



May 19, 2016

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

Dear Secretary King:

On behalf of National PTA and our 4 million PTA members, we thank you for the opportunity to provide our recommendations for non-regulatory guidance for the Every Student Succeeds Act (ESSA) to the U.S. Department of Education (ED). National PTA is the oldest and largest volunteer child advocacy association in the United States with congresses in all 50 states, DC, Virgin Islands, Puerto Rico and Europe. Since 1897, National PTA has been a strong advocate and a reputable resource for empowering all families to effectively engage in their child's education. Our association is pleased to see strong parent and family engagement language incorporated in ESSA.

Throughout the ESSA implementation process, National PTA has been and will continue working to improve the effectiveness of parental involvement and family engagement provisions in the law. National PTA's primary goal is for family engagement to become a key school improvement strategy for state and local education agencies to improve outcomes for each child. More than 40 years of research shows that family engagement is critical for student success, and students whose families are involved attend school more regularly, earn better grades, enroll in advanced-level programs and have higher graduation rates.¹ Unfortunately, all too often family engagement has become a factor of compliance with federal law rather than an embedded and systemic part of a state and school district plan to foster greater educational outcomes for all students.

National PTA appreciates the opportunity to offer recommendations for non-regulatory guidance to ED as well as the openness for input the Department has provided to stakeholders since ESSA became law. While we recognize that the Department has limited time to fully delve into all areas under ESSA to provide clarity, guidance and technical assistance, we hope the Department will consider the important role parents and families play in their child's education and provide guidance in the following areas: 1) meaningful consultation and ongoing stakeholder engagement, 2) parent involvement and family engagement and 3) the Statewide Family Engagement Centers program.

¹ Henderson, A. T., & Mapp, K. L. (2002). [A New Wave of Evidence: The Impact of School, Family, and Community Connections on Student Achievement](#). Annual Synthesis 2002. National Center for Family and Community Connections with Schools.

1) Meaningful Consultation and Ongoing Stakeholder Engagement

Parents are required to be involved in the development of state and local education plans, school support and improvement plans and annual state report cards in Title I; state and local formula grants in Title II; and in the local application for student support and academic enrichments grants in Title IV. It is essential that states and districts engage parents and families in the development of these new systems under ESSA. Our association requests that ED provide guidance in the form of best practices and examples of effectively engaging all groups required in the consultation process under ESSA—Governor, members of the State legislature and State board of education (if the State has a State board of education), local educational agencies (including those located in rural areas), representatives of Indian tribes located in the State, teachers, principals, other school leaders, charter school leaders (if the State has charter schools), specialized instructional support personnel, paraprofessionals, administrators, other staff and parents².

For example, in a review of state department of education websites for information on ESSA implementation, National PTA found that roughly 30 states or territories have webpages dedicated to the Every Student Succeeds Act. However out of those 30 states, less than half (12) have had or are scheduled to have meetings with stakeholders for public comment sessions around the state to gather public input. While there are some positive signs that states are engaging stakeholders, there are some states who are not including key constituencies that are required by law to be consulted—such as parents—in their working groups. It is imperative that all stakeholders are meaningfully engaged in ESSA implementation at the onset in order to create well-rounded education plans and grant applications that benefit all students. ESSA was intentional about including the constituent groups listed above and ED should provide the necessary support to states and districts to ensure that all groups are at the table.

Furthermore, ED should offer guidance on what constitutes “meaningful,” “timely” and “continued” consultation in the law. Guidance on these terms is important because many consultation provisions in ESSA have limitations in place that could result in a state rushing its stakeholder engagement to meet deadlines. Thus, it is imperative that ED also give consideration to the timelines it establishes for state plans and other requirements that involve meaningful consultation with stakeholders. ED should also provide sample frameworks for the consultation process, in order to ensure adequate time is provided for all groups listed and other education stakeholders are actively involved in the process as Congress intended.

In regards to guidance issued on stakeholder engagement, ED should rely on the work from the IDEA Partnership, which built relationships and reached consensus with a diverse group of stakeholders on the implementation of the reauthorized Individuals with Disabilities Education Act (IDEA). From their work, the IDEA Partnership created [Leading by Convening: A Blueprint for Authentic Engagement](#),

² [The Every Student Succeeds Act](#), P.L.114-95, Section 1111, pg. 19

funded by a grant from ED, as a guide for authentic stakeholder engagement. ED should use the lessons in this report in any guidance on stakeholder engagement.

