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Office of Information and Regulatory Affairs
Office of Management and Budget
Executive Office of the President

I write in response to ICR 202410-1850-002.

I am the Director of the Inter-university Consortium for Political and Social Research ([ICPSR](http://www.icpsr.umich.edu)). ICPSR's is the nation's premier social science data archive. Founded 62 years ago, ICPSR is the world's large social science data archive with over 22,000 data studies and over a half-million annual users. ICPSR is a leader in metadata standards and data confidentiality.

The National Assessment of Education Progress (NAEP) is a critical part of our nation's data infrastructure and its ability to measure and improve our investments in the education of our children. As such it is necessary that we have the highest quality data. That is only possible if we provide assurances of confidentiality to the children, parents, and teachers who are being asked to share their personal information. Our nation's best practices for confidentiality protection were captured in the Foundations of Evidence-Based Policymaking Act of 2018, Title III, Part B, Confidential Information Protection ("CIPSEA"), bipartisan legislation passed unanimously in the U.S. Senate and by a vote of 356 to 17 in the U.S. House of Representatives. I strongly urge the appointment of a Commissioner for the National Center for Education Statistics who can faithfully implement CIPSEA protection for the NAEP and other valuable NCES data assets.

Sincerely,

Margaret C. Levenstein
ICPSR Director
Professor, School of Information

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