

June 20, 2025

I am submitting this comment:

- (a) to disagree with the May 2025 proposal that continues to limit EdFacts data collection to just those students who score at or above statewide proficiency benchmarks; and
- (b) to support the November 2024 proposal that calls on state agencies to report more complete scoring information across all performance levels in math and reading at grades four and eight.

As a life-long educator who spent most of his career as a middle school teacher and principal, I can testify with certainty that there are many good reasons to support the 2024 proposal and oppose the 2025 proposal. Here are three:

- (1) Since the early years of NCLB, independent assessment professionals have repeatedly warned that achievement and growth over time cannot be reliably tracked [using proficiency benchmarks alone](#). The May 2025 proposal perpetuates distorted reportage by relying on benchmark-based metrics that limit the information EdFacts receives to only those students who meet or exceed state proficiency benchmarks.
- (2) A major benefit of the November 2024 proposal is that it restores data collection guidelines like those used between 2009 and 2019. These guidelines were important because they enabled independent research organizations like the Stanford Education Data Archive (SEDA) to report state and district test information in [user-friendly ways to large public audiences](#).

This work helped support meaningful, public accountability by revealing achievement patterns that were not widely understood, even by otherwise well-informed people. In my own state, this included both uncomfortable evidence of anemic, cohort achievement growth in many districts that had long been convinced they were doing just fine, as well as under-reported evidence of [remarkably high growth](#) in the state's two largest urban districts.

Following the pandemic, SEDA's ability to report this kind of state and local information was disrupted by new limitations on the data collected by EdFacts. The November 2024 proposal would remove these limitations. The May 2025 proposal would extend them.

In an era when years of vague and overly wonky test reportage has led increasing numbers of educators, parents, and taxpayers to lose confidence in the value of statewide accountability testing, the May 2025 proposal is especially hard to justify.

- (3) As important as it is to limit federal reach in educational assessment, even the most reliable state testing systems sometimes slip up. The validity and reliability of state test reportage cannot be adequately protected without common yardsticks like those that NAEP, EdFacts and other trustworthy systems provide. The more we rely on states to make their own testing decisions, the more important these common points of comparison become.

The November 2024 proposal restores state test data from fourth and eighth grades that make it easier to track down discrepancies that occasionally appear between NAEP and state test results. For example, my own state is currently trying to sort out big, first-ever discrepancies between NAEP and state test trends in eighth grade reading scores from 2022 and 2024 (see charts attached). Were these discrepancies caused by inadvertent glitches in NAEP sampling procedures? Or were they caused by new but as-yet-unrecognized problems inside the state system?

A clear first step toward answering these questions would be to see if other states experienced similar discrepancies across full scoring distributions for 8<sup>th</sup> grade reading in 2022 and 2024. But currently, EdFacts data from 2021 through 2024 only provide information for students who score at or above state proficiency benchmarks, i.e., data that don't reliably represent scoring shifts across the rest of the scoring distribution. Adoption of the November 2024 proposal won't help Illinois sort out discrepancy issues from 2022 and 2024. But it will help Illinois and all other states track down similar discrepancies in the years ahead. The May 2025 proposal just perpetuates the problem.

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## First-Ever Discrepancies between NAEP and State Test Reportage in Illinois

