

January 21, 2016

Deborah Spitz
U.S. Department of Education
400 Maryland Avenue SW
Room 3E306
Washington, DC 20202

Dear Deborah,

Thank you for the opportunity to submit a response to the ESSA Request for Information. *Partners for Each and Every Child* (Partners-*for*) is an organization focused on advancing equity and excellence for all children in the United States' educational system. Using the recommendations in the Congressionally-commissioned Equity and Excellence Commission's final report - entitled *For Each and Every Child* - as a polestar for collaborative education reform, we advance equity in education by supporting and connecting non-partisan stakeholder communities around the country.

The five chapters of the *For Each and Every Child* report – School Finance and Efficiency, Teaching, Leading and Learning, Early Childhood Education, Mitigating the Effects of Poverty, and Governance and Accountability – provide the basic framework for our work in states and across the country. Partners-*for* and our national and state Partners are designing and recruiting, and supporting—with resources, financial and otherwise—Hubs, defined by either an issue area or geography, to link allies, efforts, knowledge, and resources. Our network does not require total consensus to proceed. Instead, network participants choose from a range of issues and strategies, enabling them to work with uncommon allies on discrete and timely matters of mutual interest. By identifying gap-closing strategies and commonalities among states and communities, we will pool our broad array of resources in support of the Hubs, link efforts, and learn from one another to build a movement for equity and excellence across the country.

Each of Partners-*for*'s geographically-based state Hubs is a reflection of the education landscape in that state, including stakeholders that represent its geographic and demographic diversity and span the broad community of vested organizations and groups. This is key in the ESSA context because structured, meaningful, ongoing stakeholder engagement will be critical to implementing the content of the law. The law's "theory of action" on devolution and data transparency, paired with its repeated inclusion of stakeholder engagement requirements, should be interpreted to require and support structures or mechanisms for ongoing stakeholder engagement. This means not only looking to places in the law where stakeholder engagement is

clearly required, but also looking to leverage other opportunities where states and districts could build in stakeholder engagement processes to improve outcomes for all.

Carefully designed and implemented stakeholder engagement measures will ensure that communities have an active voice within the review and design of education reforms to improve outcomes for all students. It will also ensure authenticity and inclusion in the decision and design process in such a way that practice and community needs inform policy. Lastly, quality stakeholder engagement better ensures equity and continuous improvement of programs and activities under the law thanks to engaged communities reviewing results and recommending and designing improvements.

Under ESSA, states, districts, and communities will be able to design systems (from accountability, to assessment, to instruction and school improvement, to supports for students) that are tailored to meet the needs of their communities and to optimize college and career readiness. The inherent risk in ESSA, however, is that in communities in which there is little engagement or there is little political will to make deep efforts to improve systems, progress can stagnate or reverse, and at-risk students will be left behind. This is a particular risk in communities with comparatively fewer fiscal resources and/or in those communities facing significant challenges. Stakeholder engagement and a continuous improvement paradigm are critical to mitigating against this risk.

As Partners-*for* works to foster strong, high quality stakeholder engagement and a continuous improvement framework with our partners across the country, ED can take important steps through regulation, guidance, technical assistance, and monitoring to ensure that ***high quality stakeholder engagement and continuous improvement*** are a core part of the framework for the law's implementation to mitigate against risks and maximize opportunities. Specifically, ED should:

For state and local plans:

- Clarify that state and local plans should include information on the high quality and robust stakeholder engagement that occurred and will continue in developing and implementing the plans and any relevant needs assessments;
- Clarify that the terms "parents", "families", and "stakeholders" should include parties from a diverse set of organizations, communities, and backgrounds, such as: civil rights groups, parent/community groups, teachers, labor organizations, researchers and advocacy organizations, and elected officials;
- Provide guidance and technical assistance that reflects Partners-*for*'s principles for high quality stakeholder engagement. These principles include:
 - Providing an infrastructure for engagement that allows space for all stakeholders to convene around shared interests.
 - Ensuring the many diverse perspectives in the state are represented.

- Identifying core partners that have a willingness to work across traditional political lines to assist in bridging divides and introducing new organizations to the network.
- Building a system of shared accountability based on setting, and working collaboratively towards, concrete and achievable goals.
- Striving to find areas of common ground among all concerned stakeholders to break down barriers and move forward in service to advancing sound educational policies, attentive to matters of equity and responsive to the needs of at-risk, underserved, and politically underrepresented students.
- Creating transparent communication mechanisms and feedback loops to support successful and sustainable implementation of plans and continued stakeholder engagement.

For periodic reviews and updates of plans:

- Clarify that state and local plans should reflect how any required periodic reviews and updates of those plans with stakeholders are being used to continuously improve activities under the law (e.g. Title II, Title III, 21st Century Community Learning Centers);
- Ensure that periodic reviews include a focus on outcomes and activities for each subgroup of students.