2) Parental Involvement and Family Engagement

Similar to the [April 23, 2004 non-regulatory guidance](#) that ED issued on parent involvement under No Child Left Behind, National PTA would also like to see non-regulatory guidance for parent and family engagement in Title I, Part A of ESSA. Our association urges ED to issue improved guidance on Title I, Part A of ESSA—especially in Section 1116—which should include more recommendations, best practices, local and state examples and technical assistance to help schools and districts effectively use their reserved federal funding for family engagement activities that build meaningful family, school and community partnerships. Additionally, we would like to see guidance in the following areas:

- How schools can create effective written parent and family engagement policies as well as school-parent compacts that engage parents, families and school personnel in the process. More state education agencies should issues comprehensive guides to implementing an effective Title I parental involvement program similar to the [Systemic Family Engagement document](#) provided on Georgia Department of Education’s [website](#).
- The importance for schools to reserve more than 1% of Title I funds to carry out meaningful parent and family engagement activities and how schools can effectively use their set-aside to engage more parents and families to support student achievement. For example, we have seen success in some districts that have dedicated resources to family engagement. The Springfield Public School District, (Mass.), has a Chief Parent and Community Engagement Officer, offers a parent academy and runs the [Parent and Community Engagement \(PACE\) Center](#), which provides resources and services to parents and families to positively impact outcomes for students.³ National PTA asks that ED conduct a survey on how Title I funds for parent and family engagement are being used. The results from this survey will help school districts scale up best practices and highlight areas of need that districts face in implementing effective family engagement strategies. ED has conducted similar surveys in the past on the use of Title II, Part A funds to improve teacher and school leader quality.⁴
- How schools can effectively communicate to parents and families in an understandable and consistent way and provide information to them in a language they can understand.

Our association also requests that ED include an extensive list of resources on evidence-based family engagement practices for state and local education agencies to use at their discretion. ED should include PTA’s [National Standards for Family-School Partnerships](#) in the resource list as a research-informed

³ Klein, Alyson. “[Family Success at the Heart of Engagement Efforts in Mass. District.](#)” *Education Week* February 24, 2015.

⁴ U.S. Department of Education, [Improving Teacher Quality State Grants webpage](#)

method for educators, parent leaders and community-based organizations to use when assessing and implementing effective family engagement strategies. ED should also include a standard definition for family engagement in education in non-regulatory guidance. National PTA, along with leading researchers, expert practitioners and advocates define family engagement in education as:

“a shared responsibility of families and schools for student success, in which schools and community-based organizations are committed to reaching out to engage families in meaningful ways and families are committed to actively supporting their children’s learning and development; and that is continuous from birth through young adulthood and reinforces learning that takes place across context.”⁵

3) Statewide Family Engagement Centers

National PTA would also like ED to provide guidance on Statewide Family Engagement Centers (SFECs) in Title IV, Part E of ESSA, if the program is funded in the upcoming fiscal years. The SFECs program is an improved version of the Parental Information and Resource Centers (PIRCs) under No Child Left Behind. Originally, there was at least one PIRC in every state and the PIRC program worked to harness effective school and district practices to implement systematic family engagement programs in their state. Currently, centers still exist in Kansas, Colorado and Connecticut and we recommend that the Department reach out to the remaining family engagement centers when drafting guidance to utilize the expertise of those practitioners in the field.

National PTA will continue to be a resource and provide recommendations to ED on issues facing all children and families throughout the regulatory and non-regulatory guidance process to ensure parents and families have the resources and tools they need to make every child’s potential a reality. Please do not hesitate to contact Jacki Ball, Director of Government Affairs, at jball@pta.org or (703) 518-1243 to answer any questions or provide further input as needed.

Sincerely,



Laura M. Bay
President
National PTA



Nathan R. Monell, CAE
Executive Director
National PTA

⁵ Family Engagement in Education Act of 2015, S. 622, 114th Cong. (2015).