



January 21, 2016

The Honorable John King
Acting U.S. Secretary of Education
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

RE: Docket ID ED-2015-OESE-0130: Implementing Programs Under Title I of the Elementary and Secondary Education Act

Dear Acting Secretary King:

On behalf of National PTA and our four million PTA members, we appreciate the opportunity to provide recommendations to the U.S. Department of Education (ED) for the implementation of programs under Title I of the Every Student Succeeds Act (ESSA). 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 and over 22,000 local units. Our association advocates for all children to reach their full academic potential which Title I programs help to accomplish.

National PTA has long been a strong advocate and a reputable source for empowering all families to effectively engage in their child's education to improve student outcomes. More than 40 years of research shows that family engagement is critical for student success, and students whose families are involved attend school more regularly, earn better grades, enroll in advanced-level programs and have higher graduation rates — all of which provide societal and economic benefits. Thus, our association recommends that ED clarifies the importance for schools to reserve more than 1% of Title I funds to carry out family engagement activities and provide specific guidance on the use of funds for the family engagement set-aside.

Furthermore, National PTA would like ED to provide greater direction to state education agencies (SEA) and local education agencies (LEA) on how they can meaningfully involve families in the creation and evaluation of state and local plans to improve student achievement and school success.

We also recommend that ED clearly define terms regarding statewide accountability to ensure that schools and states appropriately measure indicators of student achievement to drive school improvement. Specifically, ED needs to provide greater clarity by defining the following terms: “consistent underperformance,” “substantial weight” and “much greater” as they relate to the indicators for annual meaningful differentiation of public schools. National PTA also encourages ED to provide regulations on the technical requirements that the “additional indicator(s) of school quality or student success” must meet to be included in a state’s accountability system.

Additionally, National PTA recommends that ED issue regulations to provide guidance in the following areas: (1) the method by which states identify consistently underperforming subgroups within a school, measure progress toward goals, and establish a timeline for action when subgroups of students are not making progress; (2) the method by which school resource inequalities are identified for additional targeted supports in its improvement plan; and (3) the 95% participation rate in the annual measurement of achievement of students and how opt-out options will be calculated in the accountability system. In addition, National PTA recommends that ED clarify that when a State uses a measure of student growth within its accountability system that such measures, (ie growth models) may not exclude students for any reason.

As for the specific recommendations that ED requested on academic assessments, National PTA asks that ED clarify and reinforce the statutory requirement that alternate assessments aligned with alternate academic achievement standards are meant for students with the most significant cognitive disabilities and that the statewide alternate assessment cap shall not exceed 1% of the total number of students assessed. National PTA recommends that ED further explain the conditions associated with “appropriate oversight” by states with local education agencies that exceed the 1% statewide cap and the criteria for requesting a secretarial waiver when that occurs.

National PTA requests for ED to produce regulations on locally selected assessments, specifically the nationally recognized high school academic assessments, which would replace state-designed assessments. As annual assessments are one of the indicators measured in the statewide accountability system, it is imperative that all students’ academic achievements are properly measured and are comparable across a state. ED should further define and give examples of the “state technical criteria” for determining if local assessments are comparable,

valid, reliable and properly aligned to state academic content standards and meet all of the requirements of state-designed assessments.

National PTA recognizes that many of the Title I programs are subject to negotiated rulemaking and our association strongly urges ED to engage families throughout the process. Additionally, as ED continues with implementation of ESSA, we ask that families are recognized as key stakeholders and consumers of our nation's public schools and are explicitly included in the development and evaluation of all policies that impact students.

National PTA recommends that a parent or family member with a student from each subgroup (major racial and ethnic groups, students with disabilities, English learners, migrant status, homeless and foster students, and students with parents in the military) be included in the rulemaking process to offer personal expertise on how students and families are affected by regulations on standards, assessments and accountability measures. National PTA is happy to provide nominations of groups and parents when the opportunity arises.

National PTA will continue to be a resource and provide recommendations to ED on issues facing all children and families throughout the regulatory process to make every child's potential a reality. Please do not hesitate to contact Jacki Ball, Director of Government Affairs, at jball@pta.org or (703) 518-1243 to answer any questions or provide further input as needed.

Sincerely,



Laura Bay
President
National PTA



Nathan R. Monell, CAE
Executive Director
National PTA