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I write to strongly oppose the U.S. Department of Education's May 2025 proposal to continue limiting the EDFacts collection of state assessment results. Reporting only the number of students who score above a single proficiency threshold offers an incomplete and insufficient picture of student achievement. This restriction severely limits the usefulness of the data for understanding trends in academic performance and evaluating the effectiveness of educational policies across states and subgroups.

In contrast, I support the Department's earlier November 2024 proposal to expand EDFacts reporting requirements to include additional performance levels in grades 4 and 8. These more detailed data allow for richer and more meaningful analyses by researchers, policymakers, and the public. For example, large-scale efforts like the Stanford Education Data Archive (<https://edopportunity.org>) rely on the more complete performance level data to produce valid comparisons of educational opportunity and outcomes nationwide. Under the May 2025 proposal, such efforts would no longer be feasible, undermining transparency and research-based policymaking.

State assessments are already administered annually to all students in grades 3 through 8 at significant public expense in both time and resources. The marginal cost of reporting more detailed results to EDFacts is minimal in comparison, yet the benefit—enabling the data to support high-quality research and evidence-based policy decisions—is substantial.

I urge the Department to reject the May 2025 proposal and instead move forward with the more comprehensive reporting approach outlined in the November 2024 proposal. Thank you for considering this comment.