

Comments on the U.S. Dept. of Education Draft Non-Regulatory Informational Document on State and Local Report Cards

Submitted via email to: oesefeedback@ed.gov

The National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE) thanks you for the opportunity to comment on the draft non-regulatory informational document on state and local report cards. This guidance is invaluable to states, local school districts, parents and other stakeholders as distribution of report cards created under Title I of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA), begins. National PLACE is a national organization that works to strengthen the voice of families and family-led organizations at decision-making tables that affect our nation's children, youth, and families. Our 60+ local, state and national members represent Parent Training and Information and Community Parent Resource Centers, Family to Family Health Information Centers, Parent to Parent USA affiliates, National Federation of Families for Children's Mental Health chapters, Family Empowerment Centers, Early Start Family Resource Centers, and other family-led, family-run organizations committed to ensuring the highest quality and most effective services and supports for children and families. Our comments are based on our knowledge and expertise regarding effective strategies to engage diverse families of children of all ages to help improve services to, and outcomes for, their children.

SECTION A. GENERAL INFORMATION

A-1. What are the responsibilities of an SEA and an LEA for preparing a report card?

COMMENT: National PLACE strongly supports the guidance that State and LEA report cards must be concise and presented in an understandable and uniform format accessible to persons with disabilities and, to the extent practicable, provided in a language that parents can understand. Further, based on the Civil Rights Act and Executive Order, the information must be accessible to parents speaking languages other than English. This requirement should explicitly be included in the guidance.

A-3. Is there a particular report card style or format that an SEA or an LEA must use?

COMMENT: National PLACE is concerned that the response to this question differs from the response in the previous guidance in that it eliminates the following italicized language: "State and LEA report cards must be concise, presented in an understandable and uniform format, and accessible to the public. (ESEA section 1111(h)(1)(B) and (h)(2)(B); 34 C.F.R. §§ 200.30(a)-(b) and 200.31(a)-(b)). *In addition, State and LEA report cards must begin with an overview section that provides information on key metrics of State, LEA, and school performance (see B-6 for more information regarding State and LEA report card overview sections). (34 C.F.R. §§ 200.30(b)(2) and 200.31(b)(2)).* Beyond these requirements, SEAs and LEAs have flexibility to use the report card style or format they determine to be most effective in presenting information to stakeholders, including parents." We do not understand the reason for this elimination.

National PLACE opposes the following proposed change to the guidance. The previous version indicated that “To help ensure that parents contribute to decisions related to report card style and format, the ESEA and its implementing regulations require that SEAs and LEAs consult with parents in developing report cards. (ESEA section 1111(h)(1)(B)(ii); 34 C.F.R. §§ 200.30(b) and 200.31(b)). The Department issued a Dear Colleague Letter to States on June 22, 2016, that provides information and resources on meaningful stakeholder engagement that may be helpful to SEAs and LEAs in consulting with parents on report cards. The letter includes the following suggestions...” The proposed new version merely states, “To help ensure that parents contribute to decisions related to report cards, the ESEA requires that SEAs consult with parents in developing the State report card. (ESEA section 1111(h)(1)(B)(ii)).” We support maintaining the current version that explicitly includes a reference to the 6/22/2016 Dear Colleague Letter.

Further, National PLACE opposes the deletion of several of the bulleted suggestions from the previous guidance, which included:

- “Holding meetings or hearings at varying times during the day, including after the work or school day or on the weekends and, if possible, offering child care, so that working parents, teachers, school leaders, and other professionals are best able to participate;
- Holding multiple meetings or hearings across the State or district, rather than only in the State capital or district headquarters, which can limit the ability of stakeholder groups from across the State or district to participate;
- Ensuring meetings or committees include a broad range of stakeholder voices, including those who have been traditionally left out of such conversations;
- Facilitating broad participation beyond the representatives that will be attending the meetings or hearings in person (for example, by working with trusted stakeholders to gather input from other stakeholders who may not be able or inclined to attend a hearing);
- Making publicly available the name and contact information of officials and stakeholders who will be working on State implementation;
- Allowing all stakeholders who are participating in meetings or hearings to provide substantive input; and
- Providing accommodations and supports to ensure meetings or hearings are accessible (e.g., translators, interpreters, materials in alternative formats for use by persons with disabilities).”

