



To: Chairman Bill Cassidy and Members of the Senate HELP Committee
From: Andrew Ho (Harvard University), Ben Shear (University of Colorado Boulder), Erin Fahle (Educational Opportunity Project), & Sean Reardon (Stanford University)
Re: Request for Information on School-Level Academic Growth Indicators
Date: February 13, 2026

Introduction: National Growth Measures Are Already Feasible

We are developers of the Stanford Education Data Archive (SEDA) at the [Educational Opportunity Project](#) (EOP). We are writing in response to the HELP committee's January 20th [Request for Information](#) entitled *Informing Parents and Policymakers Through School-Level Academic Growth Indicators*. Our comments principally respond to RFI Question 7, "What changes to the National Assessment of Educational Progress or other federal data collection efforts would support a national focus on student growth?"

In developing the SEDA database, we have demonstrated that **it is feasible to create nationally comparable growth measures across all states**, even in the absence of federal infrastructure explicitly designed for this purpose. Drawing on our expertise, this letter summarizes how the United States can vastly improve the quality and scale of student growth data available to families, researchers, and policymakers from modest changes to NAEP and other federal data collection infrastructures.

As the RFI notes, 45 states currently report growth measures, but they construct and report these measures differently, and many change their methods and reporting over time. The federal government can bridge the gap from non-comparable growth metrics to useful growth data for parents, researchers, and policymakers. This can be done, not by mandating specific growth methodology, but by collecting and establishing transparency standards for reporting growth measures that states are already producing.

Federal Options: From Immediate to Ambitious

We propose multiple options for federal action, ranging from immediate low-cost improvements to more ambitious infrastructure development. These options are not mutually exclusive.

OPTION 1: Restore *EDFacts* Data Quality (Immediate)

Using the National Assessment of Educational Progress (NAEP) and the *EDFacts* database from 2009-2019, our SEDA team has linked state test scores onto a common scale and constructed growth measures that allow meaningful comparisons of learning rates across 12,000+ school districts nationally. Researchers, journalists, and policymakers use this work regularly to understand geographic variation in educational opportunity.

Since 2021, however, *EDFacts* has collected less detailed information on student performance than it did in prior years. This small change significantly limits the use of *EDFacts* data to make even basic cohort-based growth calculations (e.g., tracking a cohort from 4th to 5th grade).

Recommendation: Restore multiple category proficiency reporting in *EDFacts*. This low-cost administrative change would immediately enable researchers to construct more robust cohort-based growth measures

from existing federal data, with minimal additional burden on states (since states already collect the needed data).

Benefits of this Approach:

- Leverages an **existing data collection mechanism**.
- Uses cohort-based learning rates to **identify communities that produce strong learning gains** versus those where students fall further behind each year, informing targeted resource allocation and identifying successful approaches in high-poverty communities.
- Enables **evaluation and improvement of schooling policies and practices** (funding formulas, accountability systems, curriculum standards). Current fragmented data makes cross-state policy learning nearly impossible.

OPTION 2: EDFacts for Growth (Core Recommendation)

As the RFI notes, 45 states currently report growth measures. But information on these measures is not centralized, nor is there transparency about the calculations that states are using to construct the measures. States invest heavily to collect these growth data; a modest federal investment to centralize and report the data would increase its utility substantially.

Recommendation: Build on the EDFacts model by collecting standardized growth measures that states are already calculating and reporting. This data collection could be modeled on the College Transparency Act approach, which makes better use of data already being collected while allowing state variation. For example, the federal government could:

- Collect school-level growth measures and information on the methods used to compute them from states that produce growth measures.
- Establish transparency standards: require documentation of methodology, disaggregation by student subgroups, and consistent reporting formats.

Benefits of This Approach:

- **Preserves state autonomy** in choosing growth models and calculation methods.
- **Facilitates peer-state learning and accountability** through cross-state comparisons, evaluation of new state policies, and understanding of which interventions work in which contexts.
- Enables **tracking of national progress on learning rates** and **identification of best practices**.
- Enables parents considering schools or moving across state lines to **compare school quality in consistent terms**. Transparency **enables informed school choice** without federal mandates constraining metrics for school improvement.

OPTION 3: NAEP as National Growth Linking Infrastructure (Ambitious)

The RFI correctly notes that NAEP “does not track individual student performance over time so cannot currently be used to construct growth measures at the state or national levels.” However, NAEP can serve a different critical function: **as a common yardstick for linking state growth measures**. Our SEDA

methodology demonstrates this approach: We link state tests through NAEP using common student populations and report state-specific measures on a common scale.

