved to be an effective way of incorporating teacher input at the design stage.

Implementation Recommendations

As with other State mandated criteria, we recommend the IDOE provide guidance on how to comply with this provision. Guidance should include best practices for involving teachers in the design process as well as highlighting model engagement efforts and corporations that excel at engaging teachers at the design stage. As part of its review and approval of the modified or locally-created plans and on-site monitoring, the IDOE should also review the corporation's teacher engagement processes and structures to confirm that they were thorough and equitable.

Summary

Involving teachers in the design of their corporation's evaluation plan ensures that the teacher voice is represented throughout the evaluation process. This level of teacher engagement can build teachers' trust in their corporation's plan and may ultimately improve their perception of the evaluation system overall.

Monitoring Plans for Consistency

One of the features of Indiana's evaluation policies is the level of local control that corporations have to determine the evaluation plan that best fits their needs. However, a high-level of local control can lead to a lot of variability in the quality and comparability of evaluation plans across the state. A best practice for states that value local control is to institute oversight and support structures that balance the benefits of flexibility and autonomy for corporations with the need to ensure a consistent standard of rigor.⁶⁹

Through the structures and processes outlined the ESEA waiver, Indiana has taken steps in this direction. The IDOE has detailed a "robust multi-layered" protocol for monitoring plan adoption and implementation.⁷⁰ The articulated strategy involves three layers of monitoring:

1. Review all newly adopted (September 2014) evaluation plans for statutory compliance
2. Conduct on-site monitoring of Focus and Priority Schools (schools that have recently been rated D or F)
3. Conduct on-site monitoring for corporations that have reported high percentages teachers that have not been evaluated and are not already monitored as Focus and Priority Schools.

Under this monitoring regimen, the IDOE estimates that about 76 corporations would receive annual monitoring, and all corporations would be monitored once every four years.

By and large, these are sound monitoring protocols, but there are opportunities to strengthen them. Additionally, to ensure the commitments made in the waiver are aligned with the Board's vision for teacher evaluation and persist beyond the short-term goals of the waiver, these monitoring protocols should be vetted by both the SBOE and IDOE and codified as appropriate. Recommendations to this effect are outlined below.

Recommendations

Legislative Recommendations

⁶⁹ National Council on Teacher Quality, *State of the States 2013: Connect the Dots: Using Evaluations of Teacher Effectiveness to Inform Policy and Practice*. (2014).

⁷⁰ Indiana ESEA Waiver Application at 274-75, retrieved from http://www.doe.in.gov/sites/default/files/esea/indiana_amended_clean_copy_waiver_6-30-14.pdf.

The current language of IC § 20-28-11.5-8(c) states that the IDOE “may request” to review a corporation’s modified or locally-developed plan. In addition, IC § 20-28-11.5-8(d) requires all corporations to submit their plans to the IDOE, but no review or approval is explicitly required except to qualify for certain grants. Additionally, Indiana law is silent on monitoring whether corporations are implementing their plans with fidelity. There are two areas where Indiana law can be strengthened to support the IDOE with ensuring corporations are in compliance with state law.

- **Require corporations to submit locally created or modified plans in advance of their adoption.** The current policy allows corporations to remain passively non-compliant and places the burden of seeking out non-compliance on the IDOE. Additionally, because review of plans is optional, this policy creates a situation in which not all corporations are held to the same standard of review. As a result, the current policy does not place the IDOE in a position to successfully ensure all corporations have adopted plans consistent with state law.

Instead, IC § 20-28-11.5-8(c) should be amended to require corporations to proactively seek approval for any plan that is not pre-approved, which appropriately distributes the burden of ensuring compliance among the IDOE and the corporations themselves. A similar review process could be used when corporations contemplate substantive changes to modified or locally-created plans. Finally, the SBOE should be notified on a regular basis as requested by the SBOE of any noncompliance so that it can support the IDOE with the enforcement of any corrective action.