The proposed revision includes only the first, third, parts of fourth, and fifth bullets, leaving out crucial guidance such as the second bullet regarding holding multiple meetings or hearings across the state; the parents in the current fourth bullet, “for example, by working with trusted stakeholders to gather input from other stakeholders who may not be able or inclined to attend a hearing;” the sixth bullet regarding allowing all stakeholders who are participating in meetings or hearings to provide substantive input; and the seventh bullet regarding provision of accommodations and supports to ensure meetings or hearings are accessible to people with disabilities and people speaking languages other than English. National PLACE strongly urges that all of the current bullets be maintained, and further, supports the proposed new bullet:

- “Publish mock-up or drafts of possible designs and examples prior to meetings so that participants can come to meetings informed and prepared, and encourage comments on posted versions of reports or templates on the State website for those unable to attend meetings in person. “

National PLACE further recommends that there be a proviso added to the above indicating that this is not an exhaustive list of strategies to solicit substantive input from stakeholders, especially parents and parent-led organizations. We would also recommend inclusion of an additional strategy:

- “Partner with family-led organizations, such as Parent Training and Information Centers and Community Parent Resource Centers, with expertise in developing resources and materials for the full range of diverse families, in developing report card style/format.”

A-4. Are there considerations or principles for displaying student and school performance data that may be helpful to SEAs and LEAs as they develop, prepare, and disseminate State and LEA report cards?

COMMENT: National PLACE appreciates the bulleted list of considerations for developing report card designs that are most accessible to and useful by families and family-led organizations; however, we are concerned about, and oppose, the weakened language, for example, changing the introduction from “In determining the design of report cards, SEAs and LEAs *should* consider the following,” to “In determining the design of report cards, SEAs and LEAs *may want to* consider the following questions...” National PLACE also opposes elimination of the current question, “Does the report card design take into account feedback provided through the required parental consultation?,” and would add, “and family-led organizations with experience and expertise in developing resources and materials for the full range of diverse families?” Further, while National PLACE supports inclusion of questions to guide SEAs and LEAs, we oppose the proposed elimination of the following italicized questions and/or components of several of the questions:

- “Does the report card reflect feedback based on different presentation formats presented to a variety of audiences representing likely consumers of report cards to ensure precise and clear communication of the data? *If so, did the test audiences evaluate the use of font size, keys, graphs, page layout, instructions, and pagination?*
- *Is the information on report cards in hard copy form? If so, is it shared online in the same format to ensure consistency across communication mediums?*
- Are the data available in both chart/graph and table format, and do the graphics and artwork improve readability and maintain user interest?
- Does the report card include narrative summaries of relevant information for parents that use plain language and avoid using jargon not well known to parents?
- Is social media embedded to allow parents to easily share information?
- Does the report card link to historical information provided in previous years?”

- Is the information provided in a mobile-ready format that is accessible across a variety of devices?
- Are the State and local report cards disseminated in formats that are accessible to individuals with disabilities and to those with limited English proficiency?”

A-5. How can an SEA and LEA meet the requirement for report cards to be concise?

COMMENT: National PLACE endorses the statement in this section that “High-level, easy-to-understand summaries are particularly important for parents, who have indicated through outreach and other feedback mechanisms that they want to know the most important points about a school first, before exploring more detailed information.” However, we recommend adding that high-level summaries should include important high-level information that is critical for parents of subcategories of students such as English language learners, students of color, and students with disabilities.

A-7. How might an SEA and LEA ensure that its report card is accessible to parents who are limited English proficient?

COMMENT: National PLACE appreciates that the Department includes this question in its guidance as it is critical for parents who are limited English proficient who have the right under the Civil Rights Act of 1964 as well as presidential Executive Order to access the information they need to make good decisions for their children. However, the proposed revision omits significant and important language from the current version that makes SEA and LEA obligations clearer than they are in the proposed change. National PLACE strongly recommends inclusion of all of the language from the current guidance as well as a direct reference to the 1/7/2015 Dear Colleague Letter from the US Departments of Education and Justice on SEA and LEA civil rights obligations to LEP parents.

SECTION B. SEA RESPONSIBILITIES

B-1. What information must an SEA include on its State report card?

