January 12, 2015

TO: Molly Hamaker-Teals, Chair, Professional Educators Standards Board (PESB)
Jennifer Wallace, Executive Director, Professional Educators Standards Board (PESB)
Members of PESB

FM: Gary Kipp, Executive Director, AWSP
Vicki Bates, Director for Principal Support, AWSP

RE: AWSP Response to Paraeducator Work Group Report and Recommendations

In response to the 2014 legislative charge articulated in SSB 6129, the Professional Educator Standards Board Paraeducator Work Group published its initial recommendations January 7, 2015. This memorandum outlines AWSP’s concerns regarding the feasibility of implementing recommendations 1-6, 9 and 10.

The resources required for implementing the outlined recommendations appear burdensome at the state and local levels at a time when fully, sustainably, and equitably funding basic education, including current unfunded/underfunded mandates, must be our priority. Within our education system, principals are still working to understand, implement, and support new certification and renewal processes for administrator and teacher groups. New evaluation systems have yet to be fully funded and implemented. Professional development needs of teachers and principals have yet to be funded at adequate levels. The additional funding needs demanded within the measures outlined in the Paraeducator Work Group Report exceed what is reasonable at this time.

Secondly, it is important new certification, endorsement and assignment rules do not limit the ability of schools and districts to assign staff to meet the needs of students and respond to changes in local contexts. This is particularly critical in small and rural settings across our state. School communities also need flexibility in professional development planning so that they can meet particular student needs based on local context. In addition, paraeducator professional development is most effective when integrated with professional development efforts across employee groups in meaningful, coherent ways. These requests for flexibility are consistent with the feedback provided by districts who gave input to the Work Group as recorded in the report. Oversight of paraeducator professional development at the state level could unnecessarily complicate these efforts.

Finally, in a broader sense, consideration of this report at this time seems like one more instance of advancing an isolated mandate absent consideration of its context in a more comprehensive, and perhaps, innovative approach. How is paraeducator staffing and professional development considered as part of the comprehensive funding model? How are enhancements in paraeducator certification matched with enhancements in responsibilities? How do we reconceive the role of paraeducators as part of instructional teams to maximize services to students, as opposed to simply building new requirements for the same roles and structures existing in our systems today? How might such innovations provide schools new flexibility in stretching to meet student needs in ways they are not able to today?
In summary, at a minimum, we recommend the state not implement any recommendations requiring certification of paraeducators without first analyzing the financial requirements and providing fully the resources that would be required. Beyond that, even if all the necessary financial resources were provided, we feel that it will be a waste of adult energy to increase certification requirements for paraeducators without a clear articulation of what the dividends would be for students. Those benefits are not evident in the report from the Work Group.

**STATE COMPONENTS**
Elementary School Principals Association of Washington (ESPAW)
Association of Washington Middle Level Principals (AWMLP)
Washington Association of Secondary School Principals (WASSP)

**NATIONAL AFFILIATES**
National Association of Elementary School Principals (NAESP)
National Association of Secondary School Principals (NASSP)