

July 27, 2026

Ross Santy
Chief Data Officer
Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202

RE: ED-2026-SCC-1816
Submitted via regulations.gov

Dear Mr. Santy,

The undersigned education and civil rights organizations respectfully submit these comments in response to the U.S. Department of Education's (the Department's) proposed revision to the Consolidated State Performance Report (CSPR) data collection. We appreciate the opportunity to comment and share the goal of ensuring that the CSPR reporting system is efficient and not unduly burdensome on states.

However, we have serious concerns about the proposal to remove a number of questions from the CSPR. The CSPR is one of the few consistent, nationwide sources of information on how federal education dollars are being allocated and used to support our nation's students—including students of color, students from low-income backgrounds, multilingual learners, and other traditionally underserved student groups the Elementary and Secondary Education Act (ESEA) is designed to serve. Eliminating these questions would create significant gaps in the public record at precisely the moment when transparency is most needed. We urge the Department to retain the questions identified below.

Title III, Part A Allocation Timeline (Questions 1.3.8.1 and 1.3.8.2)

These questions provide critical visibility into when Title III, Part A subgrantees actually receive their funds. Timely access to funding directly affects whether districts and other grantees can staff and deliver language instruction and other supports for English Learners (ELs). Losing this information would leave the public and policymakers unable to track whether federal dollars are reaching classrooms on time.

This visibility is especially important now for several reasons. First, the Department has itself delayed, and at times threatened to delay, the distribution of federal education funds—making independent visibility into allocation timelines more essential, not less. Second, the Administration has signaled a clear deprioritization of ELs, including proposing to eliminate Title III funding altogether. Removing the reporting that would allow the public to monitor how these funds flow only compounds that concern. Finally, multiple states have [received flexibility](#) in how they use state-level Title III funds, which could dramatically shift the timelines on which subgrantees receive money. Without Questions 1.3.8.1 and 1.3.8.2, there would be no consistent way to observe those shifts or their consequences for EL students.

Title I, Part D — Neglected, Delinquent, and At-Risk Youth (Questions 2.5.1.1 and 2.5.3.1)

We find the proposed removal of these questions to be especially problematic. This change goes further than what is proposed for Title III: it would completely eliminate state reporting on Children and Youth who are Neglected, Delinquent, or At-Risk, including justice-involved youth from the CSPR. These are among the most vulnerable young people served by ESEA, and Title I, Part D exists specifically to support the continuity of their education.

Removing these questions would erase the primary nationwide window into how these students are served and whether federal funds are reaching the facilities and programs responsible for their education. Once this reporting is gone, there would be no comparable substitute, and the public would lose the ability to hold the system accountable for a population that has historically been overlooked. We strongly urge the Department to retain Questions 2.5.1.1 and 2.5.3.1.

Funding Transferability for State and Local Educational Agencies (Questions 2.7.1, 2.7.2, 2.7.3, and 2.7.4)

Removing these questions is likewise a significant problem. The Department should not eliminate reporting on funding transferability at the very same time it is [actively encouraging](#) states and districts to make greater use of the transferability provision. These two actions are in direct tension.

Questions 2.7.1 through 2.7.4 are the mechanism through which the public can understand whether, and how, transferability is actually being used across the country. If the Department succeeds in driving increased use of transferability while simultaneously eliminating the only consistent data on that use, it will be impossible to determine whether the Administration's own efforts are changing state and local practices—or what the consequences of those changes are for students and programs. Retaining these questions is essential to any meaningful evaluation of the policy the Department is promoting.

Certification of State Report Card Websites (Question 2.1.1)

This question should be retained so there is a clear, authoritative record of where the public can find state report cards—the documents that house essential information on student performance on state assessments and other data generated by state accountability systems. This is some of the most important information ESEA makes publicly available, yet in practice it is often difficult to locate. The certification requirement ensures a reliable pointer to where each state's report card data actually resides. Preserving Question 2.1.1 is a low-burden way to protect public access to information that already exists but can otherwise be hard to find.

Conclusion

Each of the questions discussed above serves a distinct and important transparency function, and in several cases—most notably Title I, Part D—removal would permanently eliminate the only nationwide reporting on vulnerable student populations. We recognize the value of streamlining data collection, but reducing burden should not come at the cost of the public's ability to see how federal education funds are distributed and how well students are being supported.

We respectfully urge the Department to retain Questions 1.3.8.1, 1.3.8.2, 2.5.1.1, 2.5.3.1, 2.7.1, 2.7.2, 2.7.3, 2.7.4, and 2.1.1 in the CSPR. We appreciate the Department's consideration of these comments and welcome the opportunity to discuss them further.

Sincerely,

Advance Illinois

All4Ed

Center for Black Educator Development

Center for Strong Public Schools

Data Quality Campaign

EdTrust

Educators for Excellence

Kids First Chicago

National Association for Family, School and Community Engagement (NAFSCE)

National Center for Learning Disabilities

National Parents Union

UnidosUS