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I strongly oppose the May 2025 proposal to continue the limited EDFacts data collection. The current structure, which only captures the percentage of students above a single proficiency threshold, fails to provide the granularity necessary to understand and address disparities in student achievement across schools, districts, and subgroups.

I urge the Department to reinstate the November 2024 proposal, which would require state education agencies to report the number of students in each performance category for federally mandated math and reading tests in grades 4 and 8. These more detailed data were essential for public interest research like the Stanford Education Data Archive (SEDA), which provides one of the most comprehensive sources of nationally comparable measures of educational opportunity.

Without detailed reporting, researchers, policymakers, and communities are left with an incomplete and inequitable picture of student learning. Disaggregated performance levels are critical for identifying improvement over time, diagnosing where support is most needed, and ensuring public transparency in education systems.

Please restore the requirement that states report multiple achievement levels in EDFacts for grades 4 and 8 beginning in the 2025–26 school year and beyond.