

TO: Governing Board Members
FROM: Governing Board Staff
RE: Preparing for Policy Discussion on NAEP Reading Framework Update
DATE: November 13, 2020

Introduction

Since the July 30-31 Quarterly Governing Board Meeting, the Assessment Development Committee (ADC) and Board staff have worked with the Development Panel for the NAEP Reading Framework on two key priorities:

- 1) Completing the review of public comment received on the draft framework this summer and making initial recommendations for reconciling those comments in the next draft of the framework; and
- 2) Further explicating the key policy questions for the Governing Board's input so that you can give the Development Panel sufficient guidance on priorities for the next draft of the framework.

This preparatory memo aims to meet the following objectives:

- 1) Provide all Board members with sufficient context on developments, particularly progress since the July quarterly meeting;
- 2) Outline the policy questions that ADC has identified as most salient for Board discussion at the November quarterly meeting; and
- 3) Outline the process and next steps for the Reading Framework update coming out of the November meeting.

In addition, attached to this memo are the following appendices:

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| NAEP Reading Framework Update: Answering Questions <i>This answers questions that have been raised in Board deliberations. Click here for a more general FAQs resource.</i> | Appendix A |
| Similarities and Differences Between the Current NAEP Reading Framework and the Proposed 2025 NAEP Reading Framework <i>This lists recommended framework updates and rationales, while noting how each update builds on the current framework.</i> | Appendix B* |
| Categories of Recommended Framework Updates <i>This classifies which recommended updates reflect features already implemented as part of digitally based assessment.</i> | Appendix C* |
| Framework Impacts on NAEP Trends <i>This lists how previous framework changes have impacted trend reporting, for NAEP Reading and for other subject areas.</i> | Appendix D* |
| Background on Process for Developing and Updating NAEP Frameworks and Assessments <i>This lists process steps and policy outcomes for all NAEP framework projects, noting steps completed for the NAEP Reading Framework update.</i> | Appendix E* |
| Summary of Public Comment <i>This report summarizes all public comment received.</i> | Appendix F* |

You may notice that some of these appendices were included in the materials for the joint ADC-COSDAM planning meeting held on September 23rd. To ensure all Board members have the same working knowledge of relevant issues, we are including them again here. The repeating appendices are noted with an asterisk.

Background

Because of the important role NAEP plays as “The Nation’s Report Card,” it’s essential that it remains a valid, reliable, and relevant instrument. To do that, the framework must reflect current research and knowledge in reading comprehension.

The current NAEP reading framework was last updated almost two decades ago. In that time, education has experienced significant changes—in technology, curricular standards, and research. This requires the Board evaluate what framework changes are necessary to ensure NAEP remains a relevant and useful instrument for measuring reading progress and achievement now and in the future.

At the same time, stable reporting of student achievement trends is an important part of NAEP. The Board must carefully consider the impact of framework changes to trend alongside the need to ensure the framework accurately reflects what students should be able to know and do.

The Need for a Reading Framework Update

Board policy specifies that at least once every 10 years (and more often if there are major changes in states’ or the nation’s educational systems), the Board, through ADC, shall review the relevance of assessments and their underlying frameworks. In each **framework review**, the ADC shall solicit input from external experts to determine if changes are warranted.

Hence, these framework reviews yield one of three outcomes:

- 1) The ADC determines no changes are needed;
- 2) The ADC determines updates are needed to an existing framework; or
- 3) The ADC determines an existing framework needs to be replaced in its entirety with a new framework.

For an updated framework or a new framework, the ADC codifies its determination in a formal recommendation to the full Governing Board. The full Board takes action on this recommendation, which includes a Charge to Framework Panel that would be convened. If approved, this Charge is used to kickoff the formal framework update or replacement effort.

For the NAEP Reading Assessment, the ADC conducted a framework review that started in March 2018 and was supported by [papers](#) from and discussions with leading voices in reading, including the perspectives of educators, states, and researchers, as well as leaders who drafted the current framework.

The ADC consensus was that the suggested updates across the experts and literature reviewed reflected the need for a substantial revision of the current NAEP Reading Framework, i.e., more than tinkering or

tweaking, but not so dramatic as to be considered transformational – though one or two major areas may require some level of transformational change.

The Board responded to this need with a unanimous March 2019 vote to launch a framework update process for NAEP Reading.

What Kinds of Updates Are Recommended?

Since the last framework update in 2004 there have been significant advances in education, research, and technology that make updates to the framework necessary. The Board’s decision to launch a framework update process was predicated on the following:

- How students read has dramatically changed, due to advances in research, instruction, and technology since 2004.¹
- The NAEP Reading Assessment is now administered digitally (though framework is for paper assessment). So, NAEP must be transparent to the public on what is being assessed.²
- The current NAEP Reading Framework:
 - Was written for paper-based assessment;
 - Does not fully address the different background knowledge students bring to the assessment; and
 - Is not informed by updated state standards.

Technological Innovations

Technological innovations have dramatically changed how students access and interact with text. Online, or digital, material is increasingly part of most students’ lives, and mastery of these texts is essential for success in school and life in the future. Experts that reviewed the framework recommended that the framework be updated to acknowledge and reflect this reality.

This means that students must be multimodal readers. While multimodal reading is not new, the types of information students encounter in digital texts are wide-ranging, including infographics, video clips, interactive charts, and images. Research has shown that different demands are placed on the reader based on the modality. It’s important that NAEP Reading reflects these significant changes in how text is presented and accessed with suitable texts and related test items.

The current NAEP Reading Framework was written for paper-based assessment, but NAEP is now assessed digitally. Because digital assessments allow for different types of assessment questions than paper tests, the framework should be updated to be transparent with the public about what NAEP reading assesses.

Across assessment programs that have transitioned to digital-based administration, universal design elements help students access and navigate the digital platform as they respond to NAEP items. It ensures fairness.

¹ For example, the NAEP Validity Studies Panel (under contract to NCES) produced studies flagging content issues that needed to be addressed in the framework to support the validity of inferences about NAEP Reading.

² While all NAEP assessments are being transitioned to digital platforms as a general advance for NAEP, the subject of reading uniquely encouraged the transition to digital assessment to support construct validity: reading and texts are increasingly in digital contexts.

Background Knowledge

The current framework does not fully address the fact that students bring different background knowledge to each assessment. Research has long established that background knowledge has a substantial impact on reading comprehension. Accounting for this difference in knowledge is a perennial issue in all reading assessments.

Simply put, as readers, we draw on our prior knowledge and experiences and the thoughts, ideas, and interpretations of others to make meaning of the texts we are reading. No matter how carefully the texts are selected for NAEP, the students with greater exposure will have a “leg up” when it comes to comprehending the texts.

The NAEP Reading Assessment is focused on content knowledge specific to reading comprehension. It is not assessing the knowledge students have about different topics from their general experiences or their classes in other subjects.

Students’ differing background knowledge challenges valid measurement because NAEP Reading is focused on reading comprehension. There are a variety of strategies that can be used to more precisely measure reading comprehension. However, NAEP cannot assume students have read the same materials because, by law, NAEP must be neutral on curricula.

It is also important to understand that there are limitations to what a large-scale assessment like NAEP can do to contribute to equal opportunity, as much of that is related to curriculum, instruction, and out-of-school factors. But, to provide all students with equitable opportunity to show what they know and can do, NAEP should address the background knowledge challenge.

Changes in State Standards

The current framework does not reflect updated state standards which call for readers to engage with complex text and write from sources. In order to continue to be a relevant and valid assessment, it is important that NAEP maintains consistency with what the states require that their students know and be able to do.

Writing from sources figures prominently in new state standards, lending support for increasing opportunities for students to write both short and extended constructed responses on the NAEP reading assessment.

State standards now address differences in reading different informational texts, e.g. reading in science vs. reading in social studies. The latest reading research has also noted these differences.

Status Update

Board Deliberation

At the July Quarterly meeting, the Board engaged in a robust discussion about the initial draft of the updated Reading Framework, in which the Development Panel recommended ways to implement the types of changes identified by the framework review process. That discussion surfaced a number of substantive policy issues (see attached July meeting minutes for a full summary), including questions about whether trend could be maintained in the transition to a new framework and the Development

Panel’s proposed model for addressing the measurement challenges posed by students’ differing levels of background knowledge, as well as the timing of and research to support implementing proposed updates. As a result, ADC and COSDAM met on September 23rd to delve more deeply into the rationales for the framework update and discuss the potential timing of their implementation.

Joint ADC-COSDAM Meeting

In this joint meeting of September 23rd, ADC and COSDAM members were briefed by NCES on two key matters related to the framework update:

- Features of the current NAEP Reading Assessment, including a brief demonstration of the current assessment (using secure items) and overviews of related research and development.
- How trend was maintained for the previous NAEP Reading Framework replacement in 2004.

Committee members then discussed remaining concerns about the feasibility or necessity of recommended updates for NAEP Reading and how the reading framework update might be timed, given Board priorities for the assessment schedule and budget, maintaining trend, and innovation. The Committees agreed that several questions needed to be answered to inform deliberations. These questions are captured in Appendix A, along with answers.

