**Public Comments Received During the 30-day Comment Period**

**June 2019**

**National Assessment of Educational Progress (NAEP) 2019 and 2020 Long-Term Trend (LTT) Update**

ED-2019-ICCD-0032 Comments on FR Doc # 2019-10501

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The NAEP should identify trends by type of school, public or charter, and percentages of students by income stratification, so that we can assess whether public schools are achieving adequate progress, and whether charter schools are distortedly serving non-minority or higher income students.

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**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. The NAEP Long-Term Trend (LTT) assessment reports on student performance back to the first assessments in reading and mathematics in the 1970s. In doing so, scores are provided by

* types of schools (public, private, Catholic, etc), and
* eligibility for the National School Lunch Program and parental education (as proxies for socio-economic status).

The development of charter schools were not part of the policy landscape when the LTT assessment began in the 1970s. To learn about demographics and performance of charter school students, the main NAEP reading and mathematics assessments (which were last assessed in 2019) are better data sources, because they contain relevant charter school variables and they are administered more frequently (e.g., every other year).  Even if charter school information would be collected as part of LTT, the question posed about sorting out demographics of charter schools and changes over time is best measured by main NAEP because:

* Main NAEP has more data collection points (i.e., years, because it is administered more frequently than LTT),
* The main NAEP samples are larger and therefore charter school results are more likely to be reportable (and sometimes even reportable at the state level), and
* Including a new variable in LTT now would not provide information on trends as long as those we are able to report in the main NAEP.

Sincerely,

NAEP Project Team