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November 18, 2019

The Honorable Betsy DeVos
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Secretary DeVos:

We write to express our opposition to the Department of Education's (Department) proposed changes to the Civil Rights Data Collection (CRDC), as published in the Federal Register under ED-2019-ICCD-0119.¹ The proposal to eliminate the collection of data critical to the promotion of educational equity would undermine the ability of the Office of Civil Rights (OCR) to administer and enforce federal civil rights laws and leave children of color and children with disabilities more vulnerable to discrimination.² As you know, the mission of OCR is to "ensure equal access to education and to promote educational excellence throughout the nation through vigorous enforcement of civil rights."³ This recent proposal to limit OCR's collection of data, however, serves to effectively undermine OCR's important mission.⁴

¹ Proposed changes to the Civil Rights Data Collection, <https://www.regulations.gov/document?D=ED-2019-ICCD-0119-0002>.

² Civil rights laws enforced by OCR include: Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681, and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794. In addition, pursuant to a delegation by the Attorney General, OCR shares in the enforcement of Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12131. OCR also has jurisdiction under the Age Discrimination Act of 1975, 42 U.S.C. § 6101, and the Boy Scouts of America Equal Access Act, 20 U.S.C. § 7905 (2002). OCR further works with the Department's Office of Elementary and Secondary Education, which is responsible for administering the (Elementary and Secondary Education Act). In addition, Section 9534 of the ESEA, 20 U.S.C. § 7914, prohibits discrimination in funded programs based on race, color, religion, sex, national origin, or disability. See <https://ocrdata.ed.gov/downloads/FAQ.pdf>.

³ Office of Civil Rights, *About OCR*, U.S. Department of Education, <https://www2.ed.gov/about/offices/list/ocr/aboutocr.html> (last modified Sept. 25, 2018).

⁴ The Department's actions with the intended effect of undermining federal civil rights protection include, 1) the rescission of school discipline guidance meant to eliminate racial disparities in enforcement, 2) the rescission of guidance issued to protect transgender students, 3) delaying regulations which required schools to report the

The purpose of the CRDC is to collect “data on leading civil rights indicators related to access and barriers to educational opportunity at the early childhood through grade 12 levels” and to serve as “a critical aspect of the overall enforcement and monitoring strategy used by OCR to ensure that recipients of the Department’s Federal financial assistance do not discriminate on the basis of race, color, national origin, sex, and disability.”⁵ OCR relies on the CRDC’s data “as it investigates complaints alleging discrimination, determines whether the Federal civil rights laws it enforces have been violated, initiates proactive compliance reviews to focus on particularly acute or nationwide civil rights compliance problems, and provides policy guidance and technical assistance to educational institutions, parents, students, and others.”⁶ By amending the collection of this data to remove key elements as proposed, the Department will significantly weaken a key source of information used to identify civil rights violations and address inequities in our educational system, make it more difficult for OCR to vigorously enforce our civil rights laws, and hinder policymakers’ ability to legislate in advancement of greater equity of educational opportunity. Indeed, the majority of CRDC elements proposed for elimination comprise data most commonly used by advocates to advance systemic changes in pursuit of equitable access.⁷

The proposal will make it more difficult to assess educational inequity in preschool through grade 12 due to the elimination of critical elements. In fact, by eliminating CRDC data elements required to be reported on state and local report cards pursuant to the *Elementary and Secondary Education Act* (ESEA), as amended by the *Every Student Succeeds Act* (ESSA), this proposal will undermine the bipartisan will of Congress to report vital information to parents and to the public.⁸ Additionally, this proposal will undermine implementation of data and reporting requirements related to religious discrimination and allegations of sexual assault.

Concerns with Data Elements Proposed for Elimination

Early Childhood Education

demographics of those in special education programs, 4) introducing changes to OCR’s case processing manual making more difficult for students to make their case and which prevents the examination of systemic issues, 5) the rescission of Title IX guidance issued under the previous administration along with proposed Title IX regulations which undermine protections for survivors and make less schools less accountable for addressing instances of sexual assault, 6) eliminating the Opening Doors, Expanding Opportunities grant program, 7) the rescission of guidance which provided recommendations to schools on how to boost diversity in classrooms and campuses, and 8) producing a school safety report which blamed federal civil rights enforcement for school shootings. *See also* <https://www.propublica.org/article/devos-has-scuttled-more-than-1-200-civil-rights-probes-inherited-from-obama>.