Reading Framework Development Panel

In response to public comment (Appendix F) and initial feedback from the Governing Board, the panel needed to make several clarifications to their recommendations. The Panel needed to:

- **Strengthen rationales** to indicate why changes are necessary for the Nation’s Report Card, as a response to the charge from the Governing Board to the Panel (see Appendix B);
- **Clarify what is continuing from the current framework** so that it is clearer what from the current assessment is being built on, not discarded, and clarifying what is already permitted under the current framework (see Appendix B); and
- **Remove proposed special studies** so that it is clearer exactly what is proposed for the 2025 assessment, e.g., embedding extra questions into the assessment (that are not strictly test questions) and providing students with choice in the passages they read were proposed for special studies to be conducted after the 2025 assessment is implemented. (See Appendix A for more details. Proposed special studies will be listed in the Assessment and Item Specifications for NCES, rather than the framework document, which is for the general public.)

Relatedly, there were several foundational misconceptions in the panel’s initial draft that needed to be clarified:

- **The framework recommendations reflect substantial carryover relative to the current framework.** For example, the framework would not result in a completely new assessment with all new items. As noted in Appendix A (Question #2), preliminary analysis by NCES indicates that at least 90 percent of the current item pool can be considered as consistent with the update recommendations for the 2025 Framework – with some modifications. Appendix B highlights the specific content that is continuing from the current framework. Some public comment inaccurately characterized 2025 framework recommendations as entirely new.

- **A sociocultural perspective fully entails a cognitive perspective.** The framework panel recommends that the NAEP Reading Assessment acknowledge sociocultural context in the NAEP Reading Assessment for a variety of reasons (see Appendix A and Appendix B). The cognitive model in the current reading framework would continue to be represented, while acknowledging the contexts in which students engage in reading. Acknowledging the influence of sociocultural context supports more authentic and engaging assessment, increases guidance for digital assessment design, and brings NAEP closer to leading international assessments. Some public comments questioned whether cognitive perspectives and/or models of reading were addressed in 2025 framework recommendations. Cognitive perspectives were prominently featured in a manner that reflects what has been learned, especially in the last 20 years, about the importance of context in shaping those processes.
- **Universal Design features of the assessment would be available to all students.** A universal design element, necessary with the advent of digital assessment, helps students access and navigate the digital platform as they respond to NAEP items. It ensures fairness. Some public comment assumed that only some students would see these assessment features, thereby personalizing the assessment. This is not accurate.
- **Universal Design features would support accessibility and rigor simultaneously.** To support the design of more complex NAEP assessment tasks, Universal Design features are needed to provide adequate instructions and digital task guidance. In this way, Universal Design provides space for higher rigor. On the other hand, NCES has indicated that the NAEP Reading Assessment needs to improve measurement on the low-end of the NAEP scale, e.g., we only know what some students cannot do. Here again, Universal Design supports the overall accessibility of the assessment for all students, including lower-performing students. Some of the public comment assumed these recommended updates would simply make the NAEP Reading Assessment easier. However, the updates are designed to support validity and improve measurement across the entire NAEP scale.

The Panel has carefully reviewed all public comment (Appendix F). Using this feedback and the Board’s previous discussions as resources, the Panel has developed a comprehensive revision plan. In preparation for the full Board discussion on November 20, the ADC will discuss this revision plan as a committee on November 13, 2020.

ADC Deliberation

ADC members held a planning meeting on October 30, 2020, in which they began to articulate policy positions on key questions that have surfaced in prior Board discussions. The ADC will meet again on November 13, 2020, to finalize the committee’s recommendations on these questions and will present them to the Board for discussion at the November quarterly meeting. Fundamental questions guiding ADC’s discussions are:

1. How should the Governing Board support maintaining NAEP’s reputation as the gold-standard in measurement, while also maintaining stable reporting of student achievement trends?
2. With the convergence of research and the advent of digitally based assessment, should the NAEP Reading Assessment expand to acknowledge the context in which readers engage with passages and tasks?

3. More generally, how should the Board support improvements that enhance the accessibility and validity of the NAEP Reading Assessment?
4. How should the Governing Board deepen the insights available from NAEP Reading Assessment results, especially where research and curricular standards provide strong foundations for doing so?

Next Steps

At the November quarterly meeting, ADC will present the Board with its recommendations on policy priorities for the Reading Framework updates, related to the four policy questions above. The Board's discussion will inform the Development Panel as they prepare final revisions for Board review in March 2021, with Board action scheduled for May 2021.

***NAEP READING FRAMEWORK UPDATE:
ANSWERING QUESTIONS***

The following questions have been raised in various Board deliberations, starting in July 2020.

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1. Why did the Board decide to pursue a framework update for the NAEP Reading Assessment?

Board policy calls for frameworks to be reviewed at least once every 10 years, and the NAEP Assessment Schedule indicates a new or updated framework will be in place for the 2025 administration of NAEP, if needed. Accordingly, the Board conducted a framework review in 2018 supported by papers from and discussions with leading voices in reading, including the perspectives of educators, states, and researchers, as well as leaders who drafted the current framework. Based on this review, the consensus was that there was a need for a substantial revision of the current framework because of the significant advances in education, research, and technology since 2004.

- Technological innovations have dramatically changed how students access and interact with text. The Board’s 2018 framework review showed that the framework needed to be updated to acknowledge and reflect this reality.
- The current NAEP Reading Framework was written for paper-based assessment. To be transparent to the public about what is being assessed, each framework must explain how research and best practice is reflected in digitally based NAEP assessments. As of 2017, the assessment is digitally-based.
- The current framework does not fully address the fact that students bring different topical knowledge to each assessment. Research has long established that this knowledge has a substantial impact on reading comprehension. Accounting for this difference in knowledge is a perennial issue in all reading assessments. Further, NAEP has a unique challenge because it must be neutral with respect to curricular and instructional approaches.
- The current framework does not reflect updated state standards which call for readers to engage with complex text and write from sources.

2. To what extent do panel recommendations reflect an update as requested by the Governing Board?

The first digital administration of the NAEP Reading Assessment was conducted in 2017. Since that time, the Assessment has been revised to feature new forms of digital texts and purpose-driven tasks, Universal Design elements, and new response formats that the 2025 Framework now recommends. The 2025 Framework expands and clarifies guidance for NCES in these areas, supporting reliability and validity for the assessment.

There are two completely new updates recommended for the 2025 NAEP Reading Assessment: (a) the addition of a fourth cognitive target – asking students to use and apply what they have read; and (b) disaggregating informational texts by discipline to allow reporting of student’s reading achievement relative to texts in science and social studies. Preliminary analysis by NCES indicates that at least 90 percent of the current item pool can be considered as consistent with recommendations for the draft 2025 Framework – with some modifications. For example, carrying the full 90 percent

forward would require a more gradual implementation of recommendations to specify a purpose before a student reads a text and to structure assessment activities in a certain manner.

The remaining updates are for future years beyond 2025, depending on the time and resources available to conduct the needed research; these updates would not be implemented in the assessment if they are not supported by research.

3. What can be done to confirm that trend can be maintained before the Board adopts the framework?

Trend maintenance is largely an empirical determination. First, a content alignment study would be conducted for any framework updates, beyond minor clarifications. Then, NCES is planning to conduct a bridge study. In order for the Board to have a full guarantee that trend will be maintained: (a) the Board would need to provisionally adopt a framework update; and (b) NCES would develop items relative to that update and study their impact. Currently, any framework update process takes a minimum of 6 years, from the start of a framework update process to the implementation in the assessment (e.g., the reading framework update process started in 2019 to support an updated assessment being implemented in 2025). Putting efforts into examining if trend can be maintained ahead of final adoption of the framework would extend this timeline.

4. To what extent does past research suggest that trend can be maintained if the Board adopted the framework panel's recommendations?

The public comment draft of the framework emphasized the recommended updates without providing clear indications of how these updates represent an evolution from the current NAEP Reading Framework. The draft also did not clarify which updates were only to be implemented as research and development supported them, e.g., block-embedded questionnaire items and student choice. With these clarifications in mind, NCES estimates that at least 90 percent of the current item pool can be considered as applicable to the draft framework, with some modifications (see question #2). To support trend maintenance, NCES recommends that at least 70 percent of the 2025 item pool be items that are carried forward from the current framework. There is, however, one caveat: the newly introduced items for the 2025 item pool cannot be substantially different from those carried forward from the current framework; otherwise the risk of breaking trend is higher.

Still, the last NAEP Reading Framework update adopted by the Board in 2004 resulted in a completely new item pool for 2009 (i.e., no item carryover) because it was based on a completely new framework. At that time, the Board's expectation was that these updates would break trend. However, NCES conducted a content alignment study and a bridge study. (A report from the content alignment study is available upon request. Additional information on the Reading Trend Study is available [here](#).) The empirical analysis supported maintaining trend. In the September 23, 2020 ADC-COSDAM planning meeting, some Board members reached two conclusions: (a) scaffolded tasks are already in NAEP and thus are unlikely to threaten trend; and (b) NCES maintained trend for the

2004 NAEP Reading Framework replacement, and so NCES might be able to maintain trend again for this framework update.

5. Which update(s) are likely to present the greatest challenges to stable reporting of student achievement trends in reading? Are there any studies that can mitigate these challenges?

The two largest challenges are (1) expanding the one informational text subscale into two subscales for reading in science and reading in social studies; and (2) embedding questions, somewhat similar to questionnaire items, into the assessment itself.

For the expansion of subscales, NAEP might need to explore an alternative scaling approach that has been implemented by some international assessment programs. However, the likelihood of success is not guaranteed; it is an empirical question that requires careful study. Given that the current pool of informational text assessment blocks tend to come from either science or social studies, NCES can conduct some simulations to evaluate what might happen if there were separate subscales for science and social studies.

