

BOARD OF DIRECTORS

Andy Alderman
President

Diana Westhoff
President Elect

Darlene Davis
Treasurer

Laura Hult
Secretary

Holly Stokes
Past President

Jane Grote Abell
Lynn Blashford
Lisa Cochran
Carloyn Cullman Fulwider
Nadia Bukhari Haque
Mary Kay Irwin
Rebecca Love, Ph.D.
Matthew Sharp
David P. Shouvin
Stephanie Siddens
Tamar Williamson

Muriel Tice
Emeritus

Eric J. Karolak, Ph.D.
CEO

Action for Children



November 15, 2019

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

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

To the Director of the Information Collection Clearance Division:

Action for Children 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 the Child Care Resource and Referral Agency for Central Ohio, we have long advocated for policies, programs, and funding that expand access to affordable quality child care and early learning for all children. For us, this is the best way to assure children are well prepared for school and life beyond, families are strong and communities are vibrant.

We often turn to early childhood education data to make policy recommendations that address needed changes and improvements in our nation, state, and district's early learning systems. This includes data currently available in the Civil Rights Data Collection (CRDC) on 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.

Given the importance and uniqueness of data provided by the CRDC as an essential source of education data, and the importance of this data to policy choices our districts and states make to ensure we can effectively and equitably serve the children in our communities, **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).** Having seen the impact this data has had on our district and state, we are confident that its value far outweighs any data collection and reporting challenges.

As Ohio takes steps to move child care and early childhood education forward, it is important to understand the types of early childhood programs currently serving children, including by collecting data regarding whether early childhood programs in public pre-schools are full-day vs. part-day, whether there is a cost, and whether services for children birth to age 2 are offered for non-IDEA children. Our state benefits from a mixed-delivery system, where parents can choose the setting that is right for their families, and where young children have access to early learning experiences in programs run by public

 **Eternal Flame**
Cee Cullman 1914-2006

FUNDED BY



www.ActionForChildren.org

78 Jefferson Avenue
Columbus, OH 43215
P: 614-224-0222
F: 614-224-5437

Information and Referral:
1-855-302-4453

Delaware County:
39 West Winter Street
Delaware, OH 43015

Madison County:
217 Elm Street
London, OH 43140



Action for Children
Established 1972

schools, Head Start programs, private agencies, and home-based providers. Thanks to the information currently provided in the CRDC, we are able to have a point of comparison between school run programs and those that aren't, in order to best inform early childhood policy creation, implementation, and evaluation.

As our state continues to work to ensure all children have access to and can benefit from high-quality early learning opportunities, **we strongly oppose the proposal to only collect total preschool children enrollment count instead of data that are broken down by demographic subgroups.** To best measure the progress of this effort in Ohio, it is essential that OCR continue to require the collection and reporting of preschool enrollment data disaggregated by race, sex, disability-IDEA, and English learner status so that it can allow policymakers, educational leaders, parents, and advocates to assess the racial and English learner composition of public-school programs for our youngest learners and better understand who is and is not being served by our schools. In Ohio, this is particularly important because it informs our effort to expand access to high-quality early learning opportunities to children from diverse racial and socio-economic backgrounds and with diverse linguistic and developmental abilities, in order to close early opportunity and achievement gaps. Our state is already working to leverage all possible funding streams, and this data improves the efficient use of the dollars to avoid duplication, encourages us to target funding to communities most in need, and allows our state to work with local communities to build partnerships that catalyze innovative funding uses, as encouraged by the Administration for Children and Families.

Finally, **we oppose the new proposed structure that would combine the number of preschool children who received one out-of-school suspension, and the number of preschool children who received more than one out-of-school suspension, into one collection of preschool children who received one or more out-of-school suspensions.** The difference is important in understanding the patterns of what is happening in early childhood education programs and to whom. Indeed, over a decade of research and existing CRDC data tell us that the policies and practices of suspension and expulsion in early childhood, including repeat suspension and expulsion, are disproportionately affecting children of color, and causing harm to children and families. As educators, parents, researchers, and advocates, our stakeholders rely heavily on disaggregated data from the CRDC to help us understand how preschool suspensions and expulsions continue to impact populations of students and to tell the story of how these practices continue to fall more harshly on particular populations of students.

The data underpins emerging efforts to heighten awareness and improve policies in our community and throughout our state around the need to address the unacceptable reality that while African American children make up fewer than one in five students in public school preschool, they represent nearly half of preschoolers suspended more than once. Eliminating the requirement for local school districts to collect this disaggregated data would deeply hinder our ability to measure progress in preventing and eventually eliminating expulsions and suspensions in early childhood settings. This is particularly

troubling considering the progress our state has made to support Early Childhood Mental Health, to improve the statewide referral system for home visiting and early intervention, and to limit expulsions in the PreK-3 space through legislation.

The early childhood program data in the Civil Rights Data Collection is indispensable to ensure all children have access to and can benefit from high-quality early learning opportunities and settings. Removing the responsibility of local districts to report on this data – as they already do – when it has clear benefits for them and the children and families they serve, deters our collective efforts towards achieving to improving access, and achieving equity. 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.

Thank you for the opportunity to offer comment on for your earnest consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric J. Karolak". The signature is fluid and cursive, with a prominent initial "E" and "K".

Eric J. Karolak, Ph.D., CAE
CEO