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September 9, 2016

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

RE: Docket ID ED-2016-OESE-0047

Dear Ms. McKinney,

Thank you for the opportunity to comment on the U.S. Department of Education's (ED) proposed rule: *Elementary and Secondary Education Act of 1965, as Amended by the Every Student Succeeds Act - Innovative Assessment Demonstration Authority* published on July 11, 2016. We appreciate this opportunity to provide input and offer the following comments in support of ED's efforts to draft quality regulations.

The Association of Texas Professional Educators (ATPE) is the preeminent educator association in Texas and makes a positive difference in the lives of educators and schoolchildren. ATPE is a member-owned, member-governed professional association with more than 100,000 members, making it the leading educator association in Texas and the largest independent association for public school educators in the nation. ATPE recognizes and appreciates ED's commitment to the fair and timely implementation of the Every Student Succeeds Act (ESSA).

ATPE is generally pleased that ESSA provided states with *some* assessment flexibility, and supports the innovative assessment pilot that provides particular opportunity, even if slow building, for movement beyond the current high-stakes testing regime. As a means of reducing the time, emphasis, and expense placed on standardized testing, ATPE has encouraged Congress and ED to consider allowing states to use a scientifically valid sample of the student population to assess

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students and report disaggregated state-level data. ATPE is pleased that the Innovative Assessment Demonstration Authority proposed rule includes a version of our previous input, giving states the option to pilot a form of the already successfully utilized method of assessing students through sampling.

ATPE also supports language in the proposed rule that requires collaboration with and supports for educators throughout the demonstration process. As experienced professionals, teachers, principals, and other school-level personnel can provide valuable perspectives that should be reflected in the process. Such input should be sought in order to build a system that maximizes student learning and helps educators meet the individual needs of students. Strong support for all educators, students, and parents will also be key during implementation of new systems.

Still, ATPE continues to stress where true innovation is needed: in reducing the unnecessary and rampant high stakes associated with assessments in our country. Standardized testing, like many other things, can be useful in moderation, but our current system attempts to use standardized assessments to evaluate and apply consequences to a growing portion of our school system. ATPE and many others have recognized that the current testing regime is ineffective and even harmful for students, insofar as high-stakes testing leads to a narrowing of the curriculum, hinders differentiated instruction, and leads to numerous problems, such as student anxiety and the potential for cheating. Further, in some cases, such as using standardized test scores to evaluate teachers, the tests are being used as an ineffective measure for which they aren't designed. As ED seeks to work with states as they look to develop innovative assessment systems, we encourage the department to look for opportunities to address the harmful nature of overusing standardized assessments as high-stakes and ineffective measures of success.

We appreciate this opportunity to share our input as ED remains committed to implementing ESSA in a fair and timely manner. For additional information, please contact ATPE Governmental Relations at (800) 777-2873 or government@atpe.org.

Sincerely,

A handwritten signature in black ink that reads "Jennifer M. Canaday". The signature is written in a cursive, flowing style.

Jennifer M. Canaday, CAE
Governmental Relations Director