NATIONAL CENTER FOR EDUCATION STATISTICS NATIONAL ASSESSMENT OF EDUCATIONAL PROGRESS

National Assessment of Educational Progress (NAEP) 2021 Materials Update #2

Supporting Statement Part A

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Note: NCES is requesting an Emergency Clearance for this Amendment due to the COVID-19 outbreak impact to the 2021 NAEP test administration. This Amendment #2 v.21 revises

Amendment #1 v.20 to remove all references of LTT, U.S. History, and Civics as well as provide: 1) updated field materials for distribution to schools during the end of August or early September 2020; 2) final COVID-19 2021 Student, Teacher and School survey questionnaires; 3) updated MyNAEP Systems; 4) updated eFiling Instructions; 5) additional information regarding reduced sample size, burden, and associated costs for offering remote students (mainland and Puerto Rico public schools only) the opportunity to respond to survey questionnaire items; and 6) the final 2021 sampling memo.

A.1. Circumstances Making the Collection of Information Necessary

A.1.a. Purpose of Submission

The National Assessment of Educational Progress (NAEP) is a federally authorized survey of student achievement at grades 4, 8, and 12 in various subject areas, such as mathematics, reading, writing, science, U.S. history, civics, and technology and engineering literacy (TEL).

NAEP is conducted by the National Center for Education Statistics (NCES) in the Institute of Education Sciences of the U.S. Department of Education. As such, NCES is responsible for designing and executing the assessment, including designing the assessment procedures and methodology, developing the assessment content, selecting the final assessment content, sampling schools and students, recruiting schools, administering the assessment, scoring student responses, determining the analysis procedures, analyzing the data, and reporting the results.¹

The National Assessment Governing Board (henceforth referred to as the Governing Board), appointed by the Secretary of Education but independent of the Department, is a bipartisan group whose members include governors, state legislators, local and state school officials, educators, business representatives, and members of the general public. The Governing Board sets policy for NAEP and is responsible for developing the frameworks and test specifications that serve as the blueprint for the assessments.

The NAEP assessments contain diverse items such as "cognitive" assessment items, which measure what students know and can do in an academic subject, and "survey" or "non-cognitive" items, which gather information such as demographic variables, as well as construct-related information, such as courses taken. The survey portion includes a collection of data from students, teachers, and school administrators. Since NAEP assessments are administered uniformly using the same sets of test booklets across the nation, NAEP results serve as a common metric for all states and select urban districts. The assessment stays essentially the same from year to year, with only carefully documented changes. This permits NAEP to provide a clear picture of student academic progress over time.

NAEP consists of two assessment programs: the NAEP long-term trend (LTT) assessment and the main NAEP assessment. The LTT assessments are given at the national level only and are administered to students at ages 9, 13, and 17 in a manner that is very different from that used for the main NAEP assessments. LTT reports mathematics and reading results that present trend data since the 1970s. LTT was last administered in 2020 for ages 9 and 13 but due to the COVID-19 outbreak and school closures, NCES decided that age 17 administration would be delayed until 2022. This submission only covers the administration of the 2021 main NAEP assessment.

The possible universe of student respondents is estimated to be 12 million at grades 4, 8, and 12 for main NAEP, and at ages 9, 13, and 17 for Long-Term Trend (LTT), attending the approximately 154,000 public and private elementary and secondary schools in 50 states and the District of Columbia, and including Bureau of Indian Education and Department of Defense Education Activity (DoDEA) Schools. Note that territories, including Puerto Rico, are not included in the national samples.

NAEP provides results on subject-matter achievement, instructional experiences, and school environment for populations of students (e.g., all fourth-graders) and groups within those populations (e.g., female students, Hispanic students). NAEP does not provide scores for individual students or schools. The main NAEP assessments report current achievement levels and trends in student achievement at grades 4, 8, and 12 for the nation and, for certain assessments (e.g., reading and mathematics), states and select urban districts. The Trial Urban District Assessment (TUDA) is a special project developed to determine the feasibility of reporting district-level results for large urban districts. Currently, the following 27 districts participate in the TUDA program: Albuquerque, Atlanta, Austin, Baltimore City, Boston, Charlotte, Chicago, Clark County (NV), Cleveland, Dallas, Denver, Detroit, District of Columbia (DCPS), Duval County (FL), Fort Worth, Fresno,

The role of NCES, led by the Commissioner for Education Statistics, is defined in 20 U.S.C. §9622 (https://www.law.cornell.edu/uscode/text/20/9622) and OMB Statistical Policy Directives No. 1 and 4 (https://obamawhitehouse.archives.gov/omb/inforeg_statpolicy).

Guilford County (NC), Hillsborough County (FL), Houston, Jefferson County (KY), Los Angeles, Miami-Dade, Milwaukee, New York City, Philadelphia, San Diego, and Shelby County (TN).

This request is to conduct NAEP operational assessments in 2021 and will follow the traditional NAEP design which assesses each student in 60-minutes for one cognitive subject.

The library of possible items (including COVID-19 outbreak questionnaires) to be used in the NAEP 2021 questionnaires is provided in Appendix F. The final versions of the COVID-19 outbreak questionnaires for students, teachers, school, and the Spanish translations are also provided in this amendment (see Appendices J1, J2, J3, and J-S).

The final version of the 2021 materials are provided in this amendment. Specifically:

- This amendment includes revisions to replace the 2019 versions with the new 2021 materials that need to be mailed or go live on MyNAEP in October through December 2020. Appendices C, D1, D2, Appendix E, Appendix F, Appendices J1, J2, J3, J-S, Part A and Part B have been updated. These materials have been revised to include information related to the COVID-19 outbreak. Any updates to the communication materials needed for the addition of the remote survey questionnaires for students and updates to school coordinator responsibilities will be submitted in Amendment #3, submitted no later than December 2020.
- This amendment includes the updated 2021 instructions to school coordinators to provide student information and the content of the 2021 MyNAEP system used by school coordinators to provide requested administration information, provided in Appendices H and I, respectively. The content for the 2021 instructions for entering student information and the MyNAEP (for Spanish MyNAEP, see Appendix I2) system has been updated with questions pertaining to the COVID-19 outbreak.

Given the COVID-19 outbreak, NAEP requires personal protective equipment for field staff and must plan for additional sessions given that students may attend school on a staggered schedule. As such, this Amendment reflects the elimination of the national-only assessments (grade 8 U.S. History and Civics, and age 17 Long-Term Trend), a smaller sample of students within each state for reading and mathematics and the elimination of TUDAs from the 2021 sample, given additional costs associated with COVID-19.

Both this Emergency Clearance Amendment #2 and Amendment #3 will each be a separate and new clearance request, with 30-day public comment period notices for both published in the Federal Register. A previous version of this Emergency Clearance Package Amendment #2 was withdrawn from public comment when it became clear that it was necessary to have all the materials ready, in order to meet the appropriate timelines for administering the 2021 assessments. The summary of the amendment schedule for NAEP 2021 is detailed in the table on the following page.

Some of the assessment, questionnaire, and recruitment materials are translated into Spanish. Specifically, Spanish versions of the student assessments and questionnaires are used for qualified English language learner (ELL) students when a bilingual accommodation is offered and for all students in Puerto Rico. Typically, this is done for all operational grade 4 and 8 assessments (note that a TEL bilingual accommodation has not been offered to date and no bilingual accommodation is offered for reading). In years in which a Puerto Rico NAEP assessment is given, such as in 2021, Spanish versions of communication materials for parents, teachers, and school coordinators as well as teacher and school questionnaires are created by translating their English equivalents into Spanish. In addition, every year, Spanish versions of parent communication materials are used nationwide for Spanish-speaking parents.

NAEP 2021 Amendment Schedule

Amendment #2 (Emergency Clearance, this amendment; October 2020) Part A: Removed all references to LTT Age 17, U.S. History, and Civics; included information about reduced sample size for 2021 and elimination of district level sampling and reporting; and added the possibility of offering online survey questionnaires for remote students (mainland and Puerto Rico public schools only). Revised burden and costs have been updated to reflect the revisions to the 2021 NAEP administration

Part B: Removed all references to LTT Age 17, U.S. History, and Civics; added information about the COVID-19 outbreak; removed reference to TUDA samples due to the reduced sample

Appendix C: The 2021 sample design memorandum that describes the sampling plan allowing NAEP to go forward while schools are disrupted by the coronavirus pandemic

Appendices D1 & D2: Communication materials to be sent to the field in October through December 2020

Appendix E: Updated feedback forms

Appendix F: Added versions of the student, teacher, and school questionnaires pertaining to the COVID-19 outbreak to the library

Appendix H: Final Instructions for Entering Student Information

Appendix I: Final 2021 MyNAEP. In the section, "Provide school information" materials have been updated to include questions about the COVID-19 outbreak. In addition, the following sections were also updated: A) Review and Verify List of Students Selected for NAEP; B) Complete SD/ELL Student Information; C) Manage Questionnaires; D) Plan for Assessment Day; E) Update Student List; F) Support Assessment Activities

Appendix I2: 2021 Spanish MyNAEP system

Appendices J1, J2, J3, J-S: Updated to include final 2021 COVID-19 outbreak survey questionnaires, including the online SQs for students

Amendment #3 (December 2020)

Appendix D1 and D2: Communication materials related to the remote student participating in the survey questionnaires and updated school coordinator responsibilities

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A.1.b. Legislative Authorization

In the current legislation that reauthorized NAEP, the National Assessment of Educational Progress Authorization Act (20 U.S.C. §9622), Congress mandates the collection of national education survey data through a national assessment program:

- 1. ESTABLISHMENT- The Commissioner for Education Statistics shall, with the advice of the Assessment Board established under section 302, carry out, through grants, contracts, or cooperative agreements with one or more qualified organizations, or consortia thereof, a National Assessment of Educational Progress, which collectively refers to a national assessment, State assessments, and a long-term trend assessment in reading and mathematics.
- 2. PURPOSE; STATE ASSESSMENTS-
 - (1) PURPOSE- The purpose of this section is to provide, in a timely manner, a fair and accurate measurement of student academic achievement and reporting of trends in such achievement in reading, mathematics, and other subject matter as specified in this section.

