

Appendix E: Summary of Stakeholder Engagement Activities in the Development of Michigan’s ESSA Plan

Throughout the development of Michigan’s Plan for the Every Student Succeeds Act (ESSA), the Michigan Department of Education (MDE) has sought the input and participation of stakeholders in the process. This input has taken many forms, both in-person and virtual, and respondents spanned multiple perspectives representing individuals, organizations, and all regions of the state.

Michigan’s Journey



PHASE 1 – STRATEGIC VISION DEVELOPMENT

The initial visioning for Michigan’s ESSA plan began with State Superintendent Brian Whiston’s call for input on the state’s Top 10 in 10 plan – asking respondents to share key priorities and activities needed in order for Michigan to become a top 10 education state within the next 10 years. This work also included a review of the strategies used by states and countries with leading education systems, including the strategies outlined in the National Institute for School Leadership’s *9 Building Blocks for a World Class Education*.

In response to our invitation for ideas, more than 30 education stakeholder organizations presented their ideas to the State Board of Education, with an additional 765 individuals responding to an online public input survey, which generated nearly 4,200 recommendations. State staff pulled this input together to create the Top 10 in 10 guiding goals and principles, approved by the State Board of Education in December 2015. Additional stakeholder input informed the effort to define and refine the strategies recommended to accomplish the goals. Top 10 in 10 information is available at: www.michigan.gov/top10in10.

Additionally, the State Superintendent convened external stakeholders to serve on three vision committees around the topics of Accountability, Assessment, and School Funding.

Having already received this valuable input throughout 2015-16 through the Top 10 in 10 visioning process, MDE opted not to create a duplicative structure when the ESSA law was enacted, but rather build upon the work already underway through the Top 10 in 10 initiative. The recommendations from

each of these efforts formed the starting point for several aspects of the state’s ESSA vision and shaped the direction and focus of the ESSA work.

PHASE 2 – INITIAL PLAN DEVELOPMENT

This phase is where much of Michigan’s ESSA stakeholder activity has taken place. The MDE adopted a multi-pronged approach, meeting with and presenting to large and small groups and organizations throughout the process. An overview of these activities is described below.

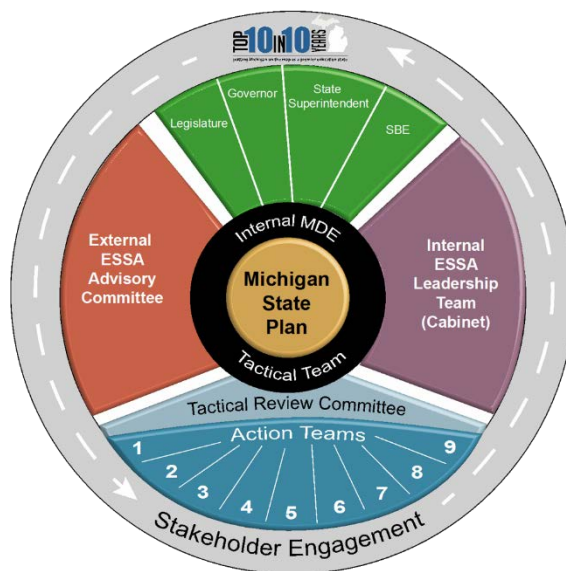
EXTERNAL STAKEHOLDERS INVOLVED IN FORMAL PLAN DEVELOPMENT AND REVIEW

The MDE created a formal structure to oversee its ESSA plan development process, as illustrated in the chart at right.

In addition to the internal review and development structures shown in this graphic, external stakeholders were represented on the nine Action Teams, led by department staff and including both internal and external topical experts, formed to review the new law and make recommendations for several specific aspects of the state plan.

Those Action Teams were:

- [Accountability System – Technical](#)
- [Additional Indicator of School Quality and Transparency Dashboard](#)
- [Assessment Implementation](#)
- [Communications and Outreach](#)
- [Fiscal](#)
- [Innovative Assessment Pilot](#)
- [Teacher and Leader Quality](#)
- [Using Data to Inform Instruction and Leadership](#)



Each Action Team’s web page includes a link to background information on the Action Team, its initial charge, and a list of internal and external members of the team, as well as any subsequent reports or recommendations from that team.

The Action Teams met frequently (some as often as weekly), reviewing the committee’s charge, related sections of the ESSA law, current practices, and input received through visioning committees, as well as conducting research and discussing options for recommendations to the state plan. As the work continued, the teams developed survey questions seeking broader stakeholder input and reviewed the responses received via those surveys.

External stakeholders also served on two larger committees charged with providing input on the combined recommendations of the Action Teams and the overall state plan. They were:

- The [Tactical Review Committee](#), whose members included representatives from local and intermediate school districts, as well as state organizations representing partners in the educational system, such as school nurses, social workers, librarians, and paraprofessionals, other state agencies, and many others whose expertise spanned multiple aspects of the ESSA plan.
- The [External Advisory Committee](#), comprising representatives of education associations, legislative leaders, the Governor’s office, representatives of business and higher education, state advocacy organizations, and other state agencies with primary roles in the state’s education system.

The Tactical Review and External Advisory Committees met monthly, initially reviewing and providing input on the overall structure of the work, and later looking at specific aspects of the Action Teams’ work, often focusing on one or two topic areas in more depth and providing input to MDE staff.

PUBLIC COMMUNICATION

One of the first stakeholder engagement efforts was the creation of a new ESSA page on the MDE’s website (www.michigan.gov/essa), which was used to share Information related to the state’s process for developing the plan with the public. Its key sections include: [State Plan Development](#) materials, such as draft recommendations, vision documents, Action Team information and work products, and any presentations made to the State Board of Education; [ESSA Resources](#), including links to the law itself and resources and guidance from MDE and the U.S. Department of Education (USED); opportunities to [Get Involved](#) in the ESSA plan development process by joining virtual focus groups, participating in online surveys, learning of other feedback opportunities, or signing up to receive ESSA updates; and [ESSA Notes](#), which contains archived versions of all ESSA Notes newsletters.

ESSA Notes newsletters, with an email distribution list of more than 3,400 subscribers, were sent whenever new opportunities for feedback or information on the plan development process was available. As the work progressed, a new edition of the newsletter was produced approximately every two weeks. Articles included information related to both state and federal activities and guidance around plan development, updates on opportunities to provide input, and status reports on Action Team activities.

ROUND ONE STAKEHOLDER SURVEY

As the work progressed and each Action Team developed preliminary recommendations or concepts, broader stakeholder input was sought in the form of an online survey, open for several weeks in August 2016. Notification of its posting was shared via the e-newsletter ESSA Notes, the MDE’s weekly communication to schools and districts, the e-newsletter Spotlight on Assessments, and by education partners via notices in their member publications, as well as through staff presentations to the State Board of Education and other organizations. More than 1,100 individuals responded to the survey, which included questions on Accountability, Assessments, Supports for Students and Schools, Teacher and Leader Quality, and Using Data to Inform Instruction related to the ESSA recommendations. Results were analyzed by topic by the Action Team leads, and responses then informed the future direction of the committees’ work. Detailed analysis of each survey was made available online:

- [Accountability System-Technical/Additional Indicator of School Quality and Transparency Dashboard \(combined results\)](#)
- [Assessment Implementation](#)
- [Innovative Assessments](#)
- [Supports](#)
- [Teacher and Leader Quality](#)
- [Using Data to Inform Instruction and Leadership](#)

OUTREACH TO STAKEHOLDERS VIA TARGETED FOCUS GROUPS AND CONFERENCE PRESENTATIONS

Throughout the plan development process, the MDE team was invited to present on ESSA at conferences, association meetings, and other venues. More than 40 presentations to groups ranging from ten people to more than 500 were given. Typically, there was opportunity for attendees to ask questions and provide input to the presenter.

In November, MDE staff led a half-day session with more than 100 members of local school boards to share details of the recommendations and seek input. These responses were shared with the relevant Action Team Lead or staff member for further consideration.

Presentations were made to all of the major education associations, and the State Superintendent provided regular updates and engaged in discussion with association leaders at their monthly Education Alliance meeting.

