

February 28, 2017

Director of the Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue SW
LBJ, Room 224-82
Washington, DC 20202-4537

Docket No.: ED-2016-ICCD-0147 (Civil Rights Data Collection)

Dear Acting Director Valentine:

We are writing on behalf of the undersigned civil rights organizations, scholars and educators to urge you and your colleagues to approve the information collection request you recently posted for the Civil Rights Data Collection (CRDC). In particular, this comment responds to the first and second questions you posed to commenters, based on our work as advocates, educators, and academic researchers concerned with equal educational opportunity.

As to your first question—the extent to which this collection is necessary to the proper functioning of the Department—the answer is resoundingly yes. The Department is tasked by statute with overseeing the proper implementation of the civil rights laws that apply to schools, including Title VI, Title IX, and Section 504. The Department is also tasked by statute with overseeing the proper implementation of laws such as the Every Student Succeeds Act and the Individuals with Disabilities Education Act, both of which include equity as part of their goals. The data in the CRDC provide important information to the Department about how SEAs and LEAs are implementing these laws. Moreover, data collection has long been an important part of the Department’s work, including during the time when the Department was merely the Office for Education in earlier administrative incarnations. Even those who advocate for a smaller federal footprint in education have often recognized that data collection would remain an important part of any reduced federal role.

As to your second question—the extent to which this information will be processed and used in a timely manner—the answer here, too, is that assuming the Department makes the data available in a timely manner, LEAs and local stakeholders will surely use the data in a timely manner. This is because the data in the CRDC are crucial for both LEAs and local stakeholders to assess how the work of schools is unfolding in local communities. The ease with which communities can examine the CRDC results and determine how they are faring on the important measures the data present makes it possible for communities to self-correct. Communities can also examine how neighboring communities and communities around the country of similar sizes and with similar demographics are doing. The data therefore represent an important mechanism that permits local control and local decision-making about how to improve. The data provide an opportunity for LEAs around the country to share their own best practices. The data also allow parents and other local stakeholders to see what their communities are doing in comparison to other communities, providing parents more information with which they can make more informed choices.

For all of these reasons, we urge you to maintain your commitment to full data collection in the CRDC and to sharing that data in easily accessible online formats.

Very truly yours,

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