- **Require regular monitoring and reporting of corporations’ plan implementation.** The review and approval process suggested above ensures that corporations *adopt* plans that meet the state’s requirements. However, adopting an approved plan does not necessarily guarantee that all the plan’s elements have been executed. To ensure the IDOE’s monitoring protocols persist, IC § 20-28-11.5-8 should be amended to provide for regular monitoring of corporations’ plan implementation. We recommend specifying how frequently each corporation should expect a review. An annual review is overly burdensome, but the IDOE’s current rate of once every four years leaves many corporations vulnerable to noncompliance that goes unnoticed for too long. We recommend a biannual cycle so that all corporations’ implementation progress is reviewed every other year.

For a subset of schools and corporations, the IDOE is currently providing annual monitoring, which we strongly recommend. The Department is prioritizing review of schools and corporations that have been rated “D” or “F” and have a high percentage of teachers who were not evaluated. These may be the appropriate focus areas, but we recommend requiring the SBOE to approve of the subset of schools that receive annual monitoring. This will allow the SBOE and IDOE to align the monitoring priorities to the State’s goals for evaluation.

Per the ESEA waiver, these recommendations are consistent with current practice. However, codifying them in statute ensures they carry the force of law and will endure after the goals of the waiver application have been achieved.

Implementation Recommendations

There are also ways to improve the State’s oversight practices without making changes to state law and build off current structures.

- **Support corporation administrators to leverage best practices when designing evaluation plans:** Many corporation administrators reported that they have felt underprepared to design their own plan or to make modifications to the State’s model system.⁷¹ In some cases, this led them to go through unnecessary iterations in the design stage. They expressed an interest in having access to more explicit guidance and examples of modifications. Because many of these resources may already be available on the IDOE’s website,

⁷¹ See Appendix A at 4 and 6.

we recommend the IDOE consider facilitating connections amongst superintendents to support them in sharing best practices and spreading effective innovations. This will also help ensure that corporations are adopting plans that have been approved by the IDOE.

- **Institute a regular reporting cycle on the progress of implementation:** To ensure the SBOE is well-informed on the status of implementation and can support the IDOE with enforcement as needed, we also recommend the IDOE report on implementation progress regularly. The details of the report content and frequency should be considered as part of the communications structures recommendations above. We recommend that reports should be given at least annually and highlight areas of progress as well as instances of noncompliance. These structures will ensure corporations are adhering to their articulated plans and that the IDOE is supported in its oversight and enforcement duties.

Summary

Because Indiana corporations are afforded a high level of autonomy in the creation and implementation of their evaluation plans, the State's role in monitoring and providing support becomes that much more critical. The monitoring regimen that the IDOE has outlined in the ESEA waiver establishes clear oversight practices. There are a few areas where the practices can be strengthened, like increasing the frequency of auditing corporations' plans to once every two years instead of once every four years. On the whole, our recommendations are intended to ensure these practices are aligned to the State's goals and that they persist beyond the ESEA waiver.

Revisions to the State's Model Plan

Continuous improvement is as vital to the evaluation of teaching as it is to the teaching practice itself. Although the design of RISE 2.0 is based in research and reflective of best practices, the benefit of experience and changing circumstances may necessitate revisions to the State's model plan. Below are recommendations regarding the process for making revisions as well as content to consider revising.

Recommendations

Legislative Recommendations

Successful implementation often requires balancing the need for consistency with the need to adapt to changing or unforeseen conditions. To ensure Indiana can strike this balance with the implementation of its model plan, it may be helpful to implement a review and approval process before substantive changes are made to the model plan.

Although IC § 20-28-11.5-2 intends for the SBOE and IDOE to work together to create a model plan, the SBOE's role in making subsequent changes to the model plan is unclear. Because the model plan exemplifies the State's interpretation of best practices and should represent the highest standard of evaluation practice and policy, we recommend amending this provision so that the SBOE must approve of substantive changes to the model plan before revisions are introduced to corporations. The phrase "substantive changes" should be defined to include any alterations to the types of measures used, the weights of those measures, and content revisions to the Teacher Effectiveness Rubric (excluding minor grammatical edits). Review and approval structures like this will ensure the model plan remains consistent with the original intent and high standards with which it was designed.

