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First and foremost , I would like to express my appreciation for the opportunity to provide feedback on the Civil Rights Data Collection process. I do understand the goals of the CRDC are important for maintaining equity and accountability. However, the current process places an unnecessary burden on school districts, because much of the required data is already available through other entities such as the Texas Education Agency .

Districts invest significant time and resources in compiling, verifying, and submitting data for CRDC reporting, much of which has already been provided to state and federal agencies through other mechanisms. This duplication of effort creates inefficiencies and diverts critical resources from direct student support and educational programming.

Data Duplication: Many of the metrics required for CRDC reporting, including enrollment, discipline, and program participation, are already submitted to the TEA as part of state accountability and compliance .

Access to Existing Data: Data regarding standardized testing, college readiness, and advanced course enrollment is also available through college boards and state agencies.

Administrative Burden: The repetitive nature of these submissions adds unnecessary administrative strain, particularly for smaller districts or those with limited staffing who wear many many hats and have limited technological capacity.

To enhance efficacy and reduce the reporting burden on districts, I encourage the OCR to explore collaborative data-sharing agreements with state education agencies and other data managers. In utilizing existing data sources, the OCR can maintain the integrity of its data collection while minimizing redundancies and allowing districts to focus more resources on serving students.

Thank you for considering this feedback and for your ongoing commitment to equity in education.