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Re: Docket No.: ED-2016—ICCD—0147

Dear Ms. Valentine:

Our organization's efforts have resulted in tremendous educational improvements for millions of students, but these improvements would have been significantly delayed if not for the data available through the Civil Rights Data Collection. For that reason and many more, we urge the Department of Education to maintain the current level of data collection from all schools and districts and to consider enhancing data collection so that parents and students have all the information they need to advocate for themselves.

The Department is proposing to change the 2017-2018 CRDC to reduce the burden on school districts. However, the Department's actions will only shift the burden onto parents and students and actually result in increased burdens for school staff.

Many parents and students attempt to gather data on their own, but they often have a difficult time navigating the records request and production process. The CRDC provides families with an easily accessible method of gathering information about schools in their communities. Diluting this tool will have the clear, predictable, and discriminatory consequence of harming students and parents in low-income communities and communities of color.

Families currently have one easily accessible source to read information about the schools in their neighborhood—CRDC—but if data is taken off the site, families will have to find other sources of information. Families with more time and resources will be able to fill the information gap, but low-income families and communities of color will not. This unjust and discriminatory result should be prevented.

Moreover, the Department of Education should consider ways to enhance the data available on CRDC so that families can make decisions that are more informed. In particular, CRDC should collect and release more data:

1. For the LGBTQ community, English-Learners, foster youth, homeless youth, students with disabilities, and other students in our school system that may have unique needs.
2. On the impact of school security/police on students' well-being and safety.
3. On the reasons why students are disciplined, with a particular focus on the use of willful defiance/disruption.

4. On the use of alternatives to exclusionary discipline, such as Restorative Justice and Positive Behavior and Intervention Supports (PBIS).

The Department of Education should also collect and release data on an annual basis so that families have the most current data available to them.

Data collection and review is also necessary for school staff to learn what is going well in their schools, what is not, and what other schools they can contact to learn from. Thus, reducing the level of data collection for CRDC will actually result in the opposite intended effect in the long-term—it will *increase* the burden on many schools because they will not have sufficient information for effective planning and problem-solving.

For the aforementioned reasons, we urge the Department of Education to maintain the current level of data collection and consider enhancing the Civil Rights Data Collection with the above-listed recommendations.

Sincerely,



Ruth Cusick
Senior Staff Attorney



Anabel Agloro
Staff Attorney



Oscar Daniel Lopez
Staff Attorney