



Center for the Study of Child Care Employment  
Institute for Research on Labor and Employment  
University of California, Berkeley  
2521 Channing Way, #5555  
Berkeley, CA 94720  
(F)/cscceucb (T)@CSCCEUCB

---

Director of the Information Collection Clearance Division  
U.S. Department of Education  
550 12th Street SW, PCP, Room 9089  
Washington, DC 20202-0023

November 18, 2019

Re: Comments on Mandatory Civil Rights Data Collection, Docket Number ED-2019-ICCD-0119

To the Director of the Information Collection Clearance Division:

The Center for the Study of Child Care Employment at the University of California, Berkeley appreciates this opportunity to provide input on the Office for Civil Rights' (OCR) proposal to eliminate several data elements related to early childhood and preschool data.

As part of our work to ensure that early care and education services are equitable and effective for children, their families, and the early education workforce, we routinely reply upon both original and extant data to inform policy recommendations that address needed changes and improvements in our national, state, and local early learning systems. As researchers, we recognize how critical a resource that data currently available in the Civil Rights Data Collection (CRDC) is as it relates to understanding whether schools provide early childhood or preschool services or programs; at what cost to parents, if any; and the demographic breakdown of the children served is a critical source of information.

Given the importance and uniqueness of data provided by the Civil Rights Data Collection (CRDC) as an essential source of education data, and the importance of this data to informing policy choices to ensure that communities can effectively and equitably serve the children, **we strongly oppose these proposed changes to the collection of early childhood program data in the Civil Rights Data Collection (CRDC) by the Department of Education's Office for Civil Rights (OCR)**. The proposed changes to eliminate questions including those noted here, represent a step backward in reducing opportunity gaps and advancing racial equity in our nation's education system:

- the costs of public preschool
- the amount of time students spend in preschool (Part-day vs. full-day)
- information as to whether preschool is provided to all students, students with disabilities, students in Title I programs, and students from low-income families
- information about the student populations served
- disaggregated data on preschool enrollment by race, sex, English Learner status, and disability classification under the Individuals with Disabilities Education Act and
- school finance data on expenditures.

The early childhood program data in the Civil Rights Data Collection is indispensable to the work of ensuring that all children have access to and can benefit from high-quality early learning opportunities and settings. At a time when we should be strengthening data requirements to inform progress, removing the responsibility of local districts to report on this data, when it has clear benefits for them and the children and families they serve, undermines our collective efforts toward equitable and effective access. We strongly urge the Department of Education's Office for Civil Rights to not move forward with the proposal to retire collection of this important early childhood program data.

We thank you for your consideration of these comments.