



THE PROFESSIONAL LEARNING ASSOCIATION

July 29, 2016

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

Re: Proposed Regulations for Consolidated Plans under the Every Student Succeeds Act (ESSA)

Dear Secretary King:

Learning Forward and the undersigned wish to express our thanks to you and your team for engaging with us to discuss how ESSA's implementation can advance evidence-based professional learning in all schools and support an equitable and excellent education for all students. In developing this letter, Learning Forward engaged over 30 members of its Redesign PD Partnership, 38 state affiliates, and its network of more than 20 of the nation's leading school districts. The leadership in these groups represents all constituencies impacted by ESSA from students to educators to state and local policymakers to community leaders. Our recommendations are informed by shared principles for the effective redesign of professional learning (enclosed), relevant research, and the work of our partners and school district leaders.

Our coalition sees ESSA state consolidated plans as a unique opportunity for states and districts to re-evaluate and potentially redesign their strategies to systematically support continuous improvement for all schools and educators. Research shows that no in-school factors matter more than teachers and school leadership, and educators, like students, need continual opportunities to gain new knowledge and skills to ensure all students have equitable access to instruction that prepares them for college and careers. We agree with Secretary King's recent comments to the Senate that high quality, evidence-based professional learning will be a crucial component of states' strategy to improve equitable access to effective instruction.

Proposed requirements for state consolidated plans under ESSA will likely define the primary contours of state and local ESSA implementation over the coming 1-2 years, and they provide important potential leverage to build and strengthen professional learning designed to ensure that all teachers engage in ongoing cycles of continuous learning and improvement. Effective professional development that changes practices for teachers and outcomes for students is not accomplished solely through an improved one-day workshop. Rather, the implementation of the kinds of evidence-based professional learning described in the law requires that policymakers and leaders at every level intentionally establish systems of professional learning. By system, we mean the culture and infrastructure (e.g., sufficient time, processes, leadership, data, and resources) at the state, district, and school levels that support continuous learning and measurable improvement for all educators, and integrates with and supports other school and district functions.

Learning Forward and the undersigned commend the Department for including a requirement in consolidated state plans to describe states' systems for educator development, retention, and advancement, including how the state will "ensure that each LEA has and is implementing a *system of professional growth* and improvement for teachers, principals, and other school leaders..." Emerging research and experience suggest that states and districts will need to take a systemic approach if professional learning is going to have its intended impact. We are also encouraged that the requirements ask states to describe their approach to "continuously improve implementation of SEA and LEA strategies and activities that are not leading to satisfactory progress toward improving student outcomes and meeting the desired program outcomes." This proposed requirement encourages states to plan at the beginning of implementation for progress monitoring and outline how they will take critical steps to assess the impact of professional learning, reflect on progress, and make necessary changes to ensure improvement over time.

Professional learning is critical to achieving ESSA's goals of equity and excellence. As a result, we ask that further attention be directed to the elements of effective professional learning systems including the new definition of professional learning in ESSA. Professional development is the most common use of Title II funds. Properly understood and implemented, ESSA strengthens the focus on systems of professional learning, down to the school level, that emerging evidence and experience suggest are vital to school and student success. To best leverage the consolidated application to help states and districts implement effective professional learning, we recommend the following:

