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Thank you for the opportunity to provide feedback on the 2025-26 and 2027-28 Civil Rights Data Collections (CRDC). I appreciate the fact that the CRDC's objective is to provide equity and accountability in education, but the current data reporting process places an unnecessary burden on school districts, since much of the required information is already available through state agencies such as Texas Education Agency (TEA) and additional educational organizations such as college boards.

Compiling, verifying and submitting data for the CRDC report requires school districts to dedicate a considerable amount of time and resources when much of the data requires has already been provided to federal and state agencies through other channels. This duplication and redundancy results in inefficiency, places a strain on limited district resources, and most importantly, distracts districts from focusing on their primary mission - serving and supporting students.

Some examples of overlap include:

Data Redundancy - Many metrics required for CRDC reporting, including enrollment, disciplinary actions, and program participation, are already reported to TEA as part of state accountability and compliance measures.

Data Availability - Information regarding standardized testing, college readiness and advanced course enrollment information is accessible through existing college boards and state agencies.

Administrative Burden - The request to submit repetitive data multiple times places unnecessary administrative pressure, especially for small school districts who have a limited number of staff and a restricted technology infrastructure.

To improve efficiency and alleviate the reporting burden on districts, I suggest that the OCR consider establishing a data-sharing agreement with state education agencies and other key data custodians. By utilizing existing data sources, the OCR can maintain the integrity of its data collection process while reducing redundancies and allowing districts to focus more resources on serving and supporting students.

Thank you for considering this feedback and for your continued dedication to equity and accountability in education.