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September 9, 2016

Ms. Jessica McKinney
U.S. Department of Education
400 Maryland Avenue, SW. Room 3W107
Washington, DC 20202-2800

Docket ID: ED-2016-OESE-0053

Dear Ms. McKinney:

The purpose of this letter is to provide the comments of the National Alliance for Public Charter Schools (National Alliance) regarding the Department's proposed regulations on Academic Assessments under the Elementary and Secondary Education Act of 1965 (ESEA) as amended by the Every Student Succeeds Act (ESSA). The National Alliance is the leading national organization committed to advancing the charter public schools movement.

Although the charter sector was represented on the negotiated rulemaking panel, Richard Pohlman, the Executive Director of Thurgood Marshall Academy was designated as an "alternate" and therefore unable to vote and thereby represent the charter sector in determinations of whether there was consensus on the proposed regulatory provisions. We are therefore submitting comments through the public comment process to clarify our support of the proposed regulations.

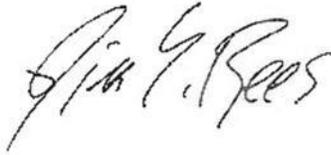
Under the statute, a public charter school that is considered by the state to be a local educational agency (LEA) would be able to apply for flexibility to administer a nationally recognized assessment if the state educational agency (SEA) chooses to make the option available. The option to offer such assessments can help high schools to select assessments that better align with the mission of the school. It can also enable a school to demonstrate in more detail its academic success, and even measure student growth (depending on the assessment), by providing grade level achievement data. A single statewide exam that is typically administered only once in reading and math before 12th grade cannot provide this data.

In contrast to charter school LEAs, district authorized charter schools, do not have the same autonomy to select a nationally recognized assessment under these proposed rules because they require the same assessment to be administered district-wide. We therefore strongly support the provision that requires school districts to consult with district-authorized charter schools when determining whether to apply for any available flexibility to offer a nationally recognized high school assessment, as provided for in section 200.3(c)(1)(ii). We also support the requirement in

200.3(c)(2)(ii) that charter schools provide an assurance that they have consulted with their authorizers,

Thank you for the opportunity to comment on the proposed rules.

Sincerely,

A handwritten signature in black ink that reads "Nina Rees". The signature is written in a cursive, flowing style.

Nina Rees
President and CEO