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June 20 2025

Office of Information and Regulatory Affairs
Attn: Desk Officer for the Institute of Education Sciences
OMB Control No. 1850-0925
Docket ED-2024-SCC-0142
Re: EDFacts Data Collection—School Years 2025-26, 2026-27, 2027-28 (with 2024-25 continuation)

1. Purpose of this comment

I urge OIRA not to approve the portions of the revised EDFacts Information-Collection Request (ICR) that would scale back—or aggregate out of existence—the grade-by-grade reading and mathematics “proficiency/readiness” indicators for grades 3-8.

2. Why the grade-level data matter

Our PK-12 private school serves ~300 students in suburban St Louis. Because Missouri does not require private schools to administer the state assessment, federal EDFacts/NAEP tabulations are our only apples-to-apples benchmark. In August 2022, using the public, grade-specific proficiency files (FS 185/188, FS 175/178), we compared our internal scores to local, state, and national COVID-era results and confirmed that our students avoided the two-year learning-loss dip that afflicted peer schools. That analysis guided curricular revisions and tuition-relief decisions.

3. Legal and policy considerations

ESSA §1111(h)(1)(C)(ii) requires that state and local report cards display the number and percentage of students at each achievement level “for each grade.” Aggregating grades undermines that statutory intent.

The Paperwork Reduction Act balances burden against practical utility; yet the ICR’s burden table shows no workload savings while utility for stakeholders plummets.

4. Recommended actions

Retain Files 175, 178, 185, 188 exactly as in SY 2024-25, preserving grade-level disaggregation.

Publish a clear cross-walk showing that any future edits will not impair longitudinal comparability for grades 3-8 reading and math.

5. Conclusion

Granular proficiency and readiness metrics are the nation’s early-warning system. They revealed pandemic learning loss; they now validate recovery strategies. Losing grade-specific data would obscure inequities, weaken accountability, and hinder evidence-based decision-making far more than it would lessen paperwork.

I respectfully request that OIRA deny approval of the grade-level roll-backs and direct ED to maintain the existing collection.

Thank you for considering this comment.

Sincerely,

Sebastian Garren
Executive Director, John Paul II Preparatory School