



June 16, 2017

MaryEllen Elia  
Commissioner  
New York State Education Department  
89 Washington Avenue  
Albany, NY 12234

Dear Commissioner Elia,

NYS Parent Teacher Association (NYS PTA) is honored to represent nearly 300,000 parents, families, educators and ALL students across New York. It is our mission to make every child's potential a reality and support ALL children with ONE voice.

The new federal Every Student Succeeds Act (ESSA) provides an opportunity to further support our children in both their learning process and well-being. Our collective goal must be to ensure every child, in every part of the state, in every school district, in every circumstance has the tools, resources and supports needed to succeed.

**Process**

We appreciate the Board of Regents' (Regents) and Education Department's efforts to include parents, educators, students, and community in the review of the draft ESSA plan. We acknowledge the work of the Boards of Cooperative Educational Services across the state sponsoring meetings. Feedback from these meetings and from the survey on high concept ideas should be reflected during this drafting process.

We thank you for including our perspective on the ESSA Think Tank, and while work was often difficult to accomplish because of the sheer size of the Think Tank, the process was welcomed.

**Standards and Assessments**

We are compelled to include short commentary on the proposed Next Generation Learning Standards and anticipated change in assessments as they relate to the implementation of ESSA.

We believe that a new accountability system for districts will require safety nets as we modify our standards, ensuring developmentally appropriate expectations for all children especially those with learning modifications.

We are pleased that the Pre-K through Grade 2 workgroup will continue to meet to review and revise the early learning standards, as we expressed concerns with some of the early learning goals in our previous commentary.

Further, we are extremely pleased about the reduction in the 3-8 English Language Art and Mathematics Assessments from three test administration days to two days. This will be a welcomed change as we continue to work together to ensure our mandated assessments are developmentally appropriate for all children and shortest in duration as possible. As you consider the next generation of assessment, we request that assessment structure be reviewed for developmental appropriateness first, then for psychometric soundness.

We also support your continued application for a waiver from certain test requirements for students with disabilities and ELL/ENL students. While we understand the state's previous waivers have been denied by USDE, we look forward to testing flexibility that respects accommodations and, if we must assess, to do so on developmental levels as opposed to chronological age levels for more students.

### **Graduation Rates**

In our previous submission on ESSA to then Education Secretary John King, we reiterated our support for the use of 5 and 6 year graduation rates. NYS PTA is highly pleased that the ESSA draft includes the use of these extended graduation rate calculations.

While we understand ESSA's 67% graduation rate intervention requirement, the use of the 5 and 6 year graduation rate calculations for accountability purposes will ensure appropriate extended learning timelines for especially at risk students, students with disabilities and English Language Learners.

### **Reporting and Accountability**

We agree with many that New York State needs dedicated time to create transparent and easy to understand language when creating accountability reports. Parents and families need to understand information, along with the meaning of terminology used and the implications of the assigned designation.

NYS PTA does NOT support a grade based system (A-F) for our schools and we are very pleased that the draft plan does not propose this.

### **Test Participation Rates**

We continue to be concerned about ESSA's reliance on test participation rates, understanding much of this mandate is in federal statute.

We are unclear, however, how New York intends to proceed as the draft plan and plan summary document provided appear not to be consistent on this issue, and therefore urge that these sections be revisited.

The draft plan and plan summary reference two different calculations:

- The draft plan indicates that students/families that opt out of the standardized exams will be listed as non-proficient for calculations used for accountability purposes (Performance Index 1);
- But in the plan summary, another measure (Performance Index 2) would allow for other measures for review, and not penalize schools for test participation rates;
- For intervention, the higher of the Performance Indexes (1 or 2) would be used.

We suggest the plan itself be revised so that it is clear that schools cannot be penalized for test participation rates as discussed in the plan summary, and that the higher of the Indexes will determine intervention.

NYS PTA strongly supports a parent's right to make informed educational decisions for their children and support the right of every parent to decide what is best for their child, which includes decisions around their child's participation in state assessments.

We believe that schools must establish a balanced use of assessments to inform instruction without over testing or emphasizing test performance. We do not support the use of a single test or assessment for placement, promotion, retention decisions or other high-stakes decisions affecting students. Over-emphasis on high-stakes testing, especially tests that can be linked to both educator and school accountability, is detrimental to students and the education process.

Further, NYS PTA continues to call for the suspension of linking results on standardized assessments with teacher/principal accountability and district accountability decisions.

We do not believe in intervention mandates based on a parental right or decision.

### **Parental Engagement**

There is no greater indicator for a child's success than real family/parental engagement and involvement. We are pleased to see, and fully support, the increased parent engagement measures to be incorporated into accountability.

Know that we support increased parent engagement at ALL schools, with incorporation of parent/family engagement embedded in turnaround plans for our state's high-need and struggling schools.

While we welcome parent/family engagement measures, we understand these are often difficult to measure and gauge.

We urge you to consider the National PTA Standards for Family-School Partnerships and the assessment rubric as a basis to measure family engagement. The Diagnostic Tool for School/District Effectiveness embeds many of these standards in the required turnaround plan.

We also support plan concepts like:

- easy to understand and transparent data dashboards for use by parents,
- parent voice in decision making, especially in struggling schools, and
- parental input in school climate surveys;

And other engagement concepts such as:

- support for all to use culturally competent family engagement practices and measures,
- growing parent capacity to understand reporting,
- assisting parents with methods to support student learning, and
- incorporating parent input on making school buildings safe and friendly.

Parents often feel left out of the educational process in many schools for a host of reasons, and we should all work together to change this and ensure that parents and families are informed and welcomed.

We also must pay particular attention to our English Language Learning and immigrant parents and families, where language and cultural barriers may also exist. We are pleased to see discussion of the importance of parental involvement as it relates to New York's Regional Bilingual Education Resources Networks and the State Migrant Education Program.

### **Foundation Aid and Equitable and Adequate Funding**

While school aid has increased in the recent years and the Gap Elimination Adjustment has been eliminated, New York State's schools and children are still owed an astounding \$3.6 billion in Foundation Aid. Sadly, the overwhelming majority of these funds are owed to our state's high needs and struggling schools.

We continue to call for a timely phase-in of the foundation aid formula and have fully supported, alongside our Educational Conference Board colleagues, the Regents school aid request to the legislature and Governor.

NYS PTA is also gravely concerned about possible cuts in federal education funding for New York. According to analysis by the state education department, New York would lose an astounding \$433 million in funding to support public school students.

While we fully support the plan's goal of a 95% graduation rate for all students, until our high-needs and struggling schools are fully and appropriately funded, it is difficult to require them to make the achievements and gains necessary under ESSA.

**Conclusion**

Please accept this submission as official comments from the NYS Parent Teacher Association on the draft ESSA plan.

We look forward to this continued work to advance the love of learning for all children and are available through this revision process to collaboratively support our children.

Sincerely,

Handwritten signature of Gracemarie Rozea in black ink.

Gracemarie Rozea, President

Handwritten signature of Kyle Belokopitsky in black ink.

Kyle Belokopitsky, Esq., Executive Director