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I am writing to strongly oppose the proposed rule to continue to limit EDFact performance data to its Covid-era status. We desperately need transparency and data to help guide decision making. As a graduate from a statistics program, I can confidently say that despite the hype behind various new techniques and modeling, machine learning and AI both, there is no substitute for good, plentiful, original, and standardized data. Mere summary statistics such as the proposed continued reversion to a single proficiency measure are woefully inadequate and in a real and even measurable way. As a trivial example, when you take an average and discarding the original data, you lose all sense of scale and spread, lose any idea about clusters, mathematicians can even describe the "information loss" that occurs. I should further note that not returning to the same standards as existed before makes some important statistical analyses virtually impossible to conduct!

Although I dislike appealing to the idea of a sunk cost more generally, when speaking of gathering data for use especially in longitudinal statistics, it is actually the case that maintaining the same standards and extent of data collection makes future data in the same format MORE valuable, not less. Let me repeat that. Do not think of this as just a financial decision involving a constant value or even depreciating asset. Limiting data collection is like selling off an appreciating asset that gains value every year! Do not consider this as a decision about if we need the data just for the here and now (though we do) - think about how the data will enrich our overall understanding of education.

The EDFact data is a social good. Without it, we resort, quite frankly, to guessing. And guessing wastes education dollars. Sometimes for decades! While it is true that many forms of educational data are already collected, this set of data for grades 4 and 8 and broken into subgroups, and collected in a standard format across states is a treasure that is of particular and unique value when looking at the facts for what matters to best support student achievement.

The data is being collected already. Please, let it be reported in one spot! That's the very definition of what the national government can do more efficiently than anyone else.

Thank you for your consideration,  
Dylan Bay