For embedding questions into the assessment itself that are not strictly test questions, this would be new to the NAEP program, i.e., no NAEP assessment currently does this, though it has been attempted in similar assessments, such as PISA. However, embedding these questions into the assessment is proposed as a tentative update, i.e., it would only be implemented if it is supported by research. It is important to note that there are several categories of questions proposed, including topic/task familiarity and engagement/motivation. While these questions would not contribute to NAEP scores, these questions might support deeper insights about process data and contextual questionnaire data. The questions might also inform improvements in the assessment as well as future framework updates. Still, some questions, particularly those addressing engagement/motivation, could raise participation issues across states, due to privacy concerns. Finally, NCES has noted that the use of these embedded survey items does not meet the expectations for comparability, across forms, that NAEP relies on for the scaling and reporting of Reading results.

6. What did public comment say about the extent to which the draft framework reflects how students are reading today?

In the public comment draft of the NAEP Reading Framework, the definition of reading comprehension is expanded to acknowledge the physical, social, and cultural contexts of students. Comments on this sociocultural perspective on reading comprehension were submitted by 7 state administrators, 38 professors and researchers, 15 district and school personnel, 6 policy experts, 1 assessment expert, and 2 anonymous reviewers. A variety of stakeholders requested more information on the implications of acknowledging sociocultural context. Some experts feared that cognitive models of reading comprehension need to be more central or more thoroughly accounted for. Others worried like one reviewer that “Framework authors are doing everything possible to

design a test that all students will be able to pass.” The large majority of the comments praised the framework’s refined definition of reading comprehension and how it reflects current research as well as state standards.

In the public comment period, all respondents had the opportunity to respond directly to a set of feedback questions. However, 8 of the 165 respondents directly responded to a question about whether the framework reflected the latest research and understanding of how students will need to engage in their communities, as well as in national and global marketplaces. They were asked: How well does the Framework reflect appropriate expectations for our nation’s students at grade 4? Grade 8? Grade 12? Five of the eight respondents replied that the Framework reflects appropriate expectations for students, with one writing that “The framework aligns well with current theory and what we know empirically about our kids’ interactions with society in general at these ages and stages.” One respondent replied that the Framework did not reflect appropriate expectations – calling for civic literacy to be more heavily emphasized. The remaining two respondents responded in neutral terms.

Relatedly, 19 of the respondents (3 professors; 6 state administrators; 8 district/school personnel—reading experts, teachers, school administrators; 1 policy person; and 1 person from the public) responded to whether these updates to the NAEP Reading Assessment would help make NAEP results more relevant to them. No one answered the question negatively. Respondents either indicated yes (89%) to the question or asked for clarification. One teacher wrote: “Yes, I was very excited to see the Framework of reading expanded to include sociocultural elements and the expanded definition of ‘text!’ I think this is crucial to gaining a more relevant understanding of students’ reading abilities.”

7. What supports the proposal to replace the NAEP Reading informational subscale with two subscales respectively addressing reading in science and reading in social studies? What did public comment say about this proposed update?

Updating the Framework to situate NAEP assessment activities within the disciplines of literature, science, and social studies is congruent with most states’ adopted standards and recent research in disciplinary literacy.

The large majority of the respondents approved of changing the assessment from indicating how well students comprehend informational texts and literary texts to indicating how well students comprehend and engage in reading in literature, reading in science, and reading in social studies. The three disciplinary contexts were applauded by 13 professors or researchers, 2 policy experts (from the National Education Association and Step by Step Learning), 5 state administrators, 10 district/school personnel, and 2 anonymous reviewers. The 10 respondents who did not support the three disciplinary contexts did not like the text definitions within the contexts and considered the three contexts to be limited in scope. They also questioned the appropriateness of the disciplinary contexts for fourth grade or preferred the present Framework’s comparison between informational versus literary texts.

8. What is the research indicating how the “science of reading” and how “sociocultural context” should inform assessment design, in comparison with curricular or instructional design? How are 2025 framework recommendations reflecting this?

In alignment with NAEP legislation, the NAEP Reading Assessment is focused exclusively on reading comprehension. For example, foundational subskills are not assessed in the main NAEP Reading Assessment. Along with legislative parameters, this focus has been warranted on at least two levels: (1) the assessment starts at grade 4; and (2) within the 60 minutes allocated for students to complete the assessment, it is not feasible to assess both reading comprehension and foundational subskills.

The draft 2025 NAEP Reading Framework acknowledges the importance of foundational skills and makes recommendations for continued special studies of decoding and fluency to inform national education policy. The science of reading posits that phonics instruction is necessary to the acquisition of foundational reading skills. As such, it has policy implications for curriculum, but there is no research consensus on the implications for the assessment of reading comprehension. NAEP legislation and Board policy requires NAEP frameworks and assessments be curricular neutral and pedagogically neutral. Accordingly, NAEP does not test the extent to which students have been exposed to particular curricula.

The draft 2025 NAEP Reading Framework reflects current research on sociocultural context, which allows the assessment to attain greater ecological validity and to draw on a greater range of texts and tasks representative of students’ diverse experiences. This will result in more precise inferences about student reading achievement. This development in the construct is made possible because of advances in measurement and in digitally administered assessment that make valid and reliable measurement of additional contributors to reading performance feasible, drawing large scale assessment closer to best practice in standards of Universal Design for Assessment.

9. What assurances can be provided to the Board that the proposed updates represent improvements in how NAEP measures student achievement in reading?

As noted, the draft 2025 NAEP Reading Framework brings the NAEP Reading Assessment closer to best practice in standards of Universal Design for Assessment. Overall, the framework’s goal is to improve measurement so that NAEP can retain its capacity to detect changes in student achievement.

NCES will not implement any updates unless they support valid and reliable measurement. NCES has carefully reviewed the draft 2025 NAEP Reading Framework. While NCES has requested clarification on several elements of the framework and many of these clarifications will be provided in the Assessment and Item Specifications (a separate companion document), none of the assessment updates intended for 2025 were deemed infeasible from an item development perspective. The assessment updates proposed for special study, however, are not necessarily feasible; research will determine

feasibility of those proposed innovations after the implementation of the 2025 assessment.

Similarities and Differences Between the Current NAEP Reading Framework and the Draft 2025 NAEP Reading Framework

| | Current Framework and Assessment | 2025 Framework | |
|---|--|--|--|
| | | Update | Rationale |
| Definition and Model | Dynamic cognitive process responsive to text, purpose, and situation | Build on current definition to situate the cognitive process of reading within a sociocultural context | Align with most recent scientific theories of how social and cultural factors inform reading comprehension; increase ecological validity of assessment (i.e., supports more authentic and engaging assessment) |
| Purposes | Scenario-based tasks offer purposes for assessment activities | Continue and expand current practices to include two overarching purposes: reading to develop understanding and reading to solve problems | Support the performance of students by making clear the purposes of assessment activities and tasks |
| Texts | Authentic literary and informational texts with some infographics; presented on computer screen since 2015 | Expand use of authentic disciplinary texts, including multimodal and digitally complex texts; commission texts when authentic disciplinary texts cannot be found | Align with types of texts currently in use in classroom, home, and community settings and the real world; expand availability of disciplinary texts |
| Disciplinary Contexts | Subscales reported for literary and informational texts | Divide informational texts into the two disciplines of science and social studies; report subscales for reading literature, science, and social studies | Emphasize most recent research regarding importance of disciplinary reading; align with state standards that focus on literacy across the disciplines |
| Universal Design and Background Knowledge | Digital platform implemented in 2017 includes look-back buttons, resetting, and avatars | Continue and expand current practices to include knowledge-based Universal Design elements (pre-reading vignettes, vocabulary definitions); task-based Universal Design elements (visual and graphic organizers, navigation aids, prompts to | Make use of digital affordances to assess what all students can do; align reading assessment activities more closely with current classroom and real-world practices; validly measure if and how readers are able to process material at a deeper level. |

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| | | reflect, voice recognition, translation); motivational Universal Design elements (e.g., avatars) | |
| Cognitive (Comprehension) Targets | Targets include Locate and Recall; Integrate and Interpret; and Critique and Evaluate | Relabel category to tie cognition to reading comprehension; add a target and relabel another to include Locate and Recall; Integrate and Interpret; Analyze and Evaluate; and Use and Apply | Expand targets to align more closely with current classroom and real-world practices |
| Item formats | Formats include selected response and constructed response | Expand to include extended constructed response | Expand formats to align more closely with current standards and assessment practices; offer opportunity to express comprehension of sources in a more extended response |
| Language Structure and Vocabulary | Vocabulary assessed with potential for a subscore | Expand to include assessment of language structure and vocabulary; no subscore proposed | Align with current research on the relationship of language to reading comprehension; consider contribution of students' understandings of language structure and vocabulary to their performance in reading comprehension |

Categories of Recommended Framework Updates

Updates recommended for the NAEP Reading Framework fall into three categories:

- I. Features carried over from the digital implementation of NAEP
- II. Features to be examined as a part of the NAEP R&D process
- III. Features requiring special studies

I. Features carried over from the digital implementation of NAEP

Some of the new features identified as updates in the 2025 framework are not new. Instead, they are features that the Governing Board, NCES, and the NAEP community of contractors decided to implement as NAEP moved all of its assessments from paper-and-pencil to a digital format over the past decade.

Universal Design features currently part of operational NAEP assessments include:

- Purposes for reading;
- Explicit directions that guide students through the assessment;
- Background video (piloted in 2019);
- Look-back buttons (referring readers directly to point in passage at which item-relevant information is found, saving time from unnecessary scrolling);
- Resetting (providing accurate feedback about the answer to a particular item so that misinformation is not carried over to the next item);
- Avatars simulating peer collaborators; and
- Clickable definitions.