- 1. Expressly ensure that states (and districts) align their strategies for professional development to the definition in ESSA, and focus on building systems of professional learning.** ESSA provides a stronger, research-based definition of what constitutes professional development under the Act, stating that professional development is "sustained (not stand-alone, 1-day, or short term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused." We urge the Department to more expressly expect each state plan (and each local plan that follows) to describe their strategy for advancing and supporting systems of professional learning (at the school and district level) consistent with the new definition of professional development, to the extent any ESSA funds will be spent on PD. In many states and districts, this calls for a shift in mindset and practice to consider what it would take for schools to operate as learning organizations, in which professional learning consistent with the definition of PD occurs every day. In supporting local systems of professional learning, states can establish the conditions that foster these deeper shifts at the district and school levels. These conditions include, for example, establishing a shared vision for high-quality professional learning, aligning state requirements to the vision, strengthening leadership for professional learning, allocating resources to support evidence-based PD practices, and measuring to learn about and improve the effectiveness of professional learning over time. States should be asked to describe what they will put in place to foster systems at the local level that align with ESSA's definition of professional development in this regard. States should also be asked to describe how they will ensure federally-funded PD at the district level aligns with the definition.
- 2. Ask states to establish guardrails for local consolidated planning requirements.** ESSA provides states and districts with considerable flexibility. To ensure that this new flexibility doesn't allow districts to move backward in their approach to professional learning, states should be encouraged to describe the state-defined guardrails or non-negotiables they will hold local plans to. We believe these guardrails will be best defined by states, and that the Department has an important role in encouraging states to do so. Many states have adopted standards for high-quality professional learning – consistent with the ESSA definition of professional development – and these standards can help to inform the state's guardrails.
- 3. Support states and districts in building educators' capacity and skill to effectively implement evidence-based strategies in school improvement.** Other sections of state consolidated plans – beyond Supporting Excellent Educators – would be strengthened by including discussion of the state's approach to professional learning and capacity building. USED might consider requiring states to describe their approach to developing teacher and leader quality within their school improvement strategy in the Accountability, Support, and School Improvement section of consolidated plans. This will not only support thoughtful consideration of capacity building needs inherent in new school improvement initiatives, but will also strengthen coherence in programs across Titles.
- 4. Provide adequate time for states to comprehensively define their approach to professional learning through their consolidated plan application.** Many states are currently targeting their limited capacity on their approaches to stakeholder engagement and accountability systems. With a proposed March or July 2017 deadline, all states may not have the requisite capacity to sufficiently facilitate a thoughtful process to assess, re-envision, and define their own system of professional learning that will substantively strengthen teacher and leader effectiveness. Given the critical role of professional learning, this section must receive as much strategic attention as other parts of the consolidated plan. ED should consider extending the dates and/or establishing a sequenced

approach where states are expected to address different parts of their plans over time, but in a clearly consolidated manner.

Recommended Revisions to §299.18 – Supporting Excellent Educators

(a) Systems of educator development, retention, and advancement. In its consolidated State plan, consistent with sections 2101 and 2102 of the Act, each SEA must describe its educator development, retention, and advancement systems, including, at a minimum—

- (1) The State’s system of certification and licensing of teachers and principals or other school leaders;
- (2) The State’s system to ensure adequate preparation of new educators, particularly for low-income and minority students; and
- (3) The State’s system of professional growth and improvement, which may include the use of an educator evaluation and support system, for educators that addresses induction, development, compensation, and advancement for teachers, principals, and other school leaders if the State has elected **to use any funds for any one of these purposes.**
Alternatively, The SEA must describe how it will ensure that each LEA **using funds for any of these purposes** has and is implementing a **comprehensive** system of professional growth and improvement for teachers, principals, and other school leaders that addresses induction, development, compensation, and advancement. **In particular, each state plan must describe the state's strategies for working with districts to advance systems of professional development at the school and district level consistent with the definition of professional development, and define the state's minimum expectations for local systems of professional growth and improvement, including any activities the state will no longer fund because they are no longer aligned with the revised definition of professional development or the state's professional learning system for improving teaching, leadership, and student learning.** (See Recommendations 1 and 2.)

(b) *Support for educators.* (1) In its consolidated State plan, each SEA must describe how it will use title II, part A funds, **Title I funds**, and funds from other included programs, consistent with allowable uses of funds provided under those programs, to support State-level strategies designed to:
(i) Increase student achievement consistent with the challenging State academic standards;
(ii) Improve the quality and effectiveness of teachers and principals or other school leaders;
(iii) Increase the number of teachers and principals or other school leaders who are effective in improving student academic achievement in schools; and
(iv) Provide low-income and minority students greater access to effective teachers, principals, and other school leaders consistent with the provisions described in paragraph (c) of this section.

Each state plan must describe how it will ensure that LEAs receiving Title II funds will coordinate professional development activities provided through Federal, State, and local programs, consistent with the requirements in section 2102 (b)(2)(F) of the Act. (See Recommendation 1.)

Recommended Changes to §299.17 (Comprehensive Support and Improvement):

Add text to item (5) in (d) *Comprehensive support and improvement plan.* (5) Other State-identified strategies, including **approaches to ensuring sufficient capacity-building for efforts described in improvement plans**, timelines and funding sources from included programs consistent with allowable uses of funds provided under those programs, as applicable, to improve low-performing schools. (See Recommendation 3.)

Add text to (e) *Performance management and technical assistance.*

(2) The technical assistance it will provide to each LEA in the State serving a significant number of schools identified for comprehensive and targeted support and improvement, including technical assistance related to selection of evidence-based interventions **and building educator capacity to implement evidence-based interventions**, consistent with the requirements in section 1111(d)(3)(A)(iii) of the Act and § 200.23(b). (See Recommendation 3.)