The National Assessment of Educational Progress Authorization Act also requires the assessment to collect data on specified student groups and characteristics, including information organized by race/ethnicity, gender, socio-economic status, disability, and English language learners. This allows for the fair and accurate presentation of achievement data and permits the collection of background, non-cognitive, or descriptive information that is related to academic achievement and aids in the fair reporting of results. The intent of the law is to provide representative sample data on student achievement for the nation, the states, and a variety of populations of students, and to monitor progress over time.

The statute and regulation mandating or authorizing the collection of this information can be found at https://www.law.cornell.edu/uscode/text/20/9622.

A.1.c. Overview of NAEP Assessments

This section provides a broad overview of NAEP assessments, including information on the assessment frameworks, the cognitive and survey items, inclusion policies, the transition to digitally based assessments (DBA), and the assessment types.

A.1.c.1. NAEP Frameworks

NAEP assessments follow subject-area frameworks developed by the Governing Board and use the latest advances in assessment methodology. Frameworks capture a range of subject-specific content and thinking skills needed by students in order to deal with the complex issues they encounter inside and outside their classrooms. The NAEP frameworks are determined through a development process that ensures they are appropriate for current educational requirements. Because the assessments must remain flexible to mirror changes in educational objectives and curricula, the frameworks must be forward-looking and responsive, balancing current teaching practices with research findings.

NAEP frameworks can serve as guidelines for planning assessments or revising curricula. They also can provide information on skills appropriate to grades 4, 8, and 12 and can be models for measuring these skills in innovative ways. The subject-area frameworks evolve to match instructional practices. Developing a framework generally involves the following steps:

- widespread participation and reviews by educators and state education officials;
- reviews by steering committees whose members represent policymakers, practitioners, and members of the general public;
- involvement of subject supervisors from education agencies;
- public hearings; and
- reviews by scholars in the field, by NCES staff, and by a policy advisory panel.

The frameworks can be found at https://www.nagb.gov/naep-frameworks/frameworks-overview.html.

A.1.c.2. Cognitive Item Development

As part of the item development process, NCES calls on many constituents to guide the process and review the assessment. Item development is guided by a multi-year design plan, which is guided by the framework and establishes the design principles, priorities, schedules, and reporting goals for each subject. Based on this plan, the NAEP contractor creates a development plan outlining the item inventory and objectives for new items and then begins the development process by developing more items than are needed. This item pool is then subjected to:

- internal contractor review with content experts, teachers, and experts on political sensitivity and bias;
- playtesting, tryouts, or cognitive interviews with small groups of students for select items (particularly those that have new item types, formats, or challenging content); and
- refinement of items and scoring rubrics under NCES guidance.

Next, a standing committee of content experts, state and local education agency representatives, teachers, and representatives of professional associations reviews the items. The standing committee considers:

- the appropriateness of the items for the particular grade;
- the representative nature of the item set;
- the compatibility of the items with the framework and test specifications; and
- the quality of items and scoring rubrics.

For state-level assessments, this may be followed by a state item review where further feedback is received. Items are then revised and submitted to NCES and the Governing Board Assessment Development Committee for approval prior to pilot testing.

The pilot test is used to finalize the testing instrument. Items may be dropped from consideration or move forward to the operational assessment. The item set is once again subjected to review by the standing committee and NCES following generally the same procedure described above. A final set of test items is then assembled for NCES and the Governing Board's review and approval. After the operational assessment, items are once again examined. In rare cases where item statistics indicate problems, the item may be dropped from the assessment. The remaining items are secured for reuse in future assessments, with a subset of those items publicly released.

A.1.c.3. Survey Items

In addition to assessing subject-area achievement, NAEP collects information that serves to fulfill the reporting requirements of the federal legislation and to provide context for the reporting of student performance. The legislation requires that, whenever feasible, NAEP includes information on special groups (e.g., information reported by race, ethnicity, socio-economic status, gender, disability, and limited English proficiency).

As part of most NAEP assessments, three types of questionnaires are used to collect information: student, teacher, and school (including the new COVID-19 draft for each respondent type). An overview of the questionnaires is presented below, and additional information about the content of the questionnaires is presented in Part C.

Student Questionnaires

Each NAEP student assessment booklet includes non-cognitive items, also known as the student questionnaire. The questionnaires appear in separately timed blocks of items in the assessment forms. The items collect information on students' demographic characteristics, classroom experiences, and educational support. Students' responses provide data that give context to NAEP results and/or allow researchers to track factors associated with academic achievement. Students complete the questionnaires voluntarily (for confidentiality provisions see Section A.10 for more information). Student names are never reported with their responses or with the other information collected by NAEP.

Each student questionnaire includes three types of items:

- General student information: Student responses to these items are used to collect information about
 factors such as race or ethnicity and parents' education level. Answers on the questionnaires also provide
 information about factors associated with academic performance, including homework habits, the
 language spoken in the home, and the number of books in the home.
- Other contextual/policy information: These items focus on students' educational settings and
 experiences and collect information about students' attendance (i.e., days absent), family discourse (i.e.,
 talking about school at home), reading load (i.e., pages read per day), and exposure to English in the
 home. There are also items that ask about students' effort on the assessment and the difficulty of the
 assessment. Answers on the questionnaires provide information on how aspects of education and
 educational resources are distributed among different groups.

• Subject-specific information: In most NAEP administrations, these items cover three categories of information: (1) time spent studying the subject; (2) instructional experiences in the subject; and (3) student factors (e.g., effort, confidence) related to the subject and the assessment.

As described in Section A.1.d, students receiving remote instruction in 2021 will be asked to complete the student questionnaire only, without the cognitive assessment.

Teacher Questionnaires

To provide supplemental information about the instructional experiences reported by students, teachers are asked to complete an online questionnaire using NAEPq about their instructional practices, classroom organization, teaching background and training, and the subject in which students are being assessed. Teacher responses are then matched to student data. While completion of the questionnaire is voluntary, NAEP encourages teachers' participation since their responses improve the accuracy and completeness of the NAEP assessment.

Teacher questionnaires are typically only given to teachers at grades 4 and 8; NAEP typically does not collect teacher information for grade 12. By grade 12, there is such variation in student course-taking experiences that students cannot be matched to individual teachers for each tested subject. For example, a student may not be taking a mathematics class in grade 12, so he or she cannot be matched to a teacher. Conversely, a student could be taking two mathematics classes at grade 12 and have multiple teachers related to mathematics. Only an economics teacher questionnaire has been developed and administered at grade 12. However, these data were not released (with either the 2006 or the 2012 results) due to a student-teacher match rate below statistical standards.²

Teacher questionnaires are organized into different parts. The first part of the teacher questionnaire covers background and general training and includes items concerning years of teaching experience, certifications, degrees, major and minor fields of study, coursework in education, coursework in specific subject areas, the amount of in-service training, the extent of control over instructional issues, and the availability of resources for the classroom. Subsequent parts of the teacher questionnaire tend to cover training in the subject area, classroom instructional information, and teacher exposure to issues related to the subject and the teaching of the subject. They also ask about pre- and in-service training, the ability level of the students in the class, the length of homework assignments, the use of particular resources, and how students are assigned to particular classes.

School Questionnaires

The school questionnaire provides supplemental information about school factors that may influence students' achievement. It is given to the principal or another official of each school that participates in the NAEP assessment. While schools' completion of the questionnaire is voluntary, NAEP encourages schools' participation since it makes the NAEP assessment more accurate and complete.

The school questionnaire is accessed online through NAEPq and is organized into different parts. The first part tends to cover characteristics of the school, including the length of the school day and year, school enrollment, absenteeism, dropout rates, and the size and composition of the teaching staff. Subsequent parts of the school questionnaire tend to cover tracking policies, curricula, testing practices, special priorities, and schoolwide programs and problems. The questionnaire also collects information about the availability of resources, policies for parental involvement, special services, and community services.

The supplemental charter school questionnaire designed to collect information on charter school policies and characteristics is provided to administrators of charter schools who are sampled to participate in NAEP. The supplement covers organization and school governance, parental involvement, and curriculum and offerings.

The grade 12 economics teacher match rate was 56 percent in 2012. For comparison, the 2015 teacher match rates for grades 4 and 8 were approximately 94 percent and 86 percent, respectively.

Development of Survey Items

The Background Information Framework and the Governing Board's Policy on the Collection and Reporting of Background Data (located at https://www.nagb.gov/content/nagb/assets/documents/policies/collection-report-backg-data.pdf), guide the collection and reporting of non-cognitive assessment information. In addition, subject-area frameworks provide guidance on subject-specific, non-cognitive assessment questions to be included in the questionnaires. The development process is very similar to the cognitive items, including review of the existing item pool; development of more items than are intended for use; review by experts (including the standing committee); and cognitive interviews with students, teachers, and schools. When developing the questionnaires, NAEP uses a pretesting process so that the final questions are minimally intrusive or sensitive, are grounded in educational research, and the answers can provide information relevant to the subject being assessed.

In the web-based NAEP Data Explorer,³ (located at https://www.nationsreportcard.gov/ndecore/landing) the results of the questionnaires are sorted into eight broad categories: Major Reporting Groups, Student Factors, Factors Beyond School, Instructional Content and Practice, Teacher Factors, School Factors, Community Factors, and Government Factors.

To minimize burden on the respondents and maximize the constructs addressed via the questionnaires, NAEP may spiral items across respondents and/or rotate some non-required items across assessment administrations. The "library" of items for the NAEP 2021 questionnaires, for each subject and respondent, are included in Appendix F. Not all of the items presented will be given to an individual respondent or in a specific administration. The final versions of the 2021 questionnaires are provided in this amendment.

A.1.c.4. Inclusion in NAEP

It is important for NAEP to assess as many students selected to participate as possible. Assessing representative samples of students, including students with disabilities (SD) and English language learners (ELL), helps to ensure that NAEP results accurately reflect the educational performance of all students in the target population and can continue to serve as a meaningful measure of U.S. students' academic achievement over time.