II. Features to be examined as a part of the NAEP R&D process

Besides the features that are already operational in NAEP, a number of recommended updates can be evaluated before 2025 as a part of the normal research and development cycle that NAEP uses in developing new assessment blocks. NAEP never introduces a new block into a live NAEP assessment until and unless it has undergone systematic scrutiny, which includes cognitive interviews with individual students, small scale tryouts under “live” testing conditions, and field testing, whereby proposed new blocks are folded into operational blocks of a live assessment.

Updates that can be evaluated as a part of the normal NAEP assessment development process before 2025 include:

- Extending concept sketch design process to activity structures for all blocks;
- Expanding text modes: conventional text, dynamic text, image, video, podcast, dynamic image;
- Additional Universal Design features, such as providing background information on topic (including videos), embedded vocabulary supports, or planning tools;

- Additional comprehension target: Use and Apply (in addition to the 3 targets in the current framework);
- Expanded item response formats, e.g., graphic organizers or matrices, drop down menus, or dynamic search engines;
- New tools for measuring text complexity, to improve the selection of passages; and
- Emphasizing disciplinary contexts for literature, science, and social studies, and reporting subscales for these areas.

III. Features requiring special studies

Finally, some of the recommended updates represent major, consequential, and/or controversial shifts and, as such, deserve careful study before they become a part of operational NAEP. They would add value to the degree that they generate data that are accurate, reliable, and fair—in alignment with NAEP’s mandate. These updates should be the subject of *special studies* before they are considered for inclusion in operational implementation. The list of updates requiring special studies includes:

1. Embedding student indices of perceived knowledge, curricular experiences, motivation and agency within blocks;
2. Offering voice recognition to aid in composing constructed response items;
3. Offering digital translation from L1 to English for constructed response items;
4. Offering students a choice of passages to read; and
5. Offering students a choice of response format.

Framework Impacts on NAEP Trends

Previously, the Board has pursued framework updates in three ways:

1. *New Framework with New Trend*

Research, outreach, content, and policy input show a new framework is warranted to define a new construct, including new content, skills, item types, delivery modes (i.e., digital-based assessment (DBA)), and other modifications. The new construct definition motivates a break in trend reporting from the old assessment’s results. In this case, the Board made a policy decision to not attempt to maintain trend, even if it was empirically possible.

Examples:

- *2011 NAEP Writing*—writing with word processing tools represented a different construct compared with the previous framework’s paper-pencil assessment.
- *2009 NAEP Science*—advancements in science and science curricular standards warranted a different construct with crosscutting content and deeper integration of science practices.

2. *New Framework with Maintained Trend*

A new framework is designed to be different from the previous framework. However, empirical investigation reveals that the construct does not differ substantially. Interest in maintaining trend reporting prompts research to try to ensure trend lines can be maintained. Example:

- *2009 NAEP Reading*—several sub-elements of the previous framework were no longer relevant to the field’s conceptualization of reading comprehension, prompting a new framework as in NAEP Writing and NAEP Science. Reauthorization of the Elementary and Secondary Education Act in 2002 required use of NAEP as a monitoring tool for states, prompting interest in maintaining reading trend despite construct changes. Even with a change in the number of subscales and an entirely new item pool, empirical investigation revealed that trend could be maintained from 1992. To learn more about how trend was maintained for this framework replacement, see [Understanding the 2009 Reading Trend Study](#). On September 23, 2020, ADC-COSDAM also received a briefing summarizing this work.

3. *Updated Framework with Maintained Trend*

Making gradual changes to a framework over time may help ensure that trend is maintained. Framework “tweaks” are prompted by important and less dramatic curricular and assessment advances. These changes are sporadic, rather than ongoing. Examples:

- *1990 – 2019 NAEP Mathematics*—over time “tweaks” clarified objectives, shifted content emphases, and refined the process dimension, while the construct definition was unchanged, enabling NAEP to maintain the mathematics trend line for grades 4 and 8 since 1990.
- *2006 NAEP U.S. History*—clarifications suggested by the NAEP U.S. History test specifications and removal of outdated material were “tweaks” to refresh the framework without disrupting trend.

Research to Support Content and Platform Changes More Broadly

A *content bridge study* is a central tool for making empirical and policy determinations

regarding whether NAEP trend lines can be continued when major content changes occur in a framework. An example is the 2009 Reading Trend study noted above. Given the scope of the recent framework updates (more than “tweaks”), a content bridge study is needed for these updates – pointing to yet a fourth way that the Board is choosing to pursue framework updates now and into the future. The 2025 framework updates for NAEP Reading require a content bridge study to determine whether trend can be maintained – with or without a change in the number of subscales. The same is true for the 2025 framework updates for NAEP Mathematics, adopted by the Board in November 2019.

To support the 2017 transition to digital-based assessment for NAEP Reading and Mathematics, an extensive *mode bridge study* was needed. To learn more about the bridge study for this transition, see [2017 NAEP Transition to Digitally Based Assessments](#).

Background on Process for Developing and Updating NAEP Frameworks and Assessments

Process for Developing and Updating NAEP Frameworks and Assessments

Reviewing and updating NAEP frameworks is consistent with longstanding Board policy and Congressional statute. Per Board policy, frameworks are reviewed at least once every 10 years. The reading framework was last updated in 2004 and implemented in 2009.

A framework update is a refinement, not a complete overhaul, and does not require a totally new set of assessment items. That means it connects to the current assessment, while supporting NAEP's continued relevance.

Frameworks are reviewed and updated through a comprehensive, inclusive, and deliberative process that involves active and ongoing participation of stakeholders. Stakeholder participation and input is solicited through framework panels, public comment, and other forums.

The process of developing and updating frameworks is executed primarily via two panels: A Visioning Panel with a subset of members continuing as the Development Panel. Some of these panelists helped craft the current framework. This overlap brings historical perspective and supports continuity. Per Board policy, these panels reflect diversity in terms of gender, race/ethnicity, region of the country, and viewpoints regarding the content of the assessment under development. For example, at least 20 percent of the Visioning Panel is to have classroom teaching experience in the subject areas under consideration.

Public comment is sought from various segments of the population to reflect many different views. In the case of the reading framework update, several webinars were held as part of the public comment process to ensure maximum opportunities for public input. Public comment has always been an important part of the development process that can lead to substantive changes in the drafting process. For example, when updating the mathematics framework in 2019, the Panel made changes to the draft based on public comment, including removing a few objectives in the area of data analysis, probability, and statistics in grade 4 that were not commonly covered across states.

For the NAEP Reading Framework, the following chronological checklist indicates which process steps have been completed and which remain:

- ✓ ADC Discussion with external experts
- ✓ ADC recommendation for the assessment
- ✓ Board action on the charge to update or replace framework
- ✓ Panel meetings to develop draft framework (with support from Technical Advisory Committee)
- ✓ Public Comment on draft framework
- Board review of draft framework and public comment
- Panel prepares final revisions based on public comment and Board review
- Board action on framework

- Board action on assessment and item specifications
- Assessment developed (~4 years, including a pilot assessment)
- Operational assessment administered
- Results released in Report Card
- Special studies for additional assessment and Report Card features (as time and resources allow)

Policy Outcomes to be Achieved for Each NAEP Framework

In accordance with the Board’s policy, the final framework must:

- Be inclusive of content valued by the public
- Reflect high aspirations
- Focus on important, measurable indicators
- Avoid endorsing or advocating a particular instructional approach
- Be clear and accessible to educators and the general public
- Define the construct(s) to be assessed and reported upon
- Articulate item formats, sample items, and sub-content weightings to demonstrate how the construct is to be measured
- Describe how much of the content domain relates to the *NAEP Basic*, *NAEP Proficient*, and *NAEP Advanced* achievement levels for each grade to be tested, in accordance with the [Governing Board Achievement Levels Policy](#)
- Align to widely accepted professional testing standards
- Support fair and accurate measurement of student academic achievement
- Support NAEP assessment items that will be secular, neutral, and non-ideological and free from racial, cultural, gender, or regional bias

Summary of Public Comment Response on the 2025 NAEP Reading Framework Draft 3

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OVERVIEW OF REVIEW AND RESPONSE

A total of 2,626 comments were submitted by 158 individuals and 7 organizations. Respondents provided their comments either embedded in a copy of the Framework document or via a separate document. The comments were gathered together in a spreadsheet, one comment per row. Each row contains several pieces of information related to the comment.

