February 13, 2026

The Honorable Bill Cassidy
Chair
Committee on Health, Education, Labor, and Pensions
United States Senate
520 Hart Senate Office Building
Washington, DC 20510

Re: Response to Request for Public Comment on Measuring Student Growth

Dear Senator Cassidy,

The undersigned organizations appreciate the opportunity to respond to your request for public input on measuring student growth. As non-profit education and workforce policy organizations, we are committed to using data and evidence to improve transparency as well as education and employment pathways for individuals and communities across the country. Through a variety of approaches, we all seek to promote data policies and practices that result in better support and services for individuals and communities, particularly policies and practices that impact the use of statewide longitudinal data systems (SLDSs)—systems that incorporate early childhood, K–12, postsecondary, and workforce data.

Student growth data, when considered in conjunction with other measures of student progress, including proficiency measures, provides a comprehensive picture of student learning. However, different approaches to measurement answer different questions and tell different stories about student progress. For example, student proficiency measures ensure that students are learning, at minimum, the content and skills expected of a student performing at a particular grade level. Student growth measures help teachers and school leaders understand how much a student has improved within a particular academic year. Proficiency informs educators and parents about the student's efforts while growth provides them with a picture of the school's efforts. Because both of these measures are critical to retain, we write to comment on ways to ensure families, school leaders, and policymakers have access to both types of comparable information on students' academic success in K–12 schools.

We have addressed these comments to only those areas in which we have expertise. We look forward to continuing our engagement with you and other members of the HELP Committee on this critical issue. Please feel free to contact Data Quality Campaign Vice President, Federal Policy Kate Tromble (kate@dataqualitycampaign.org) to further discuss any of the proposals offered in this comment.

Sincerely,

All4Ed
Alliance for Learning Innovation

America Forward
Center for Strong Public Schools
Data Foundation
Data Quality Campaign
EdTrust
InnovateEDU
Knowledge Alliance
National Center on Education and the Economy
Results for America
StriveTogether
Teach For America
The Study Group
TNTP

What have states learned from developing different measures of student growth? How have states most effectively used growth data to inform policy decisions?

The Every Student Succeeds Act (ESSA) mandates that state accountability systems incorporate an additional indicator of student achievement. While the law does not explicitly require the use of student growth measures, it recommends them for elementary and middle schools and permits their use at the high school level.[1] Growth can be measured in a variety of ways including through value-added measurements, student growth percentiles, value tables, growth-to-standard, and gain scores.[2]

Currently, 48 states and the District of Columbia use one of these measures of student growth as part of their ESSA accountability plan. The different measures tell students, families, school leaders, and policymakers similar, but slightly different, things about student success. What is most important, however, is that the information is reported and clearly communicated to parents. The data should be published publicly, including through school report cards, to provide families, school leaders, and policymakers with more information about student progress.

Since 1994, the Elementary and Secondary Education Act has required that all students statewide take the same standards-aligned assessments. Since 2001, these assessments have been required annually in grades 3–8 and once in high school. The Committee must ensure that states continue to implement comparable assessments that can be used to accurately assess student growth and proficiency. Administering different assessments from district to district and school to school could undermine the transparency of the academic achievement information families, school leaders, and policymakers receive and hinder their ability to compare how well schools are serving students across schools and districts. Critically, administering the same assessment statewide allows for disaggregated reporting of results by student groups so education leaders can identify and track gaps across student groups and so parents and families have reliable, consistent, and accurate information about whether their child is meeting grade-level expectations in core subjects.

With comparable assessments as a foundation, states can then accurately measure student achievement. Most consumers of education data are familiar with status achievement measures, often referred to as “proficiency.” Proficiency status tells educators and families a student’s performance at one moment in time, usually based on a standardized test score. It answers the question: *Is Grace reading on grade level right now?* Growth measures add to that information, using an individual student’s assessment data over time to evaluate some aspect of that student’s academic progress.

As noted above, there are different ways to design growth measures. Some growth measures use advanced statistical methods while some use a more simple calculation. Each measure

[1] "Growth Data is Critical for Supporting Student Success" (2021).
[2] *Growth Data: It Matters and It’s Complicated* (2019).

follows a set of processes or rules based on decisions made by people. Because they use different data and different methods, growth measures answer different questions, such as:

- How much has Grace learned since last year?
- How much has Grace learned compared to her similarly performing peers?
- How much has Grace's school contributed to her learning?

Although "growth" means something different in each state and different methods answer slightly different questions, all growth data operates in conjunction with proficiency measures. In short, they measure both the student's current performance and the student's projected performance.

The Committee can look to the different state approaches to gain insight into current best practices. Although federal accountability law does not require every state to measure and report student growth, an overwhelming number of states have adopted the approach, indicating that it is a best practice. Key examples of state approaches include the following:

- **Massachusetts** calculates a growth measure from a student's 8th grade test scores vs. their 10th grade test scores to calculate how much the student grew over 9th and 10th grade combined.[3]
- **Tennessee** measures student growth through the Tennessee Value-Added Assessment System (TVAAS), which is different from student proficiency that is scored on the Tennessee Comprehensive Assessment Program (TCAP). In calculating a TVAAS score, a student's performance is compared to the performance of his or her peers who have performed similarly on past assessments.