⁵ U.S. Department of Education, Civil Rights Data Collection: Frequently Asked Questions at 1 (2019), <https://ocrdata.ed.gov/downloads/FAQ.pdf>.

⁶ *Id.* This data are also a, “valuable resource for other Department offices and Federal agencies, policymakers and researchers, educators and school officials, parents and students, and the public who seek data on student equity and opportunity.”

⁷ Ary Amerikaner, *Why We Need to Protect the Civil Rights Data Collection (CRDC) from Secretary DeVos’ Proposed Cuts*, Education Trust (October 2, 2019), <https://edtrust.org/the-equity-line/why-we-need-to-protect-the-civil-rights-data-collection-crdc-from-secretary-devos-proposed-cuts/>.

⁸ Every Student Succeeds Act of 2015, Pub. L. No. 114-95 § 114 Stat. 1177 (2015-2016).

Under this proposal, the Department would no longer collect data on preschool enrollment and access. Yet researchers have documented inequities in access to high-quality preschool by race as well as disability status, pointing to the importance of disaggregating enrollment data.⁹ A recent report from the Urban Institute also points to high levels of segregation in early childhood settings.¹⁰ Report authors found that early childhood programs are almost twice as likely to enroll 90 percent or more Black or Latino students than kindergarten and first grade settings. As the preschool landscape shifts rapidly across the country, it is imperative that both the public and policymakers have a reliable federal data source concerning the availability and quality of preschool to guide policy decisions that ensure a strong start for all young learners in this nation. Eliminating this data would prevent policymakers from fully understanding the makeup of our preschools and ensuring that appropriate services are provided to all students.

English Learner Students with Disabilities

Under the proposed changes, the Department would no longer collect data disaggregated by student disability status, as defined by the *Individuals with Disabilities Education Act* (IDEA), for English Learner (EL) students enrolled in English language instruction programs.¹¹ Data collection regarding the numbers of EL students with identified disabilities informs the redress of disproportionality issues related to EL students classified with disabilities. The data helps to ensure that EL students receive appropriate instruction according to their learning needs; educators are equipped to make accurate diagnoses for students, and, teacher preparation programs recognize the need to infuse the “specialized evidence-based content necessary to support ELLs with disabilities.”¹² Without the collection of such data, important considerations such as the assurance of standardized testing and other assessments for students in their native languages and increased English to Speakers of Other Languages (ESOL) and special education supports cannot be examined and remedied to improve the educational experiences of EL students with and without disabilities, as required by federal law.¹³

School Finance

The Department’s proposal would eliminate critical school finance data and teacher and non-personnel salary information. ESSA requires state education agencies and local education agencies to report school-level public per-pupil expenditure data by federal, state, and local funds on their annual report cards. The ESSA data, though, are not required to be disaggregated by school personnel and non-personnel expenditures. However, the CRDC data combined with the ESSA reporting requirement provides critical information to help parents, policymakers, and

⁹ Rachel Valentino, *Will Public Pre-K Really Close Achievement Gaps? Gaps in Prekindergarten Quality Between Students and Across States*, 55 *American Education Research Journal* 79; Christina Yeager Pelatti et al., *Examining Quality in Two Preschool Settings: Publicly Funded Early Childhood Education and Inclusive Early Childhood Education Classrooms*, 45 *Child Youth Care Forum* 829, (2016).

¹⁰ Urban Institute, *Segregated from the Start: Comparing Segregation in Early Childhood and K-12 Education*, <https://www.urban.org/features/seggregated-start>.

¹¹ 20 U.S.C. §1400 et seq.; P.L. 108-446.

¹² Jessica L.W. Miranda et al., *Preparing Special Education Teacher Candidates to Teach English Language Learners with disabilities: How Well Are We Doing*, 23 *Language Teaching Research* 330 (2017).

¹³ Broughton, J., Soto, I., & White, A. (208). *Serving ELLs in the Florida ESSA plan*. University of South Florida Anchin Center, 1(1), 1-5.

the public understand how states and school districts allocate funding to schools and whether high need schools are receiving equitable resources. The current combined reporting promotes transparency of resource allocation, helping school districts assess their funding practices to ensure our most vulnerable students and low-performing schools receive the resources they need to succeed.

