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From 2009 to 2019 SEAs reported detailed data to EDFacts including the number of students scoring in all performance categories in each district and public school (including charter schools).

The 2009-2019 detailed performance level data enabled researchers to develop and publish measures of student learning and school improvement that were comparable across every school and district in the country (see <https://edopportunity.org>).

This is substantially more district-level information than is provided by NAEP's Trial Urban District Assessment (TUDA), which provides comparisons of performance among only 26 large school districts.

In effect, the detailed 2009-2019 EDFacts data made it possible to construct TUDA-like measures of performance for 14,000+ school districts (and 60,000 elementary and middle schools) instead of 26 districts. Moreover, the cost of producing these TUDA-like comparable measures for 14,000 districts using EDFacts data is minimal compared to the cost of conducting the NAEP TUDA assessments.

These measures have been and can continue to be very useful to SEAs and LEAs for monitoring the effectiveness of their schools and shaping policy to improve and reform public schools.

The more limited performance data collected by EDFacts since 2019, and proposed to be continued by this regulation, are insufficient for the purpose of creating nationally-comparable district learning and improvement estimates.

In the absence of detailed EDFacts data, researchers have relied on publicly available state assessments results, reported on SEA websites. But using such data yields nationally-comparable measures of student performance for only 8,000 of the 14,000 districts in the country. And such measures generally cannot be constructed for schools (including charter schools); nor can they be constructed for all states, because some states do not report sufficiently detailed data for each district or school and because data for small schools and districts are masked in public files for privacy reasons.

As the federal government empowers states to take full control over the education of their students, it is important that states and local districts learn as much as possible from their data. By systematically compiling disseminating more detailed data, EDFacts can provide a way for states to get more accurate information about their districts and their performance relative to other similar districts across the country.

EDFacts is uniquely positioned to work with SEAs to collect the detailed student performance data. ED regularly collects data from SEAs as required by statute via the EDFacts system (and has for two decades), so the system is already in place. Moreover, the added cost of collecting slightly more detailed data (data already in the SEA files) is far outweighed by the value to SEAs and LEAs of the information constructed from that data. Finally, the work of constructing the nationally-comparable measures of student learning and school improvement from EDFacts data costs the federal government nothing—it has been done for the last 15 years by researchers funded by private foundations and universities.

Given its value to state and local education agencies, I request that ED collect test score data in multiple performance categories in reading and math for students in grades 4 and 8 for the 2025-2026, 2026-2027, and 2027-2028 school years.

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