Several groups with interest in the ESSA plan development approached MDE seeking an opportunity to share input from their members' perspectives. We considered these *targeted focus groups*. These took the form of a meeting with multiple members of the group or organization in attendance, in focused discussion with MDE staff, to learn of their unique interests and concerns and discuss ways in which they might be addressed as part of the ESSA plan. Follow-up meetings with many of the groups will be held during the formal public comment process to outline where/how their input has been incorporated into the final plan or implementation activities. In many cases, additional input during the implementation phase will be sought, to assure continued alignment.

Groups with specific interest in meeting to discuss their feedback on ESSA included school librarians, representatives of Michigan's Math and Science Center Network, arts education associations, student advocacy groups, parents of and organizations representing foster and homeless youth in the state, Michigan's 12 federally recognized tribes, and several civil rights organizations (the latter two described in more detail below).

The MDE has committed to ongoing dialog with representatives of these various groups throughout the implementation phase of the ESSA plan.

TRIBAL CONSULTATION

Federally recognized tribal organizations are listed as one of the groups for whom engagement and consultation is required. This fit well with a developing Indigenous Education Initiative (IEI) that had recently been convened within the Department and the Governor's 2012 executive order requiring each

state agency to identify a liaison to coordinate departmental efforts related to Tribal-State affairs. Members of the ESSA planning team worked with the liaison and the IEI staff to convene several consultation meetings with representatives from Michigan's 12 federally recognized tribes and their education associations, and through this process have created agreement to continue working together to provide guidance to state education agency (SEA) and local education agency (LEA) staff regarding ESSA consultation requirements and service to Native American children and their families.

As a results of these preliminary discussions, MDE has taken the following actions:

- Integrated references to tribal education departments throughout all foundational plan documents, to represent this commitment;
- Committed to quarterly consultation between the SEA and the federally recognized tribes;
- Committed to developing processes to engage in 1:1 consultation between the SEA and each federally recognized tribe individually;
- Adopted as guidance the Confederation of Michigan Tribal Education Directors "Guidance to Michigan Department of Education Regarding Tribal Consultation in the Every Student Succeeds Act," with plans to use this as the core document to motivate consultation work between the SEA and the tribes as well as LEAs and tribes.

W.K. KELLOGG AND STEELCASE FOUNDATION GRANTS TO SUPPORT OUTREACH AND ENGAGEMENT EFFORTS

In partnership with the Council of Michigan Foundations (CMF), MDE sought grant funds from Michigan-based foundations to support the ESSA plan development process. The W.K. Kellogg Foundation awarded CMF/MDE \$175,000 and the Steelcase Foundation provided a \$10,000 match to foster stakeholder engagement efforts around ESSA and Michigan's Top 10 in 10 initiative, with a focus on outreach to parents and traditionally underserved communities and groups. Because of the timing of the awards, much of MDE's stakeholder engagement was already underway when the funds were received, so the funds are planned to be used for stakeholder engagement during the implementation phase of the plan, as well as in the later stages of plan development.

The MDE and CMF have contracted with Lansing-based Public Policy Associates to assist in these targeted outreach efforts. Details of these activities are described throughout this report.

CIVIL RIGHTS AND SCHOOL JUSTICE ORGANIZATIONS

Recognizing the importance of engagement with civil rights organizations in the development of the ESSA plan, the MDE used a portion of the grant funds provided through the W.K. Kellogg and Steelcase Foundations to partner with Public Policy Associates to convene a focus group of representatives from multiple civil rights organizations throughout the state. The draft recommendations were shared with the group, and MDE staff engaged in facilitated dialog with attendees to discuss their overall thoughts on improving the state's educational system and feedback on the draft plan. Following the discussion, participants were asked to prioritize areas of focus from the ideas generated during discussion. A key topic of discussion was the importance of increasing student voice and stakeholder participation and

access to decision-making processes, coupled with a strong passion to break down silos within state government entities to coordinate mutual areas of work with students and their families.

At their request, all meeting attendees were added to the ESSA Notes email list, and invited to take part in future opportunities for stakeholder input. In direct response to this discussion, MDE added the collection of student suspension and expulsion data to its proposal for the transparency dashboard recommendation, and will be seeking additional feedback from these groups during the development phase of the transparency dashboard. On a broader scale, MDE leadership has begun outreach to other state agencies to facilitate increased partnership in certain areas of work, including the Partnership District concept.

Civil Rights organizations also provided input through the Michigan Students Succeed Coalition, a coalition of multiple state organizations (including civil rights and student advocacy groups) formed to share collective input on the ESSA plan. MDE staff, including the State Superintendent and Deputy Superintendent, met with representatives of the Coalition during the second phase of stakeholder input to discuss more detailed aspects of the plan recommendations and seek input from group members. A summary of this discussion was shared with MDE leadership and in addition to being considered for ESSA plan development, will be used to guide the department's work going forward, with the goal of continued engagement.

PARENT SURVEY

In partnership with an ongoing Student Voices initiative within MDE's Office of Education Improvement and Innovation, MDE partnered with YouGov to conduct a survey that ran during October-November 2016, aimed at parents of P-12 students, seeking thoughts and input on issues that related to aspects of the ESSA plan. The opportunity to participate was shared via ESSA Notes and the ESSA webpage, as well as directly to those who volunteered for the Parent virtual focus group and shared by stakeholder organizations. Additionally, the opportunity was reported in several media outlets. More than 1,700 Michigan parents of children under 18 responded. Parents were asked for their opinions on what is needed for their student to receive a great education, information deemed important to determine school quality, thoughts on why some schools are underperforming, who is responsible for student academic achievement, equity of distribution for education resources across the state, level of understanding of education terms and concepts, confidence with their own child's school, and opinions and use of results on statewide assessments. An analysis of that survey was provided to the MDE, in which responses were reported both in aggregate, as well as compared across income levels and noting where responses varied across those groups.

This analysis was provided to MDE in December and was shared with Action Team Leads and other MDE staff, including those working on the ESSA plan. One of the findings of the survey was that responding parents supported the concept of MDE placing emphasis on helping teachers and aligning resources to support schools deemed as low-performing, which aligns well with the Partnership District concept. Additionally, respondents listed as most important to school quality: school safety; student achievement as determined by graduation rates, post-secondary enrollment, and the presence of art and music classes. This input, along with that received from other stakeholder groups, led to the addition of *time spent in arts, music, and physical education courses* as one of the components of the school quality and

student success accountability indicator, and the consideration of other factors for inclusion on MDE's proposed Transparency Dashboard.

STATE BOARD OF EDUCATION

Throughout the plan development, information has been shared with and input gathered from members of the State Board of Education (SBE) via weekly email updates on ESSA plan development activities and formal presentations at SBE meetings. There will have been six presentations to the SBE, culminating in the presentation that will serve as the start of the official public comment period for Michigan's draft plan. Additionally, the ESSA vision and plan have been discussed at the SBE's Annual Retreat, at an orientation session for newly-elected members, in multiple discussions with individual board members, and during a special meeting convened just prior to the launch of formal public comment. This special meeting on February 6, 2017 provided more detailed information about the proposals to board members, answered their questions about the plan and timeline, and garnered feedback to inform the final draft. The 30-day formal public comment period on the ESSA draft plan launched with the February 14, 2017 presentation of the plan to the SBE. An update on public comment received to-date was presented to the SBE at its March 14, 2017 meeting.

LEGISLATIVE AND EXECUTIVE BRANCH INVOLVEMENT

State legislative leadership, as well as chairs of the House and Senate education policy committees and education-related appropriations subcommittees, were invited to join the ESSA External Advisory Committee (EAC), which convened monthly to review and provide input on the ESSA plan. Several legislators or their designees participated regularly in these meetings.

Other legislative engagement involved the State Superintendent or Deputy Superintendent (ESSA Lead) providing testimony on various aspects of ESSA or the ESSA components to legislative committees, as well as numerous one-on-one meetings with legislators by the State Superintendent and MDE staff. During the formal public comment period, the State Superintendent and department staff met in one-on-one meetings with members of the state legislature. Testimony was provided at several state House and Senate committees related to the draft ESSA plan.

Throughout the plan process, the State Superintendent met regularly with the Governor and his education advisors, providing updates on aspects of the vision and plan and seeking input and feedback. A member of Governor Rick Snyder's team also served on the External Advisory Committee and provided regular feedback verbally and in writing.