Theme Codes and Descriptions

Theme Codes were assigned by WestEd staff based on the focus of each statement. Theme Code descriptions are as follows:

- **Equity:** Includes Language of Test and/or Response to it; ESL (English as a Second Language) or EL (English Learner) categories; dialects like AAVE (African American Vernacular English); and Student Choice
- **Disciplinary Contexts or Purposes:** Anything related to disciplinary literacy, comments relating to reading in English/Literature, Social Studies or Science, or contexts and purposes for reading in the different disciplines
- **Cognition, Cognitive Processes, or Comprehension Targets:** Any mention of these terms, mention of the brain and learning, connections between the cognitive and metacognitive, comments about ways of thinking/knowing, any mention of comprehension targets or cognitive targets
- **Vocabulary and Language:** Anything related to vocabulary, vocabulary development, language structures, how vocabulary and language structures are defined, the role of academic language and vocabulary related to learning and literacy, language knowledge and reading achievement, vocabulary and language structures in relation to meaning-making, etc.
- **Text/Literacy:** Anything related to the definition of text, the nature or types of texts; the nature of literacy; technology related to literacy
- **Reporting:** Includes explanatory variables; SES; race/ethnicity; ELs (English Learners – both current and former); Motivation, Engagement, Affect, Efficacy, Student Agency, or anything related to how information from NAEP will be shared with the public
- **Scaffolding or Background Knowledge:** Anything related to background knowledge (i.e., knowledge about topics that each student has based on their home, school, and community experiences) or what students need to know in order to comprehend text, anything related to scaffolding or support for reading comprehension, there may be mention of metacognition in relation to background knowledge and scaffolding
- **Sociocultural Model of Reading:** Anything having to do with the nature or description of the model, with proposed changes to or expansions of the model guiding the NAEP Reading Assessment
- **Proofing:** Includes comments suggesting grammatical and style changes to the Framework document

Distribution of Comments by Theme Code

About a third of comments, 37%, focused on proofing suggestions. The Reporting category, including explanatory variables, totaled 13%. Comments on the Sociocultural Model made up 12% of comments, while Disciplinary Contexts or Purposes came to 9%. Scaffolding or Background Knowledge made up 8% of comments, while comments on the nature of Text or Literacy totaled 7%. Responses on Equity were 4% of comments. Comments on Cognition,

Cognitive Processes and Comprehensions Targets made up 4%, and Vocabulary and Language totaled 4%.

Category Codes and Descriptions

Category Codes are for the actions that commenters want to see taken during framework revision. This is distinct from the theme code.

| | |
|---|---|
| edit (light) | – calls for authors to correct, clarify, or wordsmith (e.g., about a typo or style) |
| edit (moderate) | – calls for authors to clarify or improve presentation of existing ideas |
| edit (significant) ADD or DELETE | – calls for authors to ADD something that is absent or DELETE something that doesn't belong |
| assertion | (e.g., opinion, question, or action that may not be within the purview of the Framework) |
| kudo | (e.g., approval or praise) |
| weeded out | (irrelevant, e.g., “add music”) |
| TBD | – needs discussion or review |

Distribution of Comments by Category Code

For the entire Framework, 17% of comments praised the work (kudos); 43% of comments suggested light edits, and 29% suggested moderate or significant edits. Assertions totaled 11% of responses. The Weeded Out and TBD categories combined to 2% of comments.

SUMMARY OF COMMENTS BY THEME CODES

Below is a summary of comments based on the Theme Code. Not included in the discussion are the comments related to Proofing-related edits.

Equity (*n*=118; 4%)

Fifty-five respondents (7 state administrators, 2 assessment specialists, 1 critical friend, 8 curriculum specialists, 1 member of the public, 4 policymakers, 4 reading content experts, 20 researchers, and 8 teachers) made 118 comments about equity.

Several respondents viewed the Framework's treatment of equity favorably, with many of them giving kudos. For example, a group representing Student Achievement Partners and the Council of the Great City Schools stated: “We think it is critical to focus on equity, and we believe the new activity structures should do much to engage a greater variety of students and thereby yield a more accurate picture of students' reading abilities.” A professor complimented how equity was addressed in the draft 2025 Framework, stating the following:

Equity is fruitfully addressed.... For this NAEP, equity is recognizing and valuing readers' diverse communities, all with their own pools of privileged resources available for comprehending and for children to rely on as they develop reading comprehension.... Whatever resources students bring to reading comprehension form their home base, their upbringing and outside life, ...the testers work to marshal those resources for use so the students can do their best. The authors design (as in universal design) multiple points of access and multiple paths within the reading comprehension tasks and among the varied congregation of texts.

Five respondents provided major critiques of the equity focus in the draft 2025 Framework (1 professor, 1 state administrator, 1 policy expert, 1 district/school person, and 1 anonymous reviewer). The professor wanted to know how the draft 2025 NAEP discussion of equity was any better than past NAEP discussions. She considered the connections between sociocultural theory and research on reading comprehension and assessment with students of color to be weak. The other four respondents questioned whether the equity approach in the draft 2025 NAEP Framework would lower expectations for minority students or hide the gaps in achievement rather than actually improve the instruction and academic performance of minority students.

The rest of the respondents either praised or raised questions about individual equity issues. For example, nine respondents liked the possibility of letting English learners use their first language to answer questions about English texts (proposed as a special study in addition to the core framework), and four liked disaggregating student scores by SES and/or English learner status (proposed as a reporting feature to support interpreting assessment results). In contrast, 14 respondents were concerned about the limited focus on students with special needs in the draft 2025 NAEP Framework. Eleven respondents questioned whether the proposed technological advances in NAEP would pose access problems and/or require more time for some students to complete the assessment.

Disciplinary Context and Purposes ($n=242$; 9%)

Eighty respondents (1 local school administrator, 12 state administrators, 5 assessment specialists, 1 business representative, 3 critical friends, 12 curriculum specialists, 4 members of the public, 3 policymakers, 7 reading content experts, 16 researchers, and 16 teachers) made 242 comments about disciplinary context and purposes.

Disciplinary contexts. Most respondents approved of changing the assessment from indicating how well students comprehend informational texts and literary texts to indicating how well students comprehend while reading in literature, reading in science, and reading in social studies. The three disciplinary contexts were approved by 13 professors or researchers, 2 policy experts (from the National Education Association and Step by Step Learning), 5 state administrators, 10 district/school personnel, and 2 anonymous reviewers. The 10 respondents who did not approve of the three disciplinary contexts did not like the text definitions within the contexts and considered the three contexts to be limited in scope. They also questioned the appropriateness of the disciplinary contexts for fourth grade or preferred the present Framework's comparison between informational versus literary texts.

Very few respondents commented on reading in literature. Three of the professors/researchers raised questions about reading in science. For instance, they asked about some of the science reading activities described in the draft 2025 Framework, e.g., why engineering was not included, and what every day reading texts in science would be. Five of the professors/researchers asked questions, requested more elaboration, or gave advice on reading in social studies. For example, they wanted to know if reading in social studies included current events, were concerned that 4th and 8th grade would not reflect the full range of disciplinary norms, recommended the use of "social sciences" rather than social studies, or advised that history be discussed separately from social studies. Three of the respondents wanted to know why mathematics was not identified as a disciplinary context.

Reading activity purposes. Many respondents liked the two reading activity purposes: reading for understanding and reading to solve a problem. The respondents who liked the two purposes included two professors/researchers, five state administrators, and four district/school personnel. One respondent explained that “disciplinary literacy is especially important for indicating progress toward advanced reading comprehension.”

Six respondents (4 professors/researchers, 1 state administrator, 1 district/school personnel) were skeptical. They were not sure that the two purposes could be separated from disciplinary purposes, thought the differences between them needed to be expanded, and questioned whether the test taker would pursue the indicated purpose when participating in NAEP. However, when the discussion examined how one or both of the purposes could be employed within a particular disciplinary context, then two previous naysayers (two professors) approved of the two purposes.

Cognition, Cognitive Processes, and Comprehension Targets (n=111; 4%)

Forty-eight individuals (8 state administrators, 1 assessment data user, 5 assessment specialists, 2 critical friends, 3 curriculum specialists, 2 members of the public, 4 policymakers, 3 reading content experts, 13 researchers, and 7 teachers) made 111 comments about this theme.

Cognition and cognitive processes. Twenty-five respondents (14 professors/researchers; 2 state administrators; 2 assessment experts—anonymous and President of National Council of Measurement in Education; 5 district/school personnel; and 2 anonymous reviewers) commented on cognition and cognitive processes. Eleven respondents requested information or further elaboration on the role of cognition and cognitive processes in the draft 2025 Framework, while nine respondents indicated approval or acceptance of the discussion of cognition and cognitive processes in the Framework. A typical request was to elaborate on cognitive components of reading comprehension in the sociocultural reading comprehension model. Respondents also asked about the inclusion of foundational skills, metacognition, self-efficacy, engagement, and/or affective issues in the discussion of cognitive processes. Nine professors/researchers requested elaboration on cognition and cognitive processes, while only one professor/researcher approved of how cognition and cognitive processes were discussed. In contrast, two state administrators, five district/school personnel, and two anonymous individuals accepted or approved of the discussion of cognition and cognitive processes in the draft 2025 Framework. The other respondents made assertions or commented on topics such as the integration of reading and writing and teachers’ instructional focus.

Comprehension targets or tasks. Thirty respondents commented on comprehension targets or target tasks (11 professors/researchers; 7 state administrators; 3 policy experts—including a group representing Student Achievement Partners and the Council of the Great City Schools; 2 assessment experts; 4 district/school personnel; 3 anonymous reviewers). Eleven respondents (2 professors/researchers, 5 state administrators, 1 assessment expert, 3 school/district personnel) voiced approval of the change in wording from cognitive targets to comprehension targets and the addition of a fourth target, “use and apply.” For example, one respondent commented, “the comprehension targets seem to represent what should be assessed in NAEP.” Regarding “use and apply,” a state administrator stated, “we think this [use and apply] is essential and will support our emphasis on critical thinking.” No respondents voiced disapproval of the change in wording from cognitive targets to comprehension targets.

Thirteen respondents (4 professors/researchers, 4 state administrators, 1 assessment expert, 1 policy expert, 2 district/school personnel, and 1 anonymous reviewer) had concerns about “use and apply,” including three who approved of it. Four professors/researchers thought that “use and apply” would be challenging for mature readers or too difficult for inexperienced readers; a state administrator thought that scaffolds should be provided for “use and apply” and an assessment expert and a district/school person questioned the amount of writing needed to address “use and apply.”

