

October 27, 2021

Commissioner Jeffrey C. Riley
Massachusetts Department of Elementary and Secondary Education
75 Pleasant St
Malden, MA 02148

Dear Commissioner Riley,

As you know, the Massachusetts Education Equity Partnership has been deeply engaged in advocacy related to the implementation of the Student Opportunity Act (SOA). Like you, we believe that the combination of funding and collective planning requirements make this law a critical vehicle for improving opportunity and outcomes for students of color, economically disadvantaged students, English learners and students with disabilities in the Commonwealth. For that reason, we were glad to hear that the Department of Elementary and Secondary Education (DESE) will be asking districts to amend their SOA plans in early 2022 to address the impacts of the COVID-19 pandemic as well as the influx of federal relief and recovery resources.

We write today to offer some recommendations for how DESE could leverage the amendment process to strengthen district planning and deepen SOA's impact. Many of our partners engaged in advocacy related to the first round of SOA plans and several played key roles in spearheading stakeholder engagement in their communities. In addition, when DESE published districts' initial plans, we reviewed more than 20 of them (including plans of all Gateway City districts) to identify highlights and areas of challenge. The following recommendations are rooted in lessons learned from this work:

1. Clearly communicate the goals of the Student Opportunity Act and district plans

The Student Opportunity Act is, at its core, a civil rights law aimed at eliminating deep inequities in the learning experiences and outcomes of different groups of students in Massachusetts. DESE can help deliver on SOA's promise by:

- a. Clearly communicating the goals of SOA planning; and
- b. Setting improvement targets that incentivize eliminating disparities in opportunity to learn

Clearly communicating the goals of SOA planning

District leaders have been asked to fill out many different kinds of plans over the years, and plan fatigue is real. In the absence of clear communication about the purpose, importance and value of SOA plans, the amendment process could be perceived as another bureaucratic exercise, rather than an opportunity to meaningfully engage with students, families and educators to map a better path forward following the disruptions of the past year and a half. We urge DESE to

emphasize the importance of this opportunity to hear from and build trust with the community, understand the biggest equity challenges in the district post-pandemic, and identify how the district will use unprecedented state and federal resources to tackle those challenges.

Setting improvement targets that incentivize eliminating disparities in opportunity to learn

The law gives DESE the power – and responsibility – to set statewide improvement targets for addressing disparities in students’ school experiences and outcomes.

Improvement targets are more than just measures used to track progress. They are an important tool for communicating expectations.

We urge DESE to set improvement targets that make clear that districts must work to reduce disparities in student learning experiences and outcomes between groups that have long been underserved in our schools – including Black, Latinx and Native students, students from economically disadvantaged families, English learners and students with disabilities – and their more privileged peers. Importantly, [targets currently used in the state’s accountability system](#) do not meet these parameters. SOA targets should demand substantially greater progress for underserved student groups than for students overall.

2. Provide districts with support to help them develop strong plans

Although some districts’ SOA plans were quite strong, presenting a clear analysis of student needs, identifying strategies to address those needs, and laying out concrete next steps, many fell short. The quality of the plans and observations from community advocates suggest that many districts would benefit from additional support to enable them to approach the planning process systematically and with an equity lens. We recommend that DESE provide additional capacity-building for district leaders to help ensure meaningful, equity-driven planning. For example, DESE could:

- **Create a network of districts** to share best practices, identify challenges to strong planning, and find strategies to overcome those challenges. Plans developed by the network could serve as exemplars for other districts.
- Hire **external partners with track records of success to support district leaders** through the planning process, from helping to organize meaningful stakeholder engagement, to analyzing data, to identifying workable research-based improvement strategies.
- Provide districts with a **pre-populated data report** to help launch their planning. The report should contain disaggregated data – by subgroup and by school – on critical opportunity and outcome metrics, such as chronic absenteeism, discipline rates, assessment results, graduation and dropout rates, Pre-K enrollment, postsecondary enrollment and persistence, educator diversity and educator retention data disaggregated by race/ethnicity, and the results of the VOCAL student survey. To drive attention to students who are often particularly underserved in our schools, we

recommend cross-tabulating the data by race/ethnicity and income, disability and English learner status.

- Develop **guidance** on strong stakeholder engagement (particularly engaging with students and families), including concrete examples that districts can emulate.
- Establish **a strong plan review process** through which districts can get feedback about overall plan quality, including rationale for evidence-based program selection and information on implementation. Consider engaging retired education leaders and community partners as reviewers.

DESE's allotment of federal relief and recovery dollars can be used to offset costs of these supports.

Improve the plan template to address common plan shortcomings

In addition to providing more capacity-building and support, DESE could improve the quality of district plans by strengthening the plan template. Some of the most common challenges in the first round of SOA plans included:

- **Unclear rationale and/or lack of alignment** between key equity challenges in a district, selected interventions or strategies, and metrics used to measure progress.
- **Lack of information about implementation of proposed strategies** – for example, when are districts planning to hire additional staff, or expand the number of pre-K seats?
- **Minimal information on stakeholder engagement efforts**, and especially of the feedback received through that engagement.

With student, family and educator needs at an all-time high, and educators and administrators – especially teachers – stretched particularly thin, it is especially important that education leaders select a limited number of priorities and institute careful spending plans to drive real, tangible change. DESE could support this kind of prioritization and planning by modifying the template to ask questions such as:

- What are the 3-5 biggest challenges that the district needs to address in the next three years in order to support the closure of disparities in student learning experiences and outcomes? What data (including any stakeholder feedback) did the district examine to identify these challenges and what did those data show?
- What evidence-based strategies or interventions will the district implement to address these challenges? What research/evidence led the district to select these particular approaches?
- When does the district expect to implement the proposed strategies?
- What leading indicators will the district use to track implementation?
- What indicators will the district use to measure whether proposed strategies are working?
- Describe how the district engaged stakeholders – including students and families -- in developing this plan. Who did the district consult, when, and how?

- What did the district learn from each group (e.g., parents, students, etc.) of stakeholders consulted?

We would be happy to discuss the recommendations in this letter with you and look forward to supporting you and your team in making the next round of SOA planning as impactful as possible.

With deep gratitude for all that you do to support Massachusetts students, families and educators,

