



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-0047: Innovative Assessment Demonstration Authority

Dear Jessica McKinney:

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) on the Innovative Assessment Pilot within 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 over 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. We are pleased that proposed regulations on the innovative assessment pilot requires parent input, opportunities for feedback and ensures school district communication to parents on the program.

Our association supports high-quality assessments that provide valuable information to parents, teachers and school leaders about the growth and achievement of their students. 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.

§200.77 Demonstration Authority Application Requirements and §200.79 Transition to Statewide Use

National PTA is encouraged that ED prioritizes parent consultation in the application for an innovative assessment pilot. Specifically, our association strongly supports the proposed language in section §200.77(a) that SEAs must submit “evidence” in their application to the U.S. Secretary of Education that a SEA collaborated with education stakeholders including parents. Meaningful stakeholder engagement and consultation is a priority for National PTA during the ESSA implementation process.

Requiring evidence of consultation for the innovative assessment demonstration authority application ensures that parents will be essential partners in the process. Having the support and engagement of families during the development and implementation of the innovative assessments is critical to ensuring effective school-family partnerships that increase student achievement.

National PTA is supportive of the statute language in §200.77(d)(3)(B)(iv) for states to annually report feedback from parents and other education stakeholders about their satisfaction with the innovative assessment system. Mechanisms should be provided to allow parents to give regular feedback on the pilot innovative assessment system. We also appreciate that feedback from all stakeholders must be considered in the transition of the pilot to statewide use for assessment and accountability purposes (§200.79(b)(3)).

Furthermore, our association strongly supports the requirements under §200.77 (d)(4) to provide parents with information on academic assessments in a uniform and understandable format for all parents—including parents with limited English proficiency and individuals 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 local education agencies (LEAs) secure written translations for at least the most populous language other than English spoken by the state’s participating student population.

It is imperative that with a “new” or “pilot” program, all parents have the information they need to support their child’s learning. Providing written translated materials on the innovative assessment demonstrates a commitment to making sure all parents and families are informed.

§200.78 Demonstration Authority Selection Criteria

National PTA supports the proposed regulations in §200.78 (b)(3)(iv) that requests SEAs to include support—demonstrated by signatures—from local parent organizations and other education stakeholders in their innovative assessment pilot application to ED. While signatures show support for the innovative assessment pilot application, ED should emphasize that signatures should not take the place of meaningful consultation with parents and other stakeholders but rather be in addition to this engagement.

Our association also recommends that ED include language to the proposed regulations in §200.78 (d) that would require a description of the strategies that an SEA has developed and will use to familiarize parents and families about the innovative assessment system. Almost half of all parents in Be a Learning Hero’s survey, “[Hearts & Minds of Parents in an Uncertain World](#),” stated that they could use more help to better understand and interpret their child’s assessment results. Additionally, 58% of parents surveyed said that having a guide to explain the scoring of the state tests would be extremely or very helpful. Having a well thought out plan for communicating with, and educating parents on the use and interpretation of innovative assessments is essential. Therefore, ED should revise the proposed regulations in §200.78 (d) to read as follows with suggested new language in **bold**:

d) *Supports for educators, **parents** and students.* The quality of the supports that the SEA or consortium will provide to educators, **parents** and students to enable successful implementation of the innovative assessment system and improve instruction and student outcomes. In determining the quality of supports, the Secretary considers—

(2) The strategies the SEA or consortium has developed and will use to familiarize **parents** and students with the innovative assessment system;

Insert after §200.78 (d)(4) the following:

(5) The strategies the SEA or consortium has developed and will use to communicate assessment results and the supports they will provide to parents and families to better understand the meaning of the assessment results and how parents can use the information to support their child’s academic growth and achievement.



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,

A handwritten signature in black ink that reads "Laura M. Bay".

Laura M. Bay
President
National PTA

A handwritten signature in black ink that reads "Nathan R. Monell".

Nathan R. Monell, CAE
Executive Director
National PTA