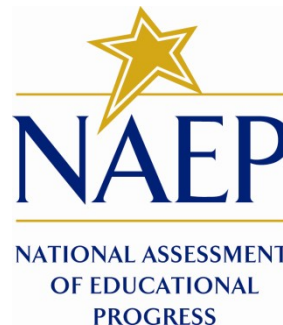


*NATIONAL CENTER FOR EDUCATION STATISTICS
NATIONAL ASSESSMENT OF EDUCATIONAL PROGRESS*

*National Assessment of Educational Progress
(NAEP) 2021 School Survey*

*Supporting Statement
Part A*

OMB# 1850-0957 v.2



February 2021

TABLE OF CONTENTS

A. JUSTIFICATION.....	4
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.....	4
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.....	5
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.....	5
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.....	5
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.....	6
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.....	6
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.....	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.....	6
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.....	6
9. Explain any decision to provide any payment or gift to respondents.....	6
10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.....	7
11. Provide additional justification for any questions of a sensitive nature.....	9
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....	9
13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information.....	10
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.....	10

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).....	10
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.....	10
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.....	11
18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.....	11

A. JUSTIFICATION

This is an emergency request to collect voluntary responses from individual schools via an online survey to better understand the impact of the COVID-19 pandemic on students and educators. The National Center for Education Statistics (NCES), in the Institute of Education Sciences of the U.S. Department of Education, will oversee the survey collection, which is designed to collect vital data with the least possible burden on schools. Data gathered in the survey will include:

- The share of the nation's schools that are open with full-time in-person instruction, open with online and in-person instruction, or fully remote;
- Enrollment by instructional mode by race/ethnicity, socio-economic status, English learner status, and disability status;
- Attendance rates by instructional mode by race/ethnicity, socio-economic status, English learner status, disability status, and housing status;
- Frequency of in-person learning for students;
- Average number of hours of synchronous instruction for students in remote instruction mode; and,
- Student groups prioritized by schools for in-person instruction by selected school characteristics.

The survey will collect data from approximately 3,500 schools that enroll fourth-graders and an equal number of schools that enroll eighth-graders. Results will be collected monthly beginning this month and running through June, and key findings will be reported. The study will maximize the use of federal dollars by utilizing the existing online data collection systems and infrastructure used for the Nation's Report Card, also known as the National Assessment of Educational Progress (NAEP).

- 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 January 21, 2021 [Executive Order on Supporting the Reopening and Continuing Operation of Schools and Early Childhood Education Providers](#) states that the Department of Education must “coordinate with the Director of the Institute of Education Sciences to facilitate, consistent with applicable law, the collection of data necessary to fully understand the impact of the COVID-19 pandemic on students and educators, including data on the status of in-person learning. These data shall be disaggregated by student demographics, including race, ethnicity, disability, English-language-learner status, and free or reduced lunch status or other appropriate indicators of family income.”

With the participation of educators and school leaders across the country, NCES will be able to report the percentages of students who received instruction remotely, in-person, or in a hybrid instructional mode for selected districts, states, and the nation. NCES will provide these data for various student groups, in addition to information about attendance rates, in an online dashboard. The survey questions, including the Spanish translated versions, can be found in Appendix B.

- 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 new data collection will provide the status of in-person learning in grades 4 and 8, disaggregated by student demographics. Results will be available for the nation and participating states and large urban districts in the Trial Urban District Assessment (TUDA), provided NCES' reporting standards are met. The results of the survey will be published monthly and will be shown in an interactive online dashboard, which will also enable users to download data in simple, flat files. The dashboard will show the percentage of fourth- and eighth-grade students in states and participating districts by:

- Instructional mode (in-person, remote, or hybrid) of 4th and 8th grade students by race/ethnicity, socio-economic status, English learner status, and disability status;
- Frequency of in-person instruction for hybrid instruction (each week, every two weeks, every three weeks, other) of 4th and 8th grade students;
- Number of days in-person per week for 4th and 8th grade students in hybrid instruction by selected school characteristics;
- Number of hours per day of synchronous instruction for 4th and 8th grade remote students by selected school characteristics;
- Student groups prioritized by schools for in-person instruction by selected school characteristics; and
- Attendance rates of 4th and 8th grade students by race/ethnicity, socio-economic status, English learner status, and disability status.

