

February 28, 2017

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

Re: Docket No. ED–2016–ICCD–0147; Notice in Federal Register

Partners *for* Each and Every Child (Partners *for*) is pleased to respond to the United States Department of Education’s (US ED) notice of intent to collect the Civil Rights Data Collection (CRDC). This information is critical to US ED and the Office for Civil Rights serving its mission, and to the public.

Every two years since 1968, US ED has collected information on demographics and educational opportunities for students of different genders, races, English-proficiency levels, and disabilities. These data are used both for enforcement of federal civil rights laws, national, state and local policy making, and for research to improve education for these students.

And in its consistent call for stakeholder engagement throughout the processes of policy development and implementation, the *Every Student Succeeds Act* (ESSA) provides the basic framework for a more locally driven – and potentially more directly democratic – paradigm for public education in the United States. Such a process will depend on a wholly informed public, and the CRDC stands as the most comprehensive sources of school-level data available.

Stakeholders around the country – policy makers and families, students, teachers and business leaders – are working hard to make the most of the opportunity created by ESSA, to ensure schools wherein each and every child grows and learns in a safe and stimulating environment, by investing in systems that value and represent the strength of our community and, ultimately, prepare every child for a productive future. This work depends on an informed citizenry. Data alone cannot do this, but it is an essential ingredient.

It is clear that the challenges of disproportionate rates of resources, discipline, and access to rigorous coursework (to name a few data points made universal nationally by the CRDC) in high minority and high poverty schools and districts are not a discrete problem of distribution. Rather, a comprehensive analysis of these challenges, made possible by data from the CRDC, reveals that the distribution is just one downstream outcome of a deeper challenge of drawing

effective teachers and resources to high need areas of our nation, and the professional and personal supports that teachers and schools need to teach, thrive and lead. Accurate and detailed information – data – are essential to addressing the complexities of providing an excellent education to all students.

In addition to empowering local engagement, informing policy and research, and enforcing our national civil rights laws, many other groups and organizations have come to rely on the CRDC to contribute to the truth-telling they are doing about complex educational issues including (to name a few):

- GreatSchools.org
 - GreatSchools is the leading national nonprofit **empowering parents** to unlock educational opportunities for their children. They provide school information and parenting resources to help millions of American families choose the right school, support learning at home, and guide their children to great futures.
- [Change the Equation](#)
 - Change the Equation is a coalition of **corporate members** leading a movement to ensure that every young person in the U.S. is STEM literate through high-quality STEM experiences that spark a lifelong love of learning.
- [George W. Bush Institute](#) “State of our Cities” Platform
 - The Institute works to increase student achievement and improve the quality of our schools by using data and research-based education practices and policies with a focus on **accountability and principal leadership**.
- [Dignity in Schools Campaign](#)
 - As a national coalition, the Dignity in Schools Campaign builds power amongst **parents, youth, organizers, advocates and educators** to transform their own communities, support alternatives to a culture of zero-tolerance, punishment, criminalization and the dismantling of public schools, and fight racism and all forms of oppression.
- [Civil Rights Project](#)
 - Civil Rights Project/Proyecto Derechos Civiles helps **renew the civil rights movement** by bridging the worlds of ideas and action, to be a preeminent source of intellectual capital within that movement, and to deepen the understanding of the issues that must be resolved to achieve racial and ethnic equity as society moves through the great transformation of the 21st century.
- [Center for American Progress](#) on Teacher Absenteeism
 - Teacher Absence as a Leading Indicator of Student Achievement; CAP is an independent nonpartisan policy institute that is dedicated to improving the lives of all Americans, through bold, progressive ideas, as well as strong leadership and concerted action. Their aim is not just to change the conversation, but to **change the country**.

- [Attendance Works](#)
 - A national and state initiative that promotes better policy and practice around school attendance. They promote tracking chronic absence data for each student beginning in kindergarten, or ideally earlier, and partnering with **families and community agencies** to intervene when poor attendance is a problem for students or schools.

In order to understand and address issues of equity, stakeholder access to and understanding of relevant and longitudinal data is critically important. School community data can establish a shared set of facts to drive a deep understanding of root causes. The CRDC fills gaps in local, district, and state level data systems and makes such information and indicators comparable across these regions. The new Administration must preserve the essential information provided by the CRDC in order to continue to support local decision-making addresses issues of equity and access to excellent education.

Partners *for* is an organization focused on advancing equity and excellence for all children in the United States' educational system. Using the recommendations in the Congressionally-commissioned Equity and Excellence Commission's final report - entitled *For Each and Every Child* - as a polestar for collaborative education reform, we advance equity in education by supporting and connecting non-partisan stakeholder communities around the country.

Molly Mauer



Director, Partners *for* Each and Every Child
Senior Vice President, The Opportunity Institute

