

April 11, 2017

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

RE: Stakeholder Engagement and the California State Plan for the Every Student Succeeds Act

Dear Superintendent Torlakson,

We represent parent, community, and civil rights organizations working to close opportunity and achievement gaps for low-income students, students of color, and English learners. We write to urge the California Department of Education to take additional steps to meaningfully engage parents, students, community members, and teachers before finalizing critical decisions about California's Every Student Succeeds Act (ESSA) state plan.

The state is required to consult with a variety of stakeholders, including parents, when developing its ESSA state plan. Input from diverse communities of students, parents, community members, and teachers is critical, because these stakeholders are the ones who interact with schools on a daily basis and the ones for whom school quality matters the most. For these reasons, the way in which schools are measured and supported matters a great deal to these stakeholders.

While we appreciate the efforts the state has made, more engagement is needed. State representatives have gathered input, but these input sessions have not been designed in such a way as to be accessible and understandable to parents and community members. In a state where 59% of students are low-income, 22% are English learners, 42% come from homes where English is not the primary language, 54% are Latino, 6% are African American, and 12% are Asian, Pacific Islander, or Filipino, the state needs to make every effort to reach out to diverse communities and help them understand why ESSA matters to them. The Department's capacity to engage in extensive outreach is limited and, to date, it has yet to partner with external organizations whose capacity to support outreach to parents, students, and community members is much greater. Accordingly, we are offering to partner with the Department to expand its outreach efforts directly to affected communities.

Specifically, we recommend the state do the following:

1. **Conduct another round of input sessions.** The state should partner with community-based organizations who have expertise with reaching and engaging diverse parents, students, classroom teachers, and community members and can ensure that the content is understandable and accessible to that audience. Organizations like those signing this letter, among others, can help get the word out, craft the agenda, and facilitate the sessions. Parents, students, community members, and classroom teachers will be more likely to attend and offer input if they feel affinity for the group organizing the session and if they are asked questions in ways that are relevant to their roles and experiences.
2. **Review drafts of plan sections with stakeholders before the full plan is published in May 2017.** This was the state's original plan, and indeed, the state did publish drafts of some sections in November 2016. That was a good start. The state has not continued to publish content since then. In particular, the public deserves the opportunity to review and comment on the *Accountability, Support and Improvement* section and the *Supporting Excellent Educators* section before May.

3. **During the 30-day public comment period, help stakeholders understand the plan and make it easy for them to comment.** Again, the state should partner with community-based organizations and advocacy groups who can help get the word out and who can demystify the plan for stakeholders. The state should also develop webinars, in-person workshops, fact sheets, and other tools in partnership with community-based organizations in order to help communicate key details and make the plan understandable and relevant to these stakeholders. Ideally, the state would offer multiple opportunities to offer input and allow for input through a variety of formats (including focus groups, meetings at school sites, workshops, surveys, and online platforms – all in multiple languages, including Spanish).

What are “the right issues” on which to engage stakeholders? We suggest the state gather input and foster discussion in the following areas:

WHAT ESSA REQUIRES	AREAS FOR STAKEHOLDER INPUT
Long-Term Goals & School Identification	
<p>The state plan must describe the statewide accountability system. This system must include:</p> <ul style="list-style-type: none"> • “Ambitious...long-term goals” for academic achievement, graduation, and English language proficiency. These goals must include “measurements of interim progress” for each group that “take into account the improvement necessary...to make significant progress in closing statewide proficiency and graduation rate gaps.” They must be the “same multi-year length of time” for all groups. • “A system meaningfully differentiating, on an annual basis, all public schools” using multiple indicators. • The state must identify at least the lowest performing 5% of Title 1 schools and all high schools failing to graduate one-third or more of students. 	<ul style="list-style-type: none"> • The Dashboards are a core piece of the state’s accountability system. In general, are the Dashboards clear and useful, and how can they be improved? • How should the state convey long-term goals on the Dashboards? • How should the state convey interim progress targets designed to close achievement gaps? • When looking at the Dashboard, can you easily see how well a school is serving all students and particular groups of students? • If the state identifies a school or district as needing improvement, how and where should that information be conveyed?
School Improvement Plans And Assistance	
<p>The state must have a school support and improvement plan that focuses on 1) the bottom 5% of Title 1 schools and low-graduation rate schools, 2) schools where any subgroup of students is consistently underperforming, and 3) schools where any subgroup would, on its own, cause the school to rank in the bottom 5%.</p>	<ul style="list-style-type: none"> • What role should parents, students, teachers, and community members have in developing an improvement plan? • How swiftly should assistance be provided, for how long, and when should it end? • What role should community-based partners have in providing technical assistance? • How should the public be notified and updated on improvement work? • What should the district or state do about schools that are persistently underperforming, even after efforts to help them improve?

	<ul style="list-style-type: none"> • In cases where a student attends a persistently underperforming school, what supports, options, or resources should parents have? What notifications should parents receive?
Teacher Equity	
<p>The state plan must describe how the state will ensure that “low-income and minority children” are not disproportionately served by “ineffective, out-of-field, or inexperienced” teachers. They must also describe how they will measure this and publicly report progress.</p>	<ul style="list-style-type: none"> • What do parents need to know about the quality of teaching in their child’s district and school? • Should parents and the public be notified if a school has a disproportionate number of ineffective, out-of-field, or inexperienced teachers, and, if so, how? • How should district administrators and the state monitor and report on the equitable distribution of great teachers within districts and throughout the state? • What steps can be taken locally and statewide to ensure that low-income and minority children are served by effective teachers?
School Site Expenditures	
<p>Annual state report cards must include per-pupil expenditures for each district and school in the state. These must be disaggregated by funding source.</p>	<ul style="list-style-type: none"> • What information about school funding and spending will help parents, educators, and community members determine whether their schools receive fair funding relative to other schools in the district and across the state? • What information about school spending will help stakeholders engage in planning and decision-making?
English Learners	
<p>The state plan must describe how it will establish and implement standardized, statewide entrance and exit procedures for English learners. It must also describe how it will make every effort to develop assessments in languages other than English, including its timeline for doing so. It must also describe how it will support districts in meeting goals and standards for English learner progress.</p> <p>ESSA also requires that English learners receive appropriate accommodations on assessments, including “in the language and form most likely to yield accurate data on what such students know and can do in academic content areas.”</p> <p>ESSA also requires that districts use Title III funds to help English learners achieve English</p>	<ul style="list-style-type: none"> • How well do schools and districts communicate with parents about how and why their children are identified as English learners, how and why they are redesignated as English proficient, and to what services they are entitled? How can they strengthen this communication? • When will the state develop a language arts assessment in primary languages other than English? How will schools and districts be held accountable for performance on this assessment? • How consistent should reclassification practices be from school to school and district to district? • To what extent are English learners taking state assessments provided with appropriate supports? What needs to be improved?

proficiency, and these funds must supplement, not supplant, state and local funds.	
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We appreciate the state’s commitment to building a best-in-class continuous improvement and accountability system. Continuous improvement should always include and engage diverse parents, students, community members, and classroom teachers. The ESSA state plan is an important piece of the California accountability system and must be crafted with meaningful input from California’s many stakeholders.

Thank you for considering these recommendations. We stand ready to assist you in engaging California’s parents, students, community members, and teachers in this important plan. We look forward to discussing these suggestions with your staff soon.

Sincerely,

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