Additionally, the Deputy Superintendent, serving as the ESSA lead, met monthly with the governor's education advisor to discuss the ESSA process and key components of the plan.

Prior to submission of the final plan, the Governor was provided the legally-required 30-day review period.

PHASE 3 – PLAN DEVELOPMENT

This phase included refining of the initial recommendations, based on previous information and input received and the work of the Action Teams. At this point, Action Teams had developed preliminary recommendations for each aspect of the ESSA plan, and sought additional feedback from stakeholders to solidify the recommendations to the MDE leadership and State Superintendent.

FEEDBACK FORUMS

As various aspects of the plan developed, MDE partnered with intermediate school districts (ISDs) across the state to host regional [Feedback Forums](#) at six ISD locations. In addition to sharing this information by usual methods, ISDs also issued press releases within their communities, and several media outlets shared the information in their publications. All interested members of the public were invited to attend and more than 400 individuals did so, with additional people viewing the livestream video of one of the events, or watching the [archived video](#) at a later date.

At the forums (which ranged from two to six hours long), a [detailed overview](#) of the draft recommendations for Accountability, Assessments, Supports, and Educator quality components of the ESSA plan was presented to attendees, who were then invited to ask questions and share feedback with MDE staff. At several sessions, MDE topical experts were on hand for one-on-one discussions or to lead focused discussion with smaller groups.

These comments and questions were compiled and provided to Action Team leads to inform the next phase of recommendations and plans for implementation. The compiled questions became the basis for an online [ESSA FAQ document](#), which MDE plans to update as this work proceeds.

ROUND TWO STAKEHOLDER SURVEY

Following the feedback forums, all stakeholders were invited to provide feedback on the ideas and concepts presented at the forums, which comprised the plan component recommendations to-date. Again, members of the public were notified of these options via the ESSA Notes newsletter, through notices in MDE's various communications to the education community, announcements at State Board of Education meetings, and targeted outreach through partner organizations.

The survey was open December 2016-January 2017. Survey options included: five detailed topical surveys on the topics of Assessment, Accountability, Supports for Students and Schools, Educator Quality, and Supports for Special Populations, aimed at those who had attended a feedback forum or viewed the archived video; a general, less detailed survey for those who had not; and an open-text option for those who wanted to share general input on ESSA outside of the survey structure. Emailed feedback, questions, and comments were also accepted. More than 950 responses were received to the combined surveys. Detailed summaries of those responses can be found via the links below:

- [Accountability](#)
- [Assessment](#)
- [Educator Quality](#)
- [Supports](#)
- [Supports to Special Populations](#)

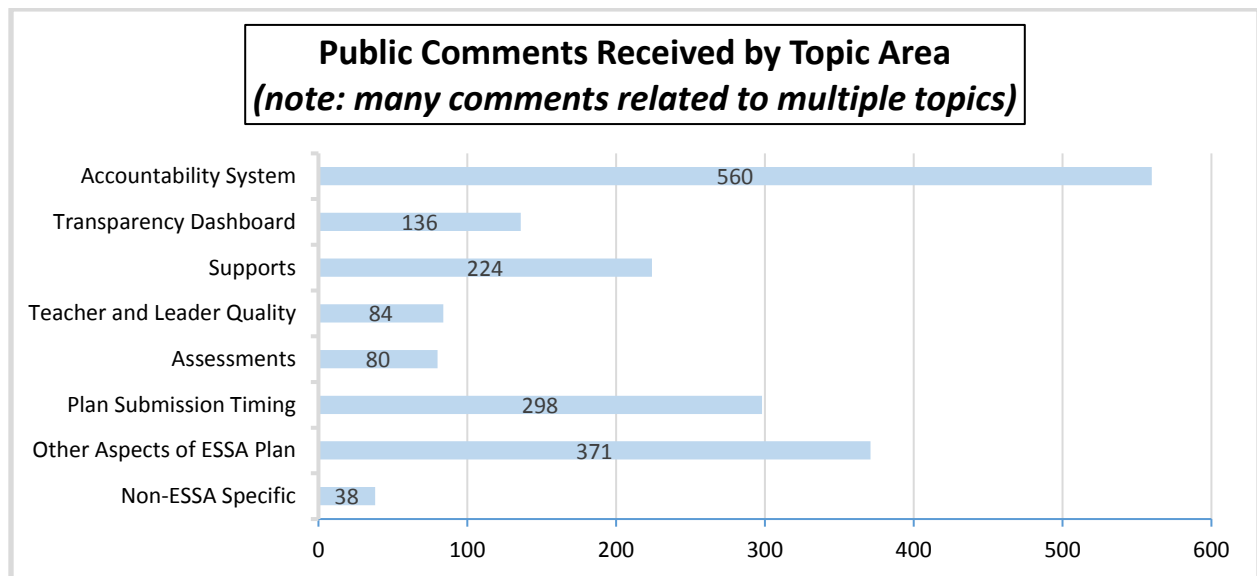
VIRTUAL FOCUS GROUPS

Parents, teachers, and paraprofessionals were invited to join virtual focus groups to discuss and provide input on the ESSA plan. These sessions, convened by Public Policy Associates, with support from the W.K. Kellogg and Steelcase Foundation grant funds, provided opportunity for more than 100 individuals to participate in moderated online discussions over several days with fellow parents, teachers, or paraprofessionals, providing input and sharing feedback on multiple aspects of the ESSA recommendations. Questions were targeted to the unique perspectives of each focus group, and discussion in each session varied, based the initial responses of participants. Participants' feedback was used to further refine the ESSA plan recommendations and will inform plan implementation processes.

FORMAL PUBLIC COMMENT ON DRAFT PLAN

The formal public comment period for Michigan's Every Student Succeeds Act (ESSA) draft plan ran from February 14, 2017 through March 16, 2017.

Throughout the public comment period, the draft plan was available for review on Michigan's ESSA website. The key components of the draft plan were shared in a presentation to the State Board of Education at its February 14, 2017 meeting. Supporting documents also posted on the website included an overview of the key components of the plan (which was also provided in Spanish and Arabic translations), high-level and detailed PowerPoint presentations related to specific aspects of the plan, and a summary of the stakeholder engagement process undertaken throughout development of the plan. Stakeholders were invited to submit comments via email to the MDE-ESSA email account or via U.S. mail. Nearly 700 public comments were received, related to the topics indicated below.



Summary of Themes

Below is a summary of the themes of the comments received within various category areas:

Accountability

- Comments were received supporting (12) and opposing (16) the inclusion of an A-F accountability system, most of them with strong feelings one way or the other. See summaries of organization/group feedback below for more detail on the positions of major groups/organizations on this topic.
- Multiple comments related to N-size (at least 40 commenters) – the majority (primarily from special education advocates) in favor of decreasing it from the proposed 30. Several commenters recommended increasing it above 30 or not weighting subgroups equally in the accountability system. Several commenters strongly supported the proposed N-size of 10 for English learners.
- There were comments for/against specific aspects of the accountability plan – particularly the various components of the Additional Indicator of School Quality/Student Success – suggesting changes to the weighting of various factors (some calling for more growth/proficiency, others suggesting more of the “other” school quality factors, many suggesting additions to the school quality/student success indicator.
- Multiple comments called for the addition of a “parent accountability” measure.
- Several comments addressed the issue of poverty and suggested that until that is addressed, the accountability system will continue to negatively label schools with high percentages of economically disadvantaged students.
- Several commenters stated that the plan does not adequately address the needs/measurements for gifted/talented students.
- Several comments called for the addition of a district-level grading system, in addition to a building level system.

