April 17, 2023

Lesley Muldoon
National Assessment Governing Board (NAGB)
U.S. Department of Education
800 North Capitol Street, NW, Suite 825
Washington, DC 20002

Re: Solicitation of Public Comments for Updating the Science Assessment Framework for the 2028 National Assessment of Educational Progress

As the oldest and largest child advocacy association in America, National PTA is grateful for the opportunity to submit this comment letter in response to the National Assessment Governing Board’s (NAGB) “Solicitation of Public Comments for Updating the Science Assessment Framework for the 2028 National Assessment of Educational Progress” notice (88 FR 16248).

High-quality assessments provide valuable information to parents, teachers and school leaders about the growth and achievement of their students. Assessments are essential to ensure all students receive a high-quality education and help guide instruction to better meet the needs of students. The information gathered from assessments can also help to make sure students and schools are receiving the necessary resources and supports in order to reach their full potential.

Moreover, science, technology, engineering, and mathematics “STEM” careers in the United States are growing twice as fast as other fields. This huge growth has created a situation in which the demand for qualified STEM professionals is high, but the supply of qualified STEM workers is low—especially among underrepresented groups like minorities and women. To meet the rapidly-growing demand for qualified STEM professionals and develop the next generation of leaders, we must help students and families build the necessary competencies and skills to pursue STEM degrees and career opportunities.

Parents and caregivers are key partners for teachers and schools to engage in the development and expansion of STEM learning and access. Decades of research shows that when families are engaged and families and schools work together, students attend school more regularly, earn better grades, enroll in higher-level programs and have higher graduation rates. Family-school partnerships also help schools—research suggests it is equally as important as school leadership and a rigorous curriculum in predicting school improvement. Parents, guardians and other caregivers must be key partners in their children’s educational success, now more than ever.

While the NAEP science assessment is critical to understanding academic progress, it cannot alone bring about improvements to K-12 education across the nation. A sound and comprehensive assessment system should include continual communication and feedback from parents, as well as multiple measures of student growth and achievement that reflect the depth and breadth of knowledge and
skills that students are expected to acquire, as well as their capacity to perform critical competencies. To ensure continued academic progress in the sciences and beyond, National PTA also recommends that:

- Federal policy maintain the requirement that states annually assess students in grades 3 – 8 in reading and math and once in high school. Students should also be assessed in science once in grades 3-5, 6-8 and 10-12.
- State-determined accountability systems provide for multiple measures of student growth and achievement.
- The federal government incentivize states and school districts to conduct audits of their assessment systems to reduce low-quality, misaligned and redundant exams.
- States develop a strategic assessment system to eliminate unnecessary exams, in consultation with district leaders, educators and parents that is aligned with academic standards and supports college and career readiness.
- States obtain the necessary resources and have appropriate policies and procedures in place to develop, validate and implement high-quality assessments with fidelity.
- States and school districts clearly articulate to parents the assessment and accountability system in place at their child’s school. Parents must be notified through multiple communication efforts of required assessments, their purpose, when they will occur, and when results will be available. Additionally, families shall be notified on how educators will use assessment data and how parents can use the information to support their child’s academic growth and achievement.
- States ensure assessment results are delivered to parents and educators in a timely, actionable and understandable manner.
- States provide clear and easily accessible information to parents, educators, school districts and the community regarding nonparticipation in state assessments and the consequences it may have on students, schools and educators. States should also collect data on the number and frequency of students who opt-out of state assessments and report on the impact to instructional practices, teacher and principal evaluations and school accountability measures.
- States and districts annually evaluate and review assessment systems to certify it accurately and fairly measures student achievement towards college and career standards and provides valuable data to parents, teachers and school leaders.
- States and school districts deliver professional development to teachers and principals to ensure assessment data is used appropriately to guide instruction and support evidenced-
based interventions for identified students, subgroups of students and school improvement.

- School districts should work collaboratively with schools to design the assessment calendar to guarantee minimal disruption to classroom learning opportunities.

- Schools and families meaningfully engage in two-way communication regarding assessments, including how schools and families can work together to use assessment data to support student growth and learning.

- Assessments must accommodate the needs of all students and effectively address digital and connectivity issues to ensure equity and adhere to the most recent federal health and safety guidelines.

- In the event of a national emergency or crisis that disrupts the public education system, local, state and federal authorities should allow for flexibility in the delivery and administration of assessments.

For over 125 years, PTA has connected families, teachers and administrators; helped families to actively engage in their children’s education; and helped strengthen partnerships between families, teachers and schools. We know that family engagement is essential to academic success, including success in the field of science. Through National PTA’s STEM + Families Program and beyond, our role is even more essential today, and our association remains committed to this critical work to ensure every child succeeds and reaches their full potential.

We appreciate the opportunity to provide this comment letter in response to the “Solicitation of Public Comments for Updating the Science Assessment Framework for the 2028 National Assessment of Educational Progress,” and look forward to working with the National Assessment Governing Board to communicate with families and improve academic success in the field of science and technology. If you have any questions or would like additional information, please feel free to contact Kate Clabaugh, National PTA Director of Government Affairs, at kclabaugh@pta.org.

Sincerely,

Anna King
President
National PTA

Nathan R. Monell, CAE
Executive Director
National PTA