COMMENT: National PLACE is concerned that the proposed guidance omits a critical question and answer from the current guidance regarding charter schools, and opposes this change. We recommend that the following question and response be added:

“In addition to what is required for all public schools and LEAs, is an SEA required to include any information with respect to chartering agencies on its State report card specific to public charter schools?

Yes. Each SEA must include on its State report card the following information for each public charter school, organized by the respective authorized public chartering agency, in the State:

- A comparison between the percentage of students in each subgroup defined in section 1111(c)(2) of the ESEA for each charter school authorized by such agency and such

percentage for the LEA or LEAs from which the charter school draws a significant portion of its students, or the geographic community within the LEA in which the charter school is located, as determined by the State; and

- A comparison between the academic achievement under 34 C.F.R. § 200.30(b)(2)(i)(A) for students in each charter school authorized by such agency and the academic achievement for students in the LEA or LEAs from which the charter school draws a significant portion of its students, or the geographic community within the LEA in which the charter school is located, as determined by the State.
(34 C.F.R. § 200.30(a)(2)(ii)).”

This information is critical not only to parents whose children attend a charter school, but also to parents who may be considering having their child(ren) attend a charter school.

B-3. How does the ESEA require an SEA to disseminate its State report card?

COMMENT: National PLACE endorses the inclusion of the recommended strategies in the proposed guidance. However, we note that several important components of the current guidance regarding how the ESEA requires an SEA to disseminate its State report card are eliminated in the proposed revised guidance, and strongly recommend that they be retained, see italicized language below:

“Printing the report card and making copies available in local schools, libraries, local parent centers, community organizations, and other easily accessible public locations;

- E-mailing copies to parents of students enrolled in schools who have agreed to receive such information;
- Distributing information *about the report card and how the public may acquire a copy* via statewide or local newspapers and other print media, including foreign-language newspapers and publications in communities in which languages other than English are predominantly spoken;
- Developing public service announcements *about the report card and how the public may acquire a copy* via radio or television and advertising through local access broadcast media, community electronic bulletin boards, and other news sources;
- Engaging parent advisory groups, including parent-teacher organizations, to provide parents copies of the report card and supplementary information about the report card, as well as bilingual/multilingual community forums to inform parents in their home language. *Rooted in the community, such advisory groups have the ability to reach diverse groups of parents, including low-income parents, parents with limited English proficiency, and parents with disabilities;* and
- Developing smartphone applications or other mobile technologies for parents to access the report card overviews or all information provided on both the overview and detail sections.”

National PLACE recommends adding to the fourth bullet above, “including parent-teacher organizations, *federally-designated Parent Training and Information and Community Parent Resource Centers, and state and local Bilingual, Special Education, and Title Parent Advisory Groups.*”

National PLACE supports the proposed guidance’s inclusion of the following language to ensure that parents, particularly underserved parents and parents of children with the poorest outcomes, can understand the report card information: “When using an online, interactive report card website, an SEA may wish to provide parents with information on how to access, as well as directions on how to use, its interactive features to understand and use information on schools, student learning, and test performance. The SEA, in coordination with its LEAs, might offer workshops for parents and community members, develop and post short training or orientation videos, or provide other assistance on how to access and use the features its website offers so that parents and community members can take full advantage of any interactive graphics, advanced analyses of longitudinal trends, and other features.”

National PLACE notes that the following important language from the current guidance is proposed to be eliminated in the new guidance, and strongly encourages that this language be included in the new guidance to ensure that SEAs keep in mind their obligation to ensure meaningful accessibility for LEP stakeholders and stakeholders with disabilities, including parents and self-advocates: “To meet the dissemination requirements, an SEA must make the report card meaningfully accessible to parents and stakeholders who are limited English proficient. (34 C.F.R. § 200.30(c)). Please refer to B-9 for information on how an SEA might meet this requirement. Additionally, an SEA must disseminate its annual report card in a manner that provides parents and members of the public with disabilities with an equal opportunity to access the report card. Please refer to B-10 for information on how an SEA might meet this requirement. As described in questions B-9 and B-10, these requirements apply to any service, program, or activity of the SEA or LEA, including any activities and documents used to promote dissemination of the State report card.”

SECTION C. LEA Responsibilities

C-3. How does the ESEA require that an LEA disseminate its report card?

