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While the importance of collecting and analyzing this data is clear, I am very concerned about the undue burden this places on local educational agencies (LEAs).

The data being requested is already accessible through state agencies and organizations like the College Board. Requiring districts to duplicate these efforts not only strains limited district resources, but also detracts from their ability to focus on their primary mission, serving students. With limited state funding and the rigorous data submission requirements already put in place for state reporting, this additional responsibility further exacerbates the pressures LEAs are facing.

I strongly urge OCR to explore utilizing existing state-level and national data sources to collect this information. By doing so, OCR can alleviate the strain on districts while maintaining data integrity. Supporting districts in this way will ensure they can focus their resources on improving student outcomes rather than duplicative reporting.

Thank you for considering this feedback and for your continued commitment to equitable education.

Sincerely,
Valerie Widger