

April 22, 2019

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

Dear Sir or Madam:

Thank you for the opportunity to provide comments on behalf of the National PTA on the non-regulatory information document, *Opportunities and Responsibilities for State and Local Report Cards under the Elementary and Secondary Education Act of 1965, as Amended by the Every Student Succeeds Act*, which the U.S. Department of Education (ED) released in draft form on March 28. National PTA is the oldest and largest volunteer child advocacy association in the United States with congresses in all 50 states, DC, Virgin Islands, Puerto Rico and Europe. Since 1897, National PTA has been a strong advocate and a reputable resource for empowering all families to effectively engage in their child's education.

On behalf of National PTA and our 3.5 million PTA members, we express our appreciation to ED for producing a guidance document that clarifies provisions of the statute and reinforces the importance of parents as a primary audience for state and local report cards. We also commend ED for including National PTA's "What Makes a Good Report Card?" resource in the guidance. This resource is a valuable tool that states and school districts will find useful in ensuring their report cards communicate a clear picture of educational impact. Lastly, we appreciate ED including best-practice ideas that state and local education agencies (SEAs and LEAs) might elect to adopt at their discretion.

As primary consumers of the education system, parents are critical stakeholders in our education system. Recognizing that data is a powerful tool to drive decisions around financial transparency, accountability and better outcomes in education and equity, National PTA is committed to ensuring that parents understand the value of data and how to leverage it in their work to improve outcomes for all students.

National PTA believes that it is essential that data transparency and use be maintained and improved to ensure a continued focus on equity and to strengthen the focus on continuous improvement. Education data such as the information presented in report cards is essential for parents. Report cards can help parents make important decisions related to their child's education, gives parents the tools they need to advocate on behalf of their children and helps start important conversations at the school, district and state level around education equity. National PTA is pleased that the department recognizes parents as essential and primary consumers of report cards.

While this guidance is a good foundational document that will help states and school districts comply with the law, we would also urge ED to carefully review and monitor the report cards issued by states and school districts. This assessment should prioritize not just pure statutory compliance, but also whether report cards are able to be understood and used by parents to make the educational decisions for their children and support school and district improvement efforts. Without robust oversight, this guidance alone will not have the impact envisioned when Congress passed the latest amendment to the Elementary and Secondary Education Act to provide transparent, meaningful and useful data to parents and families.

Thank you for the opportunity to comment on this important guidance. If we can be of further assistance, please do not hesitate to contact Jacki Ball, Director of Government Affairs at National PTA at [jball@PTA.org](mailto:jball@PTA.org) or at 703-518-1243.

Sincerely,



James L. Accomando  
President  
National PTA



Nathan R. Monell, CAE  
Executive Director  
National PTA