These metrics are intended to provide stakeholders with a clear portrait of equity in the type, frequency, and amount of instruction students receive monthly across the nation, and in states and participating districts. As monthly data are collected, stakeholders will be able to track progress. In addition, a summative report will be provided at the end of the collection, relating the results to those from the NAEP 2021 School and Teacher Questionnaire Special Study data collection (see OMB# 1850-0956 v.2). Furthermore, NCES will use this data to better interpret the impact of current school operations on the results of the NAEP assessments scheduled to be conducted in 2022.

- 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.**

Each school volunteering to participate in the NAEP 2021 School Survey will identify a designated staff member to serve as its NAEP school coordinator¹. An electronic system (known as MyNAEP) was developed so that school coordinators would provide requested administration information online about the schools for the NAEP assessments. This system has been adapted for use by the 2021 School Survey.

- 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 data collection activity conducted by NCES will be an important source of information to aid the U.S. Department of Education in understanding the current state of the educational system and how to proceed in light of the COVID-19 pandemic. These data are not being collected across the country by any other government agency or entity.

¹ If the state or district has the school-level information requested by the survey, the state or district representative may choose to complete the survey on behalf of the school(s), in lieu of the school coordinator.

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 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. For the 2021 NAEP School Survey, it is necessary to include small and private schools so that such schools are represented in the data collection and in the reports.

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.

This data collection activity conducted by NCES will be an important source of information for the U.S. Department of Education in order to understand the current state of the educational system and how to proceed in light of the COVID-19 pandemic. Monthly data collection is important to understand school instructional changes throughout the remainder of the school year.

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.

The January 21, 2021 [Executive Order on Supporting the Reopening and Continuing Operation of Schools and Early Childhood Education Providers](#) states that the Department of Education must “coordinate with the Director of the Institute of Education Sciences to facilitate, consistent with applicable law, the collection of data necessary to fully understand the impact of the COVID-19 pandemic on students and educators, including data on the status of in-person learning. These data shall be disaggregated by student demographics, including race, ethnicity, disability, English-language-learner status, and free or reduced lunch status or other appropriate indicators of family income.”

Because this data collection is extremely high priority and time sensitive, it will undergo Emergency Clearance. It will not go through a 60-day public comment period, and will only undergo a 30-day public comment period after clearance has been granted.

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 conduct the 2021 school survey 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 working closely with IES and others within the U.S. Department of Education to develop an approach to collecting data for the 2021 NAEP School Survey. Additionally, NCES is working directly with contractors Educational Testing Service (ETS) and Westat for the logistical aspects of this data collection activity. Specifically, ETS is responsible for coordinating contractor activities, developing the assessment instruments, analyzing the data, and preparing the reports, and Westat is responsible for selecting the school samples, managing field operations and data collection, and coordinating with states.

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.

Data security and confidentiality protection procedures have been put in place for NAEP to ensure that all NAEP contractors and agents (see section 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:

- 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; and
- enforce effective authentication password management policies, making it difficult to hack into the data.

The following text appears on the MyNAEP system (see Appendix A-8 for screenshot):

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 1850-0956 for the School and Teacher Questionnaire Special Study² and 1850-NEW for the NAEP 2021 School Survey. The time required to complete this information collection is estimated to average 65 minutes for the NAEP 2021 School and Teacher Questionnaire Special Study and 30 minutes for the NAEP 2021 School Survey, 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.*

OMB No. 1850-0956 APPROVAL EXPIRES 8/31/2021 for the NAEP 2021 School and Teacher Questionnaire Special Study

OMB No. 1850-0957 APPROVAL EXPIRES 8/31/2021 for the NAEP 2021 School Survey.

² The NAEP 2021 School and Teacher Questionnaire Special Study is another data collection, to be submitted in February 2021 as 1850-0956 v.2. Both collections will be done through the same MyNAEP portal, and the results of both data collections will be interpreted together, as described in section A.2.

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.

In addition, the following text appears on the log-in screen for the MyNAEP system:

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.

As part of the MyNAEP system, there is an additional screen after users log into the system. The text shown on that screen is below. The MyNAEP Data Security Agreements makes sure the registered user acknowledges that they have access to student PII and has the user certify that they will keep the information secure and confidential. Please see Appendix A-3 Figure 7.

MyNAEP DATA SECURITY AGREEMENT

Under this agreement you will have access to MyNAEP, a secure site maintained by Westat on behalf of the National Center for Education Statistics. By accepting this agreement, you also agree to keep information from the site confidential as outlined below.

