

Public Comments Received During the 60-day Comment Period

January 2023

National Assessment of Educational Progress (NAEP) 2024

ED-2022-SCC-0141

Comments on FR Doc # 2022-24796

NCES and the staff of The National Assessment of Educational Progress want to thank all public commenters for your feedback responding to a request for comments on NAEP 2024 published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in our work. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment and hope that you will continue to follow our work.

Document: ED-2022-SCC-0141-0004

Name: Adreanna Guise, J.D. Candidate 2024, University of Missouri School of Law

To Whom It May Concern,

Thank you for the opportunity to comment on Agency Information Collection Activities; Comment Request; National Assessment of Educational Progress (NAEP) 2024. My name is Adreanna Guise, and I am currently 2L at the University of Missouri-Columbia School of Law. I also received my undergraduate degree in Elementary Education from the University of Missouri-Columbia. I am planning on pursuing a career in Education Law upon graduation.

I would like to raise concern regarding Agency Information Collection Activities; Comment Request; National Assessment of Educational Progress (NAEP) 2024. The main concern I want to address is the NAEP achievement levels and their validity to showcase student knowledge.

The National Assessment of Educational Progress (NAEP) shows the results of the biennial assessment on “The Nation’s Report Card” in two different ways: (1) a scale score and (2) achievement levels. The NAEP feared that just showing the scale scores would be difficult for the public to interpret the meaning of the results, so they introduced achievement levels in 1990. (Beaton et al., 2020). The NAEP achievement levels are labeled as “NAEP Basic,” “NAEP Proficient,” and “NAEP Advanced.” (Scale scores and achievement levels, 2021). However, the statute allowing the NAEP to test nationally specifically states that “the achievement levels shall be used on a trial basis until the Commissioner for Education Statistics determines, as a result of an evaluation under subsection (f), that such levels are reasonable, valid, and informative to the public.” 20 U.S.C. § 9622(e) (2)(C). The establishment statute of the National Center for Education Statistics (NCES) also states that the NCES should convey data in a way that “is relevant and useful to practitioners, researchers, policymakers, and the public.” 20 U.S.C. § 9541(b)(1)(B). Since the application of this statute, the achievement levels have never been deemed as “reasonable, valid, and informative to the public” and therefore are not adequately useful to the practitioners, researchers, policymakers, and the public. This clearly shows that there needs to be a change to the way that the NCES analyzes and conveys the NAEP achievement levels.

There needs to be more transparency about the NAEP achievement levels. When looking at the biennial NAEP report, there is a sentence at the bottom of the paragraph describing the trial basis status of achievement levels and a small note next to the graph. However, when viewing a state’s report card, it does not say anything about

achievement levels on a trial basis anywhere on the page. Any page that mentions NAEP achievement levels should include a prominently displayed disclaimer about its status.

The National Assessment Governing Board (NAGB) states on their website that “NAEP Proficient represents the goal for what all students should know.” (The nation's report card (NAEP), 2022). Many interpret this to mean that “NAEP Proficient” is associated with students meeting grade level expectations. However, members of the governing board for the NAEP clarified that “[t]he proficient achievement level does not refer to “at grade” performance. Nor is performance at the Proficient level synonymous with ‘proficiency’ in the subject. That is, students who may be considered proficient in a subject, given the common usage of the term, might not satisfy the requirements for performance at the NAEP achievement level.” (Harvey, 2011). This becomes even more confusing to the public when many experts, including Dr. Peggy Carr, the associate commissioner of the NCES, agree that the “NAEP Basic” achievement level is closer grade level expectations. (Harvey, 2011).

The NAGB claims that they set high standards and that is why grade level or proficiency at the state level does not mean the same as “NAEP Proficient.” (The nation's report card (NAEP), 2022). However, this creates confusion for the intended audience: practitioners, researchers, policymakers, and the public. A few examples of high-profile individuals who have misunderstood NAEP achievement levels include Virginia Governor Glenn Youngkin. After the recent NAEP results came out, Youngkin stated that the discrepancy between the lower percentage of “NAEP Proficient” students but high percentage of students who met grade level was because of past governors lowering educational state standards. (Youngkin, 2022). While it may be the case that past governors changed the state standards, the discrepancy is also directly linked to the fact that “NAEP Proficient” is not the same as grade level. Campbell Brown, cofounder of the education news site The 74 and former CNN host, also mistakenly asserted that “two out of three eighth graders in this country cannot read or do math at grade level. We are not preparing our kids for what the future holds.” (Brown, 2016). Even former United States Secretary of Education, Betsy DeVos, did not understand the difference between “proficient” and “grade level” when addressing the NAEP Nation’s Report Card Release for 2019. She stated in her speech at the National Press Club that ““our nation’s report card shows that two-thirds of American students can’t read at grade level. Two out of three!”” (Strauss, 2019). When individuals who have access to many resources to explain NAEP achievement levels are still confused, there needs to be an overhaul of the achievement levels.

