

August 3rd, 2020

Stephanie Valentine  
PRA Coordinator  
Director of the Information Collection Clearance Division  
Department of Education  
550 12th Street, SW, PCP, Room 9089  
Washington, D.C. 20202-0023

Dear Ms. Valentine:

New Leaders appreciates the opportunity to provide comments to the U.S. Department of Education (the Department) regarding the 2020-21 Civil Rights Data Collection (CRDC).

**We believe the Department's decision to eliminate key questions from the CRDC would hamper the ability of a wide range of stakeholders, including the federal government, to promote equitable access to educational opportunities and to protect and advance students' civil rights. We strongly urge the Department to maintain the collection of these data.**

New Leaders is an educational leadership organization whose mission is driven by racial equity and social justice, and by an unwavering belief in the potential of every student. Building schools and systems that lift up Black and brown students and children from low-income communities is at our core. We forge deep partnerships to equip school leaders at all levels to be powerful and positive forces for change, especially in our most marginalized communities. We provide best-in-class leadership training that ensures schools are set up to provide all students with challenging, engaging learning experiences in every classroom, every day, year after year. To date, we have developed nearly 3,000 leaders who annually reach more than half a million students across the country. To support even more children and communities, we champion evidence-based policies that reflect the transformative power of exceptional school leadership and that break down inequitable structural and institutional barriers to student achievement and educational equity.

The CRDC collects a wide range of data that can be used to understand the learning opportunities available to students and whether those opportunities are available on an equitable basis. These opportunities include access to early education programs, a college preparatory curriculum and inclusive learning environments, among other important opportunities addressed through the CRDC data., the CRDC data are reported overall and disaggregated by race/ethnicity, disability status, gender, English learner status, and other student characteristics, which allows stakeholders to monitor potential inequities in access to learning opportunities.

Despite the importance and utility of these data, the Department is maintaining its proposal to eliminate from the CRDC questions related to children's access to high-quality early childhood education, school funding, and teacher quality, among other data. Further, the data on school funding proposed for elimination provides important insight into the distribution of school resources, which research demonstrates is vastly inequitable in

the United States. Few states have a legal obligation to collect these data, and while most states collect this data, it can be hard to access and difficult to compare from state-to-state.

Under the Every Student Succeeds Act (ESSA), some of the data collected through the CRDC is also included on state and local report cards providing useful information for parents, advocates, and practitioners. However, not all states and districts are currently reporting all of the data required under ESSA. Maintaining this information within the CRDC is critical to supporting state and district compliance with ESSA and to ensuring this information is easily accessible to the public.

Further, as the nation grapples with the impact of COVID-19 and states and districts face budget shortfalls, data providing insight on educational opportunity and access is even more indispensable for aiding policymakers, researchers, advocates, and other stakeholders in targeting resources to best support students—particularly those who have been pushed furthest from opportunity. These efforts should be aided by the Department, not hindered.

The Department primarily justifies the proposed deletion of this data in furtherance of reducing the “overall burden the CRDC imposes on LEA respondents.” The Department’s explanation minimizes the importance of teacher quality data—and the role of teachers—in promoting educational equity and positive academic outcomes for students.

Further, the Department argues that the utility of these data for researchers does not justify the collection process. What this justification fails to acknowledge is how the analyses conducted by researchers based on these data are in turn used by civil rights advocates and policymakers to reveal and address disparities in educational opportunity. This justification overlooks and undermines the purpose of the collection of these data, which is central to and consistent with the Department’s mission to ensure equal access to quality educational opportunities for all students.

New Leaders strongly urges the Department to maintain collection of these critical sets of data. We appreciate your consideration. If you have any questions or need any additional information or background, please contact [policyteam@newleaders.org](mailto:policyteam@newleaders.org).

Sincerely,  
Jean Desravines  
CEO  
New Leaders