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I appreciate the opportunity to provide feedback on the Civil Rights Data Collection (CRDC) process. While the goals of the CRDC are important for promoting equity and accountability, the current process places an undue burden on school districts, particularly when much of the required data is already available through other entities such as the Texas Education Agency (TEA) and college boards.

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. For example:

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

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 and technological capacity.

To enhance efficiency and reduce the reporting burden on districts, I encourage the OCR to explore collaborative data-sharing agreements with state education agencies and other data custodians. By leveraging 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.