



April 27, 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

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  
Hilary Shelton  
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

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](mailto:dpatel@niea.org) or Liz King, The Leadership Conference Director of Education Policy at [king@civilrights.org](mailto:king@civilrights.org).

Sincerely,

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

<b>Engagement Contacts</b>		
Name	Email Address	Organization
1. Luis Torres	Latorres@lulac.org	League of United Latin American Citizens
2. Susan Henderson	shenderson@dredf.org	Disability Rights Education & Defense Fund
3. Hilary Shelton	hoshelton@naacpnet.org	National Association for the Advancement of Colored People
4. Ricki Sabia	rickisabia@gmail.com	National Down Syndrome
5. Molly Mauer	Molly@theopportunityinstitute.org	The Opportunity Institute
6. Shree Chauhan	schauhan@nul.org	National Urban League
7. Kenya Bradshaw	Kenya.bradshaw@tntp.org	The New Teacher Project
8. Kelly Broughan	Kelly.Broughan@teachforamerica.org	Teach for America
9. Grace Francis	Glucyf6@gmail.com	TASH
10. Denise Marshall	Denise@copaa.org	Council of Parent Attorneys and Advocates
11. Soncia Coleman	Sonica.coleman@unitedway.org	United Way Worldwide
12. Brenda Coleman	bcalderon@nclr.org	National Council of La Raza
13. Kim Hymes	Khymes@ncld.org	National Center for Learning Disabilities
14. Anjali Thakur-Mittal	ThakurMittal@civilrights.org	The Leadership Conference on Civil and Human Rights
15. MaryLee Allen	mallen@childrensdefense.org	Children's Defense Fund
16. Cheryl Smith	Cheryl.smith@uncf.org	United Negro College Fund
17. Mary Kingston Roche	rochem@iel.org	Institute for Educational Leadership
18. Rita Pin Ahrens	rita@searac.org	Southeast Asia Resource Action Center
19. Erik Peterson	Epeterson@afterschoolalliance.org	Afterschool Alliance
20. Ahniwake Rose	Arose@niea.org	National Indian Education Association
21. Alice Cain	ajohnsoncain@teachplus.org	Teach Plus