



January 9, 2017

The Honorable MaryEllen Elia
 Commissioner of Education and President
 of the University of the State of New York
 New York State Education Building
 89 Washington Avenue
 Albany, NY 12234

Dear Commissioner Elia:

We write to urge the State Education Department to revise its timeline in order to provide meaningful time for the state to engage parents, educators and other stakeholders and receive public comment before finalizing critical decisions about how New York State will use the opportunities and levers in the new federal education law, the Every Student Succeeds Act (ESSA).

We believe that input from diverse communities of parents and educators is critical if New York is going to take advantage of the opportunities in ESSA to help spotlight and address the systemic inequities in our education system impacting students of color, low-income students, students with disabilities and English learners. Our statewide coalition of civil rights, education, parent and business organizations recently engaged a leading polling firm to conduct a [survey of New York parents](#) asking for their input on key ESSA questions. We found that parents overwhelmingly agree that schools should be rated just as students are graded and evaluated, and that parents believe it is important to measure school performance so we can tell how individual schools are doing, identify where they have problems and take steps to address those problems. Parents of color and low-income parents were the most likely to favor many of the opportunities included in ESSA for improving school performance.

Until last month, New York State had anticipated releasing its draft plan to the public in March 2017 and submitting its final plan to the U.S. Department of Education in July 2017. States were then given an additional two months (until September 2017) to develop and submit their plans. The timeline that you presented to the Board of Regents at the board's December meeting envisioned using these additional two months for SED to continue to develop the plan, relegating public comment to a 1-month period running from mid-May to mid-June.

While we appreciate the commitment you made at the December Board of Regents meeting to conduct public regional events early in 2017 while SED continues to develop the plan – and we agree that these are a necessary step – they cannot take the place of full and meaningful transparency once the draft plan is developed and the public can see what has and has not been included. In order to strengthen the legitimacy of the state’s plan, parents and other stakeholders must have enough time to react and influence the final submission.

We therefore respectfully request at least eight weeks of public comment, beginning in April in order to engage parents before the end of the school year.

We are grateful for the emphasis that you have placed on public comment when important matters have come before SED and the Board of Regents. For example, last fall’s initial review period for the state’s proposed ELA and math academic standards was scheduled for 6 ½ weeks, which was then extended to a total of nearly eight weeks.

Other states are also providing useful examples for ESSA timelines. Washington State held eight regional public forums while developing its plan and the draft plan is currently out for public review, which will last at least 90 days. Likewise, Louisiana published a draft framework and has held several public meetings while collecting input.

Of course, we also understand that circumstances may change as the new administration takes office at the U.S. Department of Education. While we cannot predict what will happen at the federal level, we know that New York will be best-positioned to advance the interests of our students if our plan is submitted after a robust public comment period that adequately takes into consideration the voices of a broad group of stakeholders, including diverse communities of parents, educators, civil rights organizations, organizations representing students with disabilities, the business community and others.

Thank you for your consideration.

Sincerely,

Buffalo Urban League
The Business Council of New York State, Inc.
Business Council of Westchester
Capital Region Chamber
Committee for Hispanic Children and Families
Democrats for Education Reform-NY
District-Parent Coordinating Council of Buffalo
The Education Trust–New York
Educators for Excellence
EPIC-Every Person Influences Children

High Achievement New York
National Center for Learning Disabilities
National Council of La Raza
New York Educator Voice Fellowship
New York Urban League
Otsego County Chamber of Commerce
Public Policy Institute of New York State
United Way of New York City
Urban League of Rochester

cc: The Honorable Betty A. Rosa, Chancellor of the Board of Regents
Members of the Board of Regents