Recent research points to “a \$23 billion gap between white and nonwhite school districts, even though they serve the same number of children.”¹⁴ Persistent resource inequity is directly related to poor student outcomes in underfunded school districts, leaving the public and policymakers to question whether all students are presently adequately served and educated.¹⁵ The CRDC data elements that the Department proposes to eliminate are the elements most commonly cited in demonstrating which school districts are underfunded and to what degree. The Department’s proposal would obscure this nation’s failure to provide equitable resources to all children, and specifically whether the allocation of state and local resources prohibits discrimination on the basis of race in programs and activities receiving federal financial assistance in compliance with Title VI of the Civil Rights Act of 1964 (Title VI), per OCR’s current sub regulatory guidance.¹⁶

Teacher Quality and Teacher Chronic Absenteeism

Under this proposal, the Department would no longer collect data on the number of full-time, first- and second-year teachers, nor would it collect data on the number of teachers absent 10 or more days in a school year. As a result, if this proposal were to be enacted, policymakers and the public may no longer have access to reliable data indicating whether low-income students and students of color are disproportionately assigned to substitute teachers, as existing CRDC data indicates.¹⁷ Research using CRDC data has demonstrated that students of color are indeed more likely to attend schools with higher concentrations of inexperienced teachers.¹⁸ In addition, CRDC data shows that Native Hawaiian and other Pacific Island and Black students are disproportionately enrolled in schools where more than 50 percent of teachers are chronically absent, defined as being absent more than 10 days a year.¹⁹ Without continued access to this information, policymakers will be unable to determine the extent of these issues going forward.

¹⁴ Ed Build, \$23 Billion at 2 (2019), <https://edbuild.org/content/23-billion/full-report.pdf>.

¹⁵ U.S. Government Accountability Office, K-12 Education: Better Use of Information Could Help Agencies Identify Disparities and Address Racial Discrimination (2016), <https://www.gao.gov/assets/680/676745.pdf>.

¹⁶ See Office of Civil Rights, *Resource Comparability Materials*, U.S. Department of Education, <https://www2.ed.gov/about/offices/list/ocr/resourcecomparability.html> (last modified Sept. 25, 2018).

¹⁷ “A forthcoming report from the [Learning Policy Institute], reviewing research on the impact of teacher experience on student achievement, will show first- and second-year teachers make up a greater proportion of the teaching staff in schools with high enrollments of students of color. In these schools ‘nearly one in every six teachers is just beginning his or her career compared to one in every 10 teachers in schools with low enrollment of students of color,’ according to the upcoming report.” Linda Jacobson, ED Dept plans to ax some teacher workforce preschool questions from Civil Rights Data Collection, September 23, 2019, <https://www.educationdive.com/news/ed-dept-plans-to-ax-some-teacher-workforce-preschool-questions-from-civil/563446/>.

¹⁸ U.S. Department of Education, 2013-2014 Civil Rights Data Collection: A First Look at 9 (2016), <https://www2.ed.gov/about/offices/list/ocr/docs/2013-14-first-look.pdf>.

¹⁹ *Id.*

The proposed removal of data elements related to teacher quality will further erode the intent of Congress to make school and district data publicly available. Per ESEA, states and school districts must report the number and percentage of inexperienced teachers disaggregated by high- and low-poverty schools on their report cards, though states may adopt their own statewide definition of the term “inexperienced.”²⁰ According to research by the Data Quality Campaign, states are struggling to comply with this directive in federal law due to challenges with state definitions of inexperienced teachers.²¹ Specifically, the Data Quality Campaign reported that 25 states do not include data on the number of inexperienced teachers, teachers with emergency credential or provisional credentials, or out-of-field teachers in schools in their report cards.²² Accordingly, if states are not reporting this data and the CRDC data is eliminated, this data will no longer exist. ESEA reporting requirements remain however, raising serious questions as to the Department’s plan to support compliance with federal law given that so many jurisdictions continue to struggle with reporting. Without the CRDC data on teacher quality at the school level, states and school districts will face an even greater struggle to effectively report this data.

Furthermore, policymakers and the public cannot effectively advocate for needed investments and changes in resource management should the collection of this data cease. Equally as significant, researchers cannot evaluate the rate of excessive teacher attrition in our most vulnerable schools and cannot conduct research related to solving teacher retention or educator equity gap issues.²³ Neither can policymakers appropriately strategize or allocate resources related to teaching and school personnel concerns and professional development.

