



July 22, 2016

Ms. Meredith Miller  
U.S. Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202

RE: Docket ID ED-2016-OESE-0032

Dear Ms. Miller:

On behalf of National PTA and our 4 million PTA members, we appreciate the opportunity to respond to the U.S. Department of Education's (ED) proposed regulations on accountability, state plans and state and local report cards under Title I of the Elementary and Secondary Education Act, now referred to as 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. 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.

The passage of ESSA into law and the ongoing implementation process has allowed parents and families more opportunities to be involved in their child's education at the school, district and state level to make every child's potential a reality.

National PTA recognizes the lasting impact of the ESSA regulations and the need to preserve and strengthen certain provisions of the proposed regulations to continue to expand family engagement opportunities in schools, improve student outcomes, and make academic information more transparent and accessible for families, as outlined below.

**§200.15 Participation in Assessments and Annual Measurement of Achievement**

National PTA supports ESSA statute that requires the participation of 95% of all students and each subgroup of students on annual statewide assessments in reading/language arts and mathematics. Our association believes that high-quality assessments provide valuable information to parents, teachers and school leaders about the growth and achievement of their students and when used appropriately, assessments provide critical data to help teachers inform and align their instruction, support student learning and readiness for postsecondary education and training, guide professional development and target evidenced-based interventions to students and schools.

Nonparticipation can result in a loss of funding, diminished resources and meaningful interventions for student subgroups, which would have a disparate impact on minorities and students with special needs and widen the achievement gap. Limited participation on statewide assessments stalls innovation by

inhibiting effective monitoring and improvement of programs, instructional strategies and exams, and could thwart transparency by providing incomplete data sets for states and schools. National PTA recommends that 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 as part of the state's accountability system. 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. It is essential that states in conjunction with parents and other stakeholders are empowered to design and determine the interventions and supports for schools and school districts that do not meet the required participation rate.

#### **§200.16 Subgroups of Students**

In response to the Department's request to comment on existing Title I regulations concerning counting students with disabilities who have exited from special education in the disability subgroup, National PTA encourages ED to only count students with disabilities who have exited special education in the disability subgroup for the school year in which they exited.

#### **§200.18 Annual Meaningful Differentiation of School Performance**

National PTA is pleased that under ESSA, states design their accountability systems to meet the needs of their students and schools, allows for multiple measures of student achievement and are developed with input from stakeholders, including parents. Parents desire and deserve comprehensive and transparent information about their child's performance and school. School report cards and/or ratings need to be part of an overall plan for comprehensive school improvement and accountability. A report card or rating must evaluate a school's performance on more than just student achievement, and include factors such as teacher qualifications, class size, school safety, and drop-out rates. Schools need to be held accountable for their efforts to reach out and communicate with parents. Report cards or ratings should outline the actions schools are taking to involve parents in school activities and decision-making and measure how parent involvement standards and policies are established and incorporated throughout the school.

#### **§200.21 Comprehensive Support and Improvement**

National PTA applauds ED's proposed regulations (§200.21(b)) that would require local education agencies (LEAs) to promptly notify parents of each student that is enrolled in a school identified for comprehensive support and improvement. The proposed regulations specify that states must notify LEAs with schools identified for comprehensive support and improvement at the beginning of the school year. Our association believes "promptly notify parents" (§200.21(b)) is too broad of a term, therefore National PTA recommends that LEAs must notify parents no later than 60 days of receiving notice from the state that their school is identified for comprehensive support and improvement. This recommendation would prioritize the need for schools to effectively communicate with parents on the

school's progress and plans for improvement in a prompt manner without overburdening districts and schools at the beginning of the school year.

Moreover, the proposed regulation would require the notice to be in a language parents can understand and explain why a school was identified and how parents can get involved in developing and implementing the school's improvement plan. While the regulation requires oral translation when written translation may not be practical, National PTA encourages the Department to add stronger language to ensure LEAs secure written translations for at least the most populous language other than English in the school that is identified for improvement (§200.21(b)(2)).

Our association supports ED's proposal for LEA's to actively involve parents in the development of the comprehensive support and improvement plans as well as the needs assessment (§200.21(c)(d)). The proposed regulations also assure that stakeholder engagement is meaningful by requiring descriptions of how LEA's will ensure early and ongoing stakeholder input in the comprehensive support and improvement plan (§200.21(d)(1)). Our association strongly supports this proposed regulation as families are essential partners in increasing student achievement and school improvement.

Furthermore, National PTA recommends the addition of meaningful family engagement opportunities and activities to the list of examples of interventions in (§200.21(d)(3)). Over 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.<sup>1</sup>

#### **§200.22 Targeted Support and Improvement**

National PTA supports the parental involvement language included in the targeted support and improvement proposed regulation (§200.22(b) and (§200.22(c)(1)), which mirrors the language included in the comprehensive support and improvement section. We offer the same recommendations to strengthen these proposed regulations as we do for §200.21 regarding written translation of the notice for the most populous language other than English in the school that is identified for improvement (§200.22(b)(2)) and the inclusion of a 60-day window for notification to parents regarding their child's school being identified for targeted support and improvement (§200.22(b)(1)).