Additionally, only having three achievement levels where “NAEP Basic” is the lowest, indicates that “NAEP Basic” is not good enough. However, when the lowest achievement level is meeting grade level, there needs to be more levels to accurately show academic concern. For example, a 2007 study showed that even though the NAEP achievement level “basic” deems that students are not college ready, fifty percent of “basic” level students earned a college degree. (Scott et al., 2007). Clearly “NAEP Proficient” does not encapsulate a high enough percentage of students that are college ready if such a high percentage of “NAEP Basic” students can earn a college degree. Many experts have recommended to change the levels to “low,” “intermediate,” “high,” and “advanced.” (Harvey, 2011). By adding more levels with attention given to clear demarcation, the achievement level data would be more accurate. The NAEP could also include benchmark percentages for how many students should realistically be at each level. This would help with preventing the misinterpretation that many students are uncharacteristically behind academically.

Despite the concerns with the current NAEP achievement levels, the NAEP still provides valuable data for the United States. In the 2023-2024 school year, forty-nine states will administer some form of standardize testing for grades three through eight. Grades nine through twelve vary by state with respect to whether or not a standardize test is taken, or if the ACT or SAT replaces that assessment altogether. (Miller, 2022). Since each state controls their education system and standards, what is being tested on can vary between states. Therefore,

the NAEP provides a neutral test for every state that is generally consistent from one testing interval to the next. This allows for trends to be established and analyzed. Specifically, the ability to track trends of gaps between race, ethnicity, and gender is incredibly important. This allows policymakers to both ensure efforts are being made to close the gaps that exist for students and to analyze whether those efforts are working. For example, after the No Child Left Behind Act, many politicians raved about the success of shrinking the achievement gap between minorities and white students. (Stedman, 2009). However, NAEP trend data was able to show that the achievement gap between minorities and whites on the NAEP had instead stayed the same or in some cases gotten even larger. (Stedman, 2009). This data is crucial for continuing to evaluate the education system and future education reform.

In summary, the NAEP should continue to be administered in 2024 with some adjustments. The NAEP achievement levels need to change to fulfill 20 U.S.C. § 9622(e)(2)(C) requirement that the levels being “reasonable, valid, and informative to the public.” 20 U.S.C. § 9622(e)(2)(C). Please see below for pertinent literature.

Sincerely,

Adreanna Guise

J.D. Candidate 2024

University of Missouri School of Law

Bibliography

20 U.S.C. § 9541

20 U.S.C. § 9622

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Valerie Strauss, Analysis | the common mistake Betsy Devos made about new NAEP scores - and other problems with her 'sky is falling' narrative The Washington Post (2019), <https://www.washingtonpost.com/education/2019/11/01/common-mistake-betsy-devos-made-about-new-naep-scores-other-problems-with-her-sky-is-falling-narrative/> (last visited Dec 2, 2022).

Dear Ms. Guise,

Thank you for your review of the 2024 NAEP Clearance Package and your public comment on the NAEP achievement levels and their validity to showcase student knowledge. The National Assessment Governing Board developed a [four-page informational document](#) to describe the recently developed achievement level descriptions (ALDs) for reporting in preparation for the 2022 NAEP release. The Governing Board is considering further ideas to convene an advisory group to assist with communication efforts. Updates regarding these efforts will be discussed at future Governing Board meetings and made available at [Quarterly Board Meeting Materials](#). Thank you again for your careful review and comment.

