

Public Comments Received During the 30-day Comment Period

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National Assessment of Educational Progress (NAEP) 2019-2020

ED-2018-ICCD-0097

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Substantively, I believe this rule accomplishes the DOE's goals as stated above; additionally, it furthers important national objectives in analyzing educational shortcomings and determining proper solutions. First, data on student performance, particularly with specific questions concerning socioeconomics and race is unequivocally necessary to the DOE's function. The data is necessary to uncover a problem's existence and provides guidance in where to start in solving it. Data including racial and socioeconomic demographics is especially valuable because lower-income and/or minority students have historically and unfortunately correlated to underperformance across many educational metrics.

Second, the proposed rule's timeline suggests the data will be processed and used in a timely manner because data goes stale eventually, but benchmarks are necessary to monitor progress. Third, the prevalence and number of standardized assessments suggests the number of annual burden hours is accurate (371,166) and I do not believe it is the most dispositive factor in determining whether this rule should be passed rather, the utility of the data collected outweighs the administrative burdens on respondents based on my responses to the following two answers.

The DOE is already enhancing the quality, utility, and clarity of the data by including the demographic data. Additionally, it is useful to consider not only at the assessments given, but also to review middle and high school transcripts in conjunction with the assessment data. Limiting analysis of educational data to only standardized assessments eclipses a more holistic, accurate view of a student's educational performance and encourages schools to teach more specifically to a test rather than to students' overall academic success. On the other hand, not using any standardized metric would make the data incomparable because curriculum varies so much from school-to-school.

Lastly, while I appreciate the immense time likely required on the part of educators and school administrators who already are pressed for time in collecting this data, its widespread use, in theory, leads to improvements in our schools. Conducting these assessments on a national level benefits the states by relieving them of the financial cost of the data collection where possible and by providing a broader scale with more opportunities for comparison to other states and similarly situated districts. Again, to solve a problem, one first must realize it exists. Large-scale data collection is an effective way to find these educational problems and help frame appropriate solutions.

In conclusion, the DOE should approve NAEP 2019 and 2020 update

NCES Response:

First, thank you for taking the time to review the materials and for providing feedback. NAEP is committed to continuing to report demographic and performance data of the highest quality. We are continuing our research in how to most accurately measure and report on demographic and performance data through such efforts as our planned transcript studies in 2019, along with innovative questionnaire items about students. NCES appreciates your support of our data collection efforts. We very much hope that the public can make use of the reported data to enhance education and we appreciate the positive feedback.

Sincerely,

NAEP Project Team