COMMENT: National PLACE endorses the inclusion of the recommended strategies in the proposed guidance. However, we note that several important components of the current guidance regarding how the ESEA requires an LEA to disseminate its local report card to make sure it is accessible to people with disabilities and with limited English proficiency are eliminated in the proposed revised guidance, and strongly recommend that they be retained, see italicized language below:

“To meet the dissemination requirements, an LEA must make the report card meaningfully accessible to parents and stakeholders who are limited English proficient. (ESEA section 1111(h)(2)(B)(ii); 34 C.F.R. § 200.31(c)). Please refer to B-8 and B-9 for information on how an

LEA might meet this requirement. Additionally, an LEA must disseminate its annual report card in a manner that provides parents and members of the public with disabilities with an equal opportunity to access the report card. As described in B-9 and B-10, these requirements apply to any service, program, or activity of the LEA, including any activities and documents used to promote dissemination of the LEA report card.” [Note: The references to B-8, B-9, and B-10 should be revised to reflect the revised section numbering in the proposed new guidance.]

C-4. How can an LEA help parents to understand and act on the information provided on the local report card, particularly information related to the schools their children attend?

COMMENT: The proposed guidance eliminates the current guidance’s question, “How many an LEA meet the requirement for disseminating the school overview section...to parents of students in each school served by the LEA?” National PLACE recommends that this question and its current answer be included in the proposed new guidance, as follows:

“An LEA may meet its responsibility to provide the report card overview to the parents of each student enrolled in each school in the LEA directly through the United States mail, e-mail, or through other means such as by sending the report card overview home to parents in their child’s backpack or distributing the report card overview during parent-teacher conferences. (34 C.F.R. § 200.31(d)(3)). In essence, an LEA may use its regular method of communicating with parents to meet the report card overview dissemination requirement, so long as it provides the overview directly to all parents in each school served by the LEA by the December 31 timeline discussed above in question B-2. In setting this policy, an LEA should consider which method of disseminating the report card overview is most likely to reach parents and, in doing so, may wish to consider such factors as family mobility, student grade level, and access to the internet. An LEA might determine that the particular circumstances of the LEA, or of a subgroup of eligible students within the LEA, necessitate using one dissemination method over another. The Department encourages an LEA to use multiple dissemination methods so as to ensure that parents receive copies of the report card overview for their school. An LEA may discuss how to disseminate the report card overview as part of its consultation with parents on the development of the report card, as required under 34 C.F.R. § 200.31(b)(1).

National PLACE endorses the inclusion of the proposed question C-4, “How can an LEA help parents to understand and act on the information provided on the local report card,” as well as its recommended strategies, see below. However, we would recommend strengthening the opening sentence, as noted in the italicized language below:

“In addition to making local report cards publicly available, LEAs and schools [may want to] *should take steps* to support parents in understanding the information provided in local report cards so that parents will be better able to contribute to improved teaching and learning for their children. Taking into consideration the context of the particular LEA and school, LEA and school staff may want to consider helping parents understand local report cards through opportunities such as back-to-school nights, parent-teacher conferences, bilingual/multilingual community forums where information is presented in parents’ home language and parents can

provide input in the language they feel most comfortable, brief webinars on accessing and reading the report cards, teacher or other school staff phone calls to parents, messaging publication of and information contained on report cards via social media, and focus groups during family events hosted at LEAs or schools. Question B-3 above offers suggestions for State report cards that may also be helpful to LEAs and schools in ensuring that parents understand information provided on local report cards. Schools can use report cards as one mechanism to engage parents in school improvement efforts. For example, if report card data show that *all or certain categories of* students in a school have limited access to accelerated coursework, parents and school officials can use such data to engage in conversations about how to increase student access to such coursework.”

SECTION D. REPORTING STUDENT ACHIEVEMENT DATA BASED ON STATE ASSESSMENTS

D-8. What information must an SEA and LEA include on its report card regarding participation rates?

COMMENT: The draft guidance eliminates critical information regarding how participation rates are factored into student achievement results.

“D-2. How must an SEA calculate student achievement for the purposes of State and local report cards?”

In calculating and reporting student achievement results, the ESEA requires that an SEA and LEA include all students tested. (ESEA section 1111(h)(1)(C)(ii) and (h)(2)(C)). Thus, the denominator for this calculation must include all students enrolled during the testing window who participated in the assessment. The numerator must include the number of students at each level of achievement based on the State’s grade-level academic achievement standards. Note that the denominator for this calculation must equal the numerator used in the calculation of the participation rate.” (Page 21)

The January 2017 guidance required that this calculation be based on either the number of participating students OR 95 percent of all students and each subgroup, whichever is greater. Specifically, the January 2017 guidance states (Page 22):

“E-2. How must a State calculate proficiency rate for the purposes of State and LEA report cards?”

