

March 6, 2017
Colorado Department of Education
Federal Programs Unit
1560 Broadway, Suite 1100
Denver, CO 80202-5149

RE: Colorado ESSA State Plan

With the goal to provide support so that the needs of students and families of all backgrounds in our state are met, we respectfully submit the following comments in response to Colorado's Draft Consolidated State Plan under the Every Student Succeeds Act.

We, Deborah Van Roy, Jamie Nicholas, Karolina Villagrana, Amanda Arellano, and Felipe Vieyra, form part of the first cohort of the National Institute for Latino School Leaders (NILSL) that focuses on the Colorado ESSA policy creation and implementation. The NILSL fellowship is a National Council of La Raza fellowship that is funded by the Bill and Melinda Gates Foundation. NILSL provides opportunities for school leaders to influence, advocate and reform policies that support English Learners and Latinos.

Our team has nearly 30 years of combined experience working in organizations that serve low-income, high needs students in Colorado communities. We have the perspectives of higher administration, teaching, community organization and engagement, English Language Learning Department coordination, assessment coordination, and parent representation. In these roles, we work with minority children and families, immigrant students, and English Language Learners. For this reason, we feel that it is incredibly important to support families in sharing their voices in the decision making process of an Act that, if implemented correctly, should strongly and positively impact them.

As NILSL fellows, we understand the importance of including English Learners in the school accountability systems, the value of state tests that help us collect data and support our students, and the focus on ensuring that quality instruction is taking place for all. Thank you for your continuous discussions about ESSA and definitions of its meaning for the state of Colorado. We believe that this policy and the conversations about it are highlighting equity in achievement. Below are our recommendations..

Recommendation 1: Clearly state the position of parents in the decision making process of ESSA.

2.1.B Outreach and Input, page 11

Colorado's roadmap in support of effective stakeholder consultation included the following overarching strategies to promote engagement and participation opportunities:

- 1. Building awareness and establishing a variety of communication channels with schools, districts, and the public through online and virtual engagement;*
- 2. Meeting with stakeholder groups throughout the plan development process, including, but not limited to: a statewide Listening Tour, participation opportunities in ESSA Committees, and multiple meetings with critical education partners;*

3. *Posting plan drafts and decision points for public input and comment prior to submission to USDE;*
4. *Developing a formalized internal process to incorporate and address stakeholder feedback as appropriate;*

Proposed change: Develop a plan in which minority and immigrant parents are included in the decision making part of the process, as they form a major part of the “critical education partners” stated in the section referenced above. Additionally, invite parents of diverse backgrounds to provide input throughout ESSA’s planning and implementation process.

We recommend changing two of the bullet points above to include:

- Building awareness and establishing a variety of communication channels with schools, districts, and the public through online and virtual engagement. Ensuring that low-income, immigrant, and minority parents and guardians are aware of the process taking place in Colorado and providing ways for them to give feedback to the committee (through meetings open to the public, meetings at schools, or surveys).
- Providing participation opportunities in ESSA Committees, and organizing multiple meetings with critical education partners. Most importantly, inviting parents of diverse backgrounds to attend meetings as they are critical partners in the decision making process.

Rationale: Providing clarity to a variety of parents and including them in the decision making process through meetings and/or virtual commentary is critical. In a choice system like Colorado’s we must understand why parents choose specific schools and what changes they need so that they feel that their children are getting the education that they deserve. Since ESSA focuses on family participation, parents must have the opportunities to be actively engaged in the education system and the option to be central to the decision making process of the act.

Recommendation 2: Define Colorado’s plan for community centered engagement in 2017 and ways to ensure that stakeholder engagement is long-term and intentional. Ensure that Colorado is implementing the parent engagement portion of ESSA.

Project Implementation, page 110

The regional Parent and Family Engagement Plan is submitted as a part of the regional MEP Application and must include a narrative on how the regional program will address the following parent and family engagement goals:

- *develop leadership skills among migrant parents;*
- *provide information for parents and families on how to support their child’s academic success;*
- *engage in two way communication with migrant families regarding the Comprehensive Needs Assessment, Service Delivery Plan and evaluation of services.*
- *The regional parent and family engagement plan consists of two parts: a) The Regional PAC— Parent Advisory Councils (PAC) is a statutory requirement and therefore must be a part of a region’s overall parent involvement plan.*

- *The region must hold a minimum of three 111 Regional PAC meetings per fiscal year. Regional PAC meetings must include at least one of the following topics: Comprehensive Needs Assessment; Service Delivery Plan; or Evaluation of services. b) Regional Parental Involvement Plan: cover all four of the Service Delivery Plan focus areas provide parents with information on how to raise student achievement be in a format and language that parents can understand*

Proposed change:

We suggest adding specific aspects to the process of the Parent and Family Engagement Plan by: including parents and educators in the implementation and evaluation of this plan, ensuring that there are both long term and short term goals, and making sure that there are dates in place to evaluate the progress of such plan.

Our Proposal:

The Colorado Department of Education (CDE) will communicate with at least 5 schools representing the state's student population three times a year by meeting with or giving out surveys to staff members and parents.

Additionally, CDE will host a meeting open to parents, staff members, and students. In these gatherings, CDE will present information about ESSA in family friendly language and will actively receive comments from the community about its consequences and implementation.

These meetings should be scheduled at the beginning of the year, after state testing, and at the end of the year. We have selected these time periods as they are defined by active parent participation. Furthermore, these dates will provide CDE with input at different points of the school year which can help with understanding ESSA's variety of effects throughout the school calendar.

Rationale: In order to have a plan that works in the long term, the individuals that ESSA is supporting (parents) and those who have been implementing it (educators) need to be a part of its creation and analysis. For this reason, there need to be clear goals with time stamps that ensure that we are constantly evaluating the implementation of ESSA's goals.

Recommendation 3: Make certain that the state plan is accessible to all parents, especially those from diverse communities, and those who do not have access to technology.

Introduction to Colorado's Stakeholder Consultation and Engagement in State Plan Development, p. 12
Creating a system of continuous feedback to remove any barriers that could prevent broad, meaningful and authentic engagement.

B.iv.2 Languages other than English, page 41.

2. A description of the process the State used to gather meaningful input on the need for assessments in languages other than English, collect and respond to public comment, and consult with educators; parents and families of English learners; students, as appropriate; and other stakeholders

Proposed change: Include access to providing feedback for those families that do not have access to technology. Also, create different versions of the state plan in different languages and include parents of different backgrounds in the decision making process.

Create an informative flyer to be published in community centers and sent out by schools. This flyer should include: information about ESSA's importance, the communities it affects, a person to contact with questions and/or suggestions, and the next date for public meetings are included.

Rationale The digital divide is affecting our families and students. If we continue to disregard the lack of participation that many parents experience because they are unable to afford internet or technology, if we continue to create processes in which their decisions are only counted if they have access to a computer, we are further pushing the inequality and silencing many voices.

Thank you for the opportunity to comment on the regulations as they relate to the Every Student Succeeds Act - Colorado Draft Consolidated State Plan. Our variety of roles in the education field and participation in policy making gives us a responsibility to ensure that families of all backgrounds have access to changes in the Colorado education system and have the opportunity to engage in meaningful and long term ways in their schools. Our students and families deserve equity focused school systems.

In Partnership,

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