Implementation Recommendations

Based on our review and stakeholder feedback, we recommend considering revisions to the Teacher Effectiveness Rubric (TER). The TER is a tool evaluators use to assess teacher practice. It is based on research and best practice and has been in use since it was piloted in 2011. Since that time, two things have happened that necessitate some revisions to the rubric. First, it has been adopted by a majority of corporations whose regular use of the tool has revealed there are areas where the TER can be refined. Specifically, stakeholders mentioned that there is too much overlap between Domains 1 and 3, which both examine teacher "inputs" like planning and collaboration with peers

and are often assessed using the same evidence.⁷² Second, Indiana has recently adopted new state standards which are not reflected in the current TER.

Therefore, we recommend revising the TER to streamline and eliminate redundancies and to ensure it is aligned with the new state standards. Because these would be substantive changes to the model system, we recommend they be approved by the SBOE.

In stakeholder discussions, educators and administrators reported some frustration with the number of observations required by the RISE 2.0 plan and some of the requirements with the Student Learning Objective (SLO) process. However, we do not recommend changes to these components of the plan at this time for two reasons. First, the requirements reflect current best practices in these areas. Second, because corporations are able to adjust, adapt or abandon any part of the RISE 2.0 model for their use, corporations are free to make changes these provisions in the ways that best fit the needs of their schools and educators.

Summary

After almost four years of use, the TER would benefit from some updates to address any redundancies in the domains and to ensure it is aligned with Indiana's new standards. We believe these revisions can support both teachers and evaluators in their use of the rubric.

Compensation Models

The compensation structure outlined in IC § 20-28-9-1.5 is intended to reward and recognize teachers in a way that is commensurate with their performance. While the statute reflects strong policy and a best practice that TNTP wholeheartedly endorses, there are areas where the law can be strengthened to support quality implementation.⁷³ Those recommendations are outlined below.

Recommendations

Legislative Recommendations

There are several aspects of Indiana's compensation law that can be strengthened to support corporations with implementation of both evaluation plans and awarding performance-based salary increases.

- **Address the perceived negative impact of preventing salary increases for teachers rated Improvement Necessary:** IC § 20-28-9-1.5 ensures that teachers are compensated in a way that reflects their performance. One component of the law prevents teachers who are rated Improvement Necessary from receiving salary increases. Through stakeholder discussions, it was mentioned that this provision may have contributed to the skewed ratings distribution the State has reported.⁷⁴ Some stakeholders speculated that preventing salary increases deters evaluators from giving teachers in need of development an honest assessment for fear of discouraging them by impacting their compensation.⁷⁵

There is no way to verify whether or to what extent this provision has impacted evaluation ratings. However, should the State wish to address the perception that the compensation law has negatively affected evaluation ratings, we propose adopting the following policy changes:

⁷² See Appendix A at 5.

⁷³ TNTP, *Shortchanged: The Hidden Costs of Lockstep Teacher Pay*. (2014).

⁷⁴ Indiana Department of Education analysis of evaluation results, retrieved from <http://compass.doe.in.gov/dashboard/EducatorRating.aspx?type=state>.

⁷⁵ See Appendix A at 6.

- Allow teachers to be rated Improvement Necessary two years in a row or Improvement Necessary followed by Ineffective before a salary increase is withheld.
- Include a provision that allows teachers rated Improvement Necessary to apply for a waiver from the condition that they not be given a salary increase. The waiver can be granted if the teacher demonstrates extraordinary circumstances impacted his or her ability to perform at a level worthy of an Effective rating. The SBOE would be authorized to issue rules establishing the process and standards for reviewing and granting waivers.

