

**Comments Received During the 60-day Public Comment Period
and NCES Responses**

February 2017

International Early Learning Study (IELS) 2018 Field Test Recruitment

ED-2016-ICCD-0138

Comments on FR Doc #2016-29749

Thank you to all commenters who posted comments by February 13, 2017 responding to a 60-day request for comments on the Department of Education’s International Early Learning Study (IELS) 2018 Field Test Recruitment. The National Center for Education Statistics (NCES) appreciates your interest in IELS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comments.

We received 225 comments, all of which touched on one or more of the concerns listed below regarding the administration of IELS in the U.S. The comments are summarized below, followed by NCES responses.

Purpose of the study

Comments included concerns about the purpose of the study and the burden it entails, its relationship to Common Core curriculum, the relative effectiveness of pre-K education, and the role of ED in conducting research and implementing policy.

The purpose of IELS is to be able to describe the wide range of cognitive and non-cognitive skills of the U.S. population of children age 5-5.0 enrolled in school, rather than to produce “scores” for individual children, prescribe curriculum or influence teaching, or provide any causal link to any particular outcome. IELS will use multiple measures – gleaned from parents, teachers, and students – to describe the set of skills typical in U.S. children as they enter formal education. Students who participated in pre-K education, and those who did not, will be included in the sample. The study seeks to describe the experiences of 5 – 5.5 year olds at the beginning of formal education, regardless of where those experiences occurred. The data collection is for statistical purposes and collects objective information that may be used by researchers and policy makers, but does not include components such as curricular recommendations or class-room practice guides. NCES weighs the benefit of gathering this information, for which no other data source exists, against the burden on schools, teachers, parents, and students. Part of that effort includes providing an opportunity for an open and public comment period to collect and respond to your comments. NCES also minimizes the burden on respondents as much as possible by, for example, using trained assessors to administer the child assessments rather than school staff, spending as little time at each school as possible, and scheduling IELS assessments on a date that is convenient for each school.

The Education Sciences Reform Act of 2002 authorizes NCES to collect, report, analyze, and disseminate statistical data related to education in the United States and in other nations. For more on that authorization, see <https://www2.ed.gov/about/offices/list/ies/index.html>.

Data security, confidentiality, and privacy

Comments included concerns with the security of the IELS data and with the privacy of students and their parents.

NCES follows rigorous procedures to protect the confidentiality of participants in our studies and ensure that data collected are kept secure. Information about NCES's confidentiality procedures (described in Section A.10 of Supporting Statement Part A) and the four laws that cover the protection of the confidentiality of individually identifiable information collected by NCES can be found at <https://nces.ed.gov/statprog/confproc.asp>. Responses are protected by federal statute (20 U.S.C., § 9573) and may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law. NCES has extensive substantive and technical protection protocols in place to meet the legal requirements that protect all data collected by the organization. Results from IELS will only be used in aggregated form and no personally identifying information about study respondents will be made publically available, nor transmitted to the Organization for Economic Cooperation and Development (OECD) or any other entity. Finally, participation in IELS is voluntary and no respondent is required to respond to questions they do not wish to answer.

Parental consent

Comments included concerns that the study usurped parental authority.

As described in the study's Supporting Statement Part A and B posted on www.regulations.gov for public comment, no child will be part of IELS without parental consent. NCES will follow the parental consent requirements of each school in the IELS sample. In our experience with studies of children in Kindergarten, typically about 70% of schools require explicit consent from parents and the remainder require implicit consent. In addition, a parent or child may elect to withdraw from the study at any time. Schools will be notified of their inclusion in the sample as soon as selected so they are able to include that information on their communications with parents as required by Family Educational Rights and Privacy Act (FERPA).

Data content, quality, and the role of the teacher

Comments included concerns about the nature of the data collected – in particular, student's social and emotional skills – in IELS and the proposed data collection methods.

The purpose of IELS is to describe the wide range of skills children possess as they enter school – oral literacy/numeracy, numeracy/mathematics, executive function, and social skills – using multiple measures. As described in Supporting Statement Part A, three instruments will be used: a direct assessment of children's skills, a parent/home questionnaire, and a teacher questionnaire. The direct assessment, administered by trained assessors (not children's teachers), is the primary means by which IELS will assess children's literacy, mathematics, and executive function skills. A primary goal of the field test is to obtain empirical information to ensure validity and reliability of the instruments, including those pertaining to social and emotional skills. In order to provide the richest description of what children bring with them as they enter formal schooling, and in recognition of the importance of children's home environments, participating parents will be asked about their children's experiences before Kindergarten begins and to provide a view of their children's social skills and literacy experiences. Teachers will also be asked, to the extent they are able, to provide information on the wide range of skills exhibited by students. NCES is committed to administering instruments that meet rigorous standards of quality. Indeed, the purpose of the IELS field test is to obtain empirical information to ensure that validity and reliability standards are met by the final IELS instruments. No questions will be asked that would violate the Protection of Pupil Rights Amendment (PPRA) regarding the collection of highly sensitive information. More on PPRA can be found here <http://familypolicy.ed.gov/ppra>.

Thank you again for your comments during the public comment period. We are grateful for this process and appreciate your feedback.

Sincerely,
Dana Kelly
International Activities Branch Chief