Sincerely,
Daniel J. McGrath, Ph.D.
Delegated Authority of Associate Commissioner
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Document: ED-2022-SCC-0141-0005

Name: Gabrielle Doyle, Advocacy Campaign Manager, The Trevor Project

The Trevor Project is pleased to submit this comment in response to the proposed National Assessment of Educational Progress (NAEP) 2024 by the National Center for Education Statistics regarding issue (4), how might the Department enhance the quality, utility, and clarity of the information to be collected. The proposed survey provides an invaluable opportunity to gain insight on the achievement of students in grades 4, 8, and 12 nationwide. There is a significant opportunity to advance the quality of the school, principal, and teacher questionnaire to better reflect how lesbian, gay, bisexual, transgender, queer, and questioning (LGBTQ) youth experience academic success in schools. Such advancement furthers the goal of collecting essential data about specified student groups and characteristics.

The Trevor Project is the world’s largest suicide prevention and mental health organization for LGBTQ young people. We offer a suite of 24/7 crisis intervention and suicide prevention programs, including TrevorLifeline, TrevorText, and TrevorChat as well as the world’s largest safe space social networking site for LGBTQ youth, TrevorSpace.

According to The Trevor Project’s 2022 National Survey on LGBTQ Youth Mental Health, [45% of LGBTQ youth](#) seriously considered attempting suicide in the past year, including more than half of transgender and nonbinary youth. This devastating statistic is not intrinsically tied to holding an LGBTQ identity, but rather due to the persistent and pervasive forms of systemic discrimination and violence that LGBTQ youth experience. LGBTQ youth who had access to spaces that affirmed their sexual orientation and gender identity — including schools — reported lower rates of attempting suicide than those who did not.

The academic achievement of students is [intrinsically related](#) to their mental health. The Centers for Disease Control and Prevention (CDC) Division of Adolescent and School Health (DASH)’s Youth Risk Behavior Surveillance System (YRBSS) monitors six categories of health-related behaviors that contribute to the leading causes of death and disability among youth and adults, and [consistently reveals](#) that LGBTQ youth experience increased adverse mental health outcomes and victimization when compared to their heterosexual and cisgender peers. Such victimization has [been revealed](#) to have a direct and persistent impact on the academic achievement of LGBTQ youth.

To better understand the impact of victimization on LGBTQ youth and the role of LGBTQ affirming school supports, it’s essential that disparities in academic achievement are readily available through robust data collection. NAEP 2024 can contribute to the collection of this data through the inclusion of sexual orientation and gender identity in the range of characteristics considered in the demographics of students participating in the NAEP. The below points emphasize specific question items included in the [2022 NAEP appendix items](#) that can be revised to meet this need.

Appendix J2 Student Questionnaires

The 2022 item on Gender asks teachers “What is your sex?” and provides the multiple choice options of A. Male or B. Female. This item fails to capture the diverse identities of students nationwide. To collect more accurate data on the gender identities of LGBTQ students, The Trevor Project recommends the inclusion of more expansive items in the NAEP 2024. The Trevor Project has developed best practices for measuring sexual orientation and gender identity among youth populations in ways that allow for nuanced individuality while still providing data that is useful for statistical analyses. These practices are included in the resource [Measuring Youth Sexual Orientation and Gender Identity](#). To better capture the gender identity of students, the item and answer choices should be rephrased as:

“Gender identity is how someone feels about their own gender. There are many ways a person can describe their gender identity and many labels a person can use. Which of the following terms best describes your current gender identity?”

- A. Girl or woman
- B. Boy or man
- C. Nonbinary, genderfluid, or genderqueer
- D. I am not sure or questioning
- E. I don’t know what this question means
- F. Decline to answer”

AND

“What sex were you assigned at birth, on your original birth certificate?”

- A. Male
- B. Female
- C. Decline to answer”

In addition to collecting this essential information about a student’s gender identity, the NAEP 2024 should include the following item to capture student’s sexual orientation.

“Sexual orientation is a person’s emotional, romantic, and/or sexual attractions to another person. There are many ways a person can describe their sexual orientation and many labels a person can use. Which of these options best describes your sexual orientation?”

- A. Straight or heterosexual
- B. Gay
- C. Lesbian
- D. Bisexual
- E. Queer
- F. Pansexual
- G. Asexual
- H. I am not sure
- I. I don’t know what this question means
- J. Decline to answer”

Appendix J2 Teacher Questionnaires

The 2022 item on Gender asks teachers “What is your sex?” and provides the multiple choice options of A. Male or B. Female. This item fails to capture the diverse identities of educators nationwide. To collect more accurate data on the identities of LGBTQ teachers nationwide, The Trevor Project recommends the utilization of the [National Academies of Sciences, Engineering, and Medicine \(NASEM\) report](#), which includes formal recommendations and best practices in collecting data on sex, sexual orientation, and gender identity in adults.