We propose two recommendations for expanding NAEP's role to enable more precise and informative growth data:

Recommendation 3A: Pilot Growth-NAEP: Conduct a pilot study tracking individual NAEP-tested students over time (e.g., oversampling 4th graders and following them to 8th grade).

Benefits of This Approach:

- Provides a **national growth benchmark** comparable across states.
- **Validates state growth measures** against a common standard.
- Informs **technical assistance** to states on growth measurement.

Recommendation 3B: Embed NAEP Items in State Assessments: Use matrix sampling to include NAEP items on every student's state assessment. (Each student answers a few NAEP items.)

Benefits of This Approach:

- Gets NAEP data in **every grade and year** (not just tested grades).
- **Eliminates the NAEP sampling burden** on selected schools.
- Creates **direct statistical links** between state scales and NAEP.
- Enables both **proficiency and growth comparisons across states**.
- Generates much **larger samples for state-level NAEP results**.

Option 3A would *augment* the current NAEP administrations that take place every other year in 4th and 8th grade. Option 3B would *replace* the current NAEP administrations. Options 3A and 3B require federal authority but each could be implemented as a pilot in volunteer states.

OPTION 4: Early Grades Expansion (Ambitious)

The RFI identifies the challenge that “statewide assessments typically do not begin until 3rd grade,” making growth measurement in elementary schools incomplete. However, half of states now require kindergarten readiness assessments (KRAs).

Recommendation: Provide federal incentives (not mandates) for states to develop or improve and report early-grade assessment results. This could be implemented through:

- Grant programs with bonus points for states implementing K-2 assessments.
- Technical assistance for developing high-quality early assessments aligned to standards.
- Research support for linking early-grade growth to longer-term trajectories.

Benefits of this Approach:

- Enable growth measurement across the full K-8 span rather than only grades 3-8.
- Linking early-grade growth to longer-term trajectories could inform investments in pre-K and early elementary interventions.
- Allow states to test whether early investments translate to sustained learning gains.

Federal Role: Data Collection and Transparency, Not Mandates

Across all three options presented, we emphasize that the recommended federal role is in **data collection and transparency standards**, not in mandating specific growth models or accountability uses. The federal government is uniquely positioned to:

- **Collect data** that only government authority can require (e.g., through EDFacts or similar mechanisms).
- **Establish transparency standards** for how states estimate and report growth measures.
- **Support research and development** on growth measurement and communication to families.
- **Convene experts** to help states understand tradeoffs of different measurement approaches.

The federal government is **not** well-positioned to:

- Mandate specific growth models. (Preserve state autonomy.)
- Build data tools and dashboards. (Researchers and practitioners do this better.)
- Rate school quality using growth measures. (Federal comparability, not federal judgment.)

This division of labor, where the federal government ensures data availability and transparency, while states choose methodologies and researchers build tools, follows the model of the College Transparency Act and aligns with principles of federalism.

Additional Federal Recommendations: Technical Assistance and Research

Beyond data collection, the federal government could support states through:

Expert Convening: Establish an expert panel to review growth measurement approaches, document tradeoffs, and provide guidance to states. They should not recommend a single approach but distill technical wisdom and help states make informed choices.

Research on Communication: Fund research on how to effectively communicate growth information to families. Federal research and development support could address the research gap identified in the RFI: “the HELP Committee is not aware of any research on which approaches to measuring and reporting growth at the school level are most useful to families.”

Technical Assistance: Provide support for states developing or revising growth measures, particularly for emerging areas like early grades or linking to NAEP.

Conclusion: Modest Federal Investment, Transformative Potential

A modest federal initiative to collect and standardize state growth measures, improving upon current *EDFacts* proficiency reporting, would preserve state autonomy while enabling cross-state comparability, family transparency, and research on educational effectiveness. The federal government would play to its unique strengths (data collection authority and national coordination) while leaving methodology choices and tool development to states and researchers.

Our work with SEDA has demonstrated both the feasibility and value of nationally comparable growth measures. We have built this despite fragmented data infrastructure. Federal support would amplify these benefits enormously, enabling better-informed families, more effective state policies, and a clearer national picture of where students are making strong learning gains and where additional support is needed.

We welcome the Committee's focus on student growth and stand ready to provide additional technical detail on any of these proposals.