



The Education Trust

Closing the gaps in opportunity and achievement, pre-K through college.

January 13, 2022

Stephanie Valentine
PRA Coordinator
Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Avenue SW, Room 6W208B
Washington, DC 20202-8240

RE: Agency Information Collection Activities; Comment Request; EDFacts Data Collection School Years 2022-23, 2023-24, and 2024-25 (With 2021-22 Continuation); [Docket ID ED-2021-SCC-0159](#)

Dear Coordinator Valentine,

On behalf of The Education Trust, an organization dedicated to closing long-standing gaps in opportunity and achievement that separate students from low-income backgrounds and students of color from their peers, thank you for the opportunity to comment on the request by the U.S. Department of Education (“the Department”) for comments regarding the Department’s EDFacts initiative, conducted by the National Center for Education Statistics (NCES), to collect, analyze, report on, and promote the use of high-quality, pre-kindergarten through grade 12 data. The Department, including the Institute for Education Sciences (IES), plays a crucial role in collecting data and monitoring implementation of critical federal programs that are intended to address opportunity gaps.

We appreciate the Department’s efforts to include more disaggregated data in the forthcoming EdFacts collections, including for students served in Title III programs and students who miss 10% or more school days. English learners come from all racial/ethnic backgrounds and collecting disaggregated racial/ethnic data for this group of students will improve our understanding of how Title III programs are serving students of different racial backgrounds. Since Local Educational Agencies have been reporting data on English learners by race/ethnicity and gender through the Civil Rights Data Collection (CRDC), states should already have or be able to quickly develop the capacity to report this data annually through EDFacts. Chronic absenteeism is an important indicator to understand students’ experience in schools and is used in many states’ accountability systems. Further disaggregating data to identify students from low-income backgrounds who miss 10% or more school days closes an important information gap in the EDFacts data and would align the chronic absenteeism data with other data elements collected through EDFacts.

We support the Department’s proposal to make significant changes to the assessment data collections. The proposed changes will better align the assessment data that is collected with the reality of assessment administration in schools, such as the fact that high schools offer end-of-course and end-of-grade testing models, as well as with flexibilities allowed by ESSA, such as administering locally selected tests in high school. While the changes may increase reporting burden, we believe that collecting assessment data that captures the nuance of assessment administration is important to understand how schools are serving students and how to target resources to close opportunity gaps.

We support the Department’s proposals to streamline data collected on magnet school status and Title I status. Because ED has determined that the CRDC yields more accurate data, we agree that it makes sense to remove the magnet school indicator from the ED Facts data collection and rely solely on data collected through the CRDC. However, with this change, and as the Department continues to review its data collections to reduce duplication across surveys and ensure the highest quality data, we strongly encourage the Department to continue to improve the alignment of and ability to link schools between ED Facts and CRDC. In addition, we strongly encourage the Department to ensure that the magnet school indicator from the CRDC continues to be reported in all datasets and data tools that allow users to access and/or view information on schools, such as the CCD school directory and [“school search” tool](#). Similarly, if the Department moves forward with moving the Title I status indicator from the CCD file specification to the Title I Part A file specification, we hope the Department will ensure that the Title I status indicator continues to be reported (albeit with a lag) in all of the places it is currently reported.

Finally, given the size of the ED Facts initiative and the value of the data collected through it, we are glad to see that the Department is planning to implement improvements to the data collection process to yield higher-quality, more timely data from states. As the Department implements these changes, we hope it will apply applicable process improvements to other data collections, especially the Civil Rights Data Collection.

We are happy to respond to any questions that you may have regarding the contents of this letter; please contact Reid Setzer, Director of Government Affairs, at rsetzer@edtrust.org. Thank you for your consideration.

Sincerely,

The Education Trust