



January 20, 2015

Deborah Spitz
U.S. Department of Education
400 Maryland Ave. SW, Room 3E306
Washington, DC 20202

RE: Request for Information: Implementing Programs under Title I of the Every Student Succeeds Act (ESSA)

Dear Ms. Spitz:

The Association of California School Administrators (ACSA) and California School Boards Association (CSBA) thank you for this opportunity to provide input in response to the Department's Request for Information on implementing programs under Title I of the Every Student Succeeds Act (ESSA). On behalf of ACSA's more than 17,000 school leader members and CSBA's 5,000 locally-elected school board members, we are writing to share our recommendations for the upcoming rule making process for ESSA, with a specific focus on the policies and technical assistance that will meet the needs of California's education community.

California's PreK-12 education system is focused on providing every student with the instruction and support they need for success in college and the workforce. Our state has been a leader in education reform for many years - reform that addresses issues such as defining and strengthening the qualifications and effectiveness of educators, closing gaps with regard to resource inequities, and designing an accountability system that honors the professionalism of our local systems and the differing contexts that exist in communities across our state. California's new Local Control Funding Formula is the result of a collaborative effort involving the Governor, lawmakers, educators, administrators, students, parents, school board members, civil rights advocates, business leaders, and community groups. Together we have created a system that takes a coherent approach to equitable funding, accountability, and continuous improvement for PreK-12 schools serving nearly 6.2 million students.

We have been early champions of ESSA, in part because it seeks to place state and local districts in the position to make decisions addressing the specific needs of our schools. Over the past two and a half years, California has undertaken a systemic change in funding and accountability of our public school system through the Local Control Funding Formula, LCFF, and Local Control Accountability Plan, LCAP. Our state has already been working to build the capacity of our education community to engage in local accountability. Through this work, we are beginning to see a shift from compliance thinking to transformational achievement gap closing thinking. ESSA gives us an opportunity to align our two

systems. Our work through the California Collaborative on Educational Excellence and the State Board of Education places California ahead of the nation on the very issues outlined in ESSA.

We also appreciate the desire of and need for the Department to move quickly toward implementation, including providing stakeholders at every level with timely, helpful information on the transition to the new law. However, this new delegation of authority to states and districts, in light of the strong bipartisan support in Congress for ESSA provisions prohibiting regulation that is contrary to any aspect of the law or beyond the scope of its provisions, lead us to respectfully call for a restrained approach to any rulemaking undertaken with regard to ESSA. For example, some advocacy groups here in California are calling for regulations that would require that the state and/or districts adopt specific approaches to turning around schools in need of support and improvement. We strongly urge the Department to leave these critically important decisions to states and districts, while offering guidance and technical assistance with regard to the identification and use of evidence based strategies.

We request prompt action by the Department to ensure that states and districts have the following:

- Clarification, in the form of non-regulatory guidance and technical assistance, on statutory provisions that are unclear or inadequately defined, such as managing the transition from public school choice provided under No Child Left Behind to the availability of Direct Student Services funding to pay for costs associated with transportation to allow a student to transfer to another qualifying public school.
- Timely, detailed information on the transition to full implementation, including key dates for submission of plans under Title I and consolidated plans for those electing to utilize them. These dates should be anchored by the statutory deadline for full implementation established by ESSA (School Year 2017-18) and reflect a sequence and pace designed to offer states and districts maximum collaboration and planning time. Major process steps should not be rushed to accommodate the presidential transition or the beginning of the 115th Congress.
- Consistent with the statute, flexibility in the development of statewide accountability systems allowing states like California to continue using strong state-developed systems using multiple measures without the need to retool them or layer on new federally mandated elements, including the need to re-establish a single achievement score. State and district leadership on indicators, weighting and interventions should not be circumvented, but the Department could play a role in identifying and building awareness of related research and best practice.
- Ongoing attention to the need to reduce the regulatory burden on local districts such as through the elimination of duplicative or unnecessary reporting requirements. ESSA's program consolidation will help minimize administrative burden, but additional steps are needed to ensure schools, particularly rural and small schools, are able to maximize time focused on teaching and learning. For example, we encourage the Department to standardize common processes across programs, reduce workflow times for common procedures, reduce inconsistency in requirements across programs, and provide robust professional development about the Department's process and procedures.

We understand the importance of establishing regulations so that the ESSA can be a success within schools across our country. We therefore ask that the Department promulgate any rules and regulations in a manner that is thoughtful and reflective, so that the intent of the ESSA can be established and developed in the continued focus on success of all students in schools across the country.

Thank you for carefully considering our recommendations. We would be pleased to respond to any questions you or your staff may have about these ideas and welcome being a resource for the work California is currently undertaking.

Sincerely,



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