



To Whom It May Concern:

Please accept these comments on behalf of Research for Action, a Philadelphia-based, nonprofit education research organization, regarding the Civil Rights Data Collection from the U.S. Department of Education. In addition to assisting the Office of Civil Rights to fulfill its mandate and enforce our nation's civil rights laws, the CRDC is highly valuable to researchers like us who are seeking to understand differences in how students are experiencing school and the ways in which these differences are related to student outcomes. It is also a crucial data set for students, parents, community members, and policymakers to assess quality and make informed decisions about public education in their communities.

In November, Research for Action analyzed the most recent release of the CRDC to measure gaps between educational opportunities and experiences (e.g. access to gifted and talented education) for students in Pennsylvania's public schools. We found that the Commonwealth of Pennsylvania, in general, has larger gaps in educational opportunities between white and black students and white and Hispanic students than our neighbors in the region and the nation as a whole. These opportunity gaps are so large that, even though white students in Pennsylvania schools receive on average better educational opportunities than white students receive in schools in the region, black and Hispanic students in Pennsylvania schools receive on average worse educational opportunities than black and Hispanic students respectively receive in schools across the region and the nation.

The CRDC data analyzed in [RFA's report](#) has proved to be a valuable resource for advocates and policymakers engaged in discussions about racial and socio-economic inequities and how state policy and school funding can ensure that all students receive an opportunity to achieve their full potential.

For these reasons, Research for Action strongly urges the U.S. Department of Education to maintain the current CRDC in its entirety. Additionally, we recommend that the CRDC be improved in the following ways:

- **Reporting enrollment by grade.** When analyzing certain educational opportunities that are specific to one or two grades (e.g. AP Physics), it would be beneficial to know the enrollment in those particular grades, rather than the enrollment of the entire school.
- **Reporting enrollment in Dual Enrollment programs by race and gender.** Currently, the CRDC simply reports whether a school provides access to a Dual Enrollment program, without reporting actual enrollment numbers in those programs.
- **Linking student enrollment by race and gender to teacher experience.** Currently the CRDC reports school enrollment by race and gender and the proportion of teachers at the school who have less than two years of experience, but the data regarding which students these less-experienced teachers teach is not available.
- **Collecting data related to access to computer science courses and the quality of school internet bandwidth,** as proposed by the Office of Civil Rights.

- **Collecting data related to completion of the Free Application for Federal Student Aid (FAFSA)**, disaggregated by race and gender.
- **Identifying the Census tract of the school** so that the CRDC can be merged with other federal datasets.

Research for Action is just one organization that uses the CRDC. Across the nation, researchers, policymakers, administrators, and districts use the CRDC to make informed decisions about how to continue to improve the education system for all students. These entities do not have the capacity to collect this data on their own or a mechanism to compare progress with other districts or states. If the Department of Education were to stop maintaining the CRDC, they would be left in the dark, undermining efforts to understand existing inequities and improve student learning for all.

Respectfully,

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