

Ms. Peggy Carr  
NAEP Achievement-Level-Setting Program  
National Assessment Governing Board  
800 North Capitol Street, NW  
Suite 825  
Washington, D.C. 20002



October 15, 2018

Dear Ms. Carr,

On behalf of the undersigned organizations, representing public school superintendents, district administrators, and educational service agency administrators, we submit this letter in response to the proposed changes by the National Assessment Governing Board (NAGB) to the National Assessment of Educational Progress (NAEP) achievement benchmarks. We are opposed to the changes as proposed and are concerned the changes fail to meet the goal in the proposal's first paragraph: to produce achievement levels that are "reasonable, useful, and informative to the public."

We thank you for extending the comment period. While still short, the additional time reflects the reality of what it takes to review and adequately respond to the type of changes proposed in the rule and what it could mean for the nation's schools, the students they serve, and the communities to which they are accountable and in which they live.

The original achievement levels were developed in a rushed process, and resulted in levels that continue to confuse educators, citizens, and policymakers. The levels have been described as 'wishful thinking' more than 'reasonable' or 'common sense', and the latest research linking NAEP's benchmarks to international assessments reveals that the majority of students in most nations cannot clear NAEP's proficiency bar.

Our organizations support high standards, and this response is not a request to lower the standards of NAEP. Rather, we are requesting that should NAGB move forward with a proposal to revise the definitions of NAEP terms, that the final product be an improvement over the current definitions and ensure that parents and the community can understand what the NAEP standard terms mean and how those levels do or do not relate to other academic scores, including assessments and grade level. We align with the recommended changes submitted by the National Superintendents Roundtable<sup>1</sup>, as they appear in the section starting at the bottom of page six of their letter. Their recommendations revise the proposed policy definitions and represent changes that improve efforts to better communicate information that is reasonable and accessible to educators and the general public.

We thank you for reviewing our submitted comment today and urge you to revise the policy definitions for the standards. We reiterate that the proposed policy definitions for NAEP achievement levels miss the mark and are unresponsive to criticism of the levels. These standards and benchmarks must be revised so as to be expressed in terms that parents and the public can understand. We welcome the opportunity to work with you as this process moves forward. Please direct any questions to Noelle Ellerson Ng ([nellerson@aasa.org](mailto:nellerson@aasa.org)).

Sincerely,

Daniel A. Domenech  
AASA, The School Superintendents Association

Joan Wade  
Association of Educational Service Agencies

<sup>1</sup> Letter from National Superintendents Roundtable (September 18, 2018)  
<http://files.constantcontact.com/d6ed868c001/b63f4624-49ad-40a1-afd8-660913afe0cd.pdf>