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Attn: Stephanie Valentine,
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division,
Office of Chief Data Officer.
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: ED Docket No. ED-2021-SCC-0023 Agency Information Collection Activities; Comment Request; NAEP 2021 School Survey

Dear Ms. Valentine:

On behalf of the National Down Syndrome Congress (NDSC), I am writing to provide NDSC's feedback regarding the U.S. Department of Education's (ED) request for comments on the National Assessment of Educational Progress (NAEP) 2021 School Survey. NDSC strongly supports the goal of gathering "vital data on the impact of COVID-19 on students and the status of in-person learning." There is a significant need to understand the academic, social, emotional, mental, and behavioral impact this pandemic has had on ALL students with disabilities. In addition to providing comments on the content of the survey, **NDSC has an overarching concern to share regarding the confusion that district and school leaders may have about whether students who take their state alternate assessment must be included in this survey. Since the NAEP has no alternate assessment, students who take their state alternate assessment do not participate in the NAEP assessment. However, this fact must not be a barrier to them being included in this very important survey. We urge ED to make this point clear in its communication to district and school leaders about the NAEP survey.** Also, we request that the following information be collected as a part of the survey:

Collect Data On Time Spent In General Education Settings

Federal law requires that students with disabilities be educated alongside their nondisabled peers to the maximum extent appropriate. We would expect that students with disabilities continued to participate in the general education classroom at the same rates during the pandemic, but we know that districts faced major challenges in serving all students well during this time. Therefore, we request that ED collect data on how much time students with disabilities participated in synchronous instruction alongside their general education peers. We also request that this data be disaggregated by IDEA disability category.

Collect Data On the Type and Frequency of Communications with Parents and Families

NDSC requests that ED collect data on the frequency of communication between schools and parents, families, and other caregivers and that this data be disaggregated by race, ethnicity, disability status, EL status of the student. We know that virtual learning has been largely dependent on support from family members, especially for younger students and students with disabilities. It's important to know how and if schools are effectively engaging with families and whether that varies by student population.

Collect Data On the Accommodations, Modifications and Supports Provided to Students with Disabilities in Virtual Settings

NDSC urges ED to collect data on the kinds of accommodations, modifications and other supports (including paraeducator support if included in the student's Individualized Education Program) that schools have provided in virtual learning settings. While virtual and remote learning created many barriers to learning for all students, there was a unique challenge facing students with disabilities who needed access to accommodations, modifications and supports in order to have equal access to learning.

Publicly Report Data Disaggregated by Disability Category

We are pleased that previous NAEP surveys have publicly reported data that is disaggregated by disability status. However, NAEP data groups all students with disabilities together and is not publicly reported by the 13 disability categories under IDEA. The unique challenges faced by students with disabilities can differ based on their identified disability. We urge you to make the data collection more robust by publicly reporting data that is disaggregated by disability category wherever possible.

Disaggregate by Disability Status and English Learners (ELs)

NDSC also urges ED to disaggregate the data by English Learner (EL) students who are also identified as having a disability either through IDEA or Section 504. It is essential that we attempt to collect data that examines how well schools are serving the more than 700,000 public school students who are both English learners and students with disabilities.

Thank you for this opportunity to comment on behalf of NDSC. If you have any questions or would like to discuss these matters further, please contact me at ricki@ndscenter.org.

Sincerely,

Ricki Sabia
Senior Education Policy Advisor
National Down Syndrome Congress