Through submitting this comment, The Trevor Project aims to support the advancement of the National Assessment of Educational Progress (NAEP) 2024 to be more inclusive and responsive to the needs and realities of LGBTQ teachers and students. Through the adoption of the proposed revisions, the National Center for Education Statistics will collect insightful data on the academic achievement of LGBTQ students. Such data is essential to advance meaningful advocacy nationwide to ensure all youth can academically and emotionally thrive in their school environments. Schools that affirm the unique needs of LGBTQ youth begin with educators and school professionals that are adequately prepared to support their LGBTQ staff and students. Should you have any questions or if we can be of any assistance regarding this matter, please do not hesitate to contact me at gabby.doyle@thetrevorproject.org.

Gabrielle Doyle
Advocacy Campaign Manager
The Trevor Project

Dear Ms. Doyle,

Thank you for your feedback dated December 8, 2022, responding to a 60-day request for comments on the proposed National Assessment of Educational Progress (NAEP) 2024 Clearance Package. The National Center for Education Statistics (NCES) appreciates your interest in NAEP and NCES data collections as well as the references you provided as part of your feedback

NCES is actively working towards including more gender identity options in future NAEP data collections both from school records (where we get student gender information) and teacher self-reports via the teacher survey questionnaire. We recognize the importance of providing response options reflective of our nation's population, including those who do not identify as exclusively male or female. In support of this, we are exploring ways to disaggregate student record data into binary and non-binary as a start. For teachers we are also exploring the inclusion of a non-binary option(s) for the teacher questionnaire. While these adjustments are under consideration, please know your feedback is valuable and will be incorporated into our discussions around these changes as we evaluate how to best expand these options beyond the existing binary-only categories.

NAEP does not collect information related to sexual orientation. The content of NAEP questionnaires is outlined in the Education Sciences Reform Act (P.L. 107-279). However, NCES has been very involved in ensuring measures of sexual orientation are inclusive across federal data collections (e.g., https://nces.ed.gov/fcsm/pdf/fcsm_sogi_terminology_fy20_report_final.pdf) and we will continue these efforts in the years to come.

Sincerely,

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Document: ED-2022-SCC-0141-0006

Name: Aaron Ridings, Chief of Staff and Deputy Executive Director for Public Policy and Research

GLSEN is pleased to submit this comment regarding measures to advance inclusion and equity for LGBTQ+¹ students and educators in the National Assessment of Educational Progress (NAEP) administered by the National Center for Education Statistics (NCES). As the leading national organization on LGBTQ+ issues in K-12 education, GLSEN urges NCES to include LGBTQ+ demographic measures in the updated surveys of students and educators that it plans to make available for review in February 2023.²

The NAEP provides critical insight into student achievement and learning experiences across academic subjects that inform education policy and practice. GLSEN strongly supports the continued inclusion of measures related to students' and teachers' race and ethnicity, measures related to students' socioeconomic status, and the collection of data on disability status and English Learner status through student records. Revising NAEP surveys to include measures of sexual orientation and gender identity, as well as variations in sex characteristics or intersex status (SOGI-SC), will advance NCES's efforts "to better determine how well education is meeting

¹ GLSEN uses "LGBTQ+" to refer to sexual and gender minority populations, including but not limited to individuals who are lesbian, gay, bisexual, transgender, queer, nonbinary, Two-Spirit, and intersex.

² U.S. Department of Education. Agency Information Collection Activities; Comment Request; National Assessment of Educational Progress (NAEP) 2024. 87 Fed. Reg. §219 (November 15, 2022). <https://www.federalregister.gov/documents/2022/11/15/2022-24796/agency-information-collection-activities-comment-request-national-assessment-of-educational-progress>.

the needs of all students,”³ including LGBTQ+ students of color and others who experience marginalization across multiple aspects of their identity. Specifically, GLSEN recommend that NCES revise the NAEP instrument as follows:

- The NAEP student survey should allow respondents in grades 8 and 12 to self-report their sexual orientation and gender identity, if they choose to do so;
- If the NAEP collects additional gender data through student records, NCES should provide a nonbinary category for those schools that have implemented nonbinary-inclusive student information systems⁴;
- The NAEP teacher survey should allow respondents to self-report their sexual orientation and gender identity, if they choose to do so; and⁵
- The NAEP secondary student and teacher surveys should include measures that allow respondents to self-report if they were born with variations in sex characteristics or are intersex, if they choose to do so⁶; development of such measures should be a priority.

