

Public Comments Received During the 60-day Comment Period

August 2023

Statewide Longitudinal Data System (SLDS) Survey 2023-2025

ED-2023-SCC-0091

Comments on FR Doc # 2023-10943

Document: ED-2023-SCC-0091-0004

Name: New Leaders

Thank you for the opportunity to provide feedback on the U.S. Department of Education’s proposed changes to the Statewide Longitudinal Data System (SLDS) Survey 2023–2025 (Docket No.: ED-2023-SCC-0091).

New Leaders is a national education leadership nonprofit that builds the capacity of equity-minded school leaders who are committed to the success of every child. Our leaders remove barriers to success for underestimated and underserved students, supporting students in fully realizing their futures as the next generation of great thinkers, innovators, and leaders for our society. Over the course of 20 years, we have trained more than 8,000 equity-focused leaders, sixty percent of whom identify as leaders of color. Our leaders impact more than 2 million students in our K-12 school system annually and serve as powerful and positive forces for change in their communities. A study by the RAND Corporation affirmed the strength of our approach, naming New Leaders the principal preparation program with the strongest evidence of positive impact.

We believe that strong data systems can be a powerful tool for advancing evidence-based solutions to improve teaching and learning in classrooms and schools across the country, and to close opportunity and achievement gaps for underestimated students and under-resourced communities. The State Longitudinal Data System (SLDS) grant program, in particular, has proven to be a formidable force for positive change, prompting states and territories to strengthen their capacity to automate the linking of K-12, educator, postsecondary, workforce, career and technical education (CTE), adult education, and early childhood data.

We support the Department’s proposal to switch from annual to biennial data collection for the reasons articulated in the notice and related documents. We know from our network of educational leaders that streamlining reporting requirements while maintaining a high bar for data quality and actionability is an important way we can support decision-makers at all levels of our school systems to efficiently access critical information, develop strategies anchored in local and state needs, and continuously monitor and improve their approaches.

We ask that the Department consider refining the 2023-2025 survey questions to distinguish between educator data that is readily available and linkable for teachers and, separately, school leaders. As written, the survey asks about “educator” data and “teacher” data, but fails to explicitly inquire about information on the quality and diversity of the nation’s principals and other school leaders.

Great leadership, at every level of our school systems, can help address the urgent challenges our schools face. No matter the task at hand—accelerating student learning, tackling the mental health crises affecting children and communities, sustaining and retaining outstanding and racially/ethnically diverse educators, disrupting systemic inequities that have plagued our schools for far too long—outstanding leaders effectively marshal resources and tap into the expertise of their communities to realize measurable, sustained improvement. Indeed, decades of research affirm the profound effects of leadership. School leaders account for 25 percent of a school’s impact on student learning,¹ and an above-average principal can improve student achievement by 20 percentage points.² And school leaders play a critical role in sustaining and stabilizing the educator workforce: 97 percent of teachers list principal quality as critical to their retention and career decisions—*more than any other factor*.³

We also know leadership is a critical lever for advancing equity and racial justice. The positive effects of strong leadership are most pronounced in struggling schools, which are more likely to serve marginalized students and communities⁴—those hardest hit by the pandemic. In fact, a landmark study found “virtually no documented instances of troubled schools being turned around without intervention by a powerful leader.”⁵ In addition, research has found better school and student outcomes for teachers and children of color when a principal of color is at the helm. Leaders of color provide more rigorous academic opportunities for students of color,⁶ while fostering school environments that are more supportive and sustainable for teachers of color,⁷ who, in turn, promote better academic, social-emotional, and behavioral outcomes for all students.⁸

Despite the profound influence school leaders have on teaching and learning, it is often difficult to locate critical—or any— meaningful information on states’ school leader corps. This has to change.

Revising the SLDS 2023-2025 survey items can elevate the opportunity for states to make school leader data more accessible to decision-makers and stakeholders, thereby promoting greater

¹ Leithwood, K., Seashore Louis, K., Anderson, S., & Wahlstrom, K. (2004). *How leadership influences student learning: A review of research for the Learning from Leadership Project*. New York, NY: The Wallace Foundation. Retrieved from <http://www.wallacefoundation.org/knowledge-center/Pages/How-Leadership-Influences-Student-Learning.aspx>.

² Marzano, R. J., Waters, T., & McNulty, B. A. (2005). *School leadership that works: From research to results*. Alexandria, VA: Association for Supervision and Curriculum Development.

³ Scholastic Inc. (2012). *Primary Sources: America’s Teachers on the Teaching Profession*. New York, NY: Scholastic and the Bill and Melinda Gates Foundation. Retrieved from http://www.scholastic.com/primarysources/pdfs/Gates2012_full.pdf.

⁴ Seashore Louis, K., Leithwood, K., Wahlstrom, K., & Anderson, S. (2010). *Investigating the links to improved student learning*. Washington, DC: Wallace Foundation. Retrieved from <http://www.wallacefoundation.org/knowledge-center/Pages/Investigating-the-Links-to-Improved-Student-Learning.aspx>.

⁵ Leithwood, K., Seashore Louis, K., Anderson, S., & Wahlstrom, K. (2004).

⁶ Grissom, J., Rodriguez, L., and Kern, E. (2017). Teacher and Principal Diversity and the Representation of Students of Color in Gifted Programs: Evidence from National Data Retrieved from <https://doi.org/10.1086/690274>.

⁷ Grissom, J. and Keiser, L. (2011). A supervisor like me: Race, representation, and the satisfaction and turnover decisions of public sector employees. Retrieved from <https://doi.org/10.1002/pam.20579>.

