

December 16, 2024

Stephanie Valentine
Manager of the Strategic Collections and Clearance Governance and Strategy Division
Office of the Chief Data Officer, Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Ave. SW
LBJ, Room 4C210
Washington, DC 20202-1200

RE: Mandatory Civil Rights Data Collection (Docket No. ED-2024-SCC-0128-0001)

Dear Ms. Valentine,

The undersigned organizations welcome the opportunity to respond to the U.S. Department of Education's (ED's) request for comments regarding the Department's proposed information collection for the mandatory Civil Rights Data Collection (CRDC) for school years 2025-26 and 2027-28. The CRDC is a vital tool to understand how schools are serving all students and its value for families, advocates, educators, and policymakers continues to grow. As a collaboration of national and state organizations seeking to advance shared education priorities through federal, state, and local policy and advocacy, we commend the Department for its commitment to improving transparency about students' experiences in the nation's public schools.

The federal government has a legal responsibility to protect the rights of students in schools and ensure that students are not discriminated against per the Civil Rights Act of 1964, the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990. The CRDC is necessary to ensure that schools are meeting students' needs pursuant to these laws. In addition, the CRDC collects critical information that states and districts include in parent-facing report cards according to the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act.

To be most useful, the data should be collected and reported in a timely way. LEAs need ample time to ensure their data systems are equipped to handle reporting requirements — well in advance of the relevant school year. We urge the Department and the Office of Management and Budget to proceed efficiently and expeditiously with revising and finalizing the CRDC for the 2025-26 and 2027-28 school years as proposed in this 60-day notice.

Sincerely,

All4Ed

Education Reform Now

EdTrust

National Center for Learning Disabilities