

January 21, 2016

Ms. Deborah Spitz
U.S. Department of Education
400 Maryland Ave. SW
Washington, D.C. 20202

Re: Comments from Learning Forward on Request for Information ED-2015-OESE-0130, Implementing Programs under the Elementary and Secondary Education Act

Dear Ms. Spitz,

This letter responds to the Secretary's Request for Information regarding implementing programs under the Elementary and Secondary Education Act (Docket ED-2015-OESE-0130). We appreciate the opportunity to provide input at this initial stage of the regulatory process and look forward to continued engagement as the U.S. Department of Education (USED) leads this process of providing regulations, guidance, and other support to the field in the implementation of the Every Student Succeeds Act (ESSA).

We submit this letter as an organization that is deeply committed to all students having great education experiences every day. If all students are to have equitable educational opportunities then they must all have access to high-quality teaching. For this reason, Learning Forward is committed to working with states and districts to establish systems of professional learning that meet key attributes of quality and can promote continuous improvement in teaching and learning. Title I and Title II of ESSA give USED an opportunity to help states and districts address current inequities and improve teacher quality by ensuring that teachers who serve our most vulnerable populations are working together to learn and problem solve, and that their shared learning, best practices, and quality lessons then spread from classroom to classroom, and system to system. Throughout ESSA implementation, we urge USED to maintain a focus on ensuring that no child's fate is determined by their zip code or the number above the classroom door.

As an initial matter, all areas on which the Department may regulate or provide guidance, including standards, assessments, accountability, educator equity, and competitive programs, should be considered with professional learning at the forefront. Each of those areas should be designed purposely to inform and empower professional learning in order to improve teacher quality and student outcomes. Further, the implementation in each of those areas will be strengthened through high-quality professional learning and systems of continuous improvement and support, so that educators are prepared to lead in the transitions that will occur over the coming months and years.

More specifically, USED should prioritize appropriate strategies in ESSA implementation to encourage states and districts to focus on building systems of professional learning that meet the new definition of "professional development" in ESSA and that can promote equitable access and continuous improvement toward high-quality teaching and learning for all students. For example:

1. Link Professional Learning to Equitable Access to Effective Teachers: Title I of ESSA requires states to report on the distribution of ineffective, out-of-field, or inexperienced teachers (and to some extent principals) on state report cards, and to describe in state and local plans how inequitable distributions of ineffective, out-of-school, or inexperienced teachers will be addressed. Hiring or firing practices alone will not lead to equitable access to effective teaching. Professional learning that leads to improvement in practice is needed, particularly in areas where inequitable access persists. USED should, through regulations or guidance, encourage states to target efforts toward districts and schools with inequitable access to improve systems of professional learning as a critical strategy to advance equitable access to effective teaching. Additionally, USED should strengthen equitable access to effective teaching by encouraging or requiring states and districts to focus on principal leadership as a critical part of designing and implementing effective systems of professional learning.

2. Use State and Local Plans to Advance Systems of Professional Learning: Each state and district will be required to submit state and local plans under ESSA, including consolidated plans as appropriate. USED should require and monitor in these plans that states and districts address their strategies for strengthening professional learning consistent with ESSA's definition and building systems of professional learning for all schools, particularly schools with inequitable access to effective teachers and leaders.

Language in ESSA also requires stakeholder engagement and periodic review and improvement (such as in state and local plans under Titles I and II). USED should leverage these provisions to require and encourage periodic reflection on the implementation of plans, lessons learned, and how those lessons will impact future planning, activities, and spending. Designing and implementing high-quality professional development that improves learning for all students cannot be achieved by a top-down compliance regime. Rather, it will require the development of true learning systems with engagement at all levels that can promote innovation, evaluation, and continuous improvement.

3. Encourage Accountability Indicators and School Improvement Strategies that Focus on Access to Effective Teachers and Leaders: Under Title I, statewide accountability systems must include one or more state-defined indicators that measure school quality, in addition to required academic indicators. Learning conditions – the way in which culture, leadership, and systems support learning for educators, leaders, and students - are important leading indicators that could provide critical information through state and local accountability systems for purposes of school improvement and equitable distribution of effective teachers and leaders. USED should use guidance and technical assistance to provide examples of statewide accountability indicators, such as teacher quality and improvement, leadership quality, and school climate and culture, that are leading indicators of improved student learning.

In conjunction with accountability changes, professional learning's role in school improvement should be central. Title I requires states and districts to identify lowest-performing schools and take comprehensive, evidence-based action to dramatically improve those schools. Evidence indicates that lowest-performing schools cannot improve without a clear focus on improving teaching quality and effectiveness, as well as quality of school leaders. USED should through regulations or guidance expect districts and states to directly address in school improvement plans how they will strengthen systems of professional learning to enhance teacher and leader quality and effectiveness, and continuously improve over time.

We thank you for your consideration of these priorities in implementing ESSA. As state and district leaders act to implement this new law, your appropriate regulations, guidance, and other direction will be critical to their success in understanding the parameters of what is both allowable and most educationally sound.

Respectfully,

Stephanie Hirsh