August 6, 2020

Stephanie Valentine  
Office of Chief Data Officer  
Office of Planning, Evaluation and Policy Development  
U.S. Department of Education  
550 12th Street SW  
Potomac Center Plaza, Room 9089  
Washington, DC 20202-0023  

Re: Docket No.: ED–2019–ICCD–0119

Dear Ms. Valentine:

On behalf of the American Educational Research Association (AERA), thank you for the opportunity to provide comments on the proposed revisions and schedule adjustment for the 2020-21 Civil Rights Data Collection (CRDC). AERA is the major national scientific association of 25,000 faculty, researchers, graduate students, and other distinguished professionals dedicated to advancing knowledge about education, encouraging scholarly inquiry related to education, and promoting the use of research to improve education and serve the public good.

As schools, districts, and states continue to address the impact of the COVID-19 pandemic on students, teachers, and the broader K-12 system, the information in the CRDC is more critical than ever to be able to identify and address long-standing, persistent inequities that students of color, low-income students, and students with disabilities face. The transition to distance learning in March and the planned continuation of fully online or hybrid models of instruction for the start of the 2020-21 school year have exacerbated these inequities. The forthcoming CRDC will be helpful for researchers and policymakers to understand the magnitude of the impact of the pandemic on educational equity and access. We appreciate the Department’s continued commitment to providing this important information to enable action to reduce disparities and improve educational outcomes for all students.

**Comments on Revised Timeline**

We appreciate the Department of Education’s decision to postpone data collection for a year. The swift transition in March to remote learning to mitigate the spread of COVID-19 required schools, districts, and states to focus on meeting the immediate needs of students, teachers, and families, such as providing school meals and digital devices for remote learning.
We are pleased to see that the Department plans to resume data collection for 2020-21. Although schools and districts will continue to face considerable challenges in the forthcoming academic year due to the combination of the continued pandemic and substantial revenue constraints, the pandemic has made much more publicly visible systemic inequities in education on which the CRDC is uniquely positioned to provide essential information.

In these unprecedented times, we encourage the Department to continue to monitor developments and track indicators of the spread and containment of COVID-19. Although we advance the recommendation to move forward on a 2020-21 cycle, we are also cognizant that pandemic conditions may not permit school and district staff responsible for submitting CRDC data to do so in a safe and secure manner. Under such a scenario, we emphasis that human life should not be placed at risk.

**Department of Education Response to 60-day Comment Period**

AERA appreciates that the Department has reversed its decision to eliminate the requirement to disaggregate preschool enrollment data by race, sex, English Learner status, and disability classification under the Individuals with Disabilities Education Act. We support the Department’s rationale to continue the disaggregation of preschool enrollment in order for both the Department and researchers analyzing the data to be able to address disparities in access to high-quality early childhood education programs.

While we appreciate that the Department heard these concerns and addressed them, we nevertheless continue to have substantial concerns about the continued proposed elimination of school finance data from the 2020-21 CRDC. As noted in our comments last November, the school finance indicators included in past administrations of the CRDC provide valuable data that enable research on inequities in school resources. Research has indicated that the Great Recession had a disproportionate negative impact on education outcomes in areas that were hardest hit economically. Access to school finance data is of critical importance today to understand changes in funding due to decreases in state and local revenue and the overall impact that the COVID-19 pandemic has had on equitable access to educational services.

While we reiterate our comments from November that we understand the concerns of reporting burden from school and district administrators, we strongly support the continuation of school finance data indicators in ways that minimize burden. A recent article in *AERA Open* emphasized the benefit of maintaining school finance indicators on the CRDC: “The future utility of the biennial school site data in the Civil Rights Data Collection depends on the current and all future federal administrations’ continued commitment to collecting and disseminating those data.”

We would again encourage OCR and the National Center for Education Statistics (NCES) to work toward maintaining these data fields either through linking data collected through the School-Level Finance Survey or by providing best practices for submitting data. The announced partnership last year between OCR and NCES last year was intended partly to address data
quality concerns, including improving the accuracy of reporting on these indicators. In addition, while acknowledging that several of these indicators are collected through the Annual Survey of School System Finances (F-33), these are aggregated at the district level. As funding inequities are apparent within large school districts, having school-level data is important to address any disparities in funding within districts, particularly where they adversely impact Black, Latinx, and Indigenous students.

**Comments on Directed Question 4**

**Teacher Absenteeism Data:** We maintain that data on teacher absenteeism should remain on the 2020-21 CRDC. In addition to research published in AERA journals presented in comments during the 60-day comment period, additional recent work has included teacher absenteeism data as a component of equity in K-12 education. Research for Action incorporated teacher absenteeism data as part of criteria for Access to Positive School Climate in its Educational Opportunity Dashboard, which provides a state-level analysis of CRDC data.iii In Research for Action’s most recent analysis of CRDC data, Black students were less likely to be enrolled in high schools with low teacher absenteeism than White, Hispanic, and Asian students.iv

We also acknowledge that the COVID-19 pandemic continues to affect in-person instruction. In addition to the recommendation that this field be retained in the CRDC, we urge the Department to include guidance that clarifies that teachers involved in online instruction during the 2020-21 school year should be classified as “present” and not “absent” where districts or states provide the option of hybrid or remote learning. In addition, the Department should also provide guidance to school and districts on how or whether to classify absences of teachers who need to be quarantined due to either a positive COVID-19 test or exposure to someone with the virus.

**First/Second Year Teachers:** We continue to urge the Department of Education to collect data on the number of first-year and second-year teachers. These data are very important as they enable the examination of potential disparities in teacher experience for students of color and low-income students. A recent report released after the closing of the comment period in November analyzing these data from the CRDC showed that 9 percent of schools with low numbers of students of color had a high number of first- and second-year teachers in 2016, compared with 17 percent of schools with high numbers of students of color.v

The COVID-19 pandemic interrupted pre-service preparation for this year’s first-year teachers, creating an even greater likelihood that they will enter the classroom with less experience than they would have otherwise had. Retaining the collection of counts of first- and second-year teachers will allow for comparability in future research that examines the impact of COVID-19 on educational equity.

**FTE Counts of School Support Staff:** We are pleased to see that the Department will continue to collect data on FTE counts of school counselors, psychologists, social workers, and nurses. The COVID-19 pandemic has highlighted the critical need for mental health and socioemotional
supports; trauma-informed practices; and school health services for teachers, students, and staff. With the disproportionate impact that the pandemic has had on communities of color, the continued inclusion of the collection of key school personnel will be important for researchers to examine whether students of color and students with disabilities have equitable access to these resources within school districts.

Thank you again for the opportunity to provide comments. AERA looks forward to continue working with you on this critical resource for education researchers and for evidence-based policy.

Sincerely,

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iii https://www.researchforaction.org/educational-opportunity/methodology/