

**Author Full Name :** Beth LaDuca**Received Date :** 06/08/2020 11:23 AM**Comments Received :**

June 8, 2020

Thank you for the opportunity to comment on the burden estimates for the National Assessment of Educational Progress (NAEP) 2021 (OMB Control # 1850-0928). The burden estimate for school personnel to input data for students with disabilities and English language learners (SD and ELL students) is 15 minutes per sampled student. For some schools this translates to considerable burden, as much as 600 minutes (10 hours) for one Oregon school in 2018-2019, the most recent NAEP state-level assessment year. Another Oregon school principal, with 29 SD and ELL students selected for NAEP 2019, reported:

"I had to spend an entire day locked in my office preparing for all of the student lists and accommodations. Because most of our students are either SD, ELL, or both, I had so many lists to go through. This doesn't take into account the other prep work, like sending out letters to parents, teachers, students . . . All of that was totally doable. But having to hand-enter in each student's info was a lot of work. Even for SBAC, I don't have to enter all that information. It seems like a data person could have uploaded a file or something."

As is often the case in Oregon, this principal completed all the NAEP planning activities. The official burden estimate for this work is 4.5 hours, plus the 7 hours and 15 minutes (435 minutes) required to enter the SD and ELL student information. The total burden estimate of 11 hours and 45 minutes represents a substantial burden for a school administrator.

The Oregon principal quoted above offers a very reasonable option for reducing burden: if NAEP were to allow a download of the SD and ELL student questions into an Excel spreadsheet, the school coordinator could enter the data much more efficiently and then upload the completed spreadsheet to the NAEP planning system. Having the SD and ELL questions in Excel would also allow school or district data specialists the option of entering the data automatically from a student information system. Currently, the NAEP planning system requires the school coordinator to answer the SD and ELL questions individually for each student in the online system. There are from six to eleven questions for each SD and ELL student. Reducing the burden for providing SD and ELL student information would be a meaningful improvement for NAEP 2021.

Respectfully submitted,  
Beth LaDuca  
Oregon Department of Education