



Officers
Chair
Judith L. Lichtman
National Partnership for
Women & Families
Vice Chairs
Jacqueline Pata
National Congress of American Indians
Thomas A. Saenz
Mexican American Legal
Defense and Educational Fund
Hillary Shellon
NAACP
Secretary
Jo Ann Jenkins
AARP
Treasurer
Lee A. Saunders
American Federation of State,
County & Municipal Employees

Board of Directors
Helena Berger
American Association of
People with Disabilities
Cornell William Brooks
NAACP
Lily Eskelsen Garcia
National Education Association
Jon Greenbaum
Lawyers' Committee for
Civil Rights Under Law
Marcia D. Greenberger
National Women's Law Center
Chad Griffin
Human Rights Campaign
Linda D. Hallman
AAUW
Mary Kay Henry
Service Employees International Union
Sherrilyn Ifill
NAACP Legal Defense and
Educational Fund, Inc.
Michael B. Keegan
People for the American Way
Samer E. Khalaf
American-Arab
Anti-Discrimination Committee
Elisabeth MacNamara
League of Women Voters of the
United States
Marc Morial
National Urban League
Mee Moua
Asian Americans Advancing Justice |
AAJC
Janet Murguía
National Council of La Raza
Debra Ness
National Partnership for
Women & Families
Terry O'Neill
National Organization for Women
Priscilla Ouchida
Japanese American Citizens League
Rabbi Jonah Pesner
Religious Action Center
Of Reform Judaism
Anthony Romero
American Civil Liberties Union
Shanna Smith
National Fair Housing Alliance
Richard L. Trumka
AFL-CIO
Randi Weingarten
American Federation of Teachers
Dennis Williams
International Union, UAW

Policy and Enforcement
Committee Chair
Michael Lieberman
Anti-Defamation League
President & CEO
Wade J. Henderson
Executive Vice President & COO
Karen McGill Lawson

April 22, 2016

The Honorable John B. King, Jr.
Secretary
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202

Re: Parent and Family Engagement in the Every Student Succeeds Act

Dear Secretary King,

On behalf of The Leadership Conference on Civil and Human Rights and the 25 undersigned organizations, we would like to highlight the importance of meaningful parent and community consultation in the Every Student Succeeds Act (ESSA). The Leadership Conference is a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the civil and human rights of all persons in the United States. The civil rights community sees implementation of ESSA as an opportunity to take steps to ensure equity for underserved students as long as communities are engaged in decision-making and policy is informed by the perspectives of diverse communities.

Since its inception, the intent of the ESEA has been to raise achievement for low-income and otherwise disadvantaged children. Parent and community engagement have been central requirements of the law for decades. Although required, this key piece of the law has not often, or even frequently, been meaningfully implemented. In 1969, a report titled "Is it Helping Poor Children? Title I of ESEA" highlighted key concerns within the early implementation of ESEA, including specifically the lack of parent involvement in the development of Title I programs. Authors Ruby Martin and Phyllis McClure highlighted the importance of parent and community engagement:

"No educational effort can truly succeed apart from the community in which the students live. The Office of Education recognizes this and requires that each local district provide for the maximum practical involvement of parents in the design, planning, operation, and evaluation of Title I programs. Some appropriate vehicle for community involvement, such as a Title I advisory committee, must be established by school systems, with at least half of the committee composed of parents and representatives of community agencies serving the poor community. The Title I program itself should include activities and services in which parents may be involved."

This 1969 report reinforces the importance of parent and community engagement in student success. From then to today, there remains clear congressional intent to incorporate parents

and community stakeholders in developing educational plans for students, schools, districts and states. However, not all states, districts or schools meaningfully engage parents and community stakeholders. Often times, the families of girls and boys of color, English Learners, students with disabilities, American Indian, Alaska Native, and Native Hawaiian students, low-income students and those who are migrant, homeless, in foster care or returning from or placed in juvenile detention, or who are LGBTQ are not seen or valued as vital participants. As such, they are left out of critical decision-making processes and the needs of their children are not represented in plans and policies.

As you stated during the first day of Department of Education's (ED) negotiated rulemaking meeting, the ESSA is a civil rights law at its core. You prefaced that the dialogue negotiators embark in will be complicated and technical at times, "but our North Star must be equality of opportunity." **We agree with you and believe the first step to equality of opportunity is equality of engagement.** The civil rights community is looking forward to robust regulations governing meaningful engagement in the ESSA, especially as it relates to the development of state and district plans. Since states and districts have historically failed to incorporate meaningful engagement, we have provided suggestions.

