

November 15, 2019

Data Quality Campaign Comments on Proposed Changes to Civil Rights Data Collection

Data is most useful when, through multiple indicators, it provides a clear picture of opportunities for all students. The Civil Rights Data Collection (CRDC), long considered the best source of information on inequities in education, should deliver on its promise to ensure that parents and other stakeholders have the information they need to identify and ameliorate inequities in opportunities for students. As the Department decides on next steps for the CRDC, it will be important to maintain a robust set of indicators, provide information broken down by different student groups, and explore ways the state can partner with districts to reduce burden and provide high-quality CRDC information.

Families and other stakeholders want and need a robust set of indicators about the schools that serve their students.

Families, educators, advocates, and policymakers need a variety of information about their students and schools to make informed decisions and advocate for student success. Data from the CRDC, particularly when reported alongside other measures of school performance, give stakeholders a more robust picture of whether schools are meeting the needs of students. Particularly valuable is that the CRDC includes data that captures so much of students' education experience, with indicators that range from pre-K enrollment to high school course-taking. While education stakeholders value information about student academic performance, DQC's research has shown that parents in particular also value information that goes beyond academics to tell them whether their child has access to the same opportunities as children in other schools. The CRDC provides parents with this type of actionable information, and empowers them to make informed decisions. As such, it is important that the Department maintain the wide variety of information that the CRDC provides, and not remove pieces of information that are important to families.

Families and other stakeholders want and need information that shines a light on opportunities for **all** students.

One of the most valuable aspects of the CRDC is that it highlights education inequities by provided disaggregated data (data broken down by different student groups). Families deserve to understand how their schools serve *all* children. Providing data broken out by different student groups enables parents to answer critical questions about how groups of students have differing levels of access to things like experienced teachers, challenging coursework, and other opportunities. DQC's research found that the vast majority of parents want access to information that tells them how their child's school educates students like theirs. This is not possible without providing data broken down by student group. Historically, CRDC has provided information broken down by many different groups of students; it should continue to provide the data in a way that enables parents and other stakeholders to answer the equity questions that matter to them.

States can partner with districts to improve CRDC reporting.

The scope of the CRDC is extensive, which means that it is no small task for districts to collect and report the information. Districts are often stretched thin by CRDC reporting requirements. Now that ESSA requires states to include CRDC data on report cards, there is a renewed opportunity for states to support districts in their CRDC reporting activities. States could do this by partnering with districts to submit some or all of the data, or submitting the data directly so that the districts do not have to report the information to both the state and the federal governments. The Department should consider opportunities to get input from states on taking on a larger role in the submission of CRDC data. Regardless of *how* the data is submitted, it will be important to continue to require that all of these important elements remain part of the CRDC, so that it continues to be the valuable resource for identifying and addressing inequities that it has been for decades.

DQC appreciates the opportunity to provide comments on proposed changes to the CRDC and welcomes the opportunity to further discuss these topics with ED staff. We know that the information in these collections will be a helpful resource for education stakeholders, and that the Department can play a valuable role in signaling to states the value of using education data to improve outcomes for all students.

Sincerely,

The Data Quality Campaign