

Public Comments Received During the 30-day Comment Period

July 2017

National Assessment of Educational Progress (NAEP) 2018-2019

ED-2017-ICCD-0087

Comments on FR Doc # 2017-12861

Document: ED-2017-ICCD-0087-0004

Name: Jonathan Roland

First: Do you know that you will get very few comments from classroom teachers through this portal? Do you care? I only had a chance of negotiating this system because I did some work as a regulatory engineering consultant for DOE, EPA and the military before becoming a teacher. Few classroom teachers would have a clue how to provide you comments.

Second: Please realize that every state test/data collection affects every student and teacher even if only some students are tested. This spring, PARCC tested 20% of our students but it required all of our computers and lab classrooms so computer classes had no computers and science classes could do no labs for two weeks. Teachers spend hours and hours proctoring and students spent days taking tests. Who did the COST BENEFIT ANALYSIS and decided the data was worth the cost to education?

Third: My school system (Baltimore County Public Schools, Maryland) took on all sorts of data collection requirements in order to get some "Race to the Top" funds. The requirements burden teachers and administrators and take away significant planning and instructional time from students. The funds were used to fund new impressive-sounding programs that created new administrative positions and departments while benefiting few/no students. BCPS is now stuck with the data collection burdens, the budgetary costs of maintaining the new positions and departments, and a well-spring of new oversight burdens continually being created by the RTTT-created managers whose RTTT-programs are over but who now must justify their jobs by creating new requirements for teachers to collect data and write reports. Very little benefit is created while resources are wastefully consumed. Students are short-changed. The decision-makers have no reason to stop the waste; their prestige is based on growth. RTTT made this quagmire possible.

Please, please, please stop sending money to the schools unless you can somehow safeguard against money being used to feed the bureaucracy that diverts teachers' focus, time, and energy away from our classrooms and students.

Fourth: While teaching public high school for 23 years, George W. Bush shook my hand in the White House and congratulated me on winning the Presidential Award for Excellence in Science and Math Teaching, I was invited to be one of the eight-member National Academies Teacher Advisory Council but declined because it would have taken me out of my classroom, I won the Radio Shack National Teacher Award, I am a reader for the College Board AP Physics Test and I taught as an adjunct professor for Johns Hopkins and a number of other universities.

Fifth: I hope my credentials give me some credibility, but every teacher who works in a classroom deserves to be heard. Here is the situation, please listen. Good teachers have so little margin to voice anything to the regulators and when we do nobody really listens. You know it is true. When we talk at all, our whisper is filtered through the money being made by Pearson and College Board. University Professors and consultants have much louder voices. The power lies in the departments, officials and managers whose metric is based on dollars spent and requirements enacted and checked off. Classroom teachers are left out of the conversation. We are teachers because our hearts are in the classroom with our students, not in the public arena but WE ARE THE ONLY ONES WHO REALLY KNOW WHAT IS GOING ON. How many students are taught in the halls of the Federal, State, and Local Departments of Education? None. None. None. But the power and money are there.

PLEASE, PLEASE, PLEASE take the money away from the bureaucracy - it only grows for its own benefit at the expense of the students.

At the very least, remove every string from local empowerment about how resources are spent. The parents, guardians and teachers see results first-hand and learn the best application of resources. As a rule-of-thumb, the further from the

classroom that decisions are made, the more damaging for students, e.g. Race to the Top (i.e., Race to the Top Heavy).

I remember an open comment session on some environmental regulation where a man spent his 5 minutes howling like a coyote to speak for all of the animals who have no voice in Congress. In that vein, I am tempted to collect "Teacher Development Plans" and whatever other great cost/small benefit requirements that teachers are forced to produce to justify the money and jobs invested in educational management and to fill every room of the Rayburn office building with this wasted paper representing wasted efforts of teachers across the country. Education could have been so much better, if only the people in Washington had insisted on listening to the teachers and students, instead of taking the counsel from the normal crowd of "elite" and "experts" and people who make their money on education while never teaching a child.

Thank you for reading this.

NCES Response:

Dear Mr. Roland,

Thank you for your years of service in education, and for your feedback posted on June 23, 2017 to a 30-day request for comments on the proposed National Assessment of Educational Progress (NAEP): 2018-2019. The National Center for Education Statistics appreciates your interest in the NAEP assessments. I have provided a response (below) to your comments.

The program appreciates the time you have taken to share your perceptions and experiences. Your comments are part of the public record. They will also be shared with the Acting Commissioner of the National Center for Education Statistics that administers the NAEP program, and others. Regarding your concerns about Education programs, you might consider writing to your representatives in the House and Senate where laws regarding public education are made.

In response to your concern that, in general, teachers are not heard, the NAEP program has a portal especially designed to capture feedback from teachers and administrators involved in the NAEP assessments. NAEP also sponsors expert panels of principals and teachers to provide feedback on the NAEP program. Additionally, NAEP and NCES welcome feedback from the public, including teachers, on their websites. Their comments can be entered at <https://nces.ed.gov/nationsreportcard/contactus.aspx?topic=11> and <https://nces.ed.gov/help/webmail/>.