The National Assessment Governing Board, which sets policy for NAEP, has been exploring ways to ensure that NAEP continues to appropriately include as many students as possible and to do so in a consistent manner for all jurisdictions assessed and reported on. In March 2010, the Governing Board adopted a policy, *NAEP Testing and Reporting on Students with Disabilities and English Language Learners* (located at https://www.nagb.gov/content/nagb/assets/documents/policies/naep_testandreport_studentswithdisabilities.pd f). This policy was the culmination of work with experts in testing and curriculum and those who work with exceptional children and students learning to speak English. The policy aims to:

- maximize participation of sampled students in NAEP;
- reduce variation in exclusion rates for SD and ELL students across states and districts;
- develop uniform national rules for including students in NAEP; and
- ensure that NAEP is fully representative of SD and ELL students.

The policy defines specific inclusion goals for NAEP samples. At the national, state, and district levels, the goal is to include 95 percent of all students selected for the NAEP samples, and 85 percent of those in the NAEP sample who are identified as SD or ELL.

Students are selected to participate in NAEP based on a sampling procedure⁴ designed to yield a sample of students that is representative of students in all schools nationwide and in public schools within each state. First, schools are selected, and then students are sampled from within those schools without regard to disability or English language proficiency. Once students are selected, those previously identified as SD or ELL may be offered accommodations or excluded.

³ See Section A.2 for more information about how NAEP results are reported.

⁴ See Section B.1.a for more information on the NAEP sampling procedures.

Accommodations in the testing environment or administration procedures are provided for SD and ELL students. Some examples of accommodations permitted by NAEP are extra time, testing in small-group or one-on-one sessions, reading aloud to a student, and scribing a student's responses. Some examples of testing accommodations not allowed are giving the reading assessment in a language other than English or reading the passages in the reading assessment aloud to the student.

States and jurisdictions vary in their proportions of special-needs students and in their policies on inclusion and the use of accommodations. Despite the increasing identification of SD and ELL students in some states, in particular of ELL students at grade 4, NAEP inclusion rates have generally remained steady or increased since 2003. This reflects efforts on the part of states and jurisdictions to include all students who can meaningfully participate in the NAEP assessments. The NAEP inclusion policy is an effort to ensure that this trend continues.

A.1.c.5. Digitally Based Assessments (DBA)

Virtually all of our nation's schools are equipped with computers, and an increasing number of schools are making digital tools an integral component of the learning environment, reflecting that the knowledge and skills needed for future post-secondary success involve the use of new technologies. NAEP is evolving to address the changing educational landscape through its transition to DBA.

NAEP DBA use current technology, and as technology evolves, so will the nature of delivery of the assessments. NAEP currently administers the digital assessments on tablets, which NAEP field staff bring into the schools.⁵ Other administration models may be considered in the future, including the use of school equipment or a combination of approaches.

DBA allow NAEP to:

- more accurately reflect what is happening in today's classrooms;
- improve measurement of knowledge and skills; and
- collect new types of data that provide depth in our understanding of what students know and can do, including how they engage with new technologies to approach problem solving.

Leveraging New Technologies

NAEP DBA uses new testing methods and item types that reflect the growing use of technology in education. Examples of such new item types include:

- Multimedia elements, such as videos and audio clips: The NAEP computer-based writing assessment, administered in 2011 at grades 8 and 12, made use of multimedia. These elements have been incorporated into other NAEP DBA as well. The 2011 writing tasks were presented to students on computers in a variety of ways, including text, audio, photographs, video, and animation. Examples of these tasks are available at http://www.nationsreportcard.gov/writing 2011/sample quest.aspx.
- Interactive items and tools: Some questions may allow the use of embedded technological features to form a response. For example, students may use "drag and drop" functionality to place labels on a graphic or may tap an area or zone on the screen to make a selection. Other questions may involve the use of digital tools. In the mathematics DBA, an online calculator is available for students to use when responding to some items. An equation editor is also provided for the entry of mathematical expressions and equations, and we have incorporated some digital tools, such as rulers, data graph builders, and function graphers, and continue to explore more tools that can be used to gauge students' mathematical skills. Students are shown how to use many of these interactive features and tools in the brief tutorials that are included at the beginning of each NAEP DBA. The 2019 tutorial is available at https://enaep-public.naepims.org/2019/english.html
- Immersive scenario-based tasks: Scenario-based tasks use multimedia features and tools to engage students in rich, authentic problem-solving contexts. NAEP's first scenario-based tasks were

⁵ See Section B.2 regarding procedures for data collection.

administered in 2009, when students at grades 4, 8, and 12 were assessed with interactive computer tasks in science. The science tasks asked students to solve scientific problems and perform experiments, often by simulation. They provide students more opportunities than a paper-based assessment (PBA) to demonstrate skills involved in doing science without many of the logistical constraints associated with a natural or laboratory setting. The science tasks administered in 2009 can be explored at http://www.nationsreportcard.gov/science-2009/ict-summary.aspx. NAEP also administered scenario-based tasks in the 2014 technology and engineering literacy (TEL) assessment, where students were challenged to work through computer simulations of real-world situations they might encounter in their everyday lives. A sample TEL task can be viewed at http://nces.ed.gov/nationsreportcard/tel/wells-item.aspx. NAEP is continuing to expand the use of scenario-based tasks to measure knowledge and skills in other subject areas such as mathematics and reading.

In addition to new item types, the transition to DBA makes it possible for NAEP to employ an adaptive testing design, in which assessment content is targeted to a student's ability based on performance during the test administration. Thus, students see items that are tailored to their ability levels, and they may be more likely to be able to engage in the assessment and demonstrate what they know and can do. The goal of implementing adaptive testing is to achieve better measurement of student knowledge and skills across the wide range of student performance levels on which NAEP reports. NAEP is considering using adaptive testing initially in the mathematics DBA and possibly in other NAEP assessments in the future.

The type of adaptive testing being considered for NAEP is a multi-stage test (MST) design that uses two stages. Students take two sections of cognitive items, just as in past NAEP administrations. Based on their performance on the first section of items, students receive a second section of items that is targeted to their ability level. For example, students who do not perform well on the first section of items receive a second section composed of somewhat easier items. The implementation of this two-stage MST design for NAEP mathematics grades 4 and 8 has been informed by previous research on the benefits, applicability, and feasibility of adaptive testing for NAEP. In particular, in 2011 NAEP conducted the mathematics computer-based study, which evaluated the use of a two-stage MST design for the grade 8 mathematics assessment. In addition, the 2015 Stage 1 pilots in mathematics and science also incorporated an MST design. Finally, an MST mathematics study was conducted in 2017 (approved in August 2016, OMB# 1850-0928 v.1), which informed the operational MST design for the 2019. Prior to adopting an MST design in other subject areas/grades, additional testing will be conducted for each subject area/grade. There is not an MST component included in the 2021 administration, but we will continue to consider it for future administrations.

The DBA technology allows NAEP to capture information about what students do while attempting to answer questions. While PBA only yields the final responses in the test booklet, DBA capture actions students perform while interacting with the assessment tasks, as well as the time at which students take these actions. These student interactions with the assessment interface are generally not used to assess students' knowledge and skills, but rather this information might be used to provide context for student performance. For example, more proficient students may use digital tools such as the calculator in mathematics or the spell-checker in writing assessments, compared to less proficient students. As such, NAEP will potentially uncover more information about which actions students use when they successfully (or unsuccessfully) answer specific questions on the assessment. Unless specifically required by the scoring rubrics, process data are not scored; they are primarily used for improving assessment design and for providing contexts for interpreting reported scores.

NAEP will capture the following actions in the DBA, although not all actions will be captured for all assessments:

 Student navigation (e.g., clicking back/next; clicking on the progress navigator; clicking to leave a section);

The study design and results are summarized in Oranje, A., Mazzeo, J., Xu, X., & Kulick, E. (2014). A multistage testing approach to group-score assessments. In D. Yan, A. A. von Davier, & C. Lewis (Eds.), Computerized multistage testing: Theory and applications (pp. 371-389). Boca Raton, FL: CRC Press.

- Student use of tools (e.g., zooming; using text to speech; turning on scratchwork mode; using the highlighter tool; opening the calculator; using the equation editor; clicking the change language button);
- Student responses (e.g., clicking a choice; eliminating a choice; clearing an answer; keystroke log of student typed text);
- Writing interface (e.g., expanding the response field; collapsing the prompt; using keyboard commands such as CTRL+C to copy text; clicking buttons on the toolbar such as using the bold or undo button);
- Other student events (e.g., vertical and horizontal scrolling; media interaction such as playing an audio stimulus);
- Tutorial events (records student interactions with the tutorial such as correctly following the instructions of the tutorial; incorrectly following the instructions of the tutorial; or not interacting with the tutorial when prompted); and
- Scratchwork canvas (the system saves an image of the final scratchwork canvas for each item where the scratchwork tool is available).

Development of Digitally Based Assessments (DBA)

NAEP's item and system development processes include several types of activities that help to ensure that our DBA measure the subject-area knowledge and skills outlined in the NAEP frameworks and not students' ability to use the tablet or the particular software and digital tools included in the DBA.

During item development, new digitally-based item types and tasks are studied and pretested with diverse groups of students. The purpose of these pretesting activities is to determine whether construct-irrelevant features, such as confusing wording, unfamiliar interactivity or contexts, or other factors, prevent students from demonstrating the targeted knowledge, skills, and abilities. Such activities help identify usability, design, and validity issues so that items and tasks may be further revised and refined prior to administration.

Development of the assessment delivery system, including the interface that students interact with when taking NAEP DBA, is informed by best practices in user experience design. Decisions about the availability, appearance, and functionality of system features and tools are also made based on the results of usability testing with students.

To help ensure that students know how to use the assessment system and tools, each administration of a NAEP DBA begins with a brief interactive tutorial that teaches students how to use the system features to take the assessment. Students actively engage with the tutorial, as they are asked to use specific tools and features. Help screens are also built into the system, and students can access them at any time while taking the assessment. The 2019 tutorial is available at https://enaep-public.naepims.org/2019/english.html.