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 you provide 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). NAEP collects data in a manner consistent with Family Educational Rights and Privacy Act (FERPA) privacy conventions governing the release of student data. Generally, schools must have written parental permission in order to release any information from a student's education record. However, FERPA allows schools to disclose those records, without

consent, to organizations conducting certain studies for or on behalf of the school [34 CFR Part 99.31(a)(6)(i)].

As a study authorized by the U.S. Secretary of Education, NAEP is permitted to obtain personally identifying student information without written parental permission. Even so, FERPA stipulates that data collection must be conducted in a manner that does not permit personal identification of parents and students by individuals other than representatives of the organization, and that the information is destroyed when no longer needed for the purposes for which the study was conducted [34 CFR Part 99.31 (a)(6)(ii)].

NAEP complies with FERPA confidentiality requirements through its use of data transmittal, data storage, and personnel protocols designed to safeguard personally identifying information. Information is protected during transmission to and from NAEP systems by the use of data encryption technologies, such as Secure Socket Layer (SSL) and digital certificates and signatures that encrypt data, validate data integrity, and authenticate the parties in a transaction. NAEP uses SSL for all restricted-access websites that are used to transfer data, such as www.mynaep.com. All individuals including contractors and school personnel must sign assurances of confidentiality in which they pledge to maintain data confidentiality and exercise reasonable caution to prevent access by others to this information when it is in their possession.

As a representative of your school working on NAEP, you will have access to personally identifying student information. By accepting this agreement, you are certifying that you are authorized to handle and process NAEP information on behalf of your school, and that you will keep the information secure and confidential.

Full name:
Date:
Email address:
School:
District:

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.

Each school participating in the NAEP 2021 School Survey has a designated staff member to serve as its NAEP school coordinator, who will be the person providing answers to the survey³. The estimated burden is 30-minutes on average for each of the monthly responses. Please see table below for details on the burden estimates.

³ If the state or district has the school-level information requested by the survey, the state or district representative may choose to complete the survey on behalf of the school(s), in lieu of the school coordinator.

EXHIBIT 1

Estimated Burden for NAEP 2021 School Survey

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

Survey	School Coordinator	
	# of Schools	Burden (in hours) ¹
NAEP 2021 School Survey (mainland U.S.)	3,511	8,778
NAEP 2021 School Survey (Puerto Rico)	154	385
4th Grade Totals	3,665	9,163
NAEP 2021 School Survey (mainland U.S.)	3,396	8,490
NAEP 2021 School Survey (Puerto Rico)	145	363
8th Grade Totals	3,541	8,853
Total Requested Burden	7,206	18,016

Total number of respondents: 7,206 Total number of responses: 36,030

Notes for Exhibit 1

- The burden for the school coordinator for the NAEP 2021 School Survey is 30-minutes per month, each month from February 2021 to June 2021. For the purposes of the calculation of burden, we consider the performance of each monthly task to constitute as a separate response.

EXHIBIT 2

Total Annual Estimated Burden Time Cost for NAEP 2021 School Survey

Number of Respondents	Number of Responses	Total Burden (in hours)
7,206	36,030	18,016

The estimated NAEP School Coordinator burden across all these activities translates into an estimated total burden time cost 18,016 hours⁴, is in the table below.

	NAEP School Coordinators	
	Cost	Hours
2021	\$494,900	18,016

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

⁴ The average hourly earnings of teachers and principals derived from May 2019 Bureau of Labor Statistics (BLS) Occupation Employment Statistics is \$27.47 for teachers and school staff. If mean hourly wage was not provided, it was computed assuming 2,080 hours per year. 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); last modified date May 2019.

There are no direct costs to respondents.

- 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.**

The total cost to the federal government for the preparation of the NAEP 2021 School Survey preparation, data collection, and reporting (contract costs and NCES salaries and expenses) is estimated to be \$1,445,000. The 2021 data collection cost estimate is shown in the table below.

NCES salaries and expenses	\$100,000
Contract costs	\$1,345,000
Item development	\$73,750
Sampling, training, data collection, and weighting	\$903,750
Recruitment and state support	\$58,750
Design, analysis and reporting	\$308,750

- 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 a new emergency data collection request.

- 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 data collection is scheduled to take place monthly from February 2021 to June 2021. A summative report will be released in the fall, approximately October of 2021 (see table below).

Data Collection Month	Monthly Report Published	Summative Report
February 2021	March 2021	October 2021
March 2021	April 2021	
April 2021	May 2021	
May 2021	June 2021	
June 2021	July 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.

February 2021