Transparency Dashboard

- Commenters suggested additional items to add to the Dashboard or Accountability system
 - Foreign language
 - Physical education/outdoor exercise
 - Health-related coursework
 - Access to/time spent with school librarians, and support for indicated willingness to do so
- Supports
 - Support for Blueprint, librarians, gifted and talented students, Big History program, arts instruction
 - One commenter called for increased alignment across multiple MDE initiatives (Blueprint, MTSS, Early Literacy) – all good, but not necessarily coordinated at MDE level, which makes implementation hard for districts/ISDs where they’re all in play
 - Support for English Learner recommendations
 - Support for whole child focus and partnership district model (some suggestions for additional partners)
 - Calls for more explicit references to supports for gifted and talented students
 - Calls for more explicit references to health-based curriculum as allowable activity

Teacher and Leader Quality

- Comments include concern raised re: teacher shortages, lack of \$\$ in challenging districts
- Calls for mention of preparing educators for specific groups of students – both special education and gifted and talented
- Several comments dealt with the intersection between the state assessment and educator evaluations
- See group/organizational letters for specifics on input related to these sections of the plan, as well as the state’s proposed use of the statewide Title II, A funds

Assessments

- Concern over changing assessments again
- Several commenters requested that the state pick a system and stick with it, saying that constant change creates confusion at the school/district level
- Multiple commenters don’t like any assessments
- Several comments were specific to the administration of the WIDA assessment for English learners
- Several comments encouraged use of existing district-selected assessments (NWEA, etc.) in lieu of state assessments
- Several commenters strongly supported the switch to PSAT in grade 8, several others strongly opposed the change, expressing concerns regarding alignment to state standards

Other Comments

- 297 comments (including those in the 268 letters from the “Stop Common Core” group and the special education advocates mentioned below) support delaying plan submission. One commenter specifically expressed appreciation for the state taking the lead by submitting in April, though several comments indicated support for moving forward with the plan. Several of the groups/organizations requested a delay in submission (see summaries below), to allow for more discussion on specifics of the plan. The remainder did not address timing in their comment.
- Multiple comments did not express support/opposition to specific sections of the plan – just provided input on one/more aspects – including suggestions for implementation and willingness to partner with MDE and schools in the process

Non-ESSA Related

- Multiple comments related to school funding (or lack of)
- Several comments were actually questions related to school choice/vouchers/rumors of federal-level change, or impact of proposed state legislation re accountability and school reform, or provisions of the teacher certification/licensure system

Comments from Groups and Organizations

Several groups/organizations generated “form letter” comments addressing a variety of common topics. Other organizations submitted one letter representing the agreed-upon position of their membership.

Form letters

- Opposition to Common Core and federal oversight/authority – we received 243 essentially duplicative emails that opposed Common Core, the inclusion of early childhood and social-emotional learning in the plan, collection of student-level data, and submission of the plan in April
- Recommendation for a lower N-size, particularly for students receiving special education services, calling for a lower N-size, so as not to “mask” those subgroups, many also encouraging delay in submission of the plan to allow for continued discussion (more than 25 form letters, plus additional that expressed similar sentiment)
- Support and praise for the inclusion of Fine Arts and Music in the Accountability and Transparency Dashboards, with suggestions for and promise to aid in implementation (126)
- Support among educators in public school academies for the A-F accountability system, the educator quality recommendations, the alternative accountability system (with suggestions for implementation), and making suggestions for changes to the growth measure, the assessment proposal, and some tweaks to the accountability system (per the MAPSA proposal) (37)
- Parents and educators encouraging adding gifted children as a subgroup and making more explicit reference to gifted and talented students in several sections of the plan (21)
- Support for the addition of access to and time spent in health education programs as part of the accountability system and transparency dashboard (10)

Comments On Behalf of Associations/Organizations:

EDUCATOR ASSOCIATIONS

- **Michigan Association for Gifted Children (MAGC)** — Despite their working closely with others around ESSA planning and implementation, they express dismay that there is no mention of gifted students in Michigan’s draft plan. They contend that often gifted students are underserved and thus they underperform, and that our ESSA plan—like our state’s accreditation system—relies heavily on bringing up low performing students to close gaps rather than on ensuring all students reach their potential. They present more than two dozen specific areas (citing page and section numbers) where our ESSA plan could be strengthened for gifted students.
- **Michigan Association for Media in Education (MAME)** — **Supports:** including media specialists in the School Quality/Student Success indicator. Makes the following **recommendations:** Include in accountability plan a metric indicating the FTE of library media teacher in each school; adding specific language about library/media whenever referring to a well-rounded education; list “supporting access to effective school library programs” as an allowable activity for Title IV funds (6.1D); include a document describing library measurement benchmarks (link provided) in the redesigned Comprehensive Needs Assessment (CNA) and allow MAME to review CNA when drafted; include “effective

school library programs as an item in the list of evidence-based practices in the grant application “super-highway” (provides link to evidence).

- **Michigan Association of Public School Academies (MAPSA)** — In a memo, referred to Michigan’s original accountability plan—before moving away from A-F—a “foundation to build on despite missing some critical requirements to create a meaningful accountability system that reflects student differences.” Areas of support: emphasis on supporting excellent educators; grant-making strategy for using 3% Title IIA funds (encourages addition of PSAs as collaborative partners); development of an alternative accountability system in section G. **Areas of Recommendation:** Return to A-F grading; use a growth measure other than student growth percentiles; more robust strategy for identification of schools, clarity in flexibility offered, and assurances about consistent measurement of progress; consistent assessment strategy (at least 5 years) that includes timely data usable at the classroom level; extended exclusion period for recently arrived EL students; changes to the A-F system (chart included) to focus more on outcomes than inputs.
- **Michigan Association of School Administrators/ Michigan Association of Intermediate School Administrators (MASA/MAISA)** – (March 6) Expressed concern with April 3 submission; A-F grading of Michigan schools; and public comment process that “demonstrates a lack of willingness to incorporate feedback in a revised plan or communicate changes made to the field before submission.
- **Michigan Association of School Administrators (MASA)** – (March 16) Feel strongly that some input on key issues was ignored, so addressed them in a memo. Key recommendations: Strongly urges delay of submission; oppose assigning a summative letter grade, and since so much of the plan references A-F this is a big reason for delay; weigh subgroups based on their percentage relative to overall population by building; remove teacher/administrator longevity metric, since this information is likely to be taken out of context and does not predict school health; remove (or limit to K-8 schools only and expand to “access” as well as “participation”) fine arts/music/physical education metric as it might have unintended consequences; propose a more solid metric for calculating the school quality/student success indicator and resubmit for stakeholder input; delay submission until complete accountability/feedback loop process is developed, including exit criteria; adjust methodology for identifying and serving “comprehensive support schools” to target schools with highest needs; develop a more systemic approach to Title IIA to impact more educators throughout the state and using service providers already in place.
- **Michigan Association of School Boards (MASB)** – recommend delay of submission until September, citing too many unresolved issues on the federal level and pending accountability changes at the state level. They express concern that an application from MDE while the Legislature and Congress are reviewing this very issue will cause confusion among local districts and “cause doubt with MDE’s process.”
- **Michigan Association of School Nurses (MASN)** — expressed support the plan’s focus on the “whole child” and its power to overcome barriers to student success. Identified the comprehensive needs assessment (CAN) as the key to identifying student needs and referenced a sample template that was submitted to MDE to help school systems plan for using school nursing services in the school improvement plan.