Accommodations and Universal Design Features with DBA

New technologies are improving NAEP's ability to offer accommodations to increase participation and provide universal access to students of all learning backgrounds, including students with disabilities and English language learners. In a digital environment, what used to be an accommodation for PBA becomes a seamless part of universal design, available to all students. This means that things like adjusting font size, having test items read aloud in English (text-to-speech), changing the appearance of the testing interface to have a higher and a lower contrast, using a highlighter tool, and eliminating answer choices can be accomplished by all students during the test administration.

In addition to these universal design features, NAEP also continues to offer accommodations to students with Individualized Education Programs (IEPs), Section 504 plans, and English language learning (ELL) plans requiring that they have them. Some accommodations are available in the testing system (such as additional time, a magnification tool, or a Spanish/English version of the test), while others are provided by the test administrator or the school (such as breaks during testing, sign language interpretation of the test, or a bilingual dictionary). Section B.2.b provides more information on the classification of students and the assignment of accommodations.

A.1.c.6. Assessment Types

NAEP uses three types of assessment activities, which may simultaneously be in the field during any given data collection effort. Each is described in more detail below.

Operational Assessments

Operational NAEP administrations, unlike pilot administrations, collect data to publicly report on the educational achievement of students as required by federal law. The NAEP results are reported in The Nation's Report Card (http://nationsreportcard.gov/), which is used by policymakers, state and local educators, principals, teachers, and parents to inform educational policy decisions.

Pilot Assessments

Pilot testing (also known as field testing) of cognitive and non-cognitive items is carried out in all subject areas. Pilot assessments are usually conducted in conjunction with operational assessments and use the same procedures as the operational assessments. The purpose of pilot testing is to obtain information regarding clarity, difficulty levels, timing, and feasibility of items and conditions. In addition to ensuring that items measure what is intended, the data collected from pilot tests serve as the basis for selecting the most effective items and data collection procedures for the subsequent operational assessments. Pilot testing is a cost-effective means for revising and selecting items prior to an operational data collection because the items are administered to a small nationally representative sample of students, and data are gathered about performance that crosses the spectrum of student achievement. Items that do not work well can be dropped or modified before the operational administration.

Prior to pilot testing, many new items are pre-tested with small groups of sample participants (cleared under the NCES pretesting generic clearance agreement; OMB #1850-0803). All non-cognitive items undergo one-on-one cognitive interviews, which are useful for identifying questionnaire and procedural problems before larger-scale pilot testing is undertaken. Select cognitive items also undergo pre-pilot testing, such as item tryouts or cognitive interviews, in order to test out new item types or formats, or challenging content. In addition, usability testing is conducted on new technologies and technology-based platforms and instruments.

Special Studies

Special studies are an opportunity for NAEP to investigate particular aspects of the assessment without impacting the reporting of NAEP results. Previous special studies have focused on linking NAEP to other assessments or linking across NAEP same-subject frameworks, investigating the expansion of the item pool, evaluating specific accommodations, investigating administration modes (such as DBA alternatives), and providing targeted data on specific student populations.

In addition to the overarching goal of NAEP to provide data about student achievement at the national, state, and district levels, NAEP also provides specially targeted data on an as-needed basis. At times, this may only mean that a special analysis of the existing data is necessary. At other times, this may include the addition of a short, add-on questionnaire targeted at specified groups. For example, in the past, additional student, teacher, and school questionnaires were developed and administered as part of the National Indian Education Study (NIES) that NCES conducted on behalf of the Office of Indian Education. Through such targeted questionnaires, important information about the achievement of a specific group is gathered at minimal additional burden. These types of special studies are intentionally kept to a minimum and are designed to avoid jeopardizing the main purpose of the program.

A.1.d. Overview of 2021 NAEP Assessments

The Governing Board determines NAEP policy and the assessment schedule,⁷ and future Governing Board decisions may result in changes to the plans represented here. Any changes will be presented in subsequent clearance packages or revisions to the current package. Due to the COVID-19 outbreak, NCES will provide the public with the latest information on COVID-19's impact on 2021 NAEP via the NCES website, which

⁷ The Governing Board assessment schedule can be found at https://www.nagb.gov/about-naep/assessment-schedule.html.

can be found at https://nces.ed.gov/nationsreportcard/about/covid19.aspx. The website text of more information will be updated on the NCES main webpage, and the additional NAEP COVID-19 Protocols publication as well as the corresponding website text is available in English and in Spanish (see Appendix D1-9 for English and D1-10 for Spanish).

Given the COVID-19 outbreak, there remain significant levels of uncertainty of what the conditions will be in schools leading up to and during the scheduled 2021 administration. School and student participation are currently anticipated to be highly dependent upon multiple factors outside of the program's direct control, including district and school operating statuses prior to and during the administration window, and parent/guardian decisions about permitting their student(s) to participate in NAEP. The program currently anticipates that some students sampled for NAEP will not be present to take assessments in-person on their scheduled administration date. In recognition of the importance of maximizing data collection during the COVID-19 outbreak, NAEP will also be involving school coordinators in conducting outreach to students who were not present to take an assessment in order to seek their completion of an online student survey questionnaire (SQ).

The 2021 data collection will consist of the following:

- Operational national and state DBA in mathematics and reading at grades 4 and 8, and Puerto Rico in mathematics at grades 4 and 8.
- We will offer to all mainland and Puerto Rico public schools, an online version of the student SQs remotely to the sampled students who are remote and were not able to be assessed in-person. Field staff will contact the school coordinator after the assessment for the school is completed to arrange for the parental notification of students. The school coordinator will contact students or parents approximately one week after the school completed its assessment sessions and provide instructions for the students to respond to the online student SQs.

A.2. How, by Whom, and for What Purpose the Data Will Be Used

If reporting standards are met, results will be reported on the 2021 operational assessments in mathematics and reading. Data will be analyzed carefully for consistency in data quality with past assessments.

The NAEP operational results are reported in The Nation's Report Card, which is used by policymakers, state and local educators, principals, teachers, and parents to help inform educational policy decisions. The main NAEP report cards provide national results, trends for different student groups, results on scale scores and achievement levels, and sample items. In reports with state or urban district results, there are sections that provide overview information on the performance of these jurisdictions. If NCES elects to release sample items, percentage correct statistics on those items will be provided in the report. NAEP does not provide scores for individual students or schools. Depending on consistency of data quality with past assessment years, NCES may opt to report the results in a format other than The Nation's Report Card. This alternative report would be a research and development report focused on within-year results comparisons, rather than comparisons with prior years.

Results from each NAEP assessment are provided online in an interactive website (https://www.nationsreportcard.gov/) and in one-page summary reports, called snapshots, for each participating state or urban district. Additional data tools are available online for those interested in:

- analyzing NAEP data and creating tables and graphics (https://nces.ed.gov/nationsreportcard/data/);
- comparing state performance by various demographic groups (http://nces.ed.gov/nationsreportcard/statecomparisons/);
- seeing NAEP performance results and student demographics for each state (http://nces.ed.gov/nationsreportcard/statecomparisons/);
- browsing results for each of the participating large urban districts

(http://nces.ed.gov/nationsreportcard/districts/);

- searching, sorting, and providing data for sample NAEP items (http://nces.ed.gov/nationsreportcard/itmrlsx/); and
- seeing the knowledge and skills demonstrated by students performing at different scale scores (https://www.nationsreportcard.gov/itemmaps/?subj=MAT&grade=4&year=2019).

In addition to contributing to the reporting tools mentioned above, data from the questionnaires are used as part of the marginal estimation procedures that produce the student achievement results. Questionnaire data are also used to perform quality control checks on school-reported data and in special reports, such as the <code>Black-White Achievement Gap</code> report (http://nces.ed.gov/nationsreportcard/studies/gaps/) and the Classroom Instruction Report in reading, mathematics, and science based on the 2015 Student Questionnaire Data (https://www.nationsreportcard.gov/sq_classroom/#mathematics).

Lastly, there are numerous opportunities for secondary data analysis because of NAEP's large scale, the regularity of its administrations, and its stringent quality control processes for data collection and analysis. NAEP data are used by researchers and educators who have diverse interests and varying levels of analytical experience.

Given the possible decreased sample resulting from remote instruction being provided in response to the COVID-19 outbreak, there is a desire to provide a supplemental set of state-level results that incorporates an estimate of how the untested population would have performed on NAEP. These supplemental state-level results could be calculated if state assessment scores are available for the NAEP sample. As such, NCES will work with the NAEP State Coordinators to obtain this information and then perform subsequent analyses on the data to determine if valid results can be calculated and shared with researchers and the public.

The data from online questionnaires completed by remote students will be linked to demographic data collected during e-filing. As such, the program can provide descriptive context to better understand the instructional experiences and climate of the in-school students and those receiving remote instruction.

A.3. Improved Use of Technology

NAEP has continually moved to administration methods that include greater use of technology, as described below.

Online Teacher and School Questionnaires

The teacher and school questionnaires that accompany the NAEP assessment were traditionally available as paper-based questionnaires. Starting in 2001, NAEP offered teachers and school administrators an option of either completing the questionnaires on paper or online. In an effort to reduce costs and to streamline the data collection, starting in 2014 the NAEP program moved to the practice of having the teacher and school questionnaires available primarily online through a tool known as NAEPq. To support respondents who have limited internet connections, NAEP field staff have a limited number of printed copies of the questionnaires that can be distributed at the school's request.

Electronic Pre-Assessment Activities

Each school participating in NAEP has a designated staff member to serve as its NAEP school coordinator. Pre-assessment and assessment activities include functions such as finalizing student samples, verifying student demographics, reviewing accommodations, and planning logistics for the assessment. NAEP is moving in the direction of paperless administrations. An electronic pre-assessment system (known as MyNAEP) was developed so that school coordinators would provide requested administration information online, including logistical information, updates of student and teacher information, and the completion of inclusion and accommodation information.⁸

⁸ Additional information on the MyNAEP site is included in the Section B.2.

