



November 18, 2019

SUBMITTED VIA REGULATIONS.GOV

Director of the Information Collection Clearance Division
Attn: Rosa Olmeda
U.S. Department of Education
550 12th Street SW
Potomac City Plaza, Room 9089
Washington, D.C. 20202-0023

RE: Mandatory Civil Rights Data Collection; Docket ID: ED-2019-ICCD-0119

Dear Ms. Olmeda:

The Alliance for Excellent Education (All4Ed) is deeply concerned about the U.S. Department of Education's (ED) proposal to eliminate nearly thirty data points from the Civil Rights Data Collection (CRDC), including data pertaining to teacher experience, school finance, and advanced coursework. This proposal is inconsistent with ED's mission of "fostering educational excellence and ensuring equal access," as these data points help measure if students receive equitable access to an excellent education. While eliminating these data points may reduce district burden, the loss of this information far outweighs any benefit secured through this modest burden reduction. We urge you to maintain the data points you have proposed to eliminate. Additionally, should these data points disappear, so, too, does the transparency families and communities want and need to be better informed as to the quality of schools they desire and support.

Evidence demonstrates the importance of teacher experience,ⁱ yet ED has proposed to eliminate the collection of data on the number of first- and second-year teachers in schools. Data from the CRDC demonstrate that the percentage of teachers in their first year of teaching is twice as high in school districts with the highest concentrations of Black and Latino students in comparison to school districts with the lowest percentages of Black or Latino students. Specifically, 13.9 percent of public-school classroom teachers were in their first year of teaching in school districts with an average concentration of Black or Latino students above 75 percent during the 2015–16 school year. However, only 6.0 percent of teachers were in their first year of teaching in school districts with an average concentration of Black or Latino students at or below 25 percent.ⁱⁱ Eliminating this data point will not assist in eradicating this disparity.

Research also shows that school funding influences student achievement,ⁱⁱⁱ yet ED has proposed to eliminate all data collection related to school finance. Even if one disputes the growing evidence that education spending is associated with better student outcomes, it is still prudent to collect information on how billions of taxpayer dollars are spent and to ensure they are distributed equitably. A 2014 CRDC analysis found that education spending on our most vital educational resource—our teachers—is inequitable. For nearly one-quarter of school districts, the 2014 report found a salary gap of at least \$5,000 between educators working in high schools serving the highest and lowest percentages of Black

and Latino students. ED’s proposal to eliminate the collection of school finance data would undercut efforts to ensure that taxpayer dollars are equitably distributed to support all students, particularly those who have been historically underserved.^{iv}

Further, even though the completion of accelerated coursework improves students’ preparation for college, gives high school students the opportunity to earn college credit, and reduces student debt, ED has proposed to reduce data collection regarding Advanced Placement enrollment and test-taking. According to an analysis conducted by the Government Accountability Office using data from the CRDC, “among schools that offer [Advanced Placement], roughly 70 percent of low-poverty schools offered more than 10 different AP courses, compared to about 30 percent of high-poverty schools.”^v At a time when the nation’s economy demands higher levels of education than ever before, more must be done to ensure equitable access to accelerated coursework. ED’s proposal will limit the ability to identify and address disparities in access to advanced coursework for students most in need of opportunities and support.

ED’s proposed reductions to the CRDC would have a ripple effect beyond the CRDC itself. The Every Student Succeeds Act (ESSA) linked reporting requirements on State and district report cards to CRDC in several areas, including advanced coursework (section 1111(h)(1)(C)(viii) of the Elementary and Secondary Education Act as amended by ESSA). By reducing data elements within the CRDC, ED is, in effect, reducing the information that will be made available on State and district report cards, despite Congressional intent for these report cards to highlight data collected through the CRDC.

We measure what matters. This proposal from ED sends an unfortunate message regarding the interest and intention of the federal government to maintain its historic role of ensuring all students have access to a high-quality education. We urge you to reconsider this proposal and restore the data elements described in this letter, as well as each data element proposed for elimination listed in the enclosed document. Thank you for the opportunity to comment. Should you have any questions, please contact Phillip Lovell, Vice President for Policy Development and Government Relations (plovell@all4ed.org; 202-261-9850).

Sincerely,



Deborah S. Delisle
President and CEO

ⁱ T. Kini, T and A. Podolsky, *Does Teaching Experience Increase Teacher Effectiveness? A Review of the Research* (Palo Alto: Learning Policy Institute, 2016), https://learningpolicyinstitute.org/sites/default/files/product-files/Teaching_Experience_Report_June_2016.pdf.

ⁱⁱ Unpublished analysis of SY 2015-16 CRDC data conducted by the Alliance for Excellent Education.

ⁱⁱⁱ C.K. Jackson, *Does School Spending Matter? The New Literature on and Old Question* (Chicago, IL: Northwestern University, 2018), https://works.bepress.com/c_kirabo_jackson/38/

^{iv} U.S. Department of Education Office for Civil Rights, *Civil Rights Data Collection, Data Snapshot: Teacher Equity*, (Washington, DC: Author, 2014), <https://ocrdata.ed.gov/Downloads/CRDC-Teacher-Equity-Snapshot.pdf>.

^v U.S. Government Accountability Office, *Public High Schools with More Students in Poverty and Smaller Schools Provide Fewer Academic Offerings to Prepare for College*, GAO-19-8 (Washington, DC: Author, 2018), <https://www.gao.gov/assets/700/694961.pdf>.