You have described your view of the impact of standardized testing on instructional time and access to computers at school. State testing programs (including PARCC) differ from NAEP in many ways, not least of which is that each state has a unique testing program that they oversee at the state level. NCES cannot comment on the impact of state testing programs since this not within NCES' jurisdiction. We can however comment on the procedures used for NAEP testing in which NAEP field staff come into the school with all testing components (test booklets, tablets/devices, and all other equipment being used), set up the testing space themselves, administer the assessment, and then break down the testing space and equipment. School personnel are not responsible for any set-up or assessment-proctoring tasks. In most cases NAEP is in a school for one day and assesses only a sample of approximately 50 students per school. NAEP is sensitive to school burden and works closely with states and districts to limit the effect of our data-collection on schools.

Again, thank you for your feedback. It will be considered as NAEP designs its future assessments.

Sincerely,

Linda Hamilton
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National Center for Education Statistics
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Office: 202-245-6360

Document: ED-2017-ICCD-0087-0005

Name: Kristen Roland

Please consider recalculating your total estimated number of annual burden hours. 371,166 additional annual burden hours are estimated for adding Oral-Ready Fluency, just one component of testing, to the existing NAEP requirements.

Consider the 154,000 hours that my son's high school spent to administer the PARCC test this spring to 20% of the student body over a period of ten days. This is only one of several government-mandated testing programs the school is required to implement.

2200 students and staff x 10 days of disruption to instruction x 7 hours per day = 154,000 hours of instructional time. This is a very modest estimate; please read on:

Many teachers and administrators came in early and stayed late doing classroom setup and breakdown and a myriad of similar tasks to facilitate testing and reporting. In addition, groups of students helped with daily computer setup and breakdown, furniture arrangement and storage, and similar tasks. My son spent 15 minutes every morning setting up testing laptops and equipment.

The school was required to purchase computer mice, microphones and headphones, extension cords and other testing-related equipment, all of which needed to be set up, dismantled, and stored on a daily basis. For ten days.

Every government-mandated test effectively halts the process of instruction and learning for the entire school. My son's classes were moved so the rooms could be used for testing. No one could use the library for 10 days because it was used for testing. Displaced teachers did their best to instruct in remote locations. Lateness to class due to constantly changing room assignments. No computers were available for learning during this time. The normal lunch schedule was disrupted, and many students were unfit for instructional activities following hours of testing.

I am convinced that the individuals or committees that put this burden on public educators and students were looking through rose-colored lenses. I would be hard-pressed to find an informed parent or educator* who would agree with the policies and priorities of this government with reference to the way money is spent and regulations are imposed on our nation's public schools.

If you are estimating 371,166 hours of burden for the nation just for Oral-Ready Fluency, and my son's high school arguably spent 154,000 hours on the current version of this one assessment, then you are too far away from a classroom to make an accurate estimate.

*By educator, I mean a professional who works face-to-face with students on a daily basis. I am afraid the government fundamentally misunderstands the difference between educator and manager (i.e. administrator, superintendent, or anyone else who sits in an office and makes educators abandon their classes to attend meetings and training sessions for which they will find little or no instructionally profitable application.)

NCES Response:

Dear Ms. Roland,

First, thank you for taking the time to review the materials and for providing feedback (posted on June 23, 2017) responding to a 30-day request for comments on the proposed National Assessment of Educational Progress (NAEP):2018-2019.

In response to your suggestion that we recalculate the burden for ORF, we would first like to clarify that 371,166 hours is the 2-year annual average burden for NAEP in general. Per Paperwork Reduction Act reporting guidelines, the

estimated burden for ORF in 2018 is 500 hours. For NAEP, the burden is calculated as time beyond the cognitive testing time (the time students spend responding to subject-specific content such as math questions). The burden accounts for non-cognitive time such as responding to questionnaires, reading directions, logging into the system etc. The estimates are based on previously collected timing data and are regularly reevaluated as new data are collected each year.

State testing programs (including PARCC) differ from NAEP in many ways, not least of which is that each state has a unique testing program that they oversee at the state level. NCES cannot comment on the burden of state testing programs since this not within NCES' jurisdiction. We can however comment on the procedures used for NAEP testing in which NAEP field staff come into the school with all testing components (test booklets, tablets/devices, and all other equipment being used), set up the testing space themselves, administer the assessment, and then break down the testing space and equipment. Schools provide only a room and access to electrical outlets for digitally based assessments. School personnel are not responsible for any set-up or assessment-proctoring tasks. In most cases NAEP is in a school for one day and assesses only a sample of approximately 50 students per school. NAEP is sensitive to school burden and works closely with states and districts to limit the effect of our data-collection on schools.

We do appreciate your feedback about the burden of NAEP and will continue to look for ways to minimize our footprint in schools.

Sincerely,

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