Adopting these changes will maintain the original intent of the law – to recognize and reward the State’s best teachers – while also allowing developing teachers to receive both the accurate feedback on performance they need to improve and a salary increase. This approach ensures teachers who do not improve are not rewarded for poor performance year after year.

We want to be clear that this change on its own will not significantly alter the ratings distribution most corporations have seen. Lopsided ratings distributions occur even in states and districts that do not tie performance to compensation. Additionally, most policy options simply change when or how the issue manifests. For instance, if a teacher does not improve in two years, then eventually there will need to be an evaluator who provides an honest and rigorous evaluation rating even when there are compensation implications. In our experience, the best way to alter ratings distributions is to provide extensive training and support for evaluators so they feel confident in their ability to assess teacher quality and empowered to make difficult judgments.

Finally, because any policy change to IC § 20-28-9-1.5 will have financial implications for corporations, we recommend the SBOE consult with corporations to determine whether any policy change would put them in an untenable financial position.

- **Clarify the IDOE and SBOE’s authority to enforce compliance with compensation model requirements.** IC § 20-28-9-1.5 provides for the IDOE and SBOE to work together to ensure corporations are in compliance with the state’s compensation requirements. However, the statutory requirements of their shared oversight are vague and could benefit from additional guidance from the General Assembly.

Indiana law empowers the IDOE to verify that corporations have adopted compensation models that meet the criteria set out in state law. In collaboration with the SBOE, the IDOE has instituted a review process that supports corporations in their interpretation of and adherence to state law.⁷⁶ As part of this oversight framework, the IDOE notifies corporations in writing of any non-compliance so they may correct the deficit. Additionally, the IDOE reports instances of non-compliance to the SBOE annually.

At that point, the SBOE has the authority to take “appropriate action to ensure compliance” with state law. However, there is no guidance that further clarifies the IDOE and SBOE’s roles in ensuring corporations’ compensation models meet the requirements of state law. Below are some policies for consideration that may better support the SBOE in its enforcement responsibilities:

- If a corporation’s noncompliance affected the salary increase of any Effective or Highly Effective teachers, the SBOE can call for the corporation provide backpay to these teachers for the amount they would have earned had the compensation been compliant with state law.
- If a corporation fails to correct any areas of noncompliance by the start of the next school year, the corporation will be considered willfully noncompliant and will be required to pay a monetary penalty. In the Board’s discretion, the penalty can be used to supplement teacher salaries for Effective and Highly Effective teachers in that corporation.

⁷⁶ Indiana Department of Education, Compensation Systems: <http://www.doe.in.gov/effectiveness/compensation-systems>.

- **Allocate more funding for grants used to support performance-based compensation.** During stakeholder discussions, several individuals mentioned that the size of the salary increases were not sufficient.⁷⁷ Additionally, it has been noted that some corporations use only the School Performance Awards to fund salary increases – meaning the corporation has not otherwise budgeted for salary increases – be they performance-based or across the board cost of living adjustments.

We believe that eventually corporations should be responsible for the sustainability of the performance-based compensation model they adopt. However, we also understand the compensation law is relatively new and for some corporations operating under old CBAs, they have not yet had the opportunity to implement it. Therefore, we recommend that the State allocate more funding for the School Performance Awards for the next two years – or until the next budget cycle. The increased funding for salary increases will ensure that the compensation law will continue to gain support from educators during these early years of implementation. In the meantime, we recommend that the IDOE and SBOE work with corporations to support their transition to a self-sustaining compensation model that provide significant rewards to high-performing teachers.

Implementation Recommendations

As outlined above, the IDOE regularly monitors corporations' compensation plans to ensure they meet the State's requirements. When a corporation is found to be out of compliance, the IDOE issues a memorandum describing the deficits in the corporation's plan and reportedly works with the corporation to correct the issue. This oversight protocol appears to be sufficient and fair to corporations who are out of compliance.