Recommended Revisions to §200.21 (Comprehensive Support and Improvement)

(d) *Comprehensive support and improvement plan.* Each LEA must, with respect to each school identified by the State for comprehensive support and improvement, develop and implement a comprehensive support and improvement plan for the school to improve student outcomes that—

(1) Is developed in partnership with stakeholders (including principals and other school leaders, teachers, and parents), as demonstrated, at a minimum, by describing in the plan how—

(i) Early stakeholder input was solicited and taken into account in the development of the plan, including the changes made as a result of such input; and

(ii) Stakeholders will participate in an ongoing manner in the plan's implementation, **monitoring, and refinement cycle;**

(2) Includes and is based on the results of the needs assessment described in paragraph (c) of this section;

(3) Includes one or more interventions (*e.g.*, increasing access to effective teachers or adopting incentives to recruit and retain effective teachers; increasing or redesigning instructional time; interventions based on data from early warning indicator systems; reorganizing the school to implement a new instructional model; strategies designed to increase diversity by attracting and retaining students from varying socioeconomic backgrounds; replacing school leadership; in the case of an elementary school, increasing access to high-quality preschool; converting the school to a public charter school; changing school governance; closing the school; and, in the case of a public charter school, revoking or non-renewing the school's charter by its authorized public chartering agency consistent with State charter school law) **and a description of how the LEA will build sufficient teacher and leader capacity to effectively implement the interventions** (*see Recommendation 3*) to improve student outcomes in the school that-

(i) Meet the definition of “evidence-based” under section 8101(21) of the Act;

(ii) Are supported, to the extent practicable, by evidence from a sample population or setting that overlaps with the population or setting of the school to be served;

(iii) Are supported, to the extent practicable, by the strongest level of evidence that is available and appropriate to meet the needs identified in the needs assessment under paragraph (c) of this section; and

(iv) May be selected from among any State-established evidence-based interventions or a State-approved list of evidence-based interventions, consistent with State law and § 200.23(c)(2) and (3);

ESSA presents a significant opportunity for states and districts to build and strengthen coherent systems of professional learning as part of its overall strategy for achieving its goals, and the Department has an important role to play in how it influences state and district action. In order to realize the potential of this opportunity, we seek your careful consideration of these recommendations as you revise proposed regulations for consolidated plans.

We look forward to collaborating with you and your team in this work, and hope that you will reach out if any other information might be helpful in your efforts.

Sincerely,

Stephanie Hirsh, Ph.D.
Executive Director
Learning Forward

Alyson Adams, President
Learning Forward Florida

Karolyn Belcher, President
TNTF

Ann Appolloni, President
Learning Forward Pennsylvania

Eric Brooks, President
Learning Forward Arizona

Karen Bullard, President
Learning Forward South Carolina

Amy Colton, President
Learning Forward Michigan

Lydia Conway, Ed.D., Executive Director of
Professional Learning at Fulton County Schools
(Georgia)

Christine Corbly, President
Learning Forward Washington

Juliet Correll, President
Learning Forward New England

Stephen Fink, Director, Center for Educational
Leadership at the University of Washington

Nate Franz, Executive Director of Teaching and
Learning, Syracuse City School District (New York)

Alex Fuentes, Teacher and TeachPlus Fellow
Alexandria City Public Schools, VA

Tabitha Grossman, National Director
Hope Street Group

Gaye Hawks, President
Learning Forward Tennessee

Sherri Houghton, President
Learning Forward Ohio

Terri Iles, President
Learning Forward Texas

Heather Lageman, President
Learning Forward Maryland

Laura Link, President
Learning Forward Indiana

Sara Maghan, President
Learning Forward Mississippi

Kevin McClure, President
Learning Forward Illinois

Judy Newhouse, President
Learning Forward Virginia

Kathy O'Neill, President
Learning Forward Georgia

Allyce Pinchback, Director of Professional
Development at Pittsburgh Public Schools
(Pennsylvania)

Andrea Pyatt, iPD Facilitator
Lake County Schools (Florida)

Laurie Resch, President
Learning Forward Minnesota

Dayna Richardson, President
Learning Forward Kansas

Rosemary Seitel, President
Learning Forward New Jersey

Melissa Tooley, Director of Educator Quality
New America

Jody Wood, President
Learning Forward Missouri



Redesign PD Principles

From the Redesign PD Partnership

We commit to advancing knowledge about what makes professional learning effective and using that knowledge to continuously improve practice and inform policy. We advocate for the redesign of professional learning systems because we share this belief: **Effective professional learning is essential to improving and inspiring excellent teaching and learning for all students.**