Digitally Based Assessments (DBA)

As described in Section A.1.c.5, NAEP is transitioning to DBA. The move to DBA allows NAEP to provide assessments consistent with other large-scale assessments (such as those given by the Partnership for Assessment of Readiness for College and Careers [PARCC] and the Smarter Balanced Assessment Consortium). In addition, the transition to DBA allows NAEP to more accurately reflect what is happening in today's classrooms, improve measurement of knowledge and skills, and collect new types of data that provide depth in our understanding of what students know and can do.

Automated Scoring

NAEP administers a combination of selected-response items and open-ended or constructed-response items. NAEP currently uses human scorers to score the constructed-response items, using detailed scoring rubrics and proven scoring methodologies. With the increased use of technologies, the methodology and reliability of automated scoring (i.e., the scoring of constructed-response items using computer software) has advanced. While NAEP does not currently employ automated scoring methodologies, these are being investigated for possible future use.

One study involved using two different automated scoring engines and comparing the scores to those previously given by human scorers. This study was conducted on items from the 2011 writing assessment. For each constructed-response item, approximately two-thirds of responses were used to develop the automated scoring model (the Training/Evaluation set) and the other third of responses were used to test and validate the automated scoring model (the Test/Validation set). The sample was selected from approximately 2,000 responses to each of the 22 different grade 8 prompts, plus approximately 2,000 responses to each of the 22 different grade 12 prompts. Approximately 80,000 existing responses were scored using automated scoring models for this study. No new data collection or human scoring was required.

The Training/Evaluation set was used to train, evaluate, and tune each scoring engine so as to produce the best possible scoring models for each constructed response item. The final scoring models were then applied to the Test/Validation set producing a holistic score for each response. Automated scoring performance is typically evaluated by comparison with human scoring performance. Evaluation criteria for the scoring models included measures of scorability, correlation with word count, overall mean and standard deviation calculations, and agreement with human scores using kappa, quadratic-weighted kappa, and Pearson correlation coefficients. Fairness was also examined for focal and reference groups and compared to results of human raters. In addition to comparing how well each individual scoring engine agreed with human scorers, we also compared how well the two scoring engines agreed with each other. Results of these investigations will inform whether automated scoring could be utilized for specific NAEP assessments or if additional investigations are required.

A.4. Efforts to Identify Duplication

The proposed assessments, including the questionnaires, do not exist in the same format or combination in the U.S. Department of Education or elsewhere. The non-cognitive data gathered by NAEP comprise the only comprehensive cross-sectional survey performed regularly on a large-scale basis that can be related to extensive achievement data in the United States. No other federally funded studies have been designed to collect data for the purpose of regularly assessing trends in educational progress and comparing these trends across states. None of the major non-federal studies of educational achievement were designed to measure changes in national achievement. In short, no existing data source in the public or private sector duplicates NAEP.

While the survey items in NAEP are unique, the items are not developed in a vacuum. Their development is informed by similar items in other assessments and survey programs. In addition, in future rounds of development, NCES will continue to better align the NAEP survey questions with other surveys (particularly,

⁹ These evaluation criteria were largely based on criteria advocated in Williamson, D. M., Xi, X., & Breyer, F. J. (2012). A framework for evaluation and use of automated scoring. *Educational Measurement: Issues and Practices*, *31*(1), 2-13.

but not limited to, those from other NCES and federal survey programs).

Historically, NAEP has served as a critical national "audit" function, offering an extremely helpful reference point in the interpretation of score trends on "high-stakes" tests used for school accountability. The main NAEP scales have served this function well even though high-stake state assessments were not always closely aligned with the corresponding NAEP assessments. Given the significant changes currently underway in the American educational landscape, including the Next Generation Science Standards, the Common Core State Standards, and Partnership for Assessment of Readiness for College and Careers (PARCC), and Smarter Balanced consortia, this "audit" function is even more important.

NAEP has provided the best available information about the academic achievement of the nation's students in relation to consensus assessment frameworks, maintaining long-term trend lines for decades. In addition to reporting at the national level, NAEP has offered achievement comparisons among participating states for more than two decades, and since 2003, all states have participated in the NAEP mathematics and reading assessments at the fourth and eighth grades. More recently, NAEP has also reported achievement for selected large urban school districts. In addition to characterizing the achievement of fourth-, eighth-, and twelfth-grade students in a variety of subject areas, NAEP has also served to document the often substantial disparities in achievement across demographic groups, tracking both achievement and achievement gaps over time. In addition to describing educational achievement, NAEP has furthered deliberation as to the scope and meaning of achievement in mathematics, reading, and other subject areas. NAEP assessments are aligned to ambitious assessment frameworks developed by a thoughtful process to reflect the best thinking of educators and content specialists. These frameworks have served as models for the states and other organizations to follow. Finally, NAEP has also served as a laboratory for innovation, developing and demonstrating new item formats, as well as statistical methods and models now emulated by large-scale assessments worldwide.

NAEP has functioned well as a suite of complex survey modules conducted as assessments of student achievement in fixed testing windows. The complexity of NAEP evolved by necessity to address its legal and policy reporting requirements and the complex sampling of items and students needed to make reliable and valid inferences at the subgroup, district, state, and national level for stakeholders, ranging from policymakers to secondary analysts, and do so without creating an undue burden on students and schools.

A.5. Burden on Small Businesses or Other Small Entities

The school samples for NAEP contain small-, medium-, and large-size schools, including private schools. Schools are included in the sample proportional to their representation in the population, or as necessary to meet reporting goals. It is necessary to include small and private schools so that the students attending such schools are represented in the data collection and in the reports. The trained field staff work closely with all schools to ensure that the pre-assessment activities and the administration can be completed with minimal disruption and include the new standards for COVID-19 cleaning practices.

A.6. Consequences of Collecting Information Less Frequently

Under the National Assessment of Educational Progress Authorization Act, Congress has mandated the ongoing collection of NAEP data. Failure to collect the 2021 assessment data on the current schedule would affect the quality and schedule of the NAEP assessments and would result in assessments that would not fulfill the mandate of the legislation.

A.7. Consistency with 5 CFR 1320.5

No special circumstances are involved. This data collection observes all requirements of 5 CFR 1320.5.

A.8. Consultations Outside the Agency

The NAEP assessments are conducted by an alliance of organizations under contract with the U.S. Department of Education.¹⁰ The Alliance includes the following:

¹⁰ The current contract expires on June 30, 2024.

- Management Strategies is responsible for managing the integration of multiple NAEP project schedules and providing data on timeliness, deliverables, and cost performance.
- Educational Testing Service (ETS) is responsible for coordinating Alliance contractor activities, developing the assessment instruments, analyzing the data, preparing the reports, and platform development.
- Huntington Ingalls Industries is responsible for NAEP web technology, development, operations, and maintenance including the Integrated Management System (IMS).
- Pearson is responsible for printing and distributing the assessment materials, and for scanning and scoring students' responses.
- Westat is responsible for selecting the school and student samples and managing field operations and data collection.

In addition to the NAEP Alliance, other organizations support the NAEP program, all of which are under contract with the U.S. Department of Education. The current list of organizations include:¹¹

- American Institutes for Research (AIR) is responsible for providing technical support, conducting studies on state-level NAEP assessments, and running the NAEP Validity Studies Panel.
- Council of Chief State School Officers (CCSSO) is responsible for providing ongoing information about state policies and assessments.
- CRP, Inc. is responsible for providing logistical and programmatic support.
- Hager Sharp is responsible for supporting the planning, development, and dissemination of NAEP publications and outreach activities.
- Optimal Solutions Group is responsible for providing technical support.
- Tribal Tech is responsible for providing support for the National Indian Education Study.

In addition to the contractors responsible for the development and administration of the NAEP assessments, the program involves many consultants and is also reviewed by specialists serving on various technical review panels. These consultants and special reviewers bring expertise concerning students of different ages, ethnic backgrounds, geographic regions, learning abilities, and socio-economic levels; the specific subject areas being assessed; the analysis methodologies employed; and large-scale assessment design and practices. Contractor staff and consultants have reviewed all items for bias and sensitivity issues, grade appropriateness, and appropriateness of content across states.

In particular, subject-area standing committees play a central role in the development of NAEP assessment instruments and have been essential in creating assessment content that is appropriate for the targeted populations, and that meets the expectations outlined in the Governing Board frameworks. One of the most important functions of the committees is to contribute to the validation of the assessments. Through detailed reviews of items, scoring guides, tasks, constructed-response item training sets for scorers, and other materials, the committees help establish that the assessments are accurate, accessible, fair, relevant, and grade-level appropriate, and that each item measures the knowledge and skills it was designed to measure. When appropriate, members of subject-area standing committees will also review the questionnaires with regards to appropriateness with existing curricular and instructional practices.

Appendix A lists the current members of the following NAEP advisory committees:

- NAEP Design and Analysis Committee
- NAEP Validity Studies Panel
- NAEP Quality Assurance Technical Panel
- NAEP National Indian Education Study Technical Review Panel
- NAEP Mathematics Standing Committee
- NAEP Reading Standing Committee
- NAEP Science Standing Committee
- NAEP Survey Ouestionnaires Standing Committee

The current contracts expire at varying times. As such, the specific contracting organizations may change during the course of the time period covered under this submittal.

- NAEP Mathematics Translation Review Committee
- NAEP Science Translation Review Committee
- NAEP Grade 8 Social Studies Translation Review Committee
- NAEP Grade 4 and 8 Survey Questionnaire and eNAEP DBA System Translation Review Committee
- NAEP Principals' Panel Standing Committee

As has been the practice for the past few years, OMB representatives will be invited to attend the technical review panel meetings that are most informative for OMB purposes.

In addition to the contractors and the external committees, NCES works with the NAEP State Coordinators, who serve as the liaison between each state education agency and NAEP, coordinating NAEP activities in his or her state. NAEP State Coordinators work directly with the schools sampled for NAEP.