In order for each type of engagement to be "meaningful" it must meet the following criteria:

- Engagement is meaningful when it occurs at the earliest possible stage, prior to the development of a program, initiative, or policy to ensure families of underserved students, communities, and stakeholder views are integrated.
- Engagement is most effective when it is seen and understood as a process which requires continuous input and discussion.
- Meaningful engagement is based on open dialogue and coordination that actively seeks and considers the views of all participants, and then seeking agreement on how to proceed.
- Meaningful engagement necessitates minimum requirements and expectations with respect to consultation along with the establishment of measurable outcomes.

Based on the criteria above, we request the Department of Education to define:

1. Meaningful consultation with parents, families, and community stakeholders
2. Meaningful consultation with tribes and tribal organizations

The distinction between these two types of consultation derives from the fact that tribes are sovereign nations who have a government-to-government relationship with the U.S. government. We recommend that ED use its "[Consultation and Coordination with American Indian and Alaska Native Tribal Governments](#)" outlined policy as the basis of its regulations on tribal consultation.

Meaningful community engagement, both the process and product, is the foundation that will best support **all** of our students. We encourage ED to think of engagement in the context of developing a positive relationship between states, local districts, tribes, and community stakeholders. A key component in working and supporting underserved youth is building trust, which the civil rights community can help facilitate.



Attached is a list of contacts at our organizations that can support engagement efforts with states and local districts. We encourage ED to utilize and share this list when executing meaningful community engagement efforts. If states do not meaningfully engage families and community stakeholders while implementing ESSA, we will have missed a crucial opportunity and the students we represent will continue to be denied the full protections they are entitled to under federal law. The stakes are high, family engagement is critical to closing the achievement gap, and our children deserve our best.

We look forward to working alongside the Department of Education, state departments of education, school districts and schools to inform implementation of this law at the federal, state, and local level. If you have any questions, please contact Dimple Patel, National Indian Education Association (NIEA) Federal Policy Associate at dpatel@niea.org or Liz King, The Leadership Conference Director of Education Policy at king@civilrights.org.

Sincerely,

National Indian Education Association
Leadership Conference on Civil and Human Rights
League of United Latin American Citizens
Disability Rights Education and Defense Fund
National Association for the Advancement of Colored People
National Down Syndrome Congress
Partners for Each and Every Child
National Urban League
The New Teacher Project
Teach for America
Judge David L. Bazelon Center for Mental Health Law
TASH
Council of Parent Attorneys and Advocates
New Leaders
United Way Worldwide
National Council of La Raza
National Center for Learning Disabilities
Teach Plus
Children's Defense Fund
United College Negro Fund
Coalition for Community Schools
Southeast Asia Resource Action Center
Lawyers' Committee for Civil Rights Under Law
National Women's Law Center
Afterschool Alliance



Engagement Contacts	
Name	Email Address
1. Luis Torres	Latorres@lulac.org
2. Susan Henderson	shenderson@dredf.org
3. Hilary Shelton	hoshelton@naacpnet.org
4. Ricki Sabia	rickisabia@gmail.com
5. Molly Mauer	Molly@theopportunityinstitute.org
6. Shree Chauhan	schauhan@nul.org
7. Kenya Bradshaw	Kenya.bradshaw@tntp.org
8. Kelly Broughan	Kelly.Broughan@teachforamerica.org
9. Grace Francis	Glucyf6@gmail.com
10. Denise Marshall	Denise@copaa.org
11. Soncia Coleman	Sonica.coleman@unitedway.org
12. Brenda Coleman	bcalderon@nclr.org
13. Kim Hymes	Khymes@ncld.org
14. Anjali Thakur-Mittal	ThakurMittal@civilrights.org
15. MaryLee Allen	mallen@childrensdefense.org
16. Cheryl Smith	Cheryl.smith@unconf.org
17. Mary Kingston Roche	rochem@iel.org
18. Rita Pin Ahrens	rita@searac.org
19. Erik Peterson	Epeterson@afterschoolalliance.org
20. Ahniwake Rose	Arose@niea.org
21. Alice Cain	ajohnsoncain@teachplus.org

April 22, 2016
Page 5 of 5

