



**To:** United States Department of Education, Office of Civil Rights

**From:** Southern Education Foundation

**RE:** Docket # ED–2019–ICCD–0119, Mandatory Civil Rights Data Collection

**Date:** November 18, 2019

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The Southern Education Foundation (SEF) appreciates the opportunity to provide comments to the United States Department of Education (ED) regarding the mandatory biannual Civil Rights Data Collection (CRDC) and the proposed elimination of critical equity-related questions. Founded in 1867, SEF is the nation’s oldest independent education non-profit organization in the country focused on education equity. For over 150 years, SEF has been committed to developing and advocating for high-quality public school systems for students of color and low-income students throughout the South. Historically, SEF’s engagements have ranged from building public schools for the children of newly freed slaves to recruiting and training teachers to instruct Black children in former Confederate states. Today, SEF works with researchers, policymakers, grassroots leaders, and parents to improve the pre-K through 16 education pipeline for Black and brown students in 17 states throughout the South.

As such, ED’s proposal to eliminate fundamental data collected by the CRDC deeply concerns SEF and the diverse stakeholders SEF represents throughout the South. As you know, every two years, policymakers and advocates use this information to help drive policy at the local and state level. Without critical disaggregated civil rights data ED is proposing to eliminate, interested stakeholders will not have information to improve instructional practice and experiences to students and families throughout the country. Additionally, eliminating these questions will make it much more difficult for ED to fulfill its primary responsibility of protecting the civil rights of students throughout the country.

SEF strongly encourages the ED to maintain the existing CRDC questions so the public can easily retrieve federal, state, and district data critical for student success. In particular, SEF is concerned about early childhood education, teacher experience, and school finance related data that are being considered for elimination.

**Students Access to Preschool Disaggregated by Race, Sex, Disability, and English Language Learners**

Investing in comprehensive birth-to-five early childhood education increases student achievement and saves taxpayers by minimizing government costs to adults who receive quality early educational experiences. Groundbreaking work of the Abecedarian Project in North Carolina initiated in 1972 found that students who had access to early childhood education programs have stronger learning gains throughout their school years. These same children reaped benefits in some cases as much as two decades later. According to the project, children



who participate in Pre-K programs are less likely to become teen parents, more likely to be employed, less likely to be enrolled in public assistance programs, and more likely to enter and complete college than their peers without a Pre-K experience.

High-quality preschool and birth-to-five programs for disadvantaged children can deliver between 7-13% per year return on investment<sup>i</sup>, yet ED is proposing to eliminate collecting information on who accesses early childhood education programs. It's critical for the public to know which children and families, especially those of color, access early childhood development programs so that students can have the best chance of achieving academic success. It's also critical for policymakers to eliminate any policy barriers that may impede the expansion of high-quality early childhood experiences. Without the CRDC's information, it will be difficult to understand how to evaluate broad access to early care and target limited government resources.

#### **Access to High-Quality Experienced Teachers**

Research suggests that, among school-related factors, teachers matter most. A teacher is estimated to have two to three times the impact of any other school factor on student reading and math test scores.<sup>ii</sup> Public schools perform much better when states invest in career educators and support them with strong preparation induction, ongoing professional development, and leadership roles in classrooms and schools. As teachers gain more classroom experience, students not only earn higher test scores but also attend school more often.<sup>iii</sup> Yet, ED is proposing to remove information on which students are taught by first and second-year teachers. Without this data, states nor local school districts will have the information to equitably distribute high-quality experienced teachers or fully understand how to direct professional development services to first and second-year teachers critical for student achievement.

#### **School Finance**

Research proves that investments in public education matter, especially for students who do not receive extracurricular supports and tutoring services outside of the traditional school day.<sup>iv</sup> Adequate funding spent effectively leads to improved student performance and overall life outcomes.<sup>v</sup> The United States, however, maintains tremendous funding inequities both in the total amount and how financial resources are distributed to local school districts. For example, the average per-pupil funding average in southeastern states equals \$10,845 while the northeastern per-pupil average is \$18,135.<sup>vi</sup> The CRDC discloses funding inequities that permeate the country and provides the evidence to better target and equalize funding for students who need it the most.

The data subject for elimination, including data related to early childhood education, teacher experience, and school finance provide the public, but especially policymakers and advocates, a



roadmap to invest critical taxpayer dollars. SEF strongly encourages ED to maintain the existing data.

We very much so appreciate the opportunity to comment on this critical issue. Please contact Fred Jones, SEF's Director of Government Affairs and Policy, [fjones@southerneducation.org](mailto:fjones@southerneducation.org) for any additional information.

Sincerely,  
Southern Education Foundation



## Endnotes

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<sup>i</sup> There's more to gain by taking a comprehensive approach to early childhood development. Washington, DC: The Heckman Equation, 2016. [https://heckmanequation.org/assets/2017/01/F\\_Heckman\\_CBAOnePager\\_120516.pdf](https://heckmanequation.org/assets/2017/01/F_Heckman_CBAOnePager_120516.pdf).

<sup>ii</sup> Teachers Matter: Understanding Teachers' Impact on Student Achievement. Santa Monica, CA: RAND Corporation, 2012. [https://www.rand.org/pubs/corporate\\_pubs/CP693z1-2012-09.html](https://www.rand.org/pubs/corporate_pubs/CP693z1-2012-09.html).

<sup>iii</sup> Ladd, H. F., & Sorensen, L. C. (2017). Returns to teacher experience: Student achievement and motivation in middle school. *Education Finance and Policy*, 12(2), 241–279.

<sup>iv</sup> Baker, B. D. (2017). How money matters for schools. Palo Alto, CA: Learning Policy Institute; Jackson, K., Johnson, R., and Persico, C. The effects of school spending on educational and economic outcomes; Evidence from school finance reforms, *The Quarterly Journal of Economics* 131 (1) (2016): 157-218.

<sup>v</sup> Ibid

<sup>vi</sup> SEF internal analysis of the NEA's "Rankings of the States 2018 and Estimates of School Statistics 2019"