

June 30, 2016

2001 Center St, Suite 500
Berkeley, CA 94704

Tom Torlakson, Superintendent
California Department of Education
1430 N Street
Sacramento, CA 95814

Re: Recommendations for the California Department of Education on stakeholder engagement for ESSA

Dear Superintendent Torlakson:

Partners for Each and Every Child (*Partners for*) is an organization focused on advancing equity and excellence for all children in our nation's educational system. We are eager to serve as a resource to the California Department of Education in its development and implementation of the state accountability plan, as aligned with the Every Student Succeeds Act (ESSA). 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, *Partners for* advances equity in education by supporting and connecting non-partisan stakeholder communities around the country. We work intensively with State Education Agencies (SEAs), policy leaders, and community groups in seven states, including California.

As California considers its own contexts, needs, and priorities in ESSA implementation, the voices and experiences of families, students, and communities will be crucial in protecting and advancing equity. Given the wide latitude that ESSA has allowed for states to ensure equitable access and excellence for all students, the stakes for our most vulnerable children are especially high. One of the most significant provisions in the law is the requirement that states conduct "meaningful stakeholder engagement." The new law explicitly includes 22 mentions of decisions and plans that SEAs should make and develop "in consultation with" key stakeholder groups. Most of these decisions are not directly related to stakeholder engagement efforts that are mandated in the development of Local Control Accountability Plans (LCAPs), and will require additional, explicit attention.

The law's robust and consistent stakeholder engagement provisions implicate the need for CA to build systemic structures for high quality stakeholder engagement, improving on existing efforts and mechanisms. Regular and ongoing stakeholder engagement should be a systemic priority for California across all areas of ESSA implementation and other education efforts, because efforts to improve educational excellence and equity, particularly with regard to our most vulnerable students and communities, depend on robust and thoughtful partnerships between and among federal, state, and local governmental agencies and community representatives.

To this end, Partners for has created a set of principles (see Attachment A of this letter) as part of a *Handbook for Meaningful Stakeholder Engagement*¹ (also included here) to help guide states and their partners as they work together on these efforts. These resources serve as guidance on what constitutes “meaningful consultation” with stakeholders, providing a framework for a “meaningful” process, clarifying what activities should be included within “consultation,” and indicating the breadth and scope of “stakeholders” that should be engaged.

Three years of stakeholder engagement through LCAPs, furthermore, have produced best practices that underscore the need for the California Department of Education (CDE) to include community groups in the planning and design phase of the stakeholder engagement process. CDE should engage local education agencies (LEAs) and their communities on an ongoing basis for the development and review of relevant information, and to make design and implementation improvements reflective of stakeholder feedback.

A “Meaningful” Process

We applaud CDE for its dynamic and multi-faceted stakeholder engagement efforts thus far:

- Timely creation of the CDE ESSA website, and posting of up-to-date information;
- Development of briefing materials, including the CDE listserv that provides regular updates;
- Hosting of webinars and input sessions, such as the regional listening sessions and the online survey; and
- The Advisory Board tasked with guiding the process of understanding the law and ensuring that engagement is meaningful.

CDE should continue to keep stakeholder groups well-informed by developing and distributing necessary background knowledge and offering preliminary guidance on key decision points and implications for programs, resource allocation, assessments and accountability. CDE should also expand upon its stakeholder engagement efforts that are part of the LCAP, and develop a comprehensive and system-wide framework for intentional, strategic and meaningful stakeholder engagement that prioritizes underserved communities. Within that framework, CDE should:

- Create a sustainable, ongoing infrastructure for stakeholder engagement throughout the state;
- Ensure that stakeholders have the information and background they need to engage in an informed and meaningful way;
- Be intentional about making time and space for diverse stakeholder learning and discussion throughout the process of designing, implementing, assessing, and refining reform efforts;
- Engage communities to review information and recommend and design improvements that reflect collaborative approaches for building consensus;

¹ http://partnersforeachandeverychild.org/P4_EngagementHandbook_ESSA_0616.pdf

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- Create feedback loops that provide opportunities for the inclusion of voices typically left out of the engagement process;
 - Commit to transparent, evidence-based decision-making including establishing and following clear and consistent decision-making processes and timelines;
 - Establish a cycle of identifying opportunities for improvement, taking action through planning and implementation, and assessing impact to inform next steps;
 - Determine how collaboration and engagement will inform an ongoing, continuous improvement cycle for state plans under ESSA and related state policy;
 - Ensure that stakeholder engagement generates input and insight at key reflection and decision points under ESSA;
 - Develop flexible strategies that can evolve based on stakeholder input and emerging data, information, and resources.

In addition, CDE should focus on continuous improvement as an essential paradigm/framework for stakeholder engagement. This includes not only incorporating stakeholder feedback on key decisions into ongoing implementation decisions, but designing the stakeholder engagement process so that community-based voices are consulted in the early design and initial planning stages. Partners *for* would welcome the opportunity to share with CDE further information on efforts underway to improve the quality and sustainability of stakeholder engagement efforts.