In terms of other issues, two respondents wanted to know why “locate and recall” was still included on a reading comprehension test. Four respondents wanted to know the rationale for the balance/emphasis of the assessment on the different comprehension targets, particularly how the emphasis changes from grades 4 to 8 to 12.

Vocabulary and Language (n=106; 4%)

Forty-one individuals (1 local administrator, 6 state administrators, 1 assessment data user, 4 assessment specialists, 1 critical friend, 2 curriculum specialists, 1 member of the public, 2 policymakers, 5 reading content experts, 10 researchers, and 8 teachers) made 106 comments on vocabulary and language. Several respondents voiced approval of how vocabulary and language were conceptualized and included in the draft 2025 Framework.

The supporters included three professors, two state administrators, one assessment data user, and nine district/school personnel. However, eight respondents, including one who liked the overall approach to vocabulary and language, asked for more discussion of foundational skills because at fourth grade “disfluency with grade level texts matters for reading comprehension.” The eight respondents included three professors/researchers, a group representing Student Achievement Partners and the Council of the Great City Schools, two state administrators, and two district/school personnel. One professor liked the idea of a special study on students’ use of language in the open-ended responses, while another professor wanted more information on why this would be necessary. Three respondents (district/school personnel) wanted to know more about how students’ vocabulary performance would be scored as part of NAEP. Other respondents recommended that the inclusion of innovative technologically enhanced items should be examined carefully or asked what “language structures” meant and why disciplinary words and the “if-then” structure were excluded from the draft 2025 Framework.

Four respondents (3 professors and a state administrator) liked the possibility of allowing English learners to use their first language to answer questions about their comprehension of English texts. One of the professors offered praise, stating that he “like[d] [the] sophisticated view of multilingualism and [that NAEP] steer[ed] away from deficit language views.” The other respondents made suggestions for improving the Framework’s treatment of English learners, such as including current research on bilingual students’ language development, strengthening the discussion on translanguaging, clarifying whether languages other than Spanish would be included in proposed special studies, and indicating how students’ use of first languages would be measured in proposed special studies.

Text/Literacy (n=193; 7%)

Sixty-three individuals (1 local school administrator, 8 state administrators, 1 assessment data

user, 5 assessment specialists, 2 critical friends, 2 curriculum specialists, 3 members of the public, 4 policymakers, 5 reading content experts, 21 researchers, and 11 teachers) made 193 comments about text and literacy.

Some respondents asked for clarification on a varied range of issues, including how “everyday texts” would be defined, whether the test is measuring computer skills or literacy skills, and whether 4th graders would be asked to find information in multimodal texts (i.e., texts that communicate meaning using a variety of organizational, symbolic, and dynamic features such as words, moving images, animations, color, music, and/or sound, and require readers to move across two or more of these modes to construct meaning). Some respondents asked for clarification of terms such as multimedia, multimodal, reader attributes, and navigational complexity, while others asked for more detail regarding how the definition of text is being expanded. A number of researchers suggested that the Framework should say more about text complexity in the definition of text since determining text complexity is itself a complicated process.

A member of the public, 3 researchers, a state administrator, and two anonymous readers asked for clarification and expressed some concern over the authenticity of texts, including commissioned texts.

Experts from varied stakeholder groups, including state administrators as well as researchers, greatly appreciated the expansion of text types and textual environments, including the increase in multimedia and multimodal texts. For example, one state administrator said that her team “likes the broadened definition of ‘text’ and supports the use of a variety of texts to assess reading comprehension.” Researchers found the explanation of dynamic texts and text types commendable, informative, and in line with the field’s thinking on disciplinary literacy. A view echoed by multiple stakeholder groups was one researcher’s comment: the draft Framework reflects an “excellent plan” to “employ a wider range of text choices, [and] ample representations of cultural and linguistic diversity in texts.” Similarly, multiple researchers echoed appreciation of the draft framework’s commitment that assessment “designers will redouble efforts to ensure that the full range of diversity of the population of students is taken into account in selecting texts.”

Reporting (*n*=337; 13%)

Eighty-five individuals (2 local school administrators, 13 state administrators, 1 assessment data user, 6 assessment specialists, 1 business representative, 1 critical friend, 8 curriculum specialists, 4 members of the public, 7 policymakers, 7 reading content experts, 23 researchers, and 12 teachers) made 337 comments on reporting.

There was some concern regarding the sensitive nature of survey responses. Some respondents questioned how embedded survey questions that focused on explanatory variables (e.g., students’ interest and motivation to read specific passages) would be constructed so that they did not adversely affect the students’ test taking experiences. Some wondered if there would be a full list available of what is being tracked throughout the test. There was some concern that explanatory variables might be used to lower expectations for certain students or to explain why certain students are not achieving.

Some administrators expressed concern that “collecting environmental variables [information on students’ opportunities to learn and educational support] might turn into an opportunity to blame/shame teachers,” while other stakeholders wondered whether collecting environmental variables might be “intrusive” or might lead to “profiling students. Policy experts asked for more information on how the environmental variables would be collected and felt that measuring student attributes and environmental factors could be challenging.

Questions arose about how accurate the reporting would be of English language proficiency categories – current, former, and never English learners, given that states have different criteria for exiting ELs.

State administrators had questions or asked for elaboration about a number of reporting-related ideas, including the cut-off scores for the NAEP Achievement Level Descriptions (ALDs). Various stakeholders wanted to know how the scoring would be done for the ALDs (by humans or computers) and wondered who would grade open-ended response boxes. While one state review panel felt that simple figurative language may not be adequately challenging for 4th grade students, a researcher wondered if proposed grade 4 targets might be too high. Multiple researchers suggested that there be more consistent reference to increasing text complexity in the ALDs and asked for more consistency about use of textual evidence and grade-appropriate vocabulary.

There was some concern across stakeholder groups about possible loss of trend. A group of respondents representing the Council of the Great City Schools and Student Achievement Partners recommended describing “what about the current Framework is being maintained and [charging] psychometricians with figuring out how to longitudinally link the new test with prior tests.”

Administrators as well as school and district personnel appreciated the inclusion of “explanatory variables” as embedded probes (e.g., questions to indicate students’ motivation or interest in reading specific passages). Researchers appreciated this potential new “explanatory capacity,” saying this was “ambitious and important.” Regarding reporting, several reviewers liked the focus on opportunities to learn, saying “access to resources that support rich literacy opportunities . . . is the underlying driver of achievement.” Many felt, as one researcher put it, that “providing data to identify student strengths and areas for development [would] be invaluable.”

There was support across stakeholder groups for disaggregating scores within demographic categories and expanding reporting categories. Multiple stakeholders across groups found the progression of knowledge and skills from grade 4 to 8 to 12 to be appropriate and found the expansion of reporting capacity to be both relevant and useful. They expressed appreciation for the more “nuanced” way of presenting data related to English Learners. Administrators also “applaud and admire NAEP’s ambitious proposals.

Researchers and school and district personnel widely agreed that it would be helpful to know how well students read in different disciplines and that the sub scores would be very useful for NAEP to go beyond informing how students performed to explain more about factors that contributed to student performance. As one researcher put it, and many agreed, “the information

that this type of “untangling” and expanding of categories provides is essential to having a more realistic vision of what is really happening with our students in terms of comprehension. Administrators noted that plans for reporting disciplinary information “align with the disciplinary literacy initiatives in the blueprints and district improvement plans of many local school systems.”

Scaffolding and/or Background Knowledge (n=215; 8%)

Seventy-three individuals (1 local school administrator, 14 state administrators, 1 assessment data user, 5 assessment specialists, 1 business representative, 1 critical friend, 5 curriculum specialists, 2 members of the public, 6 policymakers, 7 reading content experts, 21 researchers, and 9 teachers) made 215 comments about scaffolding and background knowledge.

Varied stakeholder groups wondered how scaffolding would be used to ensure a level playing field, what scaffolds will actually look like, how new scaffolds might affect scoring, and whether the scaffolds would be accessible/available to all students. Stakeholders across groups wondered whether scaffolds might be distracting or exhausting for students even though they are intended as support. Members from varied stakeholder groups asked whether the addition of these new types of scaffolds would necessitate longer time blocks for testing.

Some stakeholders asked for simpler definitions of terms, including “scaffolds” (a term known by educators but not the general public), and “avatar-enriched social contexts,” while others requested more information on the role of background knowledge and how the scaffolds would help supplement the prior knowledge students bring to the assessment (on various topics). While district and school personnel found the social partnering during assessment with avatars or others “interesting and exciting,” they requested “more explanation about how this would look and how NAEP would analyze these interactions when looking at responses.”

Varied stakeholders agreed that scaffolds are important, and they were glad to see them included, but they were concerned that inclusion of “scaffolding could raise questions about whether the assessment is still an assessment. Orienting this issue towards accessibility and equity would be important.” One reading expert and her team “wholeheartedly endorse the idea of scaffolds but caution against over-scaffolding, or inappropriately selecting elements for scaffolds, as doing so will cause the assessment to lose its validity and prevent students from showing the full range of what they know and can do.”

Other respondents proposed that the “multimodal approach” for assessing reading comprehension (e.g., including audios and visuals to accompany texts in the activity blocks) might “contaminate results,” because listening and viewing are not reading comprehension. Experts from varied stakeholder groups expressed concerns echoed by one researcher who said that “including videos will [make it] impossible to know whether the student’s ability to respond to test items came from reading (the construct of interest) or watching a video.”