A.9. Payments or Gifts to Respondents

In general, there will be no gifts or payments to respondents, although students do get to keep the NAEP earbuds used in DBA. On occasion, NAEP will leave educational materials at schools for their use (e.g., science kits from the science hands-on assessments). Some schools also offer recognition parties with pizza or other perks for students who participate; however, these are not reimbursed by NCES or the NAEP contractors. If any incentives are proposed as part of a future special study, they would be justified as part of that future clearance package. As appropriate, the amounts would be consistent with amounts approved in other studies with similar conditions.

A.10. Assurance of Confidentiality

Data security and confidentiality protection procedures have been put in place for NAEP to ensure that all NAEP contractors and agents (see A.8 in this document) comply with all privacy requirements, including:

- 1. The Statements of Work of NAEP contracts;
- 2. National Assessment of Educational Progress Authorization Act (20 U.S.C. §9622);
- 3. Family Educational Rights and Privacy Act (FERPA) of 1974 (20 U.S.C. §1232(g));
- 4. Privacy Act of 1974 (5 U.S.C. §552a);
- 5. Privacy Act Regulations (34 CFR Part 5b);
- 6. Computer Security Act of 1987;
- 7. U.S.A. Patriot Act of 2001 (P.L. 107-56);
- 8. Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9573);
- 9. Cybersecurity Enhancement Act of 2015 (6 U.S.C. §151);
- 10. Foundations of Evidence-Based Policymaking Act of 2018, Title III, Part B, Confidential Information Protection;
- 11. The U.S. Department of Education General Handbook for Information Technology Security General Support Systems and Major Applications Inventory Procedures (March 2005);
- 12. The U.S. Department of Education Incident Handling Procedures (February 2009);
- 13. The U.S. Department of Education, ACS Directive OM: 5-101, Contractor Employee Personnel Security Screenings;
- 14. NCES Statistical Standards; and
- 15. All new legislation that impacts the data collected through the contract for this study.

Furthermore, all NAEP contractors and agents will comply with the Department's IT security policy requirements as set forth in the Handbook for Information Assurance Security Policy and related procedures and guidance, as well as IT security requirements in the Federal Information Security Management Act (FISMA), Federal Information Processing Standards (FIPS) publications, Office of Management and Budget (OMB) Circulars, and the National Institute of Standards and Technology (NIST) standards and guidance. All

data products and publications will also adhere to the revised NCES Statistical Standards, as described at the website: http://nces.ed.gov/statprog/2012/. In addition, the Sampling and Data Collection (SDC) contractor has obtained an Authority to Operate (ATO) for the NCESLS System from the Education OCIO to operate at the FISMA moderate level through the Certification & Accreditation (C&A) process. Security controls include secure data processing centers and sites; properly vetted and cleared staff; and data sharing agreements.

An important privacy and confidentiality issue is the protection of the identity of assessed students, their teachers, and their schools. To assure this protection, NAEP has established security procedures, described below, that closely control access to potentially identifying information.

All assessment and questionnaire data are encrypted at all times. This means that NAEP applications that handle assessment and questionnaire data:

- enforce effective authentication password management policies, making it difficult to hack into the data;
- limit authorization to individuals who truly need access to the data, only granting the minimum access to individuals as they need (i.e., least privilege user access);
- keep data encrypted, both in storage and in transport, utilizing volume encryption and transport layer security protocols;
- utilize SSL certificates and HTTPS protocols for web-based applications;
- limit access to data via software and firewall configurations as well as not using well known ports for data connections; and
- restrict access to the portable networks utilized to administer an assessment to only assessment devices.

Students' names are submitted to the Sampling and Data Collection (SDC) contractor for selecting the student sample. This list also includes the month/year of birth, race/ethnicity, gender, and status codes for students with disabilities, English language learners, and participation in the National School Lunch Program. This data request for NAEP fully conforms to the requirements of the Family Educational Rights and Privacy Act of 1974 (FERPA) [20 U.S.C. 1232g; 34 CFR Part 99]. FERPA is designed to protect the privacy rights of students and their families, by providing consistent standards for the release of personally identifiable student and family information. NCES and its agents are explicitly authorized under an exception to FERPA's general consent rule to obtain student level data from institutions. For the purposes of this collection of data, FERPA permits educational agencies and institutions to disclose personally identifiable information from students' education records, without consent, to authorized representatives of the Secretary of Education in connection with an evaluation of federally supported education programs (34 CFR §§ 99.31(a)(3)(iii) and 99.35).

After the student sample is selected, the data for selected students are submitted to the Materials Preparation, Distribution, Processing and Scoring (MDPS) contractor, who includes the data in the packaging and distribution system for the production of student-specific materials (such as labels to attach to the student booklets or log-in ID cards), which are then forwarded to field staff and used to manage and facilitate the assessment. These data are also uploaded to the MyNAEP Prepare for Assessments online system for review by schools and added to the MyNAEP School Control System (SCS) used by field staff to print materials used by the schools. Student information is deleted from the packaging and distribution system before the assessment begins. Student information is deleted from the MyNAEP system typically two weeks after all quality control activities for the assessment are complete.

All paper-based student-specific materials linking personally identifiable information (PII) to assessment materials are destroyed at the schools upon completion of the assessment. The field staff remove names from forms and place the student names in the school storage envelope. The school storage envelope contains all of the forms and materials with student names and is kept at the school until the end of the school year and then destroyed by school personnel.¹²

In early May, schools receive an email from the MyNAEP system reminding them to securely destroy the contents of the NAEP storage envelope and confirm that they have done so. The confirmation is recorded in the system and tracked.

In addition to student information, teacher and principal names are collected and recorded in the MyNAEP Prepare for Assessment online system, which is used to keep track of the distribution and collection of NAEP teacher and school questionnaires. A paper copy of the questionnaire report is printed for use during the assessment, and this paper copy is left in the school storage envelope, which is destroyed at the end of the school year. The teacher and principal names are deleted from the MyNAEP system at the same time the student information is deleted.

For DBA, NAEP data are stored on systems in a locked-down environment at a secure hosting facility with strict measures in place to prevent unauthorized online access. The student names are not included on the assessment tablets or stored by the same contractor or on the same database as the student responses. Shortly before, during, and after assessments, assessment data are transmitted through secure, encrypted channels (SSL, SSH) between NAEP systems, the NAEP assessment servers, and the assessment administration devices. Data on those devices are also encrypted—these data can be read only by the assessment software—and the devices are secured against unauthorized use.

Furthermore, to protect collected data, NAEP staff will use the following precautions:

- Assessment and questionnaire data files will not identify individual respondents.
- No personally identifiable information, either by schools or respondents, will be gathered or released by third parties. No permanent files of names or other direct identifiers of respondents will be maintained.
- Student participation is voluntary.
- NAEP data are perturbed. Data perturbation is a statistical data editing technique implemented to ensure
 privacy for student and school respondents to NAEP's assessment questionnaires for assessments in
 which data are reported or attainable via restricted-use licensing arrangements with NCES. The process
 is coordinated in strict confidence with the IES Disclosure Review Board (DRB), with details of the
 process shared only with the DRB and a minimal number of contractor staff.

The following text appears on all student assessments, the MyNAEP system, and teacher and school questionnaires:¹³

Paperwork Burden Statement, OMB Information

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this voluntary information collection is 1850-0928. The time required to complete this information collection is estimated to average [xx] minutes, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this collection, or any comments or concerns regarding the status of your individual submission, please write to: *National Assessment of Educational Progress (NAEP)*, *National Center for Education Statistics (NCES)*, *Potomac Center Plaza*, 550 12th St., SW, 4th floor, Washington, DC 20202.

Authorization and Confidentiality Assurance

National Center for Education Statistics (NCES) is authorized to conduct NAEP by the National Assessment of Educational Progress Authorization Act (20 U.S.C. §9622) and to collect students' education records from education agencies or institutions for the purposes of evaluating federally supported education programs under the Family Educational Rights and Privacy Act (FERPA, 34 CFR §§ 99.31(a)(3)(iii) and 99.35).

All of the information provided by participants 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 (20 U.S.C. §9573 and 6 U.S.C. §151). By law, every NCES employee as well as every NCES agent, such as contractors and NAEP coordinators, has taken an oath and is subject to a jail term of up to 5 years, a fine of \$250,000, or both if he or she willfully discloses ANY identifiable information about participants. Electronic submission of participant's information will be monitored for viruses, malware, and other threats by Federal employees and contractors in accordance with the Cybersecurity Enhancement Act of 2015. The collected information will be combined across respondents to produce statistical reports.

Previous versions of NAEP instruments have displayed Government system warning banners. As of this package they are no longer included in NAEP instruments to assure consistency in language used across the different NAEP and NCES materials.

In addition, the following text appears on the log-in screen for the MyNAEP system and NAEPq, the teacher and school administrator questionnaires.

MyNAEP

When you have finished or if you need to stop before finishing, please LOG OUT of the survey system by clicking "Save and exit" and CLOSE ALL browser windows or screens to keep your responses secure. For example, if you used Chrome or Safari to open the survey, make sure no Chrome or Safari windows or screens are open after you end the survey. Not closing all browsers may allow someone else to see your responses.

NAEPq

When you have finished or if you need to stop before finishing, please LOG OUT of the survey system by clicking "Exit" and CLOSE ALL browser windows or screens to keep your responses secure. For example, if you used Chrome or Safari to open the survey, make sure no Chrome or Safari windows or screens are open after you end the survey. Not closing all browsers may allow someone else to see your responses.