“The report card must also include the progress of all students and each subgroup of students against the State’s measurements of interim progress established under section 1111(c)(4)(A) of the ESEA and 34 C.F.R. § 200.13. In determining whether the “all students” group and each subgroup met or did not meet measurements of interim progress and long-term goals for academic achievement, a State must use the proficiency calculation used in the State’s accountability system under ESEA section 1111(c)(4)(E)(ii) and 34 C.F.R. § 200.15(b)(1) in which the denominator includes the greater of—

- 95 percent of all students and 95 percent of each subgroup of students, as applicable, who are enrolled in the school, LEA, or State, respectively; or
The number of all such students enrolled in the school, LEA or State, respectively, who participate in these assessments.

This language is critical to ensuring that performance is measured as stated at ESEA section 1111 (c)(4)(E) (ii): “For the purpose of measuring, calculating, and reporting on the indicator described in subparagraph (B)(i), include in the denominator the greater of— (I) 95 percent of all such students, or 95 percent of all such students in the subgroup, as the case may be; or (II) the number of students participating in the assessments.”

This methodology ensures that, once test participation falls below 95 percent in total or subgroup, all non-participants are counted as non-proficient, as intended by Congress.

REQUESTED REVISION: Revise the draft guidance to include the language specific to the method of calculating achievement against goals for all students and each student subgroup. The draft guidance also eliminates the requirement that report cards include the “method of factoring in the 95 percent assessment participation requirement” in the description of the statewide accountability system (January 2017 guidance at page 27). This information should be included in state report cards.

D-5. In reporting student achievement for the children with disabilities subgroup, may an SEA and LEA include results for children who were formerly identified as children with disabilities?

COMMENT: The guidance should ALSO make clear that children who were formerly identified as children with disabilities MAY NOT be counted in the 4-year Adjusted Cohort Graduation Rate or extended-year adjusted cohort graduation rates. The rationale for this provision is the same as the provision on achievement reporting, that “It is important that parents and the public have a clear picture of the academic achievement of students who are currently receiving special education services under the IDEA.”

REQUESTED REVISION: Add information indicating that the calculation of the 4-year Adjusted Cohort Graduation Rate or extended-year adjusted cohort graduation rates may NOT include children who were formerly identified as children with disabilities during their time in the cohort. The ACGR should report only those students who exited the cohort as children with disabilities.

E. REPORTING STATE ACCOUNTABILITY SYSTEM INFORMATION

COMMENT: National PLACE appreciates and supports inclusion of the information in this section of the proposed guidance which is closely correlated with the information in the current guidance, particularly the following language:

“E-2. How can SEAs and LEAs meet the requirement to include a description of the State accountability system on State and local report cards?”

SEAs and LEAs may meet the requirement to provide a description of the State accountability system by including such information directly on State and local report cards, respectively. SEAs and LEAs may also meet this requirement by providing the web address and linking to the description, provided the web page to which it links includes all of the accountability system description elements detailed in question E-1. SEAs and LEAs, in developing their report cards, may consider the amount of information needed to help parents and other stakeholders engage in and understand the State accountability system. For example, an SEA may wish to indicate its n-size directly on its report card, even though it is available elsewhere, because such information likely facilitates understanding of how school performance is measured, and provide the website for the reader to access the other required information. Additionally, SEAs and LEAs may want to describe the State accountability system in a way that enables parents and other stakeholders to understand what the system means and its implication for students. (See question E-4 for further information on accountability system context that might be useful for parents.)”

“E-4. What additional information may help parents and other stakeholders understand the performance and progress of schools based on the State accountability system?”

