Public Comments Received During the 60-day Comment Period

May 2025

National Assessment of Educational Progress (NAEP) 2026

ED-2024-SCC-0133 Comments on FR Doc # 2024-25138

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 2026 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.

Comment: ED-2024-SCC-0133-0004
Name: Anonymous

Thank you for the opportunity to provide feedback on the proposed updates to the National Assessment of Educational Progress (NAEP). As a former Title I teacher and current graduate student in public policy at The University of Virginia, I strongly support the inclusion of social studies and civics assessments, particularly at the middle school and elementary school level.

During my time teaching in Title I schools in Kentucky and West Virginia, I observed that schools often chose not to focus on subjects like social studies and science, viewing them as less important to students' success on standardized tests, and overly focusing on reading and math. This trend is particularly concerning because it undermines a well-rounded education and deprives students, particularly those coming from the most disadvantaged backgrounds, of the opportunity to develop critical thinking skills, engage in historical content, and develop civic engagement skills at a young age. The focus on testing outcomes tied to reading and math scores often pushes social studies and science out of the curriculum, despite their importance.

The proposed revisions to the NAEP framework, which include assessments in civics and history for grade 4 and 8, reflect an important step toward addressing this issue. By prioritizing social studies and civics in the NAEP, you can send a message that these subjects are critical to students' educational development. Testing in these areas helps ensure that schools place the appropriate emphasis on providing students with the knowledge and skills they need to succeed as informed participants in our democracy.

Thank you for considering my comment.

Dear Anonymous,

We thank you for your thoughtful review of the NAEP 2026 Clearance Package and for submitting your public comment about the subject areas being assessed in the upcoming NAEP assessment.

The National Assessment Governing Board determines which subjects will be part of the upcoming NAEP assessments, published at https://www.nagb.gov/naep/assessment-schedule.html. Civics and U.S. history are scheduled to be assessed in 2026 (grade 8) and 2030 (grades 8 and 12).

Sincerely,

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Comment: ED-2024-SCC-0133-0005
Name: Ajit Gopalakrishnan, Chief Performance Officer, Connecticut State Department of Education

Thank you for the opportunity to provide comment on the agency information collection "National Assessment of Educational Progress (NAEP) 2026," OMB Control Number: 1850–0928. Supporting Statement Part A, Section A.12 provides an estimate of respondent reporting burden and shows the stark differences in burden between schools administering NAEP using NAEP-provided devices, the model in place since 2017, and schools administering NAEP using school devices, the new approach for 2026 and beyond. The transition to using school devices for the NAEP administration is the preference communicated by NCES and will reduce costs for the NAEP program. However, the new model is school-resource intensive, shifting costs and burden from NCES to schools and districts.

There is a considerable amount of work that must be completed by school personnel to adequately prepare for the NAEP administration. The "school staff preassessment activities" for schools selected for the NAEP-provided device administration model (Model 2) is estimated by NCES to require approximately two hours on average (page 26). In schools selected for the school-provided device administration model (Model 1), the same tasks are reported as requiring six hours on average (page 24). This is three times the burden for preassessment activities exclusively when a school uses their own devices for NAEP.

NCES requires school staff support on the day of the assessment. Both administration models require that the school staff member assigned the NAEP school coordinator role be available for at least two hours on the day of the assessment (page 25). The new administration model also requires the presence of a school staff member for purposes of classroom management for the 2-hour testing block because NAEP will not provide adequate field staff coverage to assess all sampled students simultaneously; note that on page 25, the estimate is incorrectly stated as one hour when the assessment session is actually two hours. Finally, a technology coordinator provided by the school must be available throughout the testing session to troubleshoot issues that may be encountered when using school devices on the school network (page 25). Like the increase in burden for pre-assessment activities, day of assessment demands also have increased from two hours to six hours.

NCES provides an estimate for "post assessment activities." The burden on school coordinators remains 20 minutes regardless of administration model, but the school-device administration model also requires 40 minutes of time from a technology coordinator (page 25). The post assessment burden has doubled.

These documented increased demands (from less than five hours to 12 hours) do not include the time necessary for every school to complete the school technology survey (estimated at one hour on page 23) to determine administration model eligibility. This additional hour is over and above the following pre-existing requirements for schools, regardless of the administration model used:

- School questionnaire to be completed by the principal: 30 minutes;
- Teacher questionnaire to be completed by teachers of selected students: 20-30 minutes per teacher; and
- Student with Disabilities (SD) and English/multilingual learner (EL) questionnaires to be completed for every sampled student identified as SD/EL. These are completed by staff members who know the students best: 15 minutes per student. Based on Connecticut's enrollment, the average school with 50 students sampled, would need to complete nine SD questionnaires and five EL questionnaires, which requires 3.5 hours of staff time.