More specific information about how NAEP handles PII is provided in the table below:

	1								
	1. Public and non-public school samples are released by the SDC contractor to NAEP State Coordinators (public schools only), NAEP TUDA Coordinators (public schools only), and SDC Gaining Cooperation Field Staff (non-public schools only) using the secure MyNAEP for Schools website.								
	2. Schools are recruited by SDC field staff for participation in NAEP.								
PII is created in	3. Participating schools need to submit a current roster of students for the sampled grade for student sampling.								
the following	Rosters of students can be created by NAEP State Coordinators, NAEP TUDA Coordinators, or NAEP School Coordinators.								
ways	a. Rosters are submitted through the secure MyNAEP for Schools website								
	b. Rosters must be in Excel								
	5. PII is contained in the roster files: state unique identifiers (optional), student names, month/year of birth, race/ethnicity, gender, and status codes for students with disabilities, English language learners, and participation in the National School Lunch Program.								
	6. PII is stored in the SDC contractor's secure data environments.								
	1. Student names (PII) are moved to the MDPS contractor via a secure FTP site. These names are used to print Student Login Cards.								
	2. Student Login Cards are only created for students taking DBA, so the student names for the PBA students are not moved.								
PII is	3. Student PII data is available to the NAEP School Coordinators and the SDC contractor's Field Staff through the secure MyNAEP for Schools website.								
moved in	a. NAEP School Coordinators can view and update PII for their own schools								
the	b. NAEP School Coordinators can print materials containing PII for their own schools								
following ways	c. NAEP School Coordinators store materials containing PII for their own schools in the "NAEP Secure Storage Envelope"								
	d. SDC contractor Field Staff can update PII for schools within their assignment								
	e. SDC contractor Field Staff can print materials containing PII for schools within their assignment								
	f. SDC contractor Field Staff store materials containing PII for schools within their assignment in their "NAEP School Folders"								
	4. At no point in time does any individual contractor have access to both the student name and								
	student assessment and questionnaire responses. MDPS has access to both the student name and								
	student assessment and questionnaire responses, but never at the same time. MDPS uses student PII to print Student Login Cards months in advance of the NAEP assessment window and								
	destroys the student PII file after the assessment begins. SDC never has access to student								

		responses, and no other contractor has access to Student PII.
	1.	MDPS contractor destroys the PII after the assessment begins.
PII is	2.	School Coordinators destroy the materials containing PII on or before the end of the school year.
destroyed in	3.	SDC contractor Field Staff destroy the materials containing PII after the school assessment has
the		been completed. SDC contractor Field Staff return their NAEP School Folders to Westat Home
following		Office for secure storage, and eventual secure destruction.
ways	4.	SDC contractor destroys student names after all weighting quality control checks have been
ways		completed. This activity is completed approximately six months following the end of the
		administration.

In addition, parents are notified of the assessment. Appendices D2-11 and D2-12 provide a parental notification letter from NAEP 2021. The letter is adapted for each grade or age/subject combination and the school principal may edit it. However, the information regarding confidentiality and the appropriate law reference will remain unchanged. Please note that parents/guardians are required to receive notification of student participation but NAEP does not require explicit parental consent (by law, parents/guardians of students selected to participate in NAEP must be notified in writing of their child's selection prior to the administration of the assessment).

A.11. Sensitive Questions

NAEP emphasizes voluntary respondent participation. Insensitive or offensive items are prohibited by the National Assessment of Educational Progress Authorization Act, and the Governing Board reviews all items for bias and sensitivity. The nature of the questions is guided by the reporting requirements in the legislation, the Governing Board's Policy on the Collection and Reporting of Background Data, and the expertise and guidance of the NAEP Survey Questionnaire Standing Committee (see Appendix A-8). Throughout the item development process, NCES staff works with consultants, contractors, and internal reviewers to identify and eliminate potential bias in the items.

The NAEP student questionnaires include items that require students to provide responses on factual questions about their family's socio-economic background, self-reported behaviors, and learning contexts, both in the school setting as well as more generally. In compliance with legislation, student questionnaires do not include items about family or personal beliefs (e.g., religious or political beliefs). The student questionnaires focus only on contextual factors that clearly relate to academic achievement.

Educators, psychologists, economists, and others have called for the collection of non-cognitive student information that can explain why some students do better in school than others. Similar questions have been included in other NCES administered assessments such as the Trends in International Mathematics and Science Study (TIMSS), the Program for International Student Assessment (PISA), the National School Climate Survey, and other federal questionnaires, including the U.S. Census. The insights achieved by the use of these well-established survey questions will help educators, policymakers, and other stakeholders make better informed decisions about how best to help students develop the knowledge and skills they need to succeed.

To provide additional context for NAEP performance results in 2021, the student, teacher, and school questionnaires include items that ask about students' learning experiences, teachers' preparation and instructional practices, and schools' preparation and instructional organization and practices related to the COVID-19 outbreak. During the development process, these COVID-19 related items underwent a similar series of reviews for bias and sensitivity as the main questionnaire items. This included a sensitivity review conducted by the contractor's independent group of reviewers who are not part of the NAEP program to identify potentially delicate, inflammatory, or inappropriate language, as well as small-scale cognitive interviews to determine whether students understood what the questions were asking and to identify and eliminate questions that students did not feel comfortable answering.

NAEP does not report student responses at the individual or school level, but strictly in aggregate forms. To reduce the impact of any individual question on NAEP reporting, the program has shifted to a balanced reporting approach that includes multi-item indices, where possible, to maximize robustness and validity. In compliance with legislation and established practices through previous NAEP administrations, students may skip any question.

A.12. Estimation of Respondent Reporting Burden (2021)

The burden numbers for NAEP data collections fluctuate considerably, with the number of students sampled every other year being much larger than in the years in between. The traditional NAEP design assesses each student in one cognitive subject for 60-minutes.

In the summer of 2019 through the spring of 2020, NCES worked with the Alliance to explore a new innovative assessment design that would allow for future efficiencies in NAEP data collection, including reducing the program's footprint across the country and in each participating school.

Traditionally, students participating in NAEP have responded to questions in two timed sections and answered a brief survey questionnaire. Under a two-subject three-block design, students would respond to assessment questions in three timed sections and answer survey questions. This design would continue to feature its hallmark matrix sampling structure where students are given only a portion of the assessment content. This design would allow NCES to assess fewer schools and students and spend less time in individual schools.

Given the status of COVID-19 quarantines, stay-at-home orders, school closures, and the various projections for the future of such orders, there is uncertainty regarding the current school year and the 2020-2021 school year. At this point, we are not able to have interactions with students due to the circumstances and thereby unable to perform usability testing with students regarding this new design. The limited and late testing of the new three-block component is concerning, particularly given the operational nature of these forms. Therefore, in April 2020, NCES made a decision to drop the two-subject three-block new design component from the 2021 assessments and transition the three-block schools to be two-block schools.

NCES is in the process of working with the Alliance on the feasibility for a three-block study in a future administration year. No decisions or information on future three-block plans are available at this time.

Given the hardships schools are facing during the COVID-19 outbreak, NCES made the decision in July 2020 to postpone the administration of grade 8 U.S. History, Civics, and age 17 LTT to reduce the amount of burden on schools during these uncertain and unprecedented times.

Exhibit 1 provides the burden information per respondent group, by grade and by year, for the 2021 data collections.

Exhibit 2 summarizes the burden by respondent group.

A description of the respondents or study is provided below, as supporting information for Exhibit 1:

• Students—Students in fourth and eighth grades will be assessed using 60-minutes of cognitive blocks in one subject followed by a non-cognitive block which usually requires up to a total of 15-minutes to complete. The core non-cognitive items are answered by students across subject areas and are related to demographic information. In addition, students answer subject-specific non-cognitive items. In 2021, students will also answer questions about their learning experiences related to the COVID-19 outbreak, adding an additional 5-minutes to the non-cognitive block, for a total of 20-minutes. Based on timing data collected from cognitive interviews and previous DBA, fourth-grade students can respond to approximately four non-cognitive items per minute, while eighth- and twelfth-grade students can respond to approximately six non-cognitive items per minute. Using this information, the non-cognitive blocks are assembled so that most students can complete all items in the allocated amount of time. Each cognitive and non-cognitive block is timed so that the burden listed above is the maximum burden time for each student.

The administrators and/or test delivery system will move students to the next section once the maximum amount of time is reached. Additional student burden accounts for time to read directions, log on to the digital device, and view a tutorial. This additional burden is estimated at 15-minutes. The cognitive or assessment items are not included in the burden estimate because they are not subject to the Paperwork Reduction Act. Therefore, the total burden for students is 35-minutes. The assessments given in Puerto Rico are translated into Spanish. To account for the language complexities, additional time is provided for the cognitive blocks (for a total of 80-minutes). The burden for students in Puerto Rico is up to 20-minutes for the non-cognitive block and an additional 15-minutes for directions, logging into the digital device, and the tutorial, for a total of 35-minutes.

- **Teachers**—The teachers of fourth- and eighth-grade students participating in main NAEP are asked to complete questionnaires about their teaching background, education, training, and classroom organization. In 2021, teachers will also answer questions about their teaching preparation and instructional practices related to the COVID-19 outbreak. Average fourth-grade teacher burden is estimated to be 35-minutes because fourth-grade teachers often have multiple subject-specific sections to complete. Average eighth-grade teacher burden is 25-minutes if only one subject is taught and an additional 10-minutes for each additional subject taught. Based on timing data collected from cognitive interviews, adults can respond to approximately six non-cognitive items per minute. Using this information, the teacher questionnaires are assembled so that most teachers can complete the questionnaire in the estimated amount of time. For adult respondents, the burden listed is the estimated average burden.
- **Principals/Administrators**—The school administrators in the sampled schools are asked to complete a questionnaire. The core items are designed to measure school characteristics and policies that research has shown are highly correlated with student achievement. Subject-specific items concentrate on curriculum and instructional services issues. In 2021, school administrators will also answer questions about their school's preparation, instructional organization and practices related to the COVID-19 outbreak. The burden for school administrators is determined in the same manner as burden for teachers (see above) and is estimated to average 40-minutes per principal/administrator, although burden may vary depending on the number of subject-specific sections included.
- **SD** and **ELL**—SD and ELL information is provided by school personnel concerning students identified as SD or ELL. This information will be used by those personnel to determine the appropriate accommodations for students. The burden for school administrators is estimated at 15-minutes, on average, for each student identified as SD and/or ELL.
- Submission of Samples— Survey sample information is collected from schools in the form of lists of potential students who may participate in NAEP. This sample information can be gathered manually or electronically at the school, district, or state level. If done at the state level, some states require a data security agreement, which is customized based on the specific requests of the state and provides verbatim security and confidentiality information from Section A.10 above. If done at the school or district level, some burden will be incurred by school personnel. It is estimated that it will take two hours, on average, for school personnel to complete the submission process. Based on recent experience, it is estimated that 26 percent of the schools or districts will complete the submission process (based on the data from 2019).
- Pre-Assessment and Assessment Activities—Each school participating in main NAEP has a designated staff member to serve as its NAEP school coordinator. Pre-assessment and assessment activities include functions such as finalizing student samples, verifying student demographics, reviewing accommodations, and planning logistics for the assessment. An electronic pre-assessment system (known as MyNAEP) was developed so that school coordinators would provide requested administration information online, including logistical information, updates of student and teacher information, and the completion of inclusion and accommodation information. More information about the school coordinators' responsibilities is included in Section B.2. Based on information collected from previous years' use of MyNAEP, it is estimated that it will take four hours and 30-minutes, on average, for school personnel to complete these activities, including looking up information to enter into the system. We will continue to use MyNAEP system data to learn more