In reporting the number and names of all identified public schools, an SEA and its LEAs may wish to indicate, for each school identified for comprehensive or targeted support and improvement, the reason the school was identified. For a school identified as a comprehensive support and improvement school, the reason for identification would include one of the following: (1) being among the lowest-performing 5 percent of Title I schools (i.e., lowest-performing school); (2) being a high school with a graduation rate of 67 percent or lower (i.e., low graduation rate school); or (3) being a school that was previously identified for additional targeted support based on having one or more subgroups whose performance, on its own, would result in the school’s identification as a lowest-performing school but failed to meet the exit criteria for such schools within a State-determined number of years, specifying which subgroup or subgroups led to such identification. For a school identified as a targeted support and improvement school, the reason for identification would include one of the following, including the subgroup or subgroups that led to the school’s identification: (1) having one or more consistently underperforming subgroups; or (2) receiving additional targeted support based on having one or more subgroups whose performance, on its own, would result in the school’s identification as a lowest-performing school.”

F. REPORTING DATA FROM THE CIVIL RIGHTS DATA COLLECTION (CRDC)

COMMENT: As an organization of family-led organizations committed to ensuring a meaningful place at decision-making tables for all families, including those whose children face the greatest disparities in access to services and in educational outcomes, and family-organizations with experience and expertise in supporting those families, National PLACE is particularly supportive

of ensuring that families have information relating to racial, ethnic, language, gender, and other equity/inequity, i.e., information that is available through the Civil Rights Data Collection.

The CRDC provides families crucial information needed to make informed choices about their children’s education. Parents need the information presented in the CRDC’s user-friendly interface to gauge which schools are likely to be the best fit for their family, as well as to work with other parents, family-led organizations, educators, and advocates to make decisions about needed areas of improvement on which to focus their school improvement efforts. Through regular review of CRDC data, parents, parent-led organizations, and other members of the public, including the media, can examine trends among schools. They can identify which schools are more likely to provide equal educational opportunities, and which face continuing challenges. The Department collects data that permits stakeholders, most importantly, parents and parent-led organizations, to make evidence-based comparisons about quantifiable measures of school climate and resource equity, including restraint and seclusion, school discipline, academic proficiency, harassment and bullying, and others.

For these reasons, National PLACE strongly endorses inclusion of this information in the current, and proposed, guidance regarding report cards.

G. REPORTING ON EDUCATOR QUALIFICATIONS

COMMENT: The qualifications of the educators in their child(ren)’s school is of critical importance to families, particularly those families in districts and schools that typically face the greatest teacher shortages and the lowest teacher qualifications and experience. National PLACE strongly supports inclusion of this information in the current, and proposed, guidance.

H. REPORTING PER-PUPIL EXPENDITURES

H-2. Can an SEA and its LEAs follow different procedures when calculating per-pupil expenditure data for State and local report cards?

COMMENT: The response to this question, “Yes. An SEA has discretion to allow LEAs to establish their own procedures for calculating per-pupil expenditures,” is quite troubling insomuch as it does not include a citation and is likely an incorrect interpretation of the statute. To allow LEAs within a SEA to follow different procedures would render this provision only marginally useful to the public. Surely Congress did not intend for this new provision – which will require significant new effort by SEAs and LEAs - to be distorted by differing calculation methods within a State.

REQUESTED REVISION: Revise this response to state that it is the SEA that is responsible for establishing uniform statewide procedures for calculation of per-pupil expenditures and LEAs within the state must adhere to those procedures.

SECTION J REPORTING POSTSECONDARY ENROLLMENT RATES FOR EACH HIGH SCHOOL

J-2. How does the ESEA define a “cohort” for purposes of reporting on postsecondary enrollment?

COMMENT: The change to the definition of a graduation cohort for the purpose of calculating postsecondary enrollment (from the January 2017 guidance) will allow for a more inclusive reporting of data, particularly as it relates to students who are taking advantage of the rapidly expanding postsecondary programs for students with intellectual disabilities.

Appendix A – Sample overview of SEA and LEA report card

COMMENT: The draft guidance has eliminated the samples contained in the January 2017 guidance. These samples are quite helpful for families and family-led organizations and should be retained.

REQUESTED REVISION: Retain the samples in Appendix A of the 2017 guidance.

CONCLUSION

Many National PLACE Board members were privileged to participate in a stakeholder input session facilitated by the US Department of Education, and we are pleased to see a number of our recommendations included in this document.

In conclusion, we appreciate the opportunity to comment on the draft non-regulatory informational document on state and local report cards. For any questions or for additional information about our comments and recommendations, please contact Diana Autin, Executive Director of the National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE), at dautin@parentsatthetable.org.