State administrators as well as others expressed that scaffolding is “both recommended and needed” and that including avatar-enriched social contexts for reading is “innovative” and will support “student engagement.” They appreciated how Universal Design for Learning and scaffolds inform the draft Framework. Researchers “very much” appreciated that “the experience of the children is being considered in the structure of an assessment system,” “situating reading

tasks in contexts of familiarity will benefit ESL readers as well as others,” and video could be used to “even out” students’ background knowledge (i.e., knowledge about topics that each student has based on their home, school, and community experiences). Varied stakeholders, including school and district personnel, researchers, a reading specialist, and an anonymous reviewer, appreciate the three types of scaffolds and the social partnering during assessment with avatars or others. For example, a reading specialist said the “inclusion of expanded scaffolds is very positive and specifically addresses supports for stronger performance by less privileged readers and students reading in a second language.” Stakeholders from across groups appreciated “the inclusion of the scaffolds descriptions and examples,” the comparison of current and future uses of scaffolds, and the “great list” of selected response options. State administrators appreciated the inclusion of diverse texts that allow for readers to “see themselves” which they asserted should improve the equity of the test-taking experience, and they agreed that scaffolds will “support students in drawing on their cultural community resources as assets.”

Sociocultural Model of Reading (*n*=313; 12%)

Seventy-five individuals (2 local administrators, 8 state administrators, 1 assessment data user, 4 assessment specialists, 1 business representative, 2 critical friends, 2 curriculum specialists, 4 members of the public, 6 policymakers, 7 reading content experts, 29 researchers, and 9 teachers) made 313 comments on the sociocultural model (SCM) of reading.

A variety of stakeholders (administrators, professors, researchers, technical experts, reading content experts, and policy experts) requested more information and elaboration on aspects of the model such as text complexity, what is meant by foundational skills, and the degree to which the proposed model incorporates cognitive models of reading comprehension. Some requested more elaboration on new testing methods and new uses of technology. Some suggested being more explicit about diversity of students and including more information about the history of NAEP between 1965-1992. Some felt that clearer articulation of how the sociocultural model aligns with more well-established models of reading would be helpful. Areas that may need further elaboration or explanation include the relationship of decoding and fluency to reading comprehension and how this Framework aligns with the science of reading. Put another way, some respondents feared that the more cognitively-driven models of reading comprehension need to be more central and/or accounted for. Some respondents and policy experts expressed concern about the possible loss of trend. Others worried like one reviewer that “Framework authors are doing everything possible to design a test that all students will be able to pass.”

Respondents whose comments were positive said that the draft framework’s articulation of the sociocultural model now reflects current research as well as state standards. Some administrators and a range of experts appreciated the comparison of old and new frameworks (i.e., what was included before, what will remain, what is new). A number of experts appreciated the expansion of the model undergirding the Framework. A variety of stakeholders appreciated the acknowledgement that students’ previous experiences with reading differ and shape performance, and more than a few commended a more asset-oriented view of students. Multiple stakeholder groups noted the importance of the draft Framework’s focus on equity. A range of stakeholders found the draft Framework more “relevant,” “useful,” “comprehensive,” and “persuasive;” and they like that it is moving the field “toward addressing real world comprehension.” Many stakeholders noted the ambitiousness of the model and some suggested that such a framework is “long overdue.”

SUMMARY OF COMMENTS RELATED TO PUBLIC COMMENT GUIDING QUESTIONS

Will these updates to the NAEP Reading Assessment help make NAEP results more relevant to you?

There were 34 comments provided by 19 respondents (3 professors; 6 state administrators; 8 district/school personnel--reading experts, teachers, school administrators; 1 policy expert; and 1 person from the public). No one answered the question negatively. The respondents overwhelmingly replied yes (89%) to the question, with a few respondents requesting some clarification or elaboration. Six of them appreciated the sociocultural model or the proposed assessment. Sample kudos included:

Professor/researcher: “This new iteration of NAEP is amazing and persuasive. The authors make good use of what NAEP has had all along and good use of what we have added to our resources by 2020.”

Teacher: “Yes, I was very excited to see the Framework of reading expanded to include sociocultural elements and the expanded definition of ‘text!’ I think this is crucial to gaining a more relevant understanding of students' reading abilities.”

District/school reading expert: “Love, love the definition of reading comprehension on p. 26, as well as on p. 27 the 2018 PISA Reading Framework quote about reading no longer considered something that is acquired in childhood, love Exhibit 2.1.”

Features that two or more respondents liked included the following (number of respondents is in parentheses):

- Equity approach (4)
- Disciplinary contexts (6)
- Reading purposes (5)
- Knowledge scaffolds (2)
- Treatment and reporting of ELs (3)
- Explanatory variables (3)
- Sociocultural model of reading comprehension (4)
- Role of technology and multimodal texts (2)

How does this model align with your understanding of reading comprehension? Refer to Exhibit 2.2, which is intended to clarify key elements of the model and the Framework.

There were 20 comments provided by 9 respondents (2 professors/researchers, 3 state administrators, 3 district/school personnel, and 1 member of the public). They overwhelmingly (89%) stated that the sociocultural model (articulated in the draft Framework’s Chapter 2) aligned with their understanding of reading comprehension. A member of the public (and a former secondary reading teacher, teacher educator, and literacy researcher) gave the following kudo:

This model accurately reflects current theoretical understandings and the latest research on reading comprehension. Arguably, it represents a more progressive

understanding than most standards. This is a good thing because it will support researchers, teachers, and policymakers to be able to use the most up-to-date theory and research to inform standards into the future. I see this NAEP Framework and the sociocultural model of reading at its foundation as a forward-looking vision that will support a more robust, authentic, and theoretically/empirically sound vision for reading instruction and assessment.

No one stated that the model did not align with their understanding of reading comprehension. However, instead of answering the question, a state administrator asked for more information on the role of background knowledge (i.e., knowledge about topics that each student has based on their home, school, and community experiences). Three respondents (a state administrator and two district/school personnel) said that the model aligned with their understanding of reading comprehension, but asked questions or made suggestions/recommendations for improvement. For example, one asked if NAEP could include more foundational skills at grade 4; another asked why NAEP did not “focus on the shared elements of music and speech;” and a third made suggestions for improving exhibit 2.2. by showing “the steps a reader would possibly follow.”

How does this model reflect current understandings in the field and the latest research and standards on reading comprehension across the country?

Nine comments were provided by 8 respondents (2 professors/researchers, 3 state administrators, and 3 district/school personnel). Three of the 8 (a professor/researcher, state administrator, and a district/school person) stated that the sociocultural model reflected current understandings in the field and the latest research and standards on reading comprehension across the country. The professor provided a detailed explanation of how the draft 2025 framework’s articulation of the sociocultural model was based on “a vibrant and properly expansive field” and “stands up around the world in different academic domains.” The district/school person thought that the model represented “what it takes to ensure students are successful” but recommended that more writing across the curriculum and a new section on interdependent literacy skills be included. Two respondents were uncertain about the extent to which the model reflected current understandings (a state administrator and a professor). The state administrator replied, “Hopefully, fairly well in common core states.” The professor stated that she was not sure that the sociocultural model was reaching credential programs and teachers but thought that the NAEP 2025 Assessment could help solve that problem. Two respondents did not answer the question but repeated previous recommendations, such as including foundational skills in the grade 4 assessment (a state administrator) and adding music to the NAEP Reading assessment (a teacher).

Given that NAEP begins at grade 4 and focuses on reading comprehension, how well does the Framework represent what you think should be assessed in NAEP (the Nation’s Report Card)? Is there anything missing?

There were 10 comments provided by 7 respondents (1 reading content expert, 1 researcher, 1 teacher, 1 member of the public, and 3 administrators). Six of the 7 respondents replied that the Framework does represent what they think should be assessed in NAEP. The remaining one respondent replied that the Framework was not fully representative because it did not acknowledge shared elements of music and speech.

The following are sample responses from the 6 individuals who replied that the Framework does represent what they think should be assessed in NAEP:

- **Member of the public:** “I believe the Framework will serve us well for what we understand now in 2020 as the sociocultural model of reading.”
- **Researcher:** “I think the Framework represents what should be assessed.”

As an assessment focused on reading comprehension, how well does the Use/Apply Comprehension Target reflect the more frequent integration of reading and writing in instruction?

Ten comments were provided by 7 respondents (1 professor, 4 state administrators, and 2 district/school personnel). Four respondents (the professor, two state administrators, and the teacher) indicated that the Use/Apply Comprehension Target reflected the integration of reading and writing, with two of them saying that it did this well or extremely well. Another state administrator cautioned that the writing tasks tied to use/apply should be meaningful and not silly. The remaining two respondents repeated answers that they previously had given related to comprehension targets.

Consider the latest research and current understanding of how students will need to engage in their communities, as well as in national and global marketplaces. How well does the Framework reflect appropriate expectations for our nation’s students at grade 4? Grade 8? Grade 12?

There were 11 comments provided by 8 respondents (1 reading content expert, 1 researcher, 1 member of the public, 2 teachers, and 3 administrators). Five of the 8 respondents replied that the Framework reflects appropriate expectations for students. Two respondents replied that the Framework did not reflect appropriate expectations. The remaining one respondent noted that she was not sure what it meant for students to engage in their communities or how it could be measured. She did not specify whether she thought the Framework reflected this well.

The two concerns expressed about the Framework reflecting appropriate expectations were:

- **Researcher:** “I think civic literacy is under-represented in the proposed Framework, in part through a fairly exclusive emphasis on disciplinary literacy.”
- **Administrator:** “The developers are assuming that the way students will need to engage in their communities...will remain from 2025 to 2040. On one hand, the test developers want to address students where they are, but the goal is to know where they will be in national and global marketplaces; I’m not sure how that data will be provided.”

