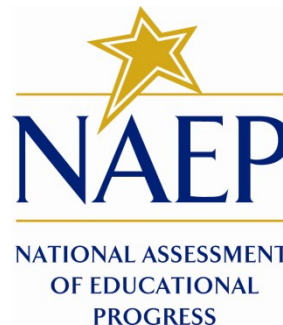


*NATIONAL CENTER FOR EDUCATION STATISTICS
NATIONAL ASSESSMENT OF EDUCATIONAL PROGRESS*

*National Assessment of Educational Progress (NAEP) 2021
Emergency Delay*

*Supporting Statement
Part A*

OMB# 1850-NEW



December 2020

A. JUSTIFICATION

This is an emergency request to suspend the collection of student assessment and survey data for the 2021 administration of the National Assessment of Educational Progress (NAEP) which is currently approved by the OMB docket 1850-0928 and the subsequent release of those results in October 2021.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

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.

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>.

Due to the impact of the COVID pandemic on school operations, it will not be possible for NCES to conduct the National Assessment of Educational Progress (NAEP) assessments in accordance with the statutory requirements defined by the Education Sciences Reform Act

(ESRA) which requires NAEP to be conducted in a valid and reliable manner every 2 years (20 U.S.C. 9622(b)(2)(B)).

NCES has been carefully monitoring physical attendance patterns in schools across the country and have determined that NCES cannot at this time conduct a national-level assessment (20 U.S.C. 9622(b)(2)(A)) in a manner with sufficient validity and reliability to meet the mandate of the law. Too many students are receiving their education through distance learning or are physically attending schools in locations where outside visitors to the schools are being kept at a minimum due to COVID levels. The NAEP assessments are a key indicator of educational progress in the United States with trends going back decades. The change in operations and lack of access to students to be assessed means that NAEP will not be able to produce estimates of what students know and can do that would be comparable to either past or future national or state estimates.

State summative assessments, however, generally use existing school staff and equipment; thus, eliminating this additional risk associated with NAEP. Therefore, while having nationally comparable NAEP data to estimate the impact of the COVID pandemic on educational progress would be ideal but impossible, there is still an opportunity to get solid state-by-state data on the impact of COVID on student outcomes. This state-level data can serve as a bridge until Spring 2022 when NCES will likely be able to conduct the national NAEP assessment in a manner that has sufficient validity and reliability.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This is an emergency request to suspend the collection of student assessment and survey data for the 2021 administration of the National Assessment of Educational Progress (NAEP) and the subsequent release of those results.

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. Previous years of data remain available. Further, state summative assessments may bridge the gap until Spring 2022 when NCES will likely be able to conduct the national NAEP assessment.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

This document suspends the collection of student assessment and survey data for the 2021 administration of the National Assessment of Educational Progress (NAEP). There are no electronic forms associated with this docket.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

This document suspends the collection of student assessment and survey data for the 2021 administration of the National Assessment of Educational Progress (NAEP). NAEP uses shared equipment and outside proctors who go into the schools to ensure a consistent assessment experience across the nation, increasing concerns about sending outsiders into schools and possibly increasing the risk of COVID transmission.

State summative assessments, however, generally use existing school staff and equipment; thus, eliminating this additional risk associated with NAEP. Therefore, while having nationally comparable NAEP data to estimate the impact of the COVID pandemic on educational progress would be ideal but impossible, there is still an opportunity to get solid state-by-state data on the impact of COVID on student outcomes. This state-level data will be available to data users in place of the student data collected by NAEP 2021. Hence, the emergency request to suspend this data collection.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The suspension of the collection of student assessment and survey data for NAEP 2021 will reduce respondent burden for students and school personnel respondents for that time-period.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The state-level sources of data listed in item 1 above provide student performance data to data users.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5 CFR 1320.5.

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

This is an emergency request; there will not be a 60-day notice published for this docket. However, a 30-day notice notifying the public of NCES' intent to suspend student assessment and survey data collection for the 2021 administration of NAEP will be published.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

NCES has been carefully monitoring physical attendance patterns in schools across the county and has determined that NCES cannot at this time conduct a national-level assessment (20 U.S.C. 9622(b)(2)(A)) in a manner with sufficient validity and reliability to

meet the mandate of the law. Too many students are receiving their education through distance learning or are physically attending schools in locations where outside visitors to the schools are being kept at a minimum due to COVID levels. The NAEP assessments are a key indicator of educational progress in the United States with trends going back decades. The change in operations and lack of access to students to be assessed means that NAEP will not be able to produce estimates of what students know and can do that would be comparable to either past or future national or state estimates.

9. Explain any decision to provide any payment or gift to respondents.

There are no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

There is no burden associated with this emergency request.

The proposed suspension of the student data collection for 2021 NAEP will reduce burden for OMB 1850-0928 for year 2021 only.

There are no costs to the public for this docket.

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.

There are no costs to the Federal Government associated with this suspension request.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden).

This is an emergency request to suspend the collection of student assessment data for the 2021 administration of the National Assessment of Educational Progress (NAEP), which is currently approved by the OMB docket 1850-0928.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

This suspension of data collection will eliminate the publication of student assessment data in late 2021.

Previously published data from NAEP can be found at <https://www.nationsreportcard.gov/>.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

There is no request for approval of non-display of the expiration date.

- 18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-I.**

There are no exceptions to the certification statement.

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