



September 7, 2016

Jessica McKinney
U.S. Department of Education
400 Maryland Ave, SW, Room 3W107
Washington, DC 20202

RE: Docket ID ED-2016-OESE-0053-0001: Title I-Improving the Academic Achievement of the Disadvantaged-Academic Assessments

Dear Jessica McKinney:

On behalf of National PTA and our four million members, we appreciate the opportunity to provide recommendations to the U.S. Department of Education (ED) on academic assessments 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 with more than 22,000 local units.

The Every Student Succeeds Act (ESSA) provides an important opportunity for states, districts and schools to improve family engagement and strengthen family-school partnerships as it requires that parents are meaningfully consulted in the development and implementation of the new education plans.

National PTA is pleased that the negotiated rulemaking committee reached consensus on proposed regulation language for academic assessments under Title I of ESSA. Our association advocates for every child to reach their full academic potential and believes the passage of ESSA and these proposed regulations are a path forward to that end. National PTA is encouraged by the inclusion of parents and families in the proposed regulations as outlined below. We appreciate the opportunity to provide recommendations that will strengthen the regulations to be even more inclusive of all parents and families.

§200.2 State Responsibilities for Assessment

Our association strongly supports the requirements under §200.2 (e) to provide parents with information on academic assessments in a uniform and understandable format for all parents—including parents with limited English proficiency and parents with disabilities. While the regulation requires oral translation when written translation may not be practical, National PTA

encourages the Department to add language to ensure state education agencies (SEAs) secure written translations for at least the most populous language other than English spoken by the state’s participating student population. Our recommendation would not overburden SEAs as this language is compatible with the state’s requirement to define “languages other than English that are present to a significant extent in the participating student population” in the state education plan under §200.6 (f). Research has shown that family engagement in a child’s education increases student achievement, improves attendance, reduces the dropout rate and advances the emotional and physical well-being of children. Thus, it is imperative that all parents and families, regardless of English language proficiency or disability, receive timely information about their child’s performance on required assessments.

§200.3 Locally Selected, Nationally Recognized High School Academic Assessments

National PTA has long advocated for effective parent and family engagement on issues concerning their child’s education. National PTA strongly supports the requirement under §200.3(c)(1)(i) that a local education agency (LEA) must inform and consult with parents before requesting approval from the state to use a locally selected and nationally recognized assessment.

The proposed regulation further includes that LEAs must notify parents on how they may provide critical input regarding the LEAs request and how it will impact the instructional program in the LEA. Furthermore, our association appreciates the notification requirement to all parents of high school students once the LEA has received approval. Meaningful two-way communication between schools and families is vital for student and school success. As seen by findings from the recent [2016 PDK poll](#), parents who feel their child’s school communicates well with them tend to rate their child’s school better than those parents who do not believe there is a strong family-school partnership.

§200.6 Inclusion of All Students

National PTA believes that states and school districts need to clearly articulate to parents the assessment and accountability system in place at their child’s school, their purpose, when the assessments will occur and when results will be available. Our members also advocate that to the extent appropriate, all children and youth with disabilities should be educated in the regular education environment alongside their peers and administered high-quality assessments that provide valuable information to parents and educators.

Inclusion, as a means for implementing the least restrictive environment, works only when the curriculum and assessments meet the needs of all children. National PTA advocated for the one percent cap on students taking alternate assessments aligned with alternate academic achievement standards in statute. Our association recognizes that some states may need flexibility on the one percent cap to meet the needs of all children and we appreciate that in order to be granted that flexibility states must demonstrate the need to assess more than one percent of students on alternative academic assessment.

Our association was encouraged to see the proposed language in §200.6(f)(1)(E)(2) that states must describe the process of how they gather meaningful input from parents on assessments in languages other than English. National PTA also supports the requirements under §200.6(f)(1)(E)(3)(iv) to ensure that states must provide assessments in languages other than English that are present to a significant extent in the participating student population. This will help to ensure that students are taking assessments in the language and form that are most likely to yield accurate and reliable information on what students know and can do to determine the students' mastery of skills in academic content areas.

§200.8 Assessment Reports

Finally, National PTA is pleased to see the inclusion of the requirement that assessment reports be provided to parents in a way that is consistent with §200.2 (e). We are appreciative that ED recognizes the important impact of family engagement and has prioritized families as essential partners in their child's education.

National PTA will continue to be a resource and provide recommendations to ED on issues facing all children and families throughout the ESSA implementation 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 M. Bay
President
National PTA



Nathan R. Monell, CAE
Executive Director
National PTA