- **Michigan Association of School Social Workers (MASSW)** — Very supportive of the overall content of the draft plan, with emphasis on whole child and importance of school climate/student safety. Urge MDE to provide additional focus to the strategies and supports to address social, emotional and behavioral needs of students. Strongly support the goal of providing access to high quality educational opportunities to all students and to address achievement gaps.
- **Michigan Association of Secondary School Principals (MASSP)** – In a memo with attachments, express concerns with “significant elements of draft plan for Title A, Part A and Title II, Part A, and urge submission delay of at least these sections. Key recommendations around Title I: Finish development of a dashboard accountability model that does not include summative grades; weight subgroups based on their percentage of overall student population in a building; use a larger n-size of 50 students; abandon the use of teacher/administrator longevity data as a metric; limit the arts/music/P.E. metric to K-5 or K-8 OR change to measure access rather than participation; provide specific information on weighting of school quality/student success metrics; revise methodology to focus on school most in need of support to leverage resources. Key recommendations around Title II (with concerns expressed with each proposed investment in MDE’s plan): complete revision to build on models used in other states, such as Battelle for Kids/Tennessee; incorporate wide-scale professional development customized for districts; dedicate funding to evaluation training.
- **Michigan College Access Network (MCAN)** — **Expressed support for:** the stakeholder engagement process; recommendation to use PSAT in grades 8-10. Expressed concerns/recommendations for: using postsecondary enrollment as a significant metric for determining a high school’s A-F grade (as the driving indicator for School Quality/Student Success for high school); CNA should consider postsecondary educational resources available to students and capture baseline data such as college enrollment rate, FAFSA completion rate, and college remediation rate, as well as other metrics named by MCAN; Partnership Model agreements should consider MCAN a ready and willing partner for high schools that have low college-going rates or large gaps between subgroups.
- **Michigan Council of Charter School Authorizers** — Express extreme concern about the “ever-changing nature of the contents of this plan” with special note of the change to (moving away from) the A-F strategy. They urge return to a single indicator (with more emphasis given to academic indicators) and encourage delay in plan submission until there is greater consensus from the education community, legislature, and executive. They also encourage dropping the time spent in fine arts/PE as it would undermine choice and stifle innovative curricula.
- **Michigan Education Association (MEA)** — Express satisfaction with many points in the overall plan, especially focus on the whole child. Their memo provides input in four areas:
 - Assessment—**Agrees with** use of benchmark exams to provide immediate feedback; encourages scheduling two exams in Sept and Jan, with optional spring exam for students who did not show growth by Jan. **Area of concern** is that assessment data should not be used for labels but rather to direct assistance.
 - Accountability — **Supports:** proportional credit for participation, inclusion of graduation rates; inclusion of access to arts/PE; inclusion of educator longevity IF we do not continue NCLB model of restructuring. **Does not support** A-F as a single indicator; academic indicators making up more than 50% of rating (overemphasis on test scores); inclusion of

- advanced college/career coursework, citing lack of funding in many low-performing schools. Would like to add metric for media center staffed with certified specialists.
- Supports for districts and schools—Supports Partnership Model; Calls for more flexibility in turn-around time, clarification on “next level of accountability.”
 - Educator quality—**Supports:** inclusion of residency-based preparation program focused in Partnership Districts, provided this does not change requirements for certification; teacher evaluations used to inform PD and improvement; inclusion of paraprofessionals in PD plans; development of career pathways. Expresses concerns with: alternative route preparation program proposal. Calls for a complete revision of MDE’s proposed plan under Title II, Part A.
 - **Michigan Library Cooperative Directors Association (MLCDA)** – Thanks to MDE for inclusion in process, encouraging continued support for/inclusion of school libraries in implementation of plan.
 - **Michigan Parent Teacher Association (PTA)** — The group applauds the plan to put Michigan children at the center of the discussion and to include stakeholder engagement, and encourages continuing that focus throughout implementation, despite USED shift in direction away from stakeholder engagement.
 - **Michigan World Language Association (MIWLA)** — Encouraged to see language in the plan to provide a well-rounded education. Since language education in US lags far behind other countries, urges additional resources to close this gap and ensure Title IV, Part A grants include support for world language instruction.

ISDS/COUNTYWIDE SUPERINTENDENTS

- **Macomb County Association of School Administrators/Macomb Association of Curriculum Administrators/Macomb County Administrators Association of Special Education** — A memo outlines concerns in several areas:
 - Accountability—Supports holding targets constant for 10 years. Major concerns around A-F as a single indicator; lack of shared methodology for calculating the weighted index for each indicator; teacher/administrator longevity as an indicator. Would support a dashboard for accountability.
 - Assessment—Concerns about using state assessment to measure growth (“using tests for purposes other than the ones that they were designed for may lead to invalid results”); additional concerns about using “unproven” methodology in a high-stakes accountability system. Expressed disappointment that MDE did not follow the recommendation of the Assessment Implementation Action Team regarding use of the PSAT in 8th grade.
 - Partnership Model—requests that ISDs be included with MDE as a full partner. Also express extreme concerns about identification of schools, timeline of improvement, and next level of accountability. Advocate for a minimum of 4 years to show reform, and strongly suggest that MDE outline several options for “next level” accountability that includes local feedback.
 - Submission deadline—“plea” to delay submission until September.
- **Oakland County Superintendents Association** — **Express gratitude and support for:** pulling back from letter grades and support for the use of a balanced dashboard of indicators, which they offer to help develop using a pilot underway in Oakland County; much of the new

assessment plan, but think benchmark assessments should be optional and administered locally; allowing for pilots of innovative assessments by select districts.

Expressed concerns: that in places, Michigan’s plan exceeds what ESSA requires (e.g. listing all schools rather than just Title 1 schools; listing every year vs. every 3 years); desire full alignment of state assessments with state standards; the process by which the plan was developed, citing “many” decisions made without considering stakeholder input; meeting an “arbitrary and unnecessary” April 3 deadline.

- **Washtenaw Superintendents Association** – Encouraging delay in submitting plan to allow for maximum state flexibility (in anticipation of revised regulations from Secretary DeVos)
- **Washtenaw ISD** – Recognized willingness to respond to public input by pulling back from A-F grading system, but urge that you delay submission of the plan “given the shifting landscape in Washington DC and release of the revised Consolidated Plan template.
- **Wayne RESA** — Expressed two primary concerns: 1) Opposition to an A-F summative grade, because it serves as a proxy for measuring poverty; also, growth measure based on medial growth percentile is inadequate to measure true (individual) student growth; 2) concern about adoption of PSAT 8/9 for 8th grade assessment, due to standards misalignment, which will throw local schools into turmoil.

ADVOCATES/COALITIONS/RESEARCHERS

- **Brandeis University, Institute for Child, Youth and Family Policy** — Applaud MDE for a strong, evidence-based approach to integrating early childhood concerns. Encouraged further strengthening it in the implementation phase by issuing guidance around defining and measuring issues of access, quality, and equity in early education and care for the LEA CNA (with specific recommendations).
- **Early Childhood Investment Corporation** — Supports the increased integration of early childhood at the earliest ages, with a focus on transition and alignment with early elementary and K-12 system. Expressed additional support for high early learning standards, leveraging resources to achieve earlier outcomes, focus on the “whole child.” Greatest concern: the implementation of early childhood components in communities and urged continued effort to increase awareness and implementation best practices/resources.
- **Ed Trust Midwest** – Supports several positive aspects of the DRAFT plan: Single summative rating IN THE ORIGINAL, using largely academic measures toward college/career readiness; ensuring subgroup performance matters in a school’s final rating; clarity around methodology for calculating ratings. Their concerns/recommendations include:
 - **Assessment:** Keep M-STEP
 - **Accountability:** Require a single summative rating; student growth measures must show whether a child is on track to meet grade-level standards; require ambitious and well-defined goals for school improvement, aligned to becoming a top ten state (calling for a higher target than 75%); reward schools for progress against the state’s long-term goals; provide greater information on plans for identifying and supporting struggling schools (prior to plan submission); require accountability ratings for *districts* as well as schools.**A separate white paper** provides feedback on ESSA, and their site also has a “submit your ESSA comments” function included.

- *Teaching Quality and Equity*: Promote equitable access of high-quality educators for most vulnerable students, and support the implementation of Michigan’s educator evaluations system;
- **EmpowerK12** — Their memo expresses appreciation for greater flexibility and focus on improved outcomes and for the stakeholder engagement process. They then present detailed and technical questions and suggestions around all accountability metrics and MDE’s long- and short-term goal setting with the goal to “ensure the creation of a more robust accountability system aligned to Michigan’s “Top 10 in 10 years” aspirations.
- **Excellence in Education** — To fully realize the benefits of a transparent A-F school grading system, ExcelinEd offers Michigan public comments based on nine evidence-based fundamental principles developed during 18 years of experience across dozens of states. Comments focus on suggestions for improving the calculations for Accountability to more closely align with the nine fundamental principles. Specific comments are provided on the Academic Achievement Indicator, Academic Progress Indicator, weighting of indicators, School Quality/Student Success Indicator, Graduation Rate Indicator, and Grading Scale. Research demonstrating the impact of A-F school ratings are provided at the end of the comments.
- **Great Lakes Education Project (GLEP)** — Expressed belief in a strong accountability system with certain characteristics: uses A-F grades annually; academics (progress & growth) comprise at least 90% of letter grade; early intervention for schools earning “D”; clear/substantive consequences for chronic failure. GLEP urges delay of submission until we have legislative consensus. Encourages MDE to seek assistance/consultation from Foundation for Excellence in Education and attaches their “Intervention Playbook.”
- **Healthy Kids, Healthy Michigan** — Recommend inclusion of Physical Education a part of the School Quality/Student success indicator but encourage addition of Health Education as well, since it is included in the definition of a “well-rounded education.”
- **Michigan Protection and Advocacy Services (MPAS)** — Proposes eight improvements that will cause the plan will better serve students with disabilities, including reduced n-size, raising long-term goals higher than 75% of schools/subgroups, reconsidering use of student growth percentiles, lowering the percentage of students taking alternative assessments, defining criteria for underperforming schools, address “context-based learning” within the plan.
- **The Arc Michigan** — Identical letter to MPAS (above)
- **Michigan Students Achieve Coalition** – *Members include: Black Family Development, Detroit Branch NAACP, Detroit Regional Chamber, Education Trust-Midwest, Grand Rapids Area Chamber of Commerce, Grand Rapids Urban League, Michigan Alliance for Special Education, Michigan Association of United Ways, Michigan College Access Network, Michigan State Branch NAACP and the Student Advocacy Center of Michigan.* The group presented five principles for meaningful accountability; called for high enough goals to significantly improve quality of education and transparency in reporting; urged including students/families/educators as full partners; and called for prompt action when schools are not meeting rigorous expectations, including those for historically underserved student groups.
- **The Advocacy Institute/National Down Syndrome Congress** — Their document focuses on “issues most critical to subgroup accountability and to students with disabilities. They call for

