

## **Response to 60-day ICR for ED-2026-SCC-0331-0001: State Education Agency, Local Educational Agency, and School Data Collection and Reporting Under ESEA, Title I, Part A**

### **Comment**

I am writing to express concern about the increasing collection of sensitive student data in educational settings and the broader policy direction that allows this trend to expand.

At both the state and federal level, there has been movement toward policies that require schools to collect more detailed personal information about students and their families. In Tennessee, for example, proposed legislation would require schools to collect immigration status information. While this is a state-level action, it reflects a broader issue that federal policy should address.

Students should feel safe in school environments. Expanding data collection—especially when it involves sensitive personal or family information—can create fear and reduce trust in educational institutions. This may discourage attendance, participation, and access to essential services.

Additionally, policies that divert funding away from public education systems while increasing administrative burdens on schools risk weakening the quality of education for the majority of students.

I urge policymakers to:

- Limit the collection of sensitive student data to what is strictly necessary
- Strengthen protections around how student data is stored and used
- Prioritize funding that directly supports public schools and student outcomes

Education policy should focus on creating safe, inclusive, and well-resourced learning environments. Expanding surveillance-like practices in schools moves us in the opposite direction.

Thank you for considering this comment.

### **Response**

Dear Ms. Nold,

Thank you for submitting a public comment in response to the Office of Elementary and Secondary Education's information collection for State Education Agency, Local Educational Agency, and School Data Collection and Reporting Under ESEA, Title I, Part A. We agree that privacy protections are essential for student data and that Federal reporting requirements should not increase burden on States, school districts, or schools.

This specific collection is seeking to extend a previous approval related to State and local report card requirements in section 1111(h) of the Elementary and Secondary Education Act of 1965, as amended (ESEA). It does not impose any new data collection elements or student-level data.

Rather, it only requires States and school districts to publicly report information that is required in the ESEA. These State and local report cards must be widely accessible to the public. In addition, the ESEA requires that any data collected or disseminated for State and local report cards must protect the privacy of individuals and prohibits data from being disaggregated if it will reveal personally identifiable information about any student, teacher, principal, or other school leader.

Thank you again for your comment.

Best,  
Office of School Support and Accountability