The IDOE also proactively supports corporations in designing compensation models. The IDOE provides an overview of the requirements on its website, a checklist for designing a compensation model as well as a model plan. We recommend the IDOE build off these practices and consider the following:

- **Support corporations by identifying exemplary models:** The IDOE currently posts all compensation models on its website, per a statutory requirement.⁷⁸ However, it notes that not all models are compliant with state law. To support corporations that are seeking examples of high-quality compensation models, the IDOE should, at a minimum, identify which models are not in compliance and therefore should not be copied or adapted. Ideally, the IDOE will also indicate which models it considers exemplary and highlight the strengths of those models so other corporations can emulate or adapt those characteristics.
- **Support corporations to plan for sustainable compensation models:** Because of the complex nature of planning for teacher compensation, some corporations may require additional assistance in designing and implementing their compensation models – particularly if they are to become self-sustaining. Therefore, we recommend that the IDOE facilitate collaboration among corporations that may be facing similar challenges. These similarly situated corporations may be able to work together to solve for a common problem of practice. Additionally, they may be able to collaborate with external partners who can provide expert guidance to solve for their common challenges.

Summary

As we noted above, Indiana's compensation policies reward and recognize teachers in a way that is commensurate with their performance and are consistent with best practices. However, there are a few areas where the law can be strengthened to support quality implementation.

⁷⁷ See Appendix A at 6.

⁷⁸ Indiana Department of Education, Local Compensation Models: <http://www.doe.in.gov/effectiveness/local-compensation-models>.

Our first recommendation acknowledges that evaluators may be reluctant to rate teachers Improvement Necessary because of the compensation consequences tied to the rating. Requiring teachers to receive a rating of Improvement Necessary two years in a row before they experience any compensation consequences and allowing for a waiver provision in certain circumstances may alleviate the concern that the current provision is too rigid and deters honest assessments of teachers' performance. However, as we noted above, these revisions to the current law will not rectify the skewed ratings distribution Indiana has experienced over the last two years. The best remedy for skewed ratings is an increased emphasis on evaluator training.

In addition to adjusting how compensation consequences are tied to evaluation ratings, we also recommend that the General Assembly clarify the SBOE's authority to ensure corporations have adopted and are implementing plans in accordance with state law. The current enforcement provision is too vague to provide the Board with sufficient guidance and cover for the actions it may take.

To ensure corporations are able to provide meaningful rewards to their best teachers, we recommend increasing the funding allotted to School Performance Awards for the next biennium. The increased funding for salary increases will allow corporations to recognize its high-performing teachers appropriately, which in these early years of implementation is critical to gaining support for the policy. However, it is equally as critical that corporations can sustain their compensation models in the long-term. So, in next two years, the IDOE and SBOE should work with corporations to develop financial models that support their compensation plans.

Finally, we recommend the IDOE build off its current monitoring and support practices to ensure corporations have access to high-quality examples of compensation models. For those corporations in need of specialized assistance, we recommend the IDOE facilitate collaboration among similarly-situated corporations so that they can leverage their best practices and work with external experts to solve for common problems of practice.

Conclusion

Over the last two months, we have conducted a close examination of the current state of Indiana's evaluation policies and practices and built off past stakeholder feedback with a targeted stakeholder engagement effort. These data points in conjunction with other research, best practices and our experience designing and implementing evaluation systems across the country informed the recommendations we set out above. These recommendations recognize Indiana's history as a leader in teacher evaluation and seek to capitalize on the strength of its current policies and practices. Additionally, we sought to honor the State's preference for local control while balancing the need for consistency and comparability across evaluation plans. We believe that resulting recommendations, if adopted, will empower Indiana to address the implementation challenges that have been identified and meet its commitments to educators.

We deeply appreciate the opportunity to work with the Board to strengthen what is already exemplary evaluation system. We look forward to the opportunity to discuss these recommendations with the Strategic Planning Committee on January 26, 2015 and then with the full Board on February 4, 2015.