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Thank you for the opportunity to comment on the information collection "National Assessment of Educational Progress (NAEP) 2024," OMB # 1850-0928. Supporting Statement Part B, section B.2.b describes a new Assessment Management System (AMS) as an "online secure site that provides participating schools with a convenient way to prepare for the upcoming assessment."

Unfortunately, the development of the AMS during 2023 for use in the NAEP 2023 field test and NAEP 2024 has not delivered the improvements long requested by many school administrators and NAEP State Coordinators. Specifically, the AMS does not offer users the ability to upload information about multiple students with disabilities and English learners in one file. In fact, the current version of the AMS lacks the functionality of the old system for schools to print worksheets with the names of these students that could be used to collect the necessary data offline from the appropriate teacher or specialist. The new AMS actually reduces the flexibility of school personnel to collect and input information.

The Oregon Department of Education has expressed the need for improvement in the collection of data for students with disabilities and English learners since April 2019, in a comment on OMB# 1850-0928 v.14. That comment is as relevant today as it was in 2019, since the issue has not been addressed; however, the burden estimate for inputting data for students with disabilities and English learners has increased from 10 to 15 minutes per student.

"The burden estimate for school personnel to input data for students with disabilities and English language learners (SD and ELL students) is 10 minutes per sampled student. For some schools, this translates to considerable burden, as much as 400 minutes for one Oregon school in 2018-2019. 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 4 hours and 50 minutes (290 minutes) required to enter the SD and ELL student information. The total burden estimate of 9 hours and 20 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...