1. Teaching and education leadership are **complex professions** that **require continuous growth and support**.
2. **Learning systems** designed to graduate college and career-ready students prioritize **time, support** and other **resources** in service of meaningful educator collaboration and professional learning.
3. An inquiry orientation and meaningful **collaboration** help create cultures that support student learning and the daily work of teachers.
4. Empowering educators to **determine and lead their own learning** and that of their peers will help them better meet the needs of their students.
5. **Measuring the impact** of professional learning provides data that are essential to decision-making and better allocation of resources

The professional learning redesign principles above shape not only our collective work but also the work of the organizations we represent. They reflect our assumptions and intentions for action.



Last Name	First Name	Title	Organization
Airhart	Kathleen	Chief Operating Officer/Dep Commissioner	Tennessee Department of Ed
Allen	Roderick	Superintendent of Schools	SD79 Cowichan Valley
Avossa	Robert	Superintendent	Palm Beach Schools
Barringer	Mary Dean	Strategic Initiative Director / Education Workforce	CCSSO
Belcher	Karolyn	President	TNTP
Berry	Barnett	CEO and Partner	Center for Teaching Quality
Brown	Catherine	Vice President, Education Policy	Center for American Progress
Cator	Karen	President and CEO	Digital Promise
Dassler	Brian	Deputy Chancellor for Educator Quality	Florida Department of Ed
Davis	Jennifer	Co-Founder & President	National Center on Time & Learning
Domenech	Dan	Executive Director	AASA
Dieterle	Ed	Director, Program Evaluation & Litigation	Summit LLC
Eubanks	Segun	Director of Teacher Quality	NEA
Fink	Stephen	Executive Director	CEL, U. Of Washington
Fuentes	Alexandra	Teacher; Teacher-in-Residence / Teach Plus	Alexandria City Public Schools (ACPS)
George	Melinda	Chief Operating Officer	NCTAF
Gonzales	Crystal	Program Associate, Education	Helmsley Charitable Trust
Grossman	Tabitha	Director of Education Policy and Partnerships	Hope Street Group
Harding	Edie	Senior Program Officer	BMGF Pacific Northwest Initiative
Hart	Tomeka	Vice President, Programs	Southern Education Foundation
Hassel	Bryan	Co-Director	Public Impact
Hirsh	Stephanie	Executive Director	Learning Forward
Littmann	Kathi	President and CEO	The Greater Tacoma Community Foundation
Minnici	Angela	Director	Center on Great Teachers & Leaders, American Institute of Research
Moxley	Susan	Superintendent	Lake County Schools
Okwudili	Jennifer	Program Officer, K-12 Policy, Advocacy and Communications	Bill and Melinda Gates Foundation
Palmer	Scott	Managing Partner	EducationCounsel
Pemberton	Donald	Director	Lastinger Center for Learning, University of Florida

Robinson
Silver

Wendy
David

Superintendent of Schools
Director, Center for Evaluation and
Equity Studies

Fort Wayne (IN) Schools
RTI International

Slamp
Tooley
Ucelli-Kashyap
Watson
Waymack

Amy
Melissa
Marla
Michael
Nancy

Senior Program Officer, College Ready
Director, PreK-12 Educator Quality
Assistant to the Pres for Educational Issues
Chief Academic Officer/Associate Secretary
Senior Program Officer,
K-12 Policy, Advocacy and Communications

Bill and Melinda Gates Foundation
New America Foundation
AFT
Delaware Department of Education
Bill and Melinda Gates Foundation

Redesign PD District Community of Practice

Aspire Public Schools (California)

Bridgeport Public Schools (Connecticut)

DC Public Schools (District of Columbia)

Denver Public Schools (Colorado)

Fresno Public Schools (California)

Fulton County Public Schools (Georgia)

Hillsborough County Public Schools (Florida)

JeffCo Public Schools (Colorado)

Knox County Schools (Tennessee)

Lake County Schools (Florida)

Long Beach Unified School District (California)

Loudon County Schools (Tennessee)

New Haven Public Schools (Connecticut)

NYC Dept of Education (New York)

Pittsburgh Public Schools (Pennsylvania)

Prince George's County Public Schools (Maryland)

Riverside Unified School District (California)

Shelby County Schools (Tennessee)

Syracuse City Schools (New York)

Tulsa Public Schools (Oklahoma)