The following are sample responses from the 5 individuals who replied that the Framework reflects appropriate expectations of students:

- **Reading content expert:** “I think this is a really well-done emphasis that connects reading skills and the world.”
- **Member of the public:** “The framework aligns well with current theory and what we know empirically about our kids’ interactions with society in general at these ages and stages.”

SUMMARY OF COMMENTS DURING PUBLIC COMMENT EVENTS

The project hosted eight online webinars for various stakeholder groups to learn about and provide feedback on the Framework. During three of the webinars, the hosts conducted polls of participants to gather further information. Each webinar was intended for a specific audience, but all webinar links were available to the general public. A total of 985 participants registered in advance for the webinars, with a total of 472 participants attending the webinars live. Participants submitted a total of 158 Framework-related comments during webinars through the Zoom chat feature and during verbal discussions.

Webinar 1: For stakeholders whose day-to-day work is directly affected by the Framework update (i.e., teachers, school administrators, teacher preparation). Co-hosted by the International Literacy Association.

410 participants registered for this webinar, with 167 participants attending. During the webinar, 83 comments were submitted, all through the Zoom chat feature. Of these 83 comments, 52% were kudos of the Framework (n = 43); 17% expressed skepticism about the Framework (n = 14); and 31% were clarifying questions (n = 26).

The kudos indicated acceptance of the use of the Sociocultural Model of Reading, the expansion of the definition of “text,” the use of sub scores, the use of scaffolding for background knowledge, and the use of disciplinary contexts as suggested in the Framework.

Skepticism toward the Framework included concerns about the ability of students to perform on a digitally based assessment, the ability of students to self-report on their own motivation, the usefulness of disciplinary contexts, the helpfulness of scaffolds to build background knowledge, and the ability of the assessment to address inequities in schools.

Clarifying questions about the Framework indicated requests for more information about comprehension targets, the scoring and reporting process, item development, support for students with special needs and English Learners, the alignment of the Framework to the Science of Reading, and the research behind the changes in the Framework.

No poll was conducted during this webinar.

Webinar 2: For stakeholders who are concerned with how reading is defined, taught, and assessed (i.e., reading/content experts, assessment experts, curriculum experts). Co-hosted by the Literacy Research Association.

146 participants registered for this webinar, with 74 participants attending. During the webinar, 44 comments were submitted, all through the Zoom chat feature. Of these 44 comments, 30% praised the Framework (n = 13); 30% expressed skepticism about the Framework (n = 13); and 41% were clarifying questions (n = 18).

The kudos indicated acceptance of the indicated reporting methods, the use of videos as background knowledge scaffolds, and the inclusion of disciplinary purposes.

Skeptical comments toward the Framework indicated concerns about the comprehension targets and the use of videos as background knowledge scaffolds.

Clarifying questions about the Framework indicated requests for more information about the comprehension targets, the proposed scaffolds, background knowledge, support for English Learners, and the research behind the proposed changes.

During the webinar, the hosts polled participants by asking two questions. They first asked, “How useful would it be to know whether comprehension performance varies by amount of background knowledge students bring to the assessment?” Forty-one participants responded to the poll, with 94% choosing “Very useful” (n = 38) and 7% choosing “Somewhat useful” (n = 3). No participants chose the third option, “Not useful.”

The hosts then asked participants, “How useful would it be to know whether performance increases when students are offered scaffolds?” Fifty-six participants responded to this question, with 93% choosing “Very useful” (n = 52) and 7% choosing “Somewhat useful” (n = 4). No participants chose the third option, “Not useful.”

Webinar 3: For stakeholders who analyze or use NAEP data to inform their work (i.e., policy experts, researchers). Co-hosted by the National Council on Measurement in Education.

13 participants registered for this webinar, with 7 participants attending. During the webinar, five comments were submitted, all through verbal discussion. Of these five comments, 60% favored the Framework (n = 3); and 40% were clarifying questions (n = 2). None of the comments expressed skepticism toward the Framework.

The supportive comments indicated acceptance of the Sociocultural Model of Reading, comprehension targets, and reporting methods.

Clarifying questions about the Framework indicated requests for more information about how cognition is present in the Sociocultural Model of Reading.

No poll was conducted during this webinar.

Webinar 4: For Assessment Directors, Assessment ELA specialists, CAPs, and ELA Collaborative. Co-hosted by the Council of Chief State School Officers.

164 participants registered for this webinar, with 121 participants attending. During the webinar, 12 comments were submitted, 10 of which were submitted through the Zoom chat feature, and 2 of which were submitted through verbal discussion. Of these 12 comments, 50% were kudos of the Framework (n = 6); 25% expressed skepticism about the Framework (n = 3); and 25% were clarifying questions (n = 3).

The positive comments indicated acceptance of the Sociocultural Model of Reading, the use of disciplinary contexts, and the use of scaffolds for background knowledge.

Skepticism toward the Framework indicated concerns about the developmental appropriateness of the assessment, making the assessment adaptive, and the “significant” difference between the NAEP assessment and statewide assessments.

Clarifying questions about the Framework indicated requests for more information about the

research behind the proposed changes in the Framework and how scaffolds will be communicated to students on the assessment.

During the webinar, the hosts polled participants with three questions. First, the hosts asked, “How useful would it be to know how well students read science materials versus social studies materials versus literature?” Ninety-four participants responded to the poll, with 78% choosing “Very useful” (n = 73) and 33% choosing “Somewhat useful” (n = 21). No participants chose the third option, “Not useful.”

Next, the hosts asked participants, “How useful would it be to know whether comprehension performance varies by amount of background knowledge students bring to the assessment?” Eighty-three participants responded to this question, with 88% choosing “Very Useful” (n = 73) and 12% choosing “Somewhat useful” (n = 10). No participants chose the third option, “Not useful.”

Finally, the hosts asked participants, “How useful would it be to know whether performance increases when students are offered scaffolds?” Eighty-three participants also responded to this question, with 78% choosing “Very useful” (n = 65) and 22% choosing “Somewhat useful” (n = 18). No participants chose the third option, “Not useful.”

Webinar 5: For Communication Directors, Deputies, and Chiefs. Co-hosted by the Council of Chief State School Officers.

43 participants registered for this webinar, with 25 participants attending. No participants shared comments about the Framework through the Zoom chat feature or through verbal discussion during this webinar.

No poll was conducted during this webinar.

Webinar 6: For stakeholders whose day-to-day work is directly affected by the Framework update (i.e., teachers, school administrators, teacher preparation). Co-hosted by the National Council of Teachers of English.

73 participants registered for this webinar, with 34 participants attending. No participants shared comments about the Framework through the Zoom chat feature during this webinar.

The hosts polled participants with two questions. First, the hosts asked, “To what extent would it be useful to know how well students read science materials versus social studies materials versus literature?” Fifteen participants responded to the question, with 87% choosing “Very useful” (n = 13) and 13% choosing “Somewhat useful” (n = 2). No participants chose the third option, “Not useful.”

The second question the hosts asked was, “How meaningful would reporting subscores for each of these areas be to you?” (the three areas being science, social studies, and literature). Fifteen participants also responded to this question, with 73% choosing “Very meaningful” (n = 11) and 27% choosing “Somewhat meaningful” (n = 4). No participants chose the third option, “Not meaningful.”

Webinar 7: For stakeholders who are impacted by NAEP outcomes (i.e., employers, parents, general public). Co-hosted by the National School Boards Association.

Eighteen participants registered for this webinar, with 11 participants attending. During the webinar, three comments were submitted, all through the Zoom chat feature. All three comments were clarifying questions.

Clarifying questions about the Framework indicated requests for more information about scaffolds, disciplinary contexts, and how the Framework could positively inform policy.

No poll was conducted during this webinar.

Webinar 8: For all audiences, focusing on updates to the NAEP Reading Assessment Framework. No co-host.

One hundred eighteen participants registered for this webinar, with 33 participants attending. During the webinar, 11 comments were submitted, all through the Zoom chat feature. Of these comments, 36% praised the Framework (n = 4); and 64% were clarifying questions (n = 7). None of the comments expressed skepticism toward the Framework.

The kudos indicated acceptance of the use of the Sociocultural Model of Reading, disciplinary contexts, and student questionnaires.

The clarifying questions indicated requests for more information about support for students with special needs and English Learners, the history of NAEP Framework updates, and student questionnaires.

No poll was conducted during this webinar.

NOTE ON DEVELOPMENT PANEL RESPONSE TO PUBLIC COMMENT

In generating this summary document, a master spreadsheet of all submitted public comment was used. The spreadsheet listed comments as well as several ancillary pieces of information:

- A. CommentID (a unique identifier for the statement in a row)
- B. File P# (the page number of the framework document, assigned by software)
- C. In-Draft P# (the page number of the framework document, as listed in the framework itself)
- D. Anchor (Framework text to which the comment is attached or related, when known; e.g., for the Text-Linked comments this is the page on which the comment appeared)
- E. Comment text (as originally submitted by the organization or individual)
- F. Author (name when known)
- G. Date (when comment was submitted)
- H. Stakeholder Role
- I. Attachments (rare, but some comments included attachments, linked in this column)
- J. Theme Code (added by WestEd staff based on focus of the statement)
- K. Category Code (added by WestEd staff to represent comment intent)

To develop the next draft of the Framework, Framework Development Panelists will engage with this spreadsheet as they collaboratively revise the chapters.