- about participant response patterns and use this information to further refine the system to minimize school coordinator burden.
- **Post-assessment Follow-up Survey**—As part of the on-going quality control of the assessment process, schools will be asked to respond to an additional follow-up survey. Survey questions solicit feedback on pre-assessment, assessment, and procedural processes. The sample post-assessment follow-up survey from 2019 is included in Appendix E. It is estimated that this interview will take on average two minutes.
- Online SQ Collection from Remote Students—In order to provide descriptive information of the students receiving instruction remotely as a result of the COVID-19 outbreak, compared to those receiving instruction in school, remote students in mainland and Puerto Rico public schools will be asked to complete the questionnaire online. Because burden for students does not include time to complete the cognitive sections, the burden will remain the same for students. There will be no additional teacher or school questionnaire data collection associated with this activity. The school coordinator will facilitate this activity, providing parents with a special parental notification letter and providing students with a personalized link or URL to access the questionnaire. This additional burden for the school coordinator is estimated at 1 hour to familiarize with the process and 15-minutes per student to distribute the information.

EXHIBIT 1

Estimated Burden for NAEP 2021 Assessments

(Note: all explanatory notes and footnotes are displayed following the table)

											School Co	ordinator						
		Students			Teachers			sam		sample su & asses	Pre-assessment, sample submission, & assessment Online SQ fro feedback remote studen			SD/ELL (school personnel)				
Subjects	# of Students	Avg. minutes per response	Burden (in hours)	# of Teachers	Avg. minutes per response	Burden (in hours)	# of Schools	Avg. minutes per response	Burden (in hours)	# of Schools	Burden (in hours) ¹	# of Schools	Burden (in hours) ³	# of Schools	# of SD/ELL Students ²	Avg. minutes per response	Burden (in hours)	Total Burden (in hours)
								4t	h Grade									
Operational (Math and Reading) single- subject assessment	95,700	35	55,825	10,064	35	5,871	2,516	40	1,677	2,516	12,714	2,264	10,756	2,516	22,968	15	5,742	92,585
Puerto Rico Math	3,000	35	1,750	596	35	348	149	40	99	149	753	134	637	149	720	15	180	3,767
4th Grade Totals	98,700	N/A	57,575	10,660	N/A	6,219	2,665	N/A	1,776	2,665	13,467	2,399	11,393	2,665	23,688	N/A	5,922	96,352
								8t	h Grade									
Operational (Reading, Math) single-subject assessment	95,700	35	55,825	14,400	25	6,000	2,400	40	1,600	2,400	12,128	2,160	10,260	2,400	18,183	15	4,546	90,359
Puerto Rico Math	3,000	35	1,750	870	25	363	145	40	97	145	733	131	620	145	570	15	143	3,706
8th Grade Totals	98,700	N/A	57,575	15,270	N/A	6,363	2,545	N/A	1,697	2,545	12,861	2,291	10,880	2,545	18,753	N/A	4,689	94,065
Total Requested Burden	197,400	N/A	115,150	25,930	N/A	12,582	5,210	N/A	3,473	5,210	26,328	4,690	22,273	5,210	42,441	N/A	10,611	190,417
Total number of respondents							238,960	То	tal number	of responses			346,541					

Notes for 2021 table in Exhibit 1

- 1. The burden for the school coordinator for the NAEP assessment is as follows: Pre-assessment burden is 4.5 hours, sample submission burden is 2 hours (for 26% of schools in 2021 based on 2019 data), and the post-assessment follow-up survey is 2-minutes. For the purposes of the calculation of burden, we consider the performance of all of these tasks to constitute 1 response.
- 2. The estimated percent of SD/ELL students (based on the NAEP 2017 sample) is 24% and 19%, at grades 4 and 8, respectively.
- 3. The school coordinator burden for the online SQs for remote students is estimated at an additional one hour plus 15-minutes per student. Given the large proportion of schools offering a remote alternative, we estimate this additional burden will be borne by 90% of the schools, and that 15 students will be assessed remotely per school, on average (balancing the schools that are all remote with those in which there are only 1 or 2 students remote). For the purposes of the calculation of burden, we consider the interaction with each student a separate response.
- 4. The same school coordinators participate in the NAEP administration and the online SQs for remote students; therefore, they are not counted as additional respondents.

EXHIBIT 2 Total Annual Estimated Burden Time Cost for NAEP 2021 Assessments

Data Collection Year	Number of Respondents	Number of Responses	Total Burden (in hours)
2021	238,960	346,541	190,417

The estimated respondent burden across all these activities translates into an estimated total burden time cost 190,417 hours¹⁴, broken out by respondent group in the table below.

	Stu	idents		s and School Staff	Pri	incipals	Total		
	Hours Cost		Hours	Cost	Hours	Cost	Hours	Cost	
2021	115,150	\$834,838	71,794	\$2,070,532	3,473	\$164,898	190,417	\$3,070,267	

A.13. Cost to Respondents

There are no direct costs to respondents.

A.14. Estimates of Cost to the Federal Government

The total cost to the federal government for the administrations of the 2021 NAEP data collections (contract costs and NCES salaries and expenses) is estimated to be \$102,000,300. The 2021 assessment cost estimate is shown in the table below.

NCES salaries and expenses	\$1,400,300
Contract costs	\$100,600,000
Printing, packaging, and distribution, and scoring	\$8,260,000
Item Development	\$5,025,000
Sampling, training, data collection, and weighting	\$61,655,000
Recruitment and State Support	\$1,240,000
Design, analysis and reporting	\$11,600,000
Securing and transferring DBA assessment data	\$200,000
DBA system development	\$12,620,000

¹⁴ The average hourly earnings of teachers and principals derived from May 2018 Bureau of Labor Statistics (BLS) Occupation Employment Statistics is \$28.84 for teachers and school staff and \$47.48 for principals. If mean hourly wage was not provided, it was computed assuming 2,080 hours per year. The exception is the student wage, which is based on the federal minimum wage of \$7.25 an hour. Source: BLS Occupation Employment Statistics, http://data.bls.gov/oes/ datatype: Occupation codes: Elementary school teachers (25-2021); Middle school teachers (25-2022); High school teachers (25-2031); Principals (11-9032); last modified date March 29, 2019.

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A.15. Reasons for Changes in Burden (from last Clearance submittal)

The nature of NAEP is that burden alternates from a relatively low burden in national-level administration years (i.e., even years) to a substantial burden increase in state-level administration years that include one or more assessments that support national, state-by-state, and certain urban districts reporting (i.e., odd years). In state/district assessment years, NAEP samples approximately 400,000-800,000 students, while in nationalonly assessment years, approximately 50,000-100,000 students. In 2021, NAEP will conduct state and national assessments. Previous clearances have included multiple years, while this submission covers only 2021. In addition, in 2021 some students were originally scheduled to take additional cognitive section(s) but the decision was made not to overload the schools with additional burden by eliminating LTT Age 17, U.S. History, and Civics in consideration of the COVID-19 outbreak impact on schools. Furthermore, questions related to the COVID-19 outbreak will be added to the student, teacher, and school questionnaires, increasing the burden for each of these respondents by 5-minutes for students and teachers and 10-minutes for schools. Finally, the overall student sample size is reduced as compared with previous administrations (approximately 198,000 students compared to approximately 750,000 for similar assessments in 2019). The decrease in student sample size is also reflected in fewer schools and associated burden. In 2021, there will now be an offering of the online version of the student survey questionnaires to the sampled students who are remote and not able to be assessed in-person.

A.16. Time Schedule for Data Collection and Publications

The time schedule for the data collection for the 2021 assessments is shown below.

NAEP 2021	January–March 2021: NAEP administration
Survey Questionnaires	February-April 2021: Data collection of survey questionnaires from remote students

The grades 4 and 8 reading and mathematics national and state results are typically released to the public around October of the same year (i.e., about 6-7 months after the end of data collection). All other operational assessments are typically released 12-15 months after the end of data collection.

The operational schedule for the NAEP assessments generally follows the same schedule for each assessment cycle. The dates below show the specifics for the 2021 state-level assessments:

- September 2020: Select the school sample and notify schools
- October–November 2020: States, districts, or schools submit the list of students
- December 2020: Select the student sample
- December 2020–January 2021: Schools prepare for the assessments using the MyNAEP system
- January–March 2021: Administer the assessments
- February–April 2021: Data collection of survey questionnaires from remote students
- March–May 2021: Process the data, score constructed response items, and calculate sampling weights
- June–July 2021: Analyze the NAEP administration data
- July–September 2021: Prepare the NAEP reports, obtaining feedback from reviewers
- July-November 2021: Analyze the survey questionnaire data from remote students
- October 2021: Release the NAEP results
- December 2021-March 2022: Prepare report of survey questionnaires of remote students

A.17. Approval for Not Displaying OMB Approval Expiration Date

No exception is requested.

A.18. Exceptions to Certification Statement

No exception is requested.