⁸ Cain Miller, C. (2018). Does Teacher Diversity Matter in Student Learning? *The New York Times*. Retrieved from <https://www.nytimes.com/2018/09/10/upshot/teacher-diversity-effect-students-learning.html>.

understanding and research into the role school leaders—including racially, ethnically, and culturally diverse school leaders—play in fueling teacher effectiveness, student academic achievement, and other critical school and student outcomes.

Thank you again for the opportunity to provide feedback. If you have any questions, please do not hesitate to reach out to me at jgran@newleaders.org.

Sincerely,

Jackie Gran
Chief Officer for Policy and Strategic Initiatives
New Leaders

Dear Ms. Gran and New Leaders,

Thank you for your feedback posted on June 29, 2023, responding to a 60-day request for comments on the proposed Statewide Longitudinal Data System (SLDS) Survey 2023-2025.

The National Center for Education Statistics is aware of the importance of capturing comprehensive educator data linkages to better understand SLDS system capacity, and it is increasingly apparent that there is renewed interest in understanding the makeup of school leadership and how it affects teacher and student outcomes. As mentioned, school leadership has both direct and indirect impacts on teacher effectiveness, student outcomes and overall school success. NCES is aware of the value that better understanding school leadership separate from general educator data could play in further defining student, teacher and overall educational outcomes. However, to be most cognizant of the level of burden on respondents, as well as the time and resources needed to complete the Survey, there are currently no direct SLDS items delineating school leadership characteristics or capacity. This suggestion will remain as a consideration as NCES works diligently to strike a balance between the comprehensiveness of the Survey and the level of burden on respondents.

The National Center for Education Statistics appreciates your interest in and continued support of the SLDS Program.

Sincerely Yours,

Nancy S. Sharkey
Statistician, National Center for Education Statistics
United States Department of Education
Institute of Education Sciences
550 12th Street, SW, Room 4162
Washington, DC 20202

Document: ED-2021-SCC-0091-0005

Name: Data Quality Campaign and Knowledge Alliance

Thank you for the opportunity to comment on the shift to a biennial collection of the Statewide Longitudinal Data System (SLDS) Survey administered by the National Center for Education Statistics (NCES). The Data Quality Campaign (DQC) is a national non-profit organization that advocates to change the role of data so that it better serves all users. Knowledge Alliance (KA), a non-profit, non-partisan organization, is composed of leading education organizations committed since 1971 to the greater use of high-quality and relevant data, research, evaluation and innovation in education policy and practice at all levels. NCES's SLDS Survey is an important source of information for our and other organizations on the status of SLDSs, the progress states are making in updating them, and the choices states are prioritizing as they update. This information is critical in understanding whether SLDSs are meeting the data access and use needs of individuals, the public, and policymakers.

As users of the SLDS Survey data, DQC and KA support the Survey's continuation on a biennial basis. We believe extending the collection period could yield benefits for NCES and states without compromising the utility of the information gathered. The benefits of biennial data collection include reduced burden for states through logically paced intervals, and faster, more productive reporting on NCES survey results.

Reduce Burden on States through Logically Paced Intervals

An important benefit of biennial reporting of the NCES survey is the easing of data collection burden for local and state agencies. Annual data collections can be a time-consuming task for state agencies, as it requires substantial effort from staff members to gather, verify, and submit the required information. Transitioning to a biennial schedule would alleviate some of this burden, while also allowing for larger capacity to ensure cleaner and improved data quality when reported. Moreover, a biennial survey would provide a more comprehensive and accurate picture of trends and progress states are making on their SLDSs. At the state level there is currently neither sufficient nor significant progress being made on SLDSs on an annual basis to require such reporting. With more time between survey collections, state institutions and agencies would have more capacity to implement changes and initiatives, allowing for meaningful progress to be documented.

Faster Reporting from NCES

Longer intervals between collection periods would make it easier for NCES to deliver robust and timely reports on the progress states are making on their SLDSs. NCES should use the added time and capacity between collections to ensure that insights and data files produced from the survey can be published quickly enough, either by NCES or through collaboration with a partner. Working with a partner organization to release high-level findings from the survey while NCES takes the time necessary to produce more granular data would provide timely value to the field. In turn, timelier reporting can support more actionable findings and recommendations for policymakers, educators, and researchers and ensure that the NCES survey remains the official source of information related to all SLDSs.

Thank you for considering our ideas on the continuation and biennial implementation of the NCES SLDS Survey. We would be pleased to respond to any questions you have about these recommendations and to share other ideas for supporting this important work. For questions or additional information, please contact Data Quality Campaign Vice President, Federal Policy Kate Tromble, kate@dataqualitycampaign.org, or Knowledge Alliance President and CEO Rachel Dinkes, rdinkes@knowledgeall.net.

Sincerely,

Jennifer Bell-Ellwanger
President and CEO
Data Quality Campaign

Rachel Dinkes
President and CEO
Knowledge Alliance

Dear Data Quality Campaign and Knowledge Alliance,

Thank you for your feedback posted on July 19, 2023 responding to a 60-day request for comments on the proposed Statewide Longitudinal Data System (SLDS) Survey 2023-2025.

The National Center for Education Statistics appreciates your support in a shift to a biennial collection of the SLDS Survey. Much thought and consideration were explored prior to embarking upon this proposal, for many of the reasons outlined in your response. NCES is optimistic that the reduction of burden for states and territories will yield more comprehensive completion and response, and a biennial collection will allow the federal team to better navigate the everchanging, and quite extensive publication review process.

The National Center for Education Statistics appreciates your interest and continued support of the SLDS Program.

Sincerely Yours,

Nancy S. Sharkey
Statistician, National Center for Education Statistics
United States Department of Education
Institute of Education Sciences
550 12th Street, SW, Room 4162
Washington, DC 20202
