



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION  
ACADEMIC IMPROVEMENT AND TEACHER QUALITY PROGRAMS

June 9, 2014

Jacki Ball  
National Association of Secondary School Principals  
1904 Association Drive  
Reston, VA 20191-1537

Dear Ms. Ball,

Thanks for your insightful comments on the U.S. Department of Education's (the Department) proposed information collection entitled "Title II, Part A Improving Teacher Quality State Grants Subgrants to Local Educational Agencies" (Docket Number ED-2014-ICCD-0054). We appreciate your support for this data collection. We have summarized your specific suggestions and provided responses below.

### **Comment**

Use the term "principal" as opposed to "administrator" when referring to building-level leaders.

### **Response**

The 2014-15 survey uses the term "principal" throughout and does not refer to "administrators" when referring to building-level leaders. Please see references to principals in Questions 2, 4, and 7.

### **Comment**

Adjust the overall survey to include a stratified random sample of principals – *exclusively*.

### **Response**

The survey is designed to collect district level information on uses of Title II, Part A funds as well as overall professional development provided to educators in the district. The unit of analysis is the district, since districts receive Title II, Part A sub-grants. However, the Department's Institute of Education Sciences (IES), National Center for Education Evaluation (NCEE) is currently conducting a national study of the Implementation of Title I/II Program Initiatives, which includes a nationally representative sample of principals. Here's a link to information on that study: [http://www.reginfo.gov/public/do/PRAViewIC?ref\\_nbr=201310-1850-001&icID=208922](http://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=201310-1850-001&icID=208922). The contact person for more information is Erica Johnson ([Erica.Johnson@ed.gov](mailto:Erica.Johnson@ed.gov)).

### **Comment**

Collect separate data regarding principals and key areas of education reform or those that are having the greatest impact on student learning. For example, Question 10 must be added to gather comparable

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data (description of activities, frequency, and number of) on whether or not professional development activities are provided for principals related to 1) implementation of college- and career-ready standards; and 2) training for principals to evaluate teachers.

### **Response**

We agree with the premise of the comment; however, adding this information to Question 10 would dramatically increase burden. Therefore, we address the comment by revising Question 5 to ask specifically about allocations associated with allowable activities designed to prepare principals to implement college- and career-ready standards.

The IES/NCEE study referenced above specifically asks about professional development for principals that is related to teacher evaluations.

### **Comment**

Develop a Question 11 to collect comparable data on district level principal mentoring programs or activities that are specifically designed to meet the needs of principals as instructional leaders. One or more questions must be clear to avoid any district level “joint” professional development programs.

### **Response**

We have already made changes to the survey from previous years so that we can report specifically on principals and the types of professional development they receive. These include: changing the response categories in Question 2 to ask separately about principals and superintendents rather than ask about both groups together; and adding a separate response column for principals in Question 4. We do not plan to add another survey item that asks specifically about district level principal mentoring programs and activities to meet the needs of principals as instructional leaders.

Again, we believe the IES/NCEE study will provide more principal-specific data.

Thanks again for your helpful suggestions and interest in our survey.

Sincerely,



Daphne Kaplan  
Team Leader  
Title II, Part A Program