

January 19, 2016

Deborah Spitz, U.S. Department of Education
400 Maryland Avenue SW., Room 3E306
Washington, DC 20202

RE: Docket ID ED-2015-OESE-0130

California State PTA is a grassroots association with over a century of experience in connecting families and schools, in helping parents develop leadership, communications and advocacy skills, and in advocating for all children. Based on our continuing work in approximately 3,500 local chapters, with over 50 percent in Title 1 schools, our organization is uniquely positioned to offer policy recommendations based on the perspectives of local parents, educators and volunteers whose children and communities are served by public schools. We would like to offer the following input as guidance to the drafting of the regulations for implementation of the **Every Student Succeeds Act (ESSA)**:

California State PTA supports a single coherent accountability system that incorporates the federal requirements of the Every Student Succeeds Act (ESSA) and builds upon the work currently being done in California to develop an accountability system based on multiple measures that clearly show how students, schools and districts are doing. We recommend the U.S. Department of Education regulations provide guidance while supporting existing efforts such as those in California where stakeholders, practitioners, and policymakers have been working diligently to develop an accountability system that meets the needs of our large, diverse student population and focuses on improved student outcomes and closure of opportunity and achievement gaps.

California State PTA has long supported the move from a single score for accountability to multiple measures that more clearly reflect what is happening in our schools. We know that to be effective an accountability system must focus on three major areas -- Outcomes, Improvement and Equity -- and this is the direction that California as a state is moving through the development and implementation of our new funding and accountability systems that focus support for historically underserved students. We believe there is congruence between the accountability measures identified in ESSA and the ones adopted in California statutes in 2014. We call for regulations that allow us to continue to develop our system of multiple measures which capture the basic conditions of learning, pupil outcomes, and engagement and will identify districts, schools and subgroups that need support and intervention to ensure closure of the opportunity and achievement gaps so that all students graduate college and career ready.

The timely adoption of ESSA gives California the opportunity to incorporate the federal requirements and to develop a single clear set of measures of school success and to avoid the past confusion for parents and communities over the previous disconnect between the two systems. Transparent processes and accessible information, which will come from an integrated federal and state accountability system, are needed for students, parents and communities. We urge the development of regulations that meet the federal requirements while allowing states the flexibility to design overall accountability systems to best meet the needs of their students, which in California is over 6 million children, and to communicate key information to stakeholders with clarity.

Parent and family engagement is one of our organization's primary concerns and is clearly identified in California statute as a state priority. California State PTA believes that parent engagement is more than regional Parent Centers and we need the ESSA regulations to recognize that fact. We encourage the Department of Education to seize opportunities to strengthen this component of the regulations moving forward. Parent engagement is the greatest predictor of student success and regulations that support parent engagement, along with resources and accountability, will serve all students well. We urge regulations that support a broader vision than simply regional Parent Centers.

California State PTA recognizes that the reauthorization of ESSA was the first step and looks forward to working with the Department of Education through the regulatory process to develop regulations that honor the intent of the law to shift decision-making to states and to help ensure families are empowered to support their children's learning so all students receive a high-quality, well-rounded education that prepares them for long-term success.

For more information, please contact:

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