“In Consultation With”

For ESSA to serve the interests of equity, CDE will need to sustain robust and ongoing dialogue with local communities. Given the distributed nature of decision-making leadership and activity in California, local communities should look to CDE to develop an infrastructure in which LEAs and stakeholders can coordinate on anticipating, responding to, and prioritizing the educational needs of the most underserved students. To ensure this, CDE should work to ensure that efforts already underway are in line with a statewide strategy and implementation plan for a robust, ongoing stakeholder engagement infrastructure, including:

- A list of stakeholders to be engaged, with information on how and where conversations with stakeholders will take place, the specific topics for engagement and any background information necessary, and how multiple methods will be used to support stakeholder engagement;
- An impact analysis of existing mechanisms for engagement, including an analysis of where existing mechanisms fall short with regard to the engagement of historically marginalized communities;
- Organizational and staffing details for engagement, including budget, resources, processes and timelines for implementation, and opportunities for partnership with relevant community-based organizations;

- Examples of substantive materials to support informed conversations across diverse groups.

A Broad Scope for “Stakeholders”

CDE should encourage the participation of a diverse group of stakeholders throughout the ESSA implementation process, and should prioritize the engagement of historically excluded voices. This approach to stakeholder engagement should consider the structures, norms, timelines, languages, and practices that may unintentionally elevate some voices over others.

CDE should consider:

- Working with key community leaders and networks to identify and prioritize opportunities for stakeholder engagement, not only to understand and identify program challenges, but also to inform decisions about funding, accountability, supports, interventions, data reporting and assessments;
- Developing a “map” of stakeholder groups that considers the needs, resources, and histories of local communities;
- Investing in diverse channels and mechanisms to build public awareness and solicit feedback from a wide variety of stakeholder groups;
- Actively engage stakeholders across a broad span of demographic, geographic, language, and political perspectives and experiences.

Thank you for your attention to this. We look forward to continuing to partner with CDE on matters pertaining to equity and ESSA implementation. If you have any questions, please contact me at molly@theopportunityinstitute.org.

Sincerely,



Molly Mauer
Director, Partners *for* Each and Every Child
Senior Vice President for PreK-12 Equity & Excellence, The Opportunity Institute

Cc: Glen Price, CDE Deputy Superintendent
Barbara Murchison, CDE ESSA State Plan Office
Dr. Carl Cohn, California Collaborative for Educational Excellence (CCEE)

Attachment A: Principles of a Systems-Approach to High-Quality Stakeholder Engagement

The following principles should guide the development of a comprehensive and integrated system so that stakeholder engagement is a seamless and indispensable facet of the multiple stages and arenas of state policy and planning.

- **Hold stakeholder engagement and pursuing equity and excellence as inseparable endeavors that must be practiced and reflected throughout the full decision-making and implementation process.**
 - Create systemic structures and expectations to embed stakeholder engagement throughout the policy and planning process, in a regular and ongoing manner.
 - Prioritize increased equitable outcomes for all students throughout all policy and reform efforts, considering both the immediate and cumulative impact on classrooms and school practice, and the improvement of key programs and activities.
- **Include diverse stakeholders, with a commitment to engaging historically excluded voices. Such a commitment goes beyond a more diverse invite list, and also considers the structures, norms, timelines, languages, and practices that may unintentionally elevate some voices over others.**
 - Work with key community leaders and networks to identify and prioritize opportunities for stakeholder engagement, not only to understand and identify program challenges, but also as part of decision-making processes on funding, accountability, supports, interventions, data reporting and assessment.
 - Assess local community histories, needs, and resources to develop a map of stakeholders that considers their knowledge, background, and expertise to inform key decisions.
 - Invest in diverse channels and mechanisms to build public awareness and solicit feedback. Actively anticipate and support stakeholders to best represent demographic, geographic, language, and political diversity and span a broad community of perspectives and experiences.
- **Support stakeholder engagement that is well-informed by developing and distributing necessary background knowledge and preliminary thoughts about key decision points and implications for program, resource allocation, assessment and accountability.**
 - Be intentional about making time and space for diverse stakeholder learning and discussion throughout the process of designing, implementing, assessing, and refining reform efforts.
 - Engage communities to review information and recommend and design improvements that reflect collaborative approaches towards building consensus.
- **Focus on continuous improvement as an essential paradigm/framework, including reflection on key decisions and implementation, as well as the stakeholder engagement process itself.**

- Commit to transparent, evidence-based decision-making including establishing and following clear and consistent decision-making processes and timelines.
- Establish a cycle of identifying opportunities for improvement, taking action through planning and implementation, and assessing impact to inform next steps.
- Determine how collaboration and engagement will inform an ongoing continuous improvement cycle regarding state ESSA plans and related state policy; ensure that stakeholder engagement generates input and insight at key reflection and decision points.
- Adapt strategies, allowing them to evolve based on new data, information, needs, and resources; remain fluid and flexible in response to stakeholder input.
- **Seek to build consensus pragmatically; effective collaboration doesn't always mean full consensus.**
 - Strive to find common ground, be willing to work across the aisle, and build on each other's expertise.
 - Commit to an understanding that the end product will result in some give-and-take on all sides.