For clear, understandable data under the law:

- Clarify that state consultation with parents on the format of data on state report cards under Title I should be robust, and provide guidance on high-quality stakeholder engagement on designing the presentation of data;
- Clarify specifically that state accountability systems may include indices, dashboards, and other designs, provided the systems are clear and transparent to the public about the components that make up an accountability determination.

ED should also look beyond explicit requirements within the law for stakeholder engagement to provide guidance and technical assistance on other meaningful ways that states and districts can engage with parents, families, and other stakeholders to continuously improve outcomes for students. ED should provide clarity and guidance around additional key areas of the law to ensure that they advance equity to the maximum extent possible, including, for example: the flexible funding pilot program; accountability systems; and requirements for the equitable distribution of teachers. The following recommendations are examples of areas in which equity can be enhanced throughout the law, and we encourage ED to apply this lens of equity to all of its implementation work.

Flexible Funding Pilot

- ED should clarify why weighted funding and other purposeful school finance mechanisms are critical to equity in our system;
- ED should encourage districts to take advantage of this pilot and should commit resources to closely monitoring the weighted formulas and the academic and other

results from the pilot, to better understand the types of weighted formulas that have the potential to improve outcomes among low-income and underrepresented students the most dramatically;

- ED should ensure that each participating district is tracking and reporting on meaningful academic indicators and other relevant data, disaggregated by subgroup, for the pilot, and that the results are reported in as transparent a manner as possible.

Over the past year, Partners-*for* has engaged our national network of partners to strategize on resource alignment and equity issues in school finance systems, including weights targeting subgroups of students. Our partners continue to provide their expertise on the question of the kind of funding structures that can be leveraged, and weights put in, to address the needs of students in high needs districts, including those in rural communities. This kind of intellectual capital can help to inform the work of participating pilot districts.

Accountability systems

- ED should clarify why high quality accountability systems rooted in rigor are critical to equity in our system;
- ED should provide clear regulations, guidance and technical assistance that ensures that states maintain rigorous expectations for all students, regardless of background, through the indicators selected in accountability systems and through the manner in which results are calculated and reported;
- This is the heart of our system of expectations and signifies our educational priorities – to improve outcomes for the students most at-risk of failure.

Development of equitable accountability systems is a key priority for each of Partners-*for's* seven anchor states. Accordingly, through our state and national partner network, we are offering support in key aspects of the development and implementation of these systems.

Educator Equity Plans

- ED should provide clear guidance on reporting on any inequities in the distribution of ineffective, inexperienced, and out-of-field teachers and leaders, and should ensure these terms are defined in a way that does not mask inequities in our systems;
- ED should set expectations for and provide guidance on how states and districts develop and include plans to address these inequities in their state and local plans;
- ED should clarify and communicate expectations that plans require public reporting as well as stakeholder input.

Partners-*for* has been invested in the development of educator equity plans throughout the course of states' renewal during 2015, both by serving as a reviewer of state plans for the Department, and by providing technical assistance to specific states to support stakeholder engagement efforts. This type of work is central to our mission, and Partners-*for* can serve as an ongoing resource for states and ED to inform and support the development of a stakeholder

engagement infrastructure that will help to ensure that state plans are actionable and sustainable.

The points raised above also implicate Partners-*for*'s priorities for equity-related efforts in Early Childhood Education (i.e., Preschool Development Grants – parental choice and engagement, professional development, etc.), and in the mitigation of poverty's effects in schools (i.e., increased funding for community schools, State Family Resource Centers, technology access/enrichment, etc.). It is important that ED help to support and strengthen state and local equity efforts in early childhood and poverty mitigation through a combination of robust and authentic stakeholder engagement, regulation, guidance, and the provision of incentives to local actors. Partners-*for* stands ready to help inform this work.

Partners-*for* will continue to advance our model of plural, distributed leadership and activity, and will continue to develop an infrastructure in which state- and locally-based education agencies and stakeholders can coordinate efforts to ensure equity remains a focal point of ESSA implementation and to develop a shared system of continuous improvement.

Beginning in March 2016, Partners-*for* will convene a series of Equity Workshops in several states across the country to connect local, state, and national stakeholders so they can engage directly in constructive, informed dialogue about opportunities to advance equity under ESSA. Building on the Workshops, states will develop strategies to advance educational equity through key policies and principles, best practices, and related tools. This comprehensive and ongoing stakeholder collaboration will allow for more sustainable and effective efforts to advance educational equity. We hope to partner with ED on these and related efforts.

Thank you for your attention to this.

Sincerely,



Christopher Edley, Jr.
Chair, Partners for Each and Every Child
Co-founder, The Opportunity Institute