



June 16, 2025

Matthew Soldner
Acting Director
Institute of Education Sciences
U.S. Department of Education
550 12th Street, SW
Washington, DC 20024

Re: Docket No.: ED-2024-SCC-0133, National Assessment of Educational Progress (NAEP) 2026

Dear Acting Director Soldner:

On behalf of the American Educational Research Association (AERA), thank you for the opportunity to provide comments on the revisions to the 2026 National Assessment of Educational Progress (NAEP) Reading and Math Assessments. AERA is the major national scientific association of 25,000 faculty, researchers, graduate students, and other distinguished professionals dedicated to advancing knowledge about education, encouraging scholarly inquiry related to education, and promoting the use of research to improve education and serve the public good.

Parents, policymakers, industry leaders, state education agencies, and school districts rely on the statistics that the NAEP provides on student performance in math, reading, and science. From the vantage of AERA's membership, education research scientists analyze public-use and restricted-use data, including NAEP process data, for research purposes that include the use of accommodations in assessments and understanding how students approach responses to assessment items. This work, in turn, informs education policy and practice.

NAEP has served as the gold standard for assessing student knowledge and reporting on student progress at a nationally-representative level for decades. The strong credibility and trust of NAEP is a testament to the important role that the National Center for Education Statistics (NCES) has as the federal statistical agency responsible for administering NAEP assessments and ensuring the accuracy, reliability, and validity of assessment data.

As a federally designated, primary statistical agency, NCES also has responsibilities under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) to ensure that data that are collected under a confidentiality pledge are used exclusively for statistical purposes. In addition, federal statistical agencies are required to safeguard the confidentiality of personally identifiable information (PII) collected under a

confidentiality pledge for statistical purposes. We are thus concerned about the statement in both the Federal Register notice and in Supporting Statement Part A indicating that CIPSEA confidentiality assurances would be removed for the 2026 administration of NAEP.

While the confidentiality provisions that exist in the Education Sciences Reform Act (ESRA) would still apply, with applicable penalties for the unauthorized disclosure of PII, the CIPSEA protections are specific to data collected exclusively for statistical purposes. CIPSEA also notes responsibilities of designated statistical agencies, one of which is to “protect the trust of information providers by ensuring the confidentiality and exclusive statistical use of their responses.” Without explicit CIPSEA protections, we are concerned that this may lessen trust in the statistical data that will be reported as part of 2026 NAEP results.

We are aware that the March reduction in force (RIF) undertaken by the Department of Education significantly reduced the number of NCES staff who were responsible for the administration of NAEP. NCES is also currently without a commissioner or a designated official serving as acting commissioner who would otherwise have the responsibilities for implementing provisions under CIPSEA. Given the importance of NAEP for understanding student academic achievement and for comparing progress across states, we seek an immediate solution that would enable the 2026 NAEP to retain CIPSEA confidentiality assurances.

Thank you again for the opportunity to provide comments to ensure the continued high quality and trust that the NAEP program has deservedly received. AERA looks forward to continue to work with you on this critical resource for education researchers and for evidence-based policy.

Sincerely,

A handwritten signature in black ink, appearing to read 'Felice J. Levine', with a stylized, cursive script.

Felice J. Levine, PhD (she/her)
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