GLSEN’s Research Brief, [Considerations for Measuring Sexual Orientation and Gender Identity in Surveys of Secondary School Students](#), provides sample measures of sexual orientation and gender identity for use in general population surveys of secondary students.⁷

For the NAEP surveys of students in grade 8 and 12, GLSEN recommends the following measure of gender identity, derived from an item that has been cognitively tested with youth:

When a person’s sex and gender do not match, they might think of themselves as transgender. Sex is what the doctor labeled you when you were born. Gender is how a person feels and identifies. Which one response best describes you?

- I am **not** transgender and I identify as a boy or a girl
- I am transgender and identify as a boy or man
- I am transgender and identify as a girl or woman
- I am transgender and identify in some other way other than a boy or girl
- I am **not** transgender and identify in some other way than a boy or girl

Followed by an item assessing sex assigned at birth:

What sex were you assigned at birth (what the doctor put on your birth certificate):

- Male
- Female

³ Institute for Education Science, National Center for Education Statistics (NCES). Survey Questionnaires: Questionnaires for Students, Teachers, and School Administrators. https://nces.ed.gov/nationsreportcard/experience/survey_questionnaires.aspx (Accessed January 4, 2023).

⁴ The sample NAEP student survey currently collects gender data exclusively through student records, providing only binary (male/female) categories for reporting. In at least 14 states (California, Connecticut, District of Columbia, Illinois, Maryland, Massachusetts, New Jersey, New Mexico, New York, Oregon, Pennsylvania, Utah, Virginia, and Washington), student records allow for the collection of nonbinary gender identity data and at least nine SEAs (California, Connecticut, District of Columbia, Illinois, Massachusetts, New Jersey, New Mexico, Oregon, Utah, and Washington) are currently publishing data on nonbinary student enrollments in required state reports. Requiring participating schools to report nonbinary students as male or female results is burdensome and leads to the collection of data that is known to be inaccurate.

⁵ The sample NAEP teacher survey asks respondents to self-report their gender using binary (male/female) gender categories.

⁶ Comprehensive LGBTQ+ inclusive data collection must include measures for this population that may comprise as much as 1.7% of the population and faces documented but understudied health and social disparities. The 2022 NASEM consensus report includes guidance and sample measures for collecting demographic data on intersex people. Rosenwohl-Mack, A., Tamar-Mattis, S., Baratz, A. B., Dalke, K. B., Ittelson, A., Zieselman, K., & Flatt, J. D. (2020). A national study on the physical and mental health of intersex adults in the US. *PloS one*, 15(10), e0240088. Zeeman, L., & Aranda, K. (2020). A systematic review of the health and healthcare inequalities for people with intersex variance. *International Journal of Environmental Research and Public Health*, 17(18), 6533. National Academies of Sciences, Engineering, and Medicine. (2020). *Understanding the Well-Being of LGBTQI+ Populations*. Washington, DC: The National Academies Press. Available at <https://doi.org/10.17226/25877>. National Academies of Sciences, Engineering, and Medicine. (2022). *Measuring Sex, Gender Identity, and Sexual Orientation*. Washington, DC: The National Academies Press. Available at <https://doi.org/10.17226/26424>.

⁷ Clark, C. M. & Kosciw, J. G. (2022). *Considerations for Measuring Sexual Orientation and Gender Identity in Surveys of Secondary School Students* (Research Brief). New York: GLSEN. <https://www.glsen.org/SOGI-measurement>. Where (additional) cognitive testing is needed, NCES should prioritize such testing.

For the NAEP surveys of students in grade 8 and 12, GLSEN recommends the following measure of sexual orientation:

Your sexuality or sexual orientation describes who you are attracted to. Below is a list of terms that people often use to describe their sexuality or sexual orientation. Which of the following best describes your sexual orientation? (We know that many people identify with more than one sexual orientation, or with sexual orientations that are not listed. However, for this survey please pick the sexual orientation on this list that best fits you.)

