

Testimony
Robert P. Grimesey, Jr., Ed.D.
Sub-Committee on Early Childhood, Elementary and Secondary Education
Education & Workforce Committee
U.S. House of Representatives
March 22, 2011

Chairman Hunter, Ranking Member Kildee, and Members of the Sub-Committee:

Thank you for inviting me to testify today regarding the impact of federal regulations and reporting from the perspective of an administrator in a small rural school division.

My name is Robert Grimesey and I am the Superintendent of Orange County Public Schools in Virginia. I also serve as Co-Chairman of the Virginia Association of School Superintendents' Legislative Committee. Orange County is a small rural school district of 5,050 students located just beyond the southern boundary of the greater Washington, D.C.-area suburbs. I speak to you today from my 27 years as a public educator, which includes 10 years as a school superintendent.

Orange County Public Schools (OCPS) takes seriously its responsibility to comply with all regulations and reporting requirements of our local school board, our state education agency (SEA) and federal agencies. Unlike many large school divisions, however, OCPS employs no individual data analysts or program analysts. We have no research office. Our entire central office administrative staff includes a total of 11 secretaries and 14 administrators, including the superintendent. These 25 individuals fulfill all division-level administrative duties, including all federal and state compliance and reporting requirements. And yet, our division-level administrative capacity is envied by most, if not all, of the 70% of America's school districts with enrollment at 2,500 or less.

At first glance, there may seem to be little that is new about state and local complaints related to federal paper work and its associated administrative burdens. Make no mistake. The vast majority of rural school superintendents and school board members understand and respect the need for reasonable accountability and transparency as we receive and invest federal dollars. However we believe that there is much that is not reasonable about the ever-expanding nature of many federal obligations. We also see a need for streamlined collaboration between USDOE and the SEAs in the articulation of data reporting requirements. Ultimately, many well-intended federal regulations are creating a "culture of compliance" that leads to a local fear of failure. Such a context makes federal compliance an end in itself. For localities at the end of this regulatory food chain, it becomes very difficult to maintain our focus on the achievement and welfare of our children.

Allow me to offer an example. On January 28, 2011, the Virginia Department of Education advised school superintendents that it was required by federal regulations associated with the American Recovery and Reinvestment Act (ARRA) to collect and report the following by September 30 of this year:

- Course-level data by student and teacher for all students;
- Descriptions of teacher and principal evaluation systems;
- Teacher and principal evaluation outcomes; and
- Information on charter schools that close.

Much of this information currently is not maintained electronically. Existing electronic data sets are not interconnected. Misalignment between the September federal deadline and the annual calendar of other state reporting tasks is going to result in duplication of effort on at least two data-reporting procedures

A new “master schedule course collection” process is being developed to address the many non-existent and disconnected data sets. The process is intended to tie each student’s class grades and standardized test scores to each of the student’s teachers, including standard classroom teachers as well as special education or English-as-a-Second-Language teachers. Having established a connection between each student and each of his or her teachers, the process then ties the student’s performance to the evaluation outcomes and licensure statuses of each of his or her teachers.

Orange County, like most rural school divisions, lacks the manpower and expertise to project the time and monetary costs associated with the development and maintenance of the new “master schedule course collection” process. However it does not require a lot of imagination to envision the work that will be needed to collect dozens of outcomes from each of the paper evaluations of our 350 teachers and principals; and then to integrate that information with the existing electronic data base for teacher licensure; and then to integrate that data base with a separate data base for student standardized test performance; and then to tie that back to the grades awarded to an individual student by each teacher who serves that student.

Let me be clear. Orange County respects the need for valid and reliable evaluations for teachers, principals and its superintendent. We also embrace the appropriate inclusion of student performance data in the evaluation of instructional staff. But we have developed and implemented an effective evaluation process without federal assistance. New layers of reporting requirements offer little benefit to what we already have accomplished on our own.

The volumes of data to be generated as a result of the new ARRA-related requirements may make for interesting reports. But what will be the ultimate price tag? And will that new cost really result in teachers and principals feeling more accountable for student learning than they do already? And ultimately, will all of this new information actually improve the welfare and academic achievement of students? In other words, is all of this really worthwhile? From the perspective of under-staffed rural school divisions, the answer may be irrelevant. We simply may not have the personnel needed to deliver on the demands of this process.

The elaborate reporting requirements associated with ARRA represent a classic example of overly burdensome federal regulations. They provide little benefit to school divisions that already have developed evaluation systems that can ensure accountability. They promulgate a culture of compliance that distracts local focus away from student learning. And they create a massive challenge for effective articulation between USDOE and the SEAs.