MDE to: delay submission until September; revise of graduation, long-term academic AND growth goals to comply with ESSA requirements; abandon student growth percentiles; describe how our assessments will use the principles of universal design for learning, list our strategies for not exceeding the 1% cap; clarify indicator metrics for ELL; lower N-size for subgroups; put less weight on growth and no weight on participation; clarify criteria for identification of targeted and comprehensive support schools. They also cite a general lack of information about how ESSA plan coordinates with the State Systemic Improvement Plan (SSIP).

- **The Mackinac Center — Expressed support for:** abandoning Top to Bottom rankings; giving greater weight to academic growth metrics. The bulk of the letter was reserved for **concerns and recommendations:** School Quality/Student Success indicators should include added weight for growth achieved by lowest-performing 25% of students (elementary & middle) and advanced coursework completion (high school); provide *specific and defined* flexibility to high-performing schools; develop a similar ranking system to measure quality of alternative education programs; retain the originally proposed A-F summative rating system (citing 2013 study regarding success of Florida’s A-F system).
- **The Student Advocacy Center of Michigan — grateful** that the state’s plan includes efforts to bring attention to attendance and school discipline, and that suspension data “finally will see the light of day in the transparency dashboard.” **They further suggest:** consider moving suspension data to the accountability system and include expulsion data to the School Quality indicator; change the n-size to 10 for all subgroups; develop and publish methodology for identifying low-performing schools prior to plan submission; provide greater clarity and transparency on the school improvement process for both low-performers and schools where subgroups are struggling; provide a meaningful role to parents and students in underserved populations.
- **482 Forward — A citywide education organizing network in Detroit. Members include neighborhood organizations, parents, and youth committed to ensuring that all Detroit children have access to an excellent education, regardless of race or socioeconomic status.** **Supports** focus on equity in plan. Encourages significant weight to growth measures. **Expresses concern** over lack of awareness/participation in plan development process. Calls for stronger future engagement, particularly with parents and their organization. Promises support in future efforts

BUSINESS/COMMUNITY/POLICYMAKERS

- **Detroit Regional Chamber —** Partnered with a broad coalition that includes Ed Trust-Midwest, the Grand Rapids Chamber, and others and fully endorses the coalition’s input/feedback. Adds comments on **key areas of concern:** Lack of a single summative rating for schools, which will leave many parents and educators without a clear understanding of school performance; continued use of M-STEP, which they strongly support; need for a more aspirational long-term school improvement goals, which are needed in order to become a Top 10 education state.
- **Hope Starts Here Stewardship Board — Co-chaired by: Rip Rapson, President/CEO of the Kresge Foundation and LaJune Montgomery Tabron, President/CEO of the W.K. Kellogg Foundation; comprising business leaders, local policymakers, parents, and practitioners**

working to develop early childhood systems to improve the lives of Detroit children.

Seven identical letters were submitted by the following Hope Starts Here Stewardship Board members: Denise L. Smith, Excellent Schools Detroit; Richard L. DeVore, PNC Financial Services Group; Danielle Atkinson, Mothering Justice; Herman Gray, MD., MBA, United Way for Southeastern Michigan; Leslie Murphy, Murphy Consulting; Eli Savit, Senior Advisor and Counsel to the Detroit Mayor; and Kimberlydawn Wisdom, Senior VP, Community Health & Equity, Henry Ford Health System.

Support for: inclusion of early childhood education throughout the document; the whole-child perspective of the plan; focus on reducing chronic absenteeism; attempt to address the vast inequities in compensation between early childhood educators and teachers in early elementary grades.

Specific recommendations: Strengthen the role and supports for early childhood education (including early elementary grades) throughout the plan; use of the micro-credential for early childhood education; review and approval of the LEA comprehensive needs assessment to ensure assessment of the LEA's early education needs; stronger focus on chronic absenteeism through more robust systems to monitor attendance and identify underlying causes; strong focus on supporting children of color; and clear guidance on how LEAs can address teacher compensation and pay equity for early childhood educators. They would like to review the CNA before release.

- **Lt. Governor Brian Calley** — Writes on behalf of “numerous student and family advocates who are concerned about potential accountability gaps for students in special education.” Calls for a lower n-size to allow parents/policymakers/educators better understand not only the performance of students in special education, but also the performance of all students within the accountability system. Also urges delay of plan submission until September.
- **Michigan Realtors Association**— Prior to the formal public comment period, the association sent a letter expressing concern with the proposed A-F system, saying it could negatively impact home values in communities with low-rated schools
- **Senator Arlen Meekhof** — Consultation with stakeholders indicates strong support for a statewide A-F system and the accountability as a whole. Constituents expressed **concerns:** put more emphasis (greater weight) on proficiency and growth, and less emphasis on school quality measurements (no more than 10 percent); for elementary and middle schools, replace graduation rate with academic progress (growth/proficiency); including teacher and administrator longevity as a factor might encourage schools to retain underperforming employees. Senator Meekhof offers to discuss additional detail on the above comments (and other components of the plan).
- **Senator Phil Pavlov** — Expresses grave concerns over an April 3 submission date with so many unresolved issues: no final decision on accountability plan; no methodology for determining indicators; whether intervention in low-performing schools should be a state or local action; lack of specific consequences for a school's failure to improve over certain amount of time. He further requests clarification on specific questions about the above issues.

PHASE 4 - IMPLEMENTATION

PLANS FOR ONGOING STAKEHOLDER ENGAGEMENT THROUGHOUT IMPLEMENTATION

Through the implementation phase of ESSA, MDE plans to continue seeking stakeholder input. Though the Action Teams and Advisory Committees will be phased out with the submission of the final plan, the need for stakeholder feedback will continue. Implementation Teams will be convened around multiple aspects of the plan, to facilitate a smooth transition from NCLB to ESSA throughout the state. External stakeholders will inform and aid in these efforts in multiple ways. Through the connections that were built and strengthened throughout the ESSA plan development process, MDE is well positioned to begin this work, with the support and assistance from our many partners.

In addition to the implementation teams, MDE's work on stakeholder outreach and engagement through the funds provided by the W.K. Kellogg and Steelcase Foundation grants will continue into the implementation of the ESSA plan. Plans to hold regional community forums following submission of the final plan are in the works now. These events, hosted in partnership with local community foundations, will help inform and guide the MDE's ESSA transition and implementation planning efforts and the development of technical assistance materials.

Outreach to parents, particularly those in previously low-performing schools, through targeted focus groups will also take place in the transition and implementation period.

Communication to schools, districts, and other stakeholders regarding policy changes resulting from the transition to ESSA will be regular, and informed by input received throughout the process.

Attachment 1: Involvement of Required Stakeholders in the ESSA Plan Development Process

ESSA requires engagement and consultation with representatives of the following groups. Below is a brief summary of ways in which each has participated or had opportunity to be involved in the plan development process.

