



November 18, 2019

Director of the Information Collection Clearance Division  
U.S. Department of Education  
550 12th Street SW, PCP, Room 9089  
Washington, DC 20202-0023

Re: Comments on Mandatory Civil Rights Data Collection, Docket Number ED-2019-ICCD-0119

To the Director of the Information Collection Clearance Division:

The National Association for the Education of Young Children (NAEYC) appreciates this opportunity to provide input on the Office for Civil Rights' (OCR) proposal to eliminate several data elements related to early childhood and preschool data.

NAEYC is a 90+ year old non-profit organization comprised of 60,000 members and 52 Affiliates across the country, committed to a vision in which all young children thrive and learn in a society dedicated to ensuring they reach their full potential. As part of our work, we have a rich history of advocating for federal, state, and local programs and policies that promote high-quality early learning for young children and their families. We often turn to early childhood education data to make policy recommendations that address needed changes and improvements in our nation's, states' and districts' early learning systems. This includes data currently available in the Civil Rights Data Collection (CRDC) on whether schools provide early childhood or preschool services or programs; at what cost to parents, if any; the role of suspensions and expulsions in early childhood education; and the demographic breakdown of the children served.

Given the importance and uniqueness of data provided by the Civil Rights Data Collection (CRDC) as an essential source of education data, and the importance of this data to policy choices districts and states make to ensure early learning programs can effectively and equitably serve young children across the country, **we strongly oppose the proposed changes to the collection of early childhood program data in the Civil Rights Data Collection (CRDC) by the Department of Education's Office for Civil Rights (OCR)**. Based on guidance from our Affiliates and partners on the ground, and having witnessed the impact this data has had in districts and states across the country, as well as our national efforts to expand access to high-quality early learning for all children, we are confident that its value far outweighs any data collection and reporting challenges. Rather, the effort needed to collect this data yields crucial results that improve the ability of early childhood educators working with children birth through age 8 to fulfil the goals of their work, and serve more children with higher-quality early learning services.

Each day, federal, state, and local legislators, parents, and advocates are working towards greater investments in high-quality early learning opportunities for young children and their families. As these efforts move forward, it is important to understand the types of early childhood programs currently serving children, including by collecting data regarding whether early childhood programs in public pre-schools are full-day vs. part-day, whether there is a cost, and whether services for children birth to age 2

are offered for non-IDEA children. States benefit from a mixed-delivery system, where parents can choose the setting that is right for their families, and where young children have access to early learning experiences in programs run by public schools, Head Start programs, private agencies, and home-based providers. Thanks to the information currently provided in the CRDC, we are able to have a point of comparison between school run programs and those that aren't, in order to best inform early childhood policy creation, implementation, and evaluation.

As our nation continues to work to ensure all children have access to and can benefit from high-quality early learning opportunities, we oppose the proposal to only collect total preschool children enrollment count instead of data that are broken down by demographic subgroups. To best measure the progress of our work, it is essential that OCR continue to require the collection and reporting of preschool enrollment data disaggregated by race, sex, disability-IDEA, and English learner status so that it can allow policymakers, educational leaders, parents, and advocates to assess the racial and English learner composition of public-school programs for our youngest learners and better understand who is and is not being served by our schools. At the federal level, this data collection is particularly important because it informs our efforts to expand access to high-quality early learning opportunities to children from diverse racial and socio-economic backgrounds and with diverse linguistic and developmental abilities, in order to close early opportunity and achievement gaps. This data bolsters our ability to encourage states to leverage all possible funding streams, efficiently use dollars in order to avoid duplication, target funding to communities most in need, and allow states to work with local communities to build partnerships that catalyze innovative funding uses, as encouraged by the Administration for Children and Families.

Finally, we oppose the new proposed structure that would combine the number of preschool children who received one out-of-school suspension, and the number of preschool children who received more than one out-of-school suspension, into one collection of preschool children who received one or more out-of-school suspensions. The difference is important in understanding the patterns of what is happening in early childhood education programs and to whom. Indeed, over a decade of research and existing CRDC data tell us that the policies and practices of suspension and expulsion in early childhood, including repeat suspension and expulsion, are disproportionately affecting children of color, and causing harm to children and families. As educators, parents, researchers, and advocates, we rely heavily on disaggregated data from the CRDC to help us understand how preschool suspensions and expulsions continue to impact populations of students and to tell the story of how these practices continue to fall more harshly on particular populations of students.

The data were critical in mobilizing advocates, school administrators, and legislators across the country to begin a critical discussion, and in some states enact policies, around the need to address the unacceptable reality that while African American children make up 18 percent of public school preschool enrollment, they represent 48 percent of preschoolers suspended more than once. The data were particularly critical in informing [our decision to stand with more than 30 leading organizations addressing early childhood education against suspension and expulsion in early childhood](#), believing deeply that it is our collective responsibility to facilitate equitable access to high-quality, developmentally appropriate, and culturally responsive early childhood education that helps families

and communities thrive, while we work together to create systems, policies, and practices that reduce disparities across race and gender, preventing and eventually eliminating expulsions and suspensions in early childhood settings.

Eliminating the requirement for local school districts to collect this disaggregated data would deeply hinder our ability to measure progress in preventing and eventually eliminating expulsions and suspensions in early childhood settings. This is particularly troubling considering the progress we have seen across states to find solutions to this reality, whether it be in the form of exploratory bodies that are further exploring and expanding on the data to best identify solutions that fit their local contexts or state legislatures and governors that have enacted policies that eliminate expulsions and suspensions in early childhood settings.

The early childhood program data in the Civil Rights Data Collection is indispensable in our work to ensure all children have access to and can benefit from high-quality early learning opportunities and settings. Removing the responsibility of local districts to report on this data, when it has clear benefits for them and the children and families they serve, deters our collective efforts towards achieving this goal. We strongly urge the Department of Education's Office for Civil Rights to not move forward with the proposal to retire collection of this important early childhood program data.

We appreciate the opportunity to offer comment on this proposal and thank you for your consideration of these comments.

Sincerely,



Lauren Hogan  
Managing Director, Policy and Professional Advancement  
National Association for the Education of Young Children (NAEYC)