- Gay
- Lesbian
- Bisexual
- Pansexual
- Straight/Heterosexual
- Questioning
- Queer
- Asexual

The inclusion of SOGI-SC measures in NAEP surveys aligns with President Biden’s Executive Order on advancing equality for lesbian, gay, bisexual, transgender, queer, and intersex individuals⁸ and the most recent recommendations on SOGI-SC data collection from the National Academies of Sciences, Engineering, and Medicine (NASEM). In 2020, NASEM recommended that federal, state, local, and tribal agencies “should consider adding measures of sexual orientation, gender identity, and intersex status to all data collection efforts and instruments,” including in the context of education.⁹ In 2022, NASEM issued a consensus study report with recommended measures and guiding principles for collecting SOGI-SC data.¹⁰

Including SOGI-SC measures in NAEP surveys of 8th and 12th grade students does not violate the Protection of Pupils Rights Amendment (PPRA), which prohibits requiring students to “submit to a survey, analysis, or evaluation that reveals information concerning” on topics including “sex behaviors or attitudes” without prior written consent from a student’s parent or guardian. Student participation in the NAEP is voluntary and SOGI-SC measures are demographic measures that do not communicate how a respondent behaves or views sex and specifically sexual activity. For example, identifying as a cisgender girl and a lesbian does not indicate that the individual respondent is sexually active or whether she views sexual activity in a positive or negative light.

Like measures of race, ethnicity, disability, and socioeconomic status, SOGI-SC measures communicate important information about who an individual is and are necessary to identify and address disparities impacting LGBTQ+ young people in K-12 schools, including those who experience compounded marginalization as LGBTQ+ students who are Black, Indigenous, and people of color (BIPOC) or people with disabilities. Given that available data consistently shows disparities impacting LGBTQ+ people in K-12 education systems and that privacy and safety concerns mean that surveys are often the *only* source of data on the educational outcomes of LGBTQ+ young people, it is essential that surveys like the NAEP include SOGI-SC measures.¹¹

Revising NAEP surveys with existing demographic measures to include SOGI-SC measures will improve our understanding of how well our schools are meeting the needs of all students. Thank you for considering these recommendations. To discuss the recommendations in this comment, please contact me at

aaron.ridings@glsen.org.

⁸ Executive Order 14075 of June 15, 2022. *Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals*. 87 Fed. Reg. §118 (June 21, 2021). <https://www.govinfo.gov/content/pkg/FR-2022-06-21/pdf/2022-13391.pdf>.

⁹ NASEM. (2020). *Understanding the Well-Being of LGBTQI+ Populations*. <https://doi.org/10.17226/25877>.

¹⁰ NASEM. (2022). *Measuring Sex, Gender Identity, and Sexual Orientation*. <https://doi.org/10.17226/26424>.

¹¹ The CDC’s Youth Risk Behavior Survey (YRBS) shows that LGBTQ+ youth are far more likely than their non-LGBTQ+ peers to experience violence victimization, including bullying at school. GLSEN’s biennial National School Climate Survey of LGBTQ+ secondary students have consistently found that experiencing anti-LGBTQ+ victimization is associated with a range of adverse outcomes that matter for educational progress, including increased absences, lower GPAs, a decreased likelihood of pursuing post-secondary education, higher levels of depression, and lower levels of self-esteem and school belonging. Kosciw, J. G., Clark, C. M., & Menard, L. (2022). *The 2021 National School Climate Survey: The experiences of LGBTQ+ youth in our nation’s schools*. New York: GLSEN. <https://www.glsen.org/research/2021-national-school-climate-survey>.

Sincerely,

Aaron Ridings

Chief of Staff and Deputy Executive Director for Public Policy and Research

Dear Mr. Ridings,

Thank you for your feedback dated January 12, 2023, responding to a 60-day request for comments on the proposed National Assessment of Educational Progress (NAEP) 2024 Clearance Package. The National Center for Education Statistics (NCES) appreciates your interest in NAEP and NCES data collections as well as the references you provided as part of your feedback

NCES is actively working towards including more gender identity options in future NAEP data collections both from school records (where we get student gender information) and teacher self-reports via the teacher survey questionnaire. We recognize the importance of providing response options reflective of our nation's population, including those who do not identify as exclusively male or female. In support of this, we are exploring ways to disaggregate student record data into binary and non-binary as a start. For teachers we are also exploring the inclusion of a non-binary option(s) for the teacher questionnaire. While these adjustments are under consideration, please know your feedback is valuable and will be incorporated into our discussions around these changes as we evaluate how to best expand these options beyond the existing binary-only categories.

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Sincerely,

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