All stakeholders: Had the opportunity to respond to multiple online surveys and attend or view one of the seven regional Feedback Forums. During the formal public comment period, stakeholders were invited to submit comments via U.S. mail or to the MDE-ESSA@michigan.gov email address.

State Board members: See State Board of Education section 2.9 above

Principals: School building principals served on several of the ESSA Action Teams. Additionally, leaders of state associations representing elementary, middle, and secondary school principals served on the External Advisory Committee.

Teachers: Teachers served as members of several of the ESSA Action Teams. Additionally, multiple representatives of Michigan's two major education labor unions served on the External Advisory and Tactical Review Committees. Opportunities to participate on Virtual Focus groups were shared via the MEA newsletter.

Service professionals, paraprofessionals, specialized instructional support personnel: Several paraprofessionals were included on the Tactical Review Committee and their voice was represented by the major education labor unions on the External Advisory Committee. Paraprofessionals were invited to participate in the paraprofessional virtual focus group sessions.

Representatives of school districts: Schools districts were represented in numerous ways throughout the process. Local education agency (LEA), public school academy (PSA), and intermediate school district (ISD) administrators, educators, board members, and staff participated on Action Teams and the External Advisory and Tactical Review Committees. MDE staff presented to and sought feedback from representatives through conferences, organization board meetings, and other small group meetings throughout the ESSA plan development process.

Private school officials: The Executive Director of the Michigan Association of Non-Public Schools served as a member of the External Advisory Committee, and is a member of the Michigan Education Alliance, which received monthly updates on ESSA from the State Superintendent. Additionally, MDE staff consulted with representatives from non-public schools in the creation of the position description for the private school ombudsman required under ESSA to support students and families being served by non-public schools in the state.

Local elected officials: LEA and ISD board members served on Action Teams and on the External Advisory and Tactical Review Committees. A half-day session for local school board members was part of the Michigan Association of School Boards' conference in November 2016, at which MDE staff shared the ESSA recommendations and sought input.

Parents: Parents served on several Action Teams and were represented through member organizations on the External Advisory Committee. MDE staff met with other parent groups to shape the stakeholder engagement activities. A Parent Virtual Focus group was created and a survey for parents was developed (both described in the main report). MDE staff also shared information with several organizations representing parents of students with disabilities and English learners, and other special populations. See also section 2.8 regarding outreach to parents in partnership with the YouGov survey. Additional focused parent outreach is planned during the implementation phase of our ESSA work.

Secondary students: MDE staff met with or presented to several groups of students during ESSA plan development, including students previously in the foster care system. Students had opportunity to respond to ESSA online surveys and attend Feedback Forums.

Community-based organizations: Representatives of several community-based organizations served on Action Teams and on the Tactical Review Committee. All had opportunity to respond to ESSA online surveys and attend Feedback Forums. Further outreach and discussion is planned in the implementation phase of the Partnership District model.

Civil rights organizations: Please refer to Civil Rights and School Justice Organizations section 2.7 above.

Institutions of higher education: The state organizations representing both public and private colleges and universities, as well as community colleges in the state, served on the External Advisory Committee. Additionally, representatives of institutions of higher education and their educator preparation institutions and a community college board member were represented on the Tactical Review committee.

Tribes: Please refer to Tribal Consultation Section 2.5 above.

Business/Employers: Representatives from of the Michigan Chamber of Commerce and several local Chambers of Commerce, as well as several other state and regional business advocacy groups, were invited to serve on the External Advisory and Tactical Review Committees.

Governor's Office: Please refer to Legislative and Executive Branch section 2.10 above.

State legislators: Please refer to Legislative and Executive Branch section 2.10 above.

General public: Served on Action Teams and the Tactical Review Committee.

Confederation of Michigan Tribal Education Directors Guidance to Michigan Department of Education Regarding Tribal Consultation in the Every Student Succeeds Act

Background: The Every Student Succeeds Act (ESSA) is the latest reauthorization of the Elementary and Secondary Education Act of 1965. Previously known as the No Child Left Behind Act (NCLB), this reauthorization gives more freedom to states to implement standards and accountability. Please visit <http://www.ed.gov/essa> for more information. Passage of the Every Student Succeeds Act (ESSA) in 2015 marks a major change in education of the United States. Furthermore, there are additions which specifically impact Tribal Nations.

- Approval of the first phase of the Navajo Nation's alternative accountability system, which provides the tribe with the authority to implement uniform standards, aligned assessments, and alternative measurements of student success across its schools in multiple states; and
- A tribal consultation requirement to local education agencies and states; and
- Two new rounds of federal grants totaling nearly \$25 million to support native youth and educators.

For several generations, tribal leaders and Native education stakeholders have urged policy makers to work collaboratively with tribes. The Every Student Succeeds Act allows educational stakeholders to enter a new era of education, one that requires timely and meaningful tribal consultation. Meaningful tribal consultation, both in process and the product, is the foundation that will best support Native students. It would be helpful if states and districts approach consultation in the context of developing a mutually respectful relationship among tribes and localities. A key component in working with tribal representatives and supporting Native youth is trust.

Concern: As part of ESSA's new tribal consultation requirements and funding increases, how are Local Education Agencies, State Education Agencies & Higher Education Institutions coordinating with Tribal Nations to implement a successful transition?

Why Consult with Tribes?

Tribes are not merely a homogenous minority group, but as sovereign nations, maintain a unique political status and should be dealt with accordingly. With tribes, the fundamental basis of required consultation is recognition of Tribal sovereignty. Over the years, the federal government has refined the obligation to interact with Tribes on a government-to-government basis in a series of laws, amendments to existing laws, and executive orders, all of which direct agencies to engage in consultation with Tribes. Today, the government-to-government relationship with Tribes has evolved to the point where consultation on a government-to-government basis is not only the law, it is considered sound management policy and the right way for the United States to conduct business.

Following suit, the State of Michigan has institutionalized tribal consultation. There have been two Executive Orders issued pertaining to tribal consultation. These include Governor Granholm's Executive Directive 2004-05, and Governor Snyder's Executive Directive 2012-02. The Confederation of Michigan Tribal Education Directors' position is that tribal consultation between the Michigan Department of Education is non-negotiable and should always occur whenever Native students are impacted. In addition to inclusion in the State ESSA Implementation Plan to the federal government, the 12 federally recognized tribes would like to collaborate on a 10 year strategic plan for tribal education consultation with the Michigan Department of Education as mandated by Governor Granholm's Executive Directive 2004-05.

Confederation of Michigan Tribal Education Directors Guidance to Michigan Department of Education Regarding Tribal Consultation in the Every Student Succeeds Act

Leverage Tribal Leadership Through Consultation

Through self-determination, Indian tribes have an inherent right to self-governance, which means tribes are provided greater power to manage local governments and local issues that affect tribal citizenship. As sovereign nations, Indian tribes exercise inherent autonomy over education, which includes control in local schools, the development and administration of culture-based curriculum, and the presence of advisory councils. Since federal funding is allocated to states to collaborate with tribes, there must be strict guidance throughout the process to ensure Native voice is included in decision-making.

Similarly, in ESSA, under Section 8538, districts are required to consult with Indian tribes or tribal organizations prior to submitting a plan for a covered program under ESSA. It is critical that meaningful consensus-based decision making is a core component when implementing ESSA as it relates to Native students. However, without a distinct tribal state policy consultation, Native perspectives will be left out of the important process of developing local and state plans. As such, we strongly encourage the state of Michigan and local districts to define meaningful consultation with tribal leaders.

Below are core components of meaningful tribal consultation, many of which ED has outlined in its “Consultation and Coordination with American Indian Alaska Native Tribal Governments” policy:

- Consultation is meaningful when it occurs at the earliest possible stage, prior to the development of a program, initiative, or policy to ensure that tribal views are integrated.
- Tribal Consultation is most effective when it is seen and understood as a process that requires continuous input and discussion.
- True consultation is based on open communication and coordination that actively seeks and considers the views of all participants, and then seeks agreement on how to proceed.
- The process of meaningful consultation is equally as important as the product of consultation. If tribal input is not reflected in how education programs and services are administered to Native students, then we have missed a great opportunity in supporting our nation’s most vulnerable youth.
- Establishing a minimum set of requirements and expectations with respect to consultation along with establishing measurable outcomes are necessities for meaningful consultation.

