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Comments Received :

To Whom It May Concern,

I am writing to express strong opposition to the U.S. Department of Education's May 2025 proposal to continue the current limited EDFacts data collection procedures, and to urge a return to the more robust reporting standards in place prior to 2019.

From 2009 to 2019, EDFacts enabled the reporting of student performance across all achievement levels, disaggregated by district, school, and subgroup. This level of detail is essential to understanding patterns of student learning and school effectiveness across the country. Since 2021, however, states have been required to report only a single measure—the proportion of students scoring above the state-defined proficiency threshold. This shift significantly restricts our collective ability to monitor educational progress, identify inequities, and support data-driven decision-making.

As a researcher and advocate for educational improvement, I have relied on EDFacts to access reliable, consistent data across states and years. The limitations of the current reporting framework are well documented:

Detailed data are missing for nearly half of U.S. school districts.

Charter schools are often excluded unless subsumed by traditional districts.

Subgroup data (e.g., for economically disadvantaged students, English learners) are frequently unavailable.

Some states do not report data at all (e.g., Maine, Alaska, New Mexico).

These gaps severely hinder our ability to produce accurate estimates of school quality and student outcomes, such as those developed through the Stanford Education Data Archive (SEDA). The November 2024 proposal to restore reporting of full performance distributions for federally mandated tests in grades 4 and 8 represented a crucial step toward transparency, accountability, and evidence-based education policy. Its retraction is deeply concerning.

I strongly urge the Department to reinstate the November 2024 proposal and resume collection of student performance data across all achievement levels for math and reading in grades 4 and 8, beginning with the 2025–26 school year and continuing through at least 2027–28. This restoration is critical not only for researchers and policymakers, but more importantly for the students, families, and communities we aim to serve through data-informed education.