

Submitted via <http://www.regulations.gov>

November 18, 2019

Stephanie Valentine
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202-2800

Re: Comments to Proposed Rule, Docket ID ED-2019-ICCD-0119, at 84 Fed. Reg. 49277 (September 19, 2019).

Dear Ms. Valentine:

We write on behalf of the National Hispanic Leadership Agenda (NHLA), a coalition of 45 leading national Latino nonpartisan civil rights and advocacy organizations, and on behalf of the Hispanic Education Coalition (HEC), which unites 18 organizations dedicated to improving educational opportunities and outcomes for the more than 59 million Latinos living in the mainland United States and Puerto Rico, in response to the proposed rule published by the Department of Education Office for Civil Rights in the Federal Register on September 19, 2019.

Latinos are the nation's largest minority group, and also the youngest. Twenty-eight percent of all students in our nation's public schools are Latino, and the Department of Education predicts that by 2027 Latino students will constitute over a third of all K-12 enrollments. It is because of this growth in the Latino community that students of color are no longer the minority, but the new majority of students in our nation's public schools.

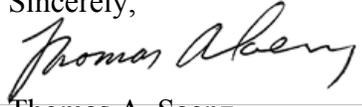
NHLA and HEC have long worked together to support systemic improvements in our country's educational system in order to meet the needs of Latino and other underrepresented students, who are often poorly served. A necessary prerequisite to ensure equal educational opportunity is access to reliable data about the educational opportunities available to Latinos, English learners, and other students. NHLA and HEC members have long supported the CRDC and used its data to fulfill their missions. NHLA and HEC recommend improvements to the CRDC, specifically, making it an annual data collection, making it available in Spanish, and publicly releasing the data the CRDC collects for Puerto Rico.

On September 19, 2019, the Department of Education proposed removing many of the most valuable CRDC data elements, which NHLA and HEC members rely upon in their work.

NHLA and HEC strongly oppose the removal of ANY data element previously collected in the CRDC.

If you have any questions, please contact Adam Fernandez of the Mexican American Legal Defense and Educational Fund at afernandez@maldef.org, or John Aguilar of the Hispanic Association of Colleges and Universities at john.aguilar@hacu.net.

Sincerely,



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