For far too long, education has “happened” to Native people. It is important, especially in the State of Michigan where two Indian boarding schools were in operation, one as recently as 1983, that we move toward educating Native people in Michigan in more just and equitable ways. One step to shifting this relationship between tribes and education is to engage with tribes on government-to-government terms on any and all issues where they will be impacted and move beyond the longstanding history of omitting tribes from decision-making power over their education.

Successful tribal consultation also takes into consideration the timelines that need to be in place in order for tribal representatives engaged in consultation to have time to communicate with our Tribal leaders or Legal departments, if needed. Approaching consultation from an Indigenous understanding of what “consultation” means is of utmost importance. The Indigenous understanding of being in a relationship is predicated upon respect and reciprocity. Therefore, collaboration vs. consultation is of much more value when putting emphasis on the inclusion of all tribes. At the local level, it is important

Confederation of Michigan Tribal Education Directors

Guidance to Michigan Department of Education Regarding Tribal Consultation in the Every Student Succeeds Act

for LEA's to consider which tribes have a service area that covers their institutions. Many tribes have overlapping service areas and may require LEA's to work with multiple tribes to reach consensus. This may be tribal education directors or tribally elected officials, but should be up to the tribes to choose who represents their voices in the process of consultation. Tribal parents should also be in the consultation & collaboration processes.

Determining the Current Educational Landscape

In order to meaningfully support Native students, the current landscape of ESSA implementation on the state, district, and school levels must be identified. It is vital to determine key contacts to develop and maintain a strong Native voice during the implementation process of the entire law (even if the contacts are not formally on the ESSA workgroup). Under ESSA, the "Indian section" or Title VI is not the only portion of the legislation that affects Native Students. Topics such as accountability, assessments, and interventions affect Native students directly. A great resource for states and districts to reference is ED's Frequently Asked Questions document that provides states and districts basic information on tribal consultation as outlined in ESSA. Considering that Native students are assessed by the same criteria as non-Native students nationally, Native input is vital in addressing state plans, accountability systems, assessments, and interventions of low-performing students and schools. Key questions to think about include:

- Does Michigan have an Indian Education Department or full-time position in Indian education dedicated to facilitating ESSA requirements?
- What is the contact information for Michigan's Tribal Liaisons for each department?
- Do Tribal Liaisons meet regularly with Tribal Leaders?
- Are there professional development trainings for the MDE staff to understand tribal sovereignty and how it may affect job duties?
- Is there an active Indian Education Association in Michigan?
- Are there Native representatives on the ESSA working group?
- How are tribal leaders being informed about ESSA?
- Have you reached out to tribal education departments/ tribal education agencies to understand their ESSA implementation status?
- In what ways have you meaningfully consulted with tribal leaders and tribal organizations regarding key provisions under ESSA, such as the state development plan, accountability systems, assessments, and interventions for low-performing students and schools?

Why is this important?

Although ESSA is geared towards K-12 students, the impact it will have on Higher Education Institutions could be beneficial. In addition to State Tribal Educational Partnerships (STEP) Grant and Native Youth Community Project (NYCP) college & career readiness grants, the Indian Professional Development Program is

Confederation of Michigan Tribal Education Directors Guidance to Michigan Department of Education Regarding Tribal Consultation in the Every Student Succeeds Act

Utilizing Collaborative Agreements such as MOU/MOA's

Collaborative agreements will help entities in several ways, such as determining accredited language revitalization, recruitment, data sharing, providing successful Tri-lateral models, meeting federal reporting mandates and timelines, and ensuring site equality.

Additional topics of interest for formalization and discussion include:

1. How will the department look at issues of districts that may have submitted consolidated applications for funding?
2. How will we increase access and notification to tribal education departments around equitable access to resources and individuals?
3. How will we braid federal Title funding; such as TITLE I, III, and VI?
4. How will we utilize Title I parent and family engagement funding to support schools in training staff regarding engagement strategies?
5. How will we allocate parent and family engagement funding for sub granting to schools to collaborate with community-based organizations that have a track record of improving family engagement and strengthening Native student success?
6. How can we work on restructuring TITLE III language to recognize Native language revitalization, additional tutoring, etc.?
7. How can Tribes coordinate with the SEA and LEA's to implement strategies of incorporating eagle feathers in the graduation of Native American students under Title VI?
8. How will we work to address FERPA issues around sharing student information?
9. How do we structure the collaborative meetings to share data and maximize its use for students?
10. How do we craft professional development services that are not based on ethnicity, but around a tribe's sovereign nation status?
11. How might we incorporate current successful tribal state partnerships? (digital badging, language accreditation, curriculum development)
12. How might we engage the higher education and teacher preparation institutions in meetings and conversations?
13. How do we build on previous agency successes in government-to-government collaborations?

Evaluate Progress

After establishing a clear understanding of an ESSA implementation system among tribal, state, and local entities, strategies must be developed to measure and monitor performance to ensure success. The evaluation strategies should be monitored collectively, encouraging ownership over each step of the consultation process to ensure all stakeholders are striving towards a consensus. Throughout the evaluation process it will be critical to bring stakeholders together again to address challenges and provide technical assistance in order to strengthen and formalize relationships. This consultation process should not be linear or stagnant. Consultation is not a single step process, it must be utilized multiple times to collaborate and monitor progress. Effective and ongoing evaluation is critical as states

Confederation of Michigan Tribal Education Directors Guidance to Michigan Department of Education Regarding Tribal Consultation in the Every Student Succeeds Act

and districts work to develop and strengthen processes and policies to facilitate meaningful tribal consultation. If tribal input is not reflected in how educational programs and services are administered to Native students, then we have missed a great opportunity in supporting our nation's most vulnerable youth.

Below are critical components of the evaluation process that states and districts are encouraged to incorporate:

- Establish a minimum set of requirements and expectations with respect to consultation.
- Establish measurable outcomes for meaningful consultation.
- Ensure everyone involved understands the objectives of each meeting and the purpose of consultation.

Questions that should guide evaluation include:

- How was outreach conducted to reach groups or individuals whose views have not traditionally been recognized?
- Was the information provided relevant, produced in plain language, and easy to understand?
- Are all consultations accessible and welcoming?
- Did all participants have the opportunity to add their value to the meeting?
- What kind of follow-up was provided after the meeting?
- Did the consultation meeting change the relationship among participants?

Follow Up and Close the Loop

When a decision about policy issue is reached, it is critical that states and districts make available a written explanation of the outcome of the consultation process. For regulatory actions, the outcomes of the consultation process need to be addressed in the preamble to the regulatory document. The written explanation will include the reasons for accepting or rejecting suggestions from the Native community. The timing of this response may vary, depending on the state law that applies in each case, and will be determined based on the form of the proposed policy. For ongoing issues identified during regular and case-by-case consultation, states and districts will provide the appropriate parties with periodic status reports.

Conclusion

Through the inclusion of the above recommendations and strategies, states and districts will help ensure that ESSA implementation better addresses the needs of Native communities and Native students. Matters of culture, language, cognition, community, and socialization are central to Native learning. The coordination and collaboration between various stakeholders will allow Native students to have the best opportunity to develop their own identities, traditional knowledge, modern skills, and self-worth. These elements will undoubtedly lead to social and academic success.

Confederation of Michigan Tribal Education Directors Guidance to Michigan Department of Education Regarding Tribal Consultation in the Every Student Succeeds Act

The Confederation of Michigan Tribal Education Directors appreciates the Departments full consideration of these suggested guidelines for tribal consultation.

June Smith, Lac Vieux Desert
Yvonne Parsons, Little River Band Ottawa
Jannan Cotto, Chair, Little Traverse Bay Band
Amy St. Arnold, Keweenaw Bay
Anna Larson, Treasurer, Hannahville
Lisa Moran, Sault Ste. Marie Tribe

Jennie Heeren, Gun Lake Band
Melissa Montoya, Secretary, Saginaw Chippewa
Geraldine Parish, Bay Mills
Sam Morseau, Vice-Chair, Pokagon Band
Andrea Rainer, Huron Band
Melissa Alberts, Grand Traverse Band

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