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To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 02/06/16 6:55 AM

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Company/Organization (if applicable) (optional):: Massachusetts Teachers Association (Board of Directors representing Brockton and Stoughton)

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CMR Number (If known): : 603

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: Department of Education; Department of Elementary and Secondary Education

Describe the regulatory issue or observation::

The Educator Evaluation system is unnecessarily complex and seems designed to create a method for introducing merit pay and creating tiers of teachers. This will lead to competition instead of collaboration among teachers. Collaboration and sharing among educators is the best way to improve the educational experience for children, not pitting teachers against each other for raises, promotions, and resources.

It also seems designed to make it easy to "evaluate out" higher paid veteran teachers, coming hand in hand with regulations that eliminate job protections around seniority next school year, when evaluation results must be used instead of seniority.

I teach in Brockton, where we had a great evaluation system in place before we were forced to change everything and use this state-mandated version. Very few people are in favor of it. It is creating an unnecessary work burden on administrators and educators alike.

In addition, the reporting and publication of the percentage of how many teachers are in each category (exemplary, proficient, etc.) seems designed to stir up public ire and questioning. I have seen comments on articles that publish aggregate results that question how there can be a certain percentage

of proficient teachers when test scores aren't really high. None of this is taking account of the population or impact of poverty on educational outcomes. Why don't we do the same and public metrics of performance for other public servants such as police? Fire? Politicians?

Suggestions for improvements to the regulation::

Scrap the entire educator evaluation system. Allow districts to create their own systems for evaluating teachers. Allow experienced educators and administrators to use their own judgments about what constitutes good teaching. If you must provide oversight, allow districts to send in their own, simpler evaluation tools for review.

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