



June 20, 2025

Matthew Soldner
Acting Director
Institute of Education Sciences
U.S. Department of Education
550 12th Street, SW
Washington, DC 20024

Ross Santy
Chief Data Officer
Office of Planning, Evaluation and Policy
Development
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202

Re: Docket No.: ED-2024-SCC-0142, EDFacts Data Collection School Years 2025-26, 2026-27, and 2027-28 (With 2024-25 Continuation)

Dear Acting Director Soldner and Chief Data Officer Santy:

On behalf of the American Educational Research Association (AERA), thank you for the opportunity to provide comments on the continuation of data collection for EDFacts. AERA is the major national scientific association of 25,000 faculty, researchers, graduate students, and other distinguished professionals dedicated to advancing knowledge about education, encouraging scholarly inquiry related to education, and promoting the use of research to improve education and serve the public good.

First and foremost, we want to underscore the value of EDFacts and the need to advance this data series. It serves many valuable purposes—highest among them, it is the sampling frame for any research or research-related work involving public schools. There is no comparable alternative; it fundamentally has no peer.

EDFacts includes a wealth of data from state education agencies (SEAs) that inform evidence-building and decision-making in education policy and practice. Among other data resources from the Department of Education and the National Center for Education Statistics (NCES), EDFacts is a prominent source of data for the Stanford Education Data Archive (SEDA) and the Urban Institute's Education Data Portal. Both of these examples of data portals have linked EDFacts with other data sets for timely and relevant research. The Educational Opportunity Project has highlighted academic achievement at a local level and disparities in achievement based on socioeconomic status and level of school segregation through the analysis of SEDA data.

Understanding how achievement varies among states and school districts necessitates detailed proficiency data to produce high-quality estimates and consistent comparisons, as well as to link to other indicators for analysis. We emphasize this issue here as AERA was among the 462 organizations and individuals supporting the proposed November 2024 update to EDFacts for expanded reporting of performance levels of

students on federally required math and reading tests in grades 4 and 8. This update would have represented the first time since 2021 that states would be required to report assessment performance data beyond the proportion of students above the state's proficiency threshold.

As part of the materials accompanying this comment request and updated information for future EDFacts collections, the Department has withdrawn all proposals that were included in the November request for clearance and comment. **We urge the Department to reconsider the decision to remove the proposed updates on state assessment proficiency data and to include multiple performance categories in reading and math for students in grade 4 and 8 for the 2025-26, 2026-2027, and 2027-2028 school years.**

We are concerned about diminished data quality and inconsistency should the current single proficiency measure remain in future EDFacts collections. As noted in a comment submitted by AERA member and Fellow Sean Reardon, the reliance on publicly-available data for comparable pre-2019 information on proficiency levels has resulted in missing data for 6,000 districts across the nation, lack of data from many charter schools, and lack of disaggregated data for the 8,000 districts where state assessment proficiency level data is available.

To be able to understand educational progress and to inform evidence-based decision-making, it is essential to have comprehensive data and consistent measures over time. Prior to 2019, EDFacts included robust state assessment proficiency data with multiple performance measure categories across multiple grades. We urge a return to this practice to the extent possible by collecting assessment data by multiple performance categories in grades 4 and 8 in EDFacts.

Thank you again for the opportunity to provide comments on future administrations of annual EDFacts collections. There are additional aspects of EDFacts that we would welcome the opportunity to discuss with you further. AERA looks forward to continuing opportunities to address this critical resource for education researchers and conclude by again emphasizing the significance of EDFacts.

Sincerely,

A handwritten signature in black ink, appearing to read 'Felice J. Levine', with a stylized, cursive script.

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