#### **§200.24 Resources to Support Continued Improvement**

National PTA is pleased to see the proposed regulations include "commitment to family and community engagement" as a priority for the use of school improvement funds. Family engagement is critical for school improvement and better outcomes for all students. While Title I, Section 1116 (a)(3) provides

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<sup>1</sup> Henderson, A. T., & Mapp, K. L. (2002). A New Wave of Evidence: The Impact of School, Family, and Community Connections on Student Achievement. Annual Synthesis 2002. National Center for Family and Community Connections with Schools. Retrieved from <https://www.sedl.org/connections/resources/evidence.pdf>

resources for family engagement as part of local activities to improve student achievement and school performance, our association supports and encourages greater allocation of resources for family engagement as part of any state and local education plan regardless of identification for school improvement.

### **§200.30 Annual State Report Card**

The National PTA is committed to improving accountability and communication to parents and to the public about school performance. Report cards can be an effective means for reporting information to parents and the community about the quality of education in public schools, and can also lead to important school improvements. To assure that school report cards respond to parents' needs and interests, National PTA has long advocated that parents must be involved at the state and local level in developing them. We are pleased ESSA continues to require the involvement of parents in the development of state report cards and that they are clear, concise and provided in a language that is understandable to all parents.

Our association supports ED's addition of an overview section at the beginning of the report card that must be distributed to parents (§200.30(b)(2)). This requirement increases parents' awareness of school performance and provides clear and transparent information on statewide student subgroup performance, graduation rates, English language proficiency and other indicators of school quality and student success. Furthermore, we recommend that the Department add language regarding accessibility (§200.30(c)) to ensure that SEAs produce the state report card in the most populous language other than English in state.

Lastly, we urge the Department to provide technical assistance to state education agencies to develop best practices for both state and local education agencies to develop, clear, transparent and comprehensive report cards for parents and families. For example, the [Illinois State Board of Education](#) provides comprehensive and informative state, school district and school level report cards for parents and the community that were developed with parental input. The "At a Glance Report Card" feature is easily downloadable and provides information on academic assessments, family engagement, school personnel and resources, post-secondary enrollment, teacher retention, per pupil spending, attendance and student mobility.

### **§200.31 Annual LEA Report Card**

ESSA explicitly mentions that annual state report cards must be developed in consultation with parents, but the statute is silent on whether parents should be consulted in the development of LEA report cards. National PTA believes parents must be involved in the development of both state and local report cards in order to adequately respond to parents' needs and interests in their child's education and school quality. National PTA supports ED's proposed regulation that parental consultation is required in the development of LEA report cards (§200.31(b)(1)).

Furthermore, our association supports ED’s addition of an overview section at the beginning of the report card that must be distributed to parents (§200.31(b)(3)). This LEA report card requirement increases parents’ awareness of their child’s school progress and further strengthens the parent-school partnership. By limiting the overview to key facts on a single piece of paper, all parents will be able to view a snapshot of their child’s school.

Additionally, we urge the Department to add language regarding accessibility (§200.31(c)) to ensure that LEAs also produce the school district report card in the most populous language other than English in the LEA.

**§299.13(b) Timely and Meaningful Consultation**

National PTA has and will continue to support stakeholder provisions in ESSA that require meaningful consultation and engagement of parents in decisions about their child’s education, such as state and local education plans, annual state reports cards and school support and improvement activities. Our association has consistently requested ED to provide greater direction and technical assistance on meaningful, timely and continued consultation in our comments on [Title I programs](#) and our letter on [non-regulatory guidance](#). National PTA is encouraged to see that ED included provisions in §299.13(b) that further explain and clarify the intent of the statute that timely and meaningful consultation with stakeholders requires State Education Agencies (SEAs) to engage stakeholders in the design and development of the state education plan prior to submission and that engagement and outreach should be continuous. National PTA is also supportive of ED’s proposed regulation in ESSA that SEAs must describe how consultation and public comments were taken into consideration and if any changes in the state plan were made because of them.

Although National PTA is content with the requirements for timely and meaningful consultation in ED’s proposed regulations for state plans, our association requests ED provide guidance consistent with the regulations stated in §299.13(b) to LEA Title I plans, annual state report cards, Title IV Part A applications, and all other aspects of the law that require stakeholder engagement. Furthermore, our association requests that ED use the [Principles of Stakeholder Engagement](#) and the [Let’s Get the Conversation Started](#) documents—that National PTA worked with other like-minded education organizations to create—as a resource for meaningful stakeholder engagement in regulations and guidance.

**General Recommendations**

National PTA recommends that ED provide more flexibility to states on the timeline for implementing their accountability systems and for identifying schools that need improvement. States need time to effectively develop and implement an accountability system that accurately measures whether all students are receiving a fair, equitable, and high quality education that works to close achievement gaps. National PTA and its constituent associations are committed to ensuring all stakeholders, especially parents have a voice in the development of education plans and we want to make sure states

and school districts have the time to thoroughly engage all stakeholders. It is imperative that we get ESSA implementation right and states can develop accountability systems that meaningfully evaluate student and school progress and provide necessary interventions and supports to the students and schools most in need.

National PTA appreciates the opportunity to provide feedback on critical areas of the ESSA proposed regulations. Our association will continue to be a resource and provide recommendations to ED on issues facing all children and families throughout the regulatory and non-regulatory guidance process to ensure parents and families have the resources and tools they need to make every child's potential a reality. Please do not hesitate to contact Jacki Ball, director of government affairs, at [jball@pta.org](mailto:jball@pta.org) or (703) 518-1243 to answer any questions or provide further input as needed.

Sincerely,



Laura M. Bay  
President  
National PTA



Nathan R. Monell, CAE  
Executive Director  
National PTA