

Public Comments Received During the 30-day Comment Period

July 2018

National Assessment of Educational Progress (NAEP) 2019-2020

ED-2018-ICCD-0044

Comments on FR Doc # 2018-13351

Document: ED-2017-ICCD-0044-0018

Name: Jennifer Kammerud



Tony Evers, PhD, State Superintendent

July 16, 2018

Kate Mullan, Acting Director
Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue SW
LBJ, Room 206-06
Washington, DC 20202-4537

Docket ID Number: ED-2018-ICCD-0044

Dear Ms. Mullan:

Thank you for the opportunity to comment on the U.S. Department of Education's (Department) proposed information collection activity related to the National Assessment of Educational Progress (NAEP). Our comments specifically address the issues of how the Department might enhance the quality, utility, and clarity of the information to be collected; and how the Department might minimize the burden of this collection on the respondents.

Appendix F-1: 2018 Cognitive Interviews Grade 4 Household Composition

The Wisconsin Department of Public Instruction (WDPI) appreciates the efforts to include more nontraditional caregivers in the questions than existed in previous versions. We are concerned, however, that these types of questions are likely not neutral for some young students. We ask that greater care be taken in the wording so fourth graders are not affected by the question, and to ensure that the question is accessible, and not overly cumbersome, for a fourth grader.

*Appendix H: NAEP 2019-2020 Student Information Instructions, page 7, and
Appendix J: NAEP 2019-2020 MyNAEP System Content, page 84*

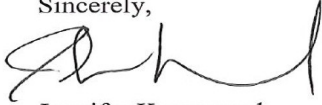
WDPI recommends the instructions around the English Learner codes be updated to reflect the new requirements contained in the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act. This would avoid confusion, and create clarity and consistency, across differing data sets.

The documents define "No, formerly ELL" as a student who has exited English learner (EL) status within the past two years and is included in adequate yearly progress (AYP) reports (see Appendix H) or is monitored for state reporting. If the intent is to make NAEP reporting for the EL subgroup more closely match the state's reporting for this subgroup, then it would be better to follow the language in ESEA section 1111(b)(3)(B). In other words, the student has exited EL status within the past four years and the state includes the student in the EL subgroup for reporting state assessment results. To that end, we would not mention AYP or monitoring in the definition.

Ms. Kate Mullan
July 16, 2018
Page 2

Thank you again for the opportunity to comment on this proposal. If you have any questions, please contact Viji Somasundaram at Visalakshi.Somasundaram@dpi.wi.gov.

Sincerely,



Jennifer Kammerud
Policy Initiatives Advisor

JK:po

NCES Response:

Dear Ms. Kammerud,

First, thank you for taking the time to review the materials and for providing feedback. In response to your inquiry regarding the extended student questionnaire items, we would like to assure you that we are aware of the sensitivity and are taking a measured approach to incorporating them into NAEP. As part of the survey questionnaire development process, all items were pretested with the types of students similar to those that will take the NAEP assessment to ensure content and sensitivity appropriateness. We acknowledge the sensitive nature of these items and the need to use questions that are more inclusive of students with differing backgrounds related to caregivers. This is why we are studying this topic more thoroughly via extensive pretesting and the special study described in this submission (the Socioeconomic Status (SES) Questionnaire Study) prior to administering these items as part of a pilot or operational NAEP administration to a larger sample of students.

To date, we have conducted two rounds of pretesting, both focus groups and cognitive interviews, with 4th, 8th, and 12th grade students from a variety of household types and multiple regions of the country to better understand how students talk about and refer to their family members. The items included in this submission reflect the language derived from the information that we received from students during the focus groups, including from 4th graders. Since the time when we posted this submission's documents for public comment, the items have been administered to students during cognitive interviews, and have been revised based on the information we obtained from the cognitive testing. The finalized items that will be administered as part of the Socioeconomic Status (SES) Questionnaire Study will be included in the update (v.11) to this submission, which we anticipate to be published for a 30-day public comment period sometime between now and early September 2018.

We also appreciate your input regarding the language around English Learner (EL) codes. NCES is currently studying this issue to inform decision-making around implementing your suggested change. We would need to conduct a bridge study to examine how changing such definitions would affect NAEP's ability to preserve the ongoing time series data collection. Due to the NAEP 2019 preparation schedule and the need to carefully consider your request, we will not be able change this aspect of data collection for NAEP 2019, but are taking your recommendation into consideration as we continue to study this topic and work to determine how best to implement EL definition changes for future NAEP administrations.

Sincerely,

Linda Hamilton
National Assessment Division

National Center for Education Statistics
U.S. Department of Education
Office: 202-245-6360

Document: ED-2017-ICCD-0044-0017

Name: Jon Bridges

As of January 1, 2018, pursuant to House Bill 2673 (2017), a person born in Oregon may change their name or gender on their birth certificate to reflect their gender identity by completing a notarized application. The application includes a non-binary option represented by the gender code X.

Please ensure that all gender fields allow for three options: M(Male), F(Female), and a third option (not NA) for neither male or female.

NCES Response:

Dear Mr. Bridges,

Thank you for taking the time to review the materials and for providing feedback. We appreciate your comments regarding the gender options and are sensitive to the importance of offering appropriate options to study participants. NCES is currently studying this issue to inform decision-making around implementing your suggested change. We will need to consult with different State Education Agencies (SEAs) to better understand the most appropriate solution to account for differing state policies and needs. Additionally, we need to take into account whether changing the options would affect NAEP's ability to preserve the ongoing time series data collection. Due to the NAEP 2019 preparation schedule and the need to carefully consider your request, we will not be able to change this aspect of data collection for NAEP 2019, but are taking your recommendation into consideration as we continue to study this topic and work to determine what gender options to use in future NAEP administrations.

Sincerely,

Linda Hamilton
National Assessment Division
National Center for Education Statistics
U.S. Department of Education
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