

January 27, 2025

Stephanie Valentine

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U.S. Department of Education
400 Maryland Avenue, SW, LBJ, Room 4C210
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Re: Agency Information Collection Activities; Comment Request; *EDFacts* Data Collection School Years 2025-26, 2026-27, and 2027-28 (With 2024-25 Continuation); [Docket ID: ED-2024-SCC-0142](#)

Dear Coordinator Valentine:

Nearly five years after the start of the COVID-19 pandemic, students, families, educators, and communities continue to work to accelerate learning and close achievement and opportunity gaps that the pandemic widened. At this critical juncture, the education community needs key information on students' opportunity to learn, achievement, and learning progress so families, educators, researchers, and other stakeholders can appropriately support students.

Accordingly, the 462 undersigned organizations and individuals in the education and research fields write in support of the [proposed](#) changes to the [EDFacts](#) data collection that would provide detailed information on how students are performing academically. Specifically, we write in support of the change in reporting to *EDFacts* that would have states report detailed information on the performance levels of students on federally required math and reading tests in grades 4 and 8.

The proposed changes would also be a marked improvement from the current data collection – which (1) only tells us if students are proficient or not and (2) does not provide detailed enough information to understand and compare rates of learning throughout the country.

Background and Context

The Elementary and Secondary Education Act (ESEA) requires that states implement high-quality academic assessments in reading, mathematics, and science. States [must test](#) all students in reading and mathematics annually in grades 3 through 8 and once in high school. States must also test all students in science at least once within three grade spans (grades 3-5, 6-9, and 10-12). Assessments in other grades and subject areas may be administered at the discretion of the state. State educational agencies (SEAs) routinely compile and report these data, including reporting the number of students in each of multiple performance categories (for example: below basic, basic, proficient, and advanced, or the like).

From 2009 to 2019 SEAs reported information in reading and math by multiple performance categories (usually four or five categories) to [EDFacts](#), which is an initiative by the U.S. Department of Education to centralize performance data supplied by SEAs to enable better analysis and use in policy development, planning, and management.

After 2019, the *EDFacts* data collection was [changed](#): instead of reporting counts of students in each of four or five performance categories, states now report only a single measure – the proportion of students above a single proficiency threshold. The stated rationale behind this change was to reduce the burden on state education agencies. However, this did little or nothing to reduce any perceived burden for SEAs as state data systems routinely tabulate student counts in all performance levels. It did, however, significantly reduce the value of the *EDFacts* data.

An analogy may help make it clear why: if we asked the National Weather Service (NWS) to report only whether the temperature was above or below freezing, we would have a hard time distinguishing the weather in New Orleans from that in New York for most of the year. But if NWS also reported whether the temperature was above 50, 70, and 90 degrees, for example, we could readily distinguish the two. The same goes for reporting of standardized test scores. Knowing how many students scored above a single proficiency threshold provides little information to distinguish among schools and districts except at the crudest level.

The Importance of Multiple Performance Levels in EDFacts Reporting

The reporting of the number of students in each of multiple performance categories from 2009-2019 allowed researchers, such as those at the [Educational Opportunity Project](#) to use this detailed information housed in EDFacts to produce publicly available measures of school quality and school improvement for nearly every school and school district in the U.S. This included a comparison of performance and gains in school districts relative to national performance and socioeconomically similar districts. This allowed families, educators, local, state, and federal policy makers and officials, researchers, and the public to monitor the quality of public schools and track their improvements and areas of need over the last decade.

Another key benefit of the EDFacts data initiative was that the detailed performance level data that was reported prior to 2019 made it possible for the education research community to measure and monitor local rates of learning progression (also known as learning rates) from one grade level to the next. The publication of multiple performance levels in the database allowed for an analysis of how students' academic skills were improving over time -- allowing for valuable data to be gleaned about learning rates for students by location and subgroup (i.e. income status, race/ethnicity, English learner status, students with disabilities, students experiencing homelessness, foster care status, migratory status, military connected status), the closing of gaps between different subgroups of students, and where targeted supports and services to accelerate student learning could be best deployed. Without centralized reporting by multiple performance levels, these analyses are not possible.

At the Educational Opportunity Project alone, the measures of school and district academic performance and learning rates based on the 2009-2019 EDFacts reporting have been downloaded more than 30,000 times by educators, education researchers, state education officials and staff, and journalists. The data have been used in dozens of [academic research](#) papers and [news stories](#). The dataset provided through the EDFacts has even reached the military, where [the Air Force has used the data to assess school quality near air force bases](#) to provide information in making decisions about base locations. Moreover, this information was being used as part of an effort to improve the health and well-being of cities across the country through the [City Health Dashboard](#).

State Examples of EDFacts Data

The detailed EDFacts data reporting allowed for a high degree of insight into school quality and school improvement across the U.S. in ways that can illuminate positive outliers to be studied as well as problems to be solved. Examples of what the data was able to illuminate, including high-performing areas in states that are of interest to education committee leaders in Congress are listed below:

- In Michigan the detailed EDFacts data identify roughly 100 high-poverty schools throughout the state where test scores improved from 2009-2019 and where student learning rates (i.e., progression from one level to the next on the scale) were more than 20% above the national average.
- In Virginia, some of the schools and districts where learning rates are highest are in relatively low-income communities. In Brighton Elementary School (in the Portsmouth, VA School District), where 90% of students are eligible for free meals, learning rates are 28% higher than the

national average. In Franklin City, one of the poorest school districts in Virginia, learning rates are higher than in almost every other district in the state, higher even than in affluent Fairfax and Arlington County schools.

- In Louisiana, the test scores of Black students in many districts—including, for example, Orleans Parish and East Baton Rouge Parish—improved faster than the national average over the last decade, and much faster than the scores of Black students in similar districts elsewhere in the country.
- In Vermont, students in nearly all school districts have average test scores at or above the national average. Since 2009, test score disparities between poor and non-poor students have also declined.

This kind of information cannot be obtained easily and comparably from individual state reporting, for at least two reasons:

1. Not all states report detailed performance category data on their public websites or disaggregate the data by grade/subgroup/detailed proficiency category.
2. Most states apply some form of suppression to the public data, so test score results are not reported for small groups of students. That makes monitoring academic performance patterns for smaller populations (Black, Hispanic/Latino, Native American, and Asian students, English learners, students experiencing homelessness and students with disabilities) impossible in most places. Furthermore, states use different suppression rules, so comparisons across states are difficult. *EDFacts* also employs suppression when releasing public statistics based on the *EDFacts* data, but the suppression rules are consistent across states.

Support for the Proposed Updates to the EDFacts Data Collection

The proposed updates to *EDFacts* to have states report reading and math test results by multiple performance categories for students in grades 4 and 8 will provide the public, families, and researchers the ability to track student learning, including by key demographics, identify areas of need, and take lessons from areas that are positive outliers.

As the country rebuilds and recovers from the impacts of the pandemic – which includes lost instructional time, [declines](#) and [disparities](#) in student achievement, and the need to accelerate learning – it is important that key data on student learning is easily available.

As a result, the 462 undersigned organizations and individuals in the education and research fields write in support of the proposed data collection changes to *EDFacts*, which require reporting by multiple performance categories on math and reading tests for students in grades 4 and 8 for the 2025-2026 school year, and for the two years afterwards.

Sincerely,

The Educational Opportunity Project

The Learning Policy Institute

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