These examples illustrate a number of effective approaches to measuring student growth, but methods will differ across states based on state specific needs. It is essential that student growth be measured using comparable assessments and considered in conjunction with proficiency and other relevant achievement measures.

What have states learned about how best to communicate information about school-average growth to families, such as through school report cards?

Families, school leaders, and policymakers need growth data that is transparent, communicated clearly, and readily available to understand individual student success and school quality and use it to inform decisions that improve student outcomes. School report cards are a useful tool to help families, communities, and policymakers understand student outcomes and overall school performance. The Committee should consider the following best practices to empower families, schools, and state policymakers to use growth data to develop policies that improve student outcomes:

- **Understand how growth data fits within the context of other accountability measures**. States should clearly situate student growth data within the broader framework of accountability measures, including proficiency measures. All indicators within state

[3] "Student Growth Data is Possible for 2021. How and Why States Should Focus On It" (2020).

accountability systems should be coherently aligned to provide a comprehensive and integrated representation of student success and school quality. Policymakers and education leaders should critically examine the rationale for how student growth is weighted and applied in combination with other measures of school performance.

- **Maintain transparency by identifying the purpose of the growth measure**. States should clearly articulate the specific growth measures they employ and the rationale for their selection. The public has a right to understand the performance of its public schools and states bear a responsibility to communicate information that is both transparent and meaningful. By providing clear context and justification for their methodological decisions, state leaders can foster public trust and accountability.
- **Ensure that students, families, and educators have secure and timely access to data about students' academic growth**. Efforts to improve educational outcomes will be ineffective unless those closest to students are equipped with actionable information that can inform instructional and programmatic decisions. Student growth data can meaningfully influence practice only when it is shared with those directly engaged in students' learning—including educators, families, and students themselves. Accordingly, states must guarantee that educators and decisionmakers at all levels have access to relevant, secure, and usable student growth data to effectively support all students' progress toward academic success.

The following state examples provide school report cards that support family, school leader, and policymaker understanding:

- **Illinois'** report card includes detailed explanations that go above and beyond to help parents understand why that data matters to them. Typical report card definitions focus on a technical description of the data point, but Illinois includes additional context to help users understand why they should care about the information and what it might mean more broadly about student performance and preparation for the future.
- **Washington** includes a "Contact Us" button in its report card for each indicator that directly connects users with the appropriate department, depending on what data they are viewing. For example, if a user is exploring teacher data and has a question, the email is directed to the Title II Department.[4]
- **Wisconsin** identifies priorities for its schools, including student performance, student growth, closing achievement gaps, and ensuring that students are on track for postsecondary education. The state's report card organizes school performance within those priorities.[5]

Are there design changes to state assessment systems that would support the creation of higher quality growth measures and are there any federal policies standing in the way of such innovation?

[4] *Show Me the Data: State Bright Spots* (2019).
[5] *Show Me the Data* (2017).

Under ESSA, states are required to include postsecondary enrollment data on report cards "where available." Forty-five states publicly report postsecondary enrollment data, but only 24 include that information on their school report cards. Displaying postsecondary enrollment data alongside high school graduation rates would allow states to provide a more comprehensive assessment of how high schools prepare their students. Publishing this data through a comprehensive resource, like school report cards, would also make it easier for families, school leaders, and policymakers to understand whether students are successfully transitioning to college once they leave high school. The Committee should consider mandatory state requirements to report postsecondary enrollment data and gain insight into some best practices from the following key state examples:

- **Michigan** includes more information that ESSA requires for postsecondary enrollment reporting, including how long students take to complete 24 college credits, how many students complete foundational coursework, and how many students pursue degree programs that are not four-year programs. This additional data gives families and communities a fuller picture of students' postsecondary performance and success.[6]
- **Pennsylvania** includes a number of postsecondary outcomes on its report card, which provides a more inclusive representation of the postsecondary experience. Indicators include the percentage of students who attend colleges, enlist in the military, and have both earned an industry recognized credential and entered the Pennsylvania workforce. By integrating a variety of postsecondary outcomes, the state provides more insight into the pathways students explore after high school.

Are there any kinds of federal support that would be useful to states seeking to implement new growth measures or revise existing ones?

States are responding to public demand for more information about school quality and student success that builds upon results from a one-time test score. Years of state and federal investments in using longitudinal student data have made it possible to use student growth data to deepen insights about teaching and learning. SLDSs allow local and state leaders to access robust measures of student growth, such as growth-to-standard or value tables.

SLDSs, which link data from across the P–20W spectrum, are essential to calculating and using student growth measures. States have done the hard work to build these systems, establish relationships, and develop policies that support their ability to use this data to answer critical policy questions and support continuous improvement. To continue this work, states need reliable, sustained federal funding and updated legislation that expands and modernizes the SLDS grant program to make data more accessible and usable. Revisiting and enacting the provisions contained within the Committee's bipartisan Advancing Research in Education Act (AREA) and increasing annual appropriations for both the SLDS and Workforce Data Quality Initiative (WDQI) grant programs are good places to start.

[6] *States Can and Must Include Postsecondary Enrollment Data on Report Cards* (2019).