The Connecticut State Department of Education supports the NAEP testing program and its importance as a high-quality measure of student achievement that can be used reliably to track national performance, compare the performance of states, and evaluate long term trends of all students and student groups. However, at a time when we are strongly encouraging the judicious use of assessments to minimize testing time and increase instructional time, we have significant concerns about NCES more than doubling the NAEP administrative burden for school personnel without any added compensation for the participating schools. Preparing for and administering NAEP will divert valuable time and resources away from the important work school staff must do every day to ensure high quality educational experiences for their students. Even though NCES presents these changes as "modernizing NAEP," district and school leaders are more likely to view the upcoming changes as a shift in burden from NCES to the schools. Therefore, we strongly encourage NCES to revisit this shift in burden and prioritize the resources necessary to continue using NCES staff for the consistent administration of NAEP nationwide. Alternatively, NCES could provide schools with a choice of using either school or NCES staff for administering NAEP and offer schools selecting their own staff with necessary compensation.

Dear Ajit Gopalakrishnan:

Thank you for your feedback and thorough review of the 2026 NAEP Clearance Package. The National Center for Educational Statistics (NCES) appreciates your comments.

The 2025 Field Test allowed NCES an opportunity to assess the total amount of burden associated with the NAEP assessment being deployed on school devices. It also helped to evaluate the processes and procedures associated with the deployment, administration, and removal of the NAEP Assessment Application. The information will help to inform a more refined estimate of burden for the 2026 Operational Assessment, which may be updated in future 2026 NAEP OMB Amendments.

In addition, the 2025 Field Test provided additional information that will help to drive decisions regarding the number of school staff needed to prepare for the assessment and their time commitment. NAEP will continue to evaluate the roles and responsibilities of those associated with the pre-, during, and post- activities associated with the NAEP assessment. NCES has always focused on gathering information about student performance without over burdening schools and districts who are part of the sample. For example, NCES has received requests to assess all students at one time, rather than in two sequential sessions. As such, in 2025 and planned for 2026, schools assessing on school devices will be given the option to assess all students in one session rather than two separate sessions. This approach reduces the overall time that instructional time would be interrupted and impacted during the school day. As we continue to gain experience assessing on school devices and learn about the improvements that can be made, we will enhance the process and systems to minimize the burden and impact on school personnel.

Once again, we appreciate your concerns and expressing the constraints that exist in Connecticut.

Sincerely,

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Comment: ED-2024-SCC-0133-0006 & ED-2024-SCC-0133-0007
Name: Dan Farley and Beth LaDuca, Oregon Department of Education

Thank you for the opportunity to comment on the burden estimates for the 2026 administration of the National Assessment of Educational Progress, also known as NAEP (OMB #1850–0928 v.36, October 2024). The Oregon Department of Education is concerned about the sharp disparity in burden between schools where NAEP will be administered on NAEP devices and schools where NAEP will be administered on school devices. NCES estimates that the burden on school staff for completing preassessment activities in NAEP device schools to be 2 hours on average, while the estimate for staff in school device schools is 6 hours on average, three times as large. This cost and burden shift from the NAEP program to schools comes at a time of budget pressures on schools in Oregon, where districts have conducted layoffs and plan future layoffs to balance budgets. In addition to the time required for preassessment activities, the administration of NAEP on school devices requires the involvement of far more district and school staff, including technology directors and specialists, district assessment directors, and teachers or educational assistants for the classroom support required to conduct NAEP in a single test session.

The total burden estimate for NAEP devices schools is less than 6 hours, while the estimate for school devices schools is 13 hours, not including the school administrator surveys, teacher surveys, or students with disabilities and English learners questionnaires. The Oregon Department of Education does not support the shift in burden from the NAEP program to schools that is required to administer NAEP on school devices. NCES has stated that the goal for future NAEP administrations, including NAEP 2026, is for most NAEP assessments to be administered on school devices. If this plan moves forward, NCES should at minimum provide a full picture of the time and staffing requirements for school device administration at the beginning of the NAEP planning process and allow districts and schools the option to choose the NAEP device administration model.----------

Dear Dan Farley and Beth LaDuca,

Thank you for your feedback on the proposed National Assessment of Education Process (NAEP) 2026 Clearance Package. The National Center for Educational Statistics (NCES) appreciates your interest in NAEP and NCES data collections and acknowledge your concerns about the burden for schools and districts as NAEP moves to utilizing school devices for the NAEP administrations.

The 2025 Field Test allowed NCES an opportunity to assess the total amount of burden associated with the NAEP assessment being deployed on school devices. It also helped to evaluate the processes and procedures associated with the deployment, administration, and removal of the NAEP Assessment Application. The information will help to inform a more refined estimate of burden for the 2026 Operational Assessment, which

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