Discipline

Under this proposal the Department would no longer collect disaggregated data on preschool out-of-school suspensions by race, sex, EL status, and student disability status as defined by IDEA. Instead, the Department would combine the number of preschoolers who received one suspension and the number of students who received multiple suspensions into one category. The Department has proposed this change in data collection even though current data collection indicates that preschoolers are more likely to face punitive school discipline than any other student group and that such discipline is disproportionately correlated to race and sex.²⁴ As the

²⁰ Under Section 1111(h)(1)(c)(ix) of ESEA, each state report card must include “The professional qualifications of teachers in the State, including information (that shall be presented in the aggregate and disaggregated by high-poverty compared to low-poverty schools) on the number and percentage of— (I) inexperienced teachers, principals, and other school leaders; (II) teachers teaching with emergency or provisional credentials; and (III) teachers who are not teaching in the subject or field for which the teacher is certified or licensed.”

²¹ Data Quality Campaign, *Show Me the Data*, <https://dataqualitycampaign.org/showmethedata/> (last updated Apr. 4, 2019).

²² *Id.*

²³ “Some schools and districts are relying heavily on first-year teachers because they can’t retain their staff for all sorts of reasons: school climate and culture is bad, teachers are overworked because there are no school counselors or mental health providers to support their students, or the building is falling apart, etc.” Ary Amerikaner, *Why We Need to Protect the Civil Rights Data Collection (CRDC) from Secretary DeVos’ Proposed Cuts*, Education Trust (October 2, 2019), <https://edtrust.org/the-equity-line/why-we-need-to-protect-the-civil-rights-data-collection-crdc-from-secretary-devos-proposed-cuts/>.

²⁴ “Twelve years ago, Yale University researchers uncovered a surprising fact: Preschoolers were more likely to be expelled than children in any other grade. In fact, preschoolers were being expelled at rates more than three times

only regularly recurring national data collection effort on the use of out-of-school suspensions in preschool, CRDC data plays a crucial role in assessing disproportionate discipline and guiding policy deliberation on ways to end the preschool-to-prison pipeline for students of color. CRDC data confirms that preschool suspensions are an urgent issue and shows that Black students make up 19 percent of preschool enrollment but account for 47 percent of suspensions.²⁵ Without this data, we will not have the detailed and reliable information necessary to develop policies that work to end the disproportionality of school discipline in our preschools.

Even though the Department has taken steps to weaken the use of disparate impact analysis to enforce Title VI, as evidenced by its rescission of the 2014 discipline guidance package, the Department continues to be charged with enforcing Title VI to protect students against policies and practices that have a discriminatory effect. This proposal is merely another action by the Department to undermine enforcement of Title VI, despite the regulatory framework for such enforcement that remains in place.

Credit Recovery

The Department's proposal to stop collecting data on the number of students who participate in credit recovery programs is also problematic. Credit recovery is defined "as a strategy that encourages at-risk students to re-take a previously failed course required for high school graduation and earn credit if the student successfully completes the course requirements" with the goal to "provide a pathway for high school students who have a history of course failure and help them avoid falling further behind in school."²⁶ However, studies have shown that while the schools that most rely on these programs demonstrate increases in their graduation rates, their students do not fare well on state achievement tests. This raises concerns that these programs are actually leading to inflated graduation rates.²⁷ In addition to concerns that credit recovery programs are potentially inflating graduation rates, studies have shown that these programs are most commonly used in schools with high numbers of students of color.²⁸ These trends deserve

higher than school-aged children. Subsequent research found that the effect of this phenomenon was also racialized. A report by the U.S. Department of Education's Office of Civil Rights showed that African American children represented 18 percent of public preschool enrollment, but 48 percent of preschoolers receiving multiple out-of-school suspensions." Rasheed Malik, *New Data Reveal 250 Preschoolers are Suspended or Expelled Every Day*, Center for American Progress (November 6, 2017) <https://www.americanprogress.org/issues/early-childhood/news/2017/11/06/442280/new-data-reveal-250-preschoolers-suspended-expelled-every-day/>; see also U.S. Government Accountability Office, *Discipline Disparities for Black Students, Boys, and Students with Disabilities* (2018) <https://www.gao.gov/assets/700/690828.pdf>; Russell J. Skiba & Natasha T. Williams, *Are Black Kids Worse? Myths and Facts About Racial Differences in Behavior: A Summary of the Literature* (The Equity Project at Indiana University, Supplementary Paper I, 2014).

²⁵ U.S. Department of Education, *2013-2014 Civil Rights Data Collection: A First Look* (2016), <https://www2.ed.gov/about/offices/list/ocr/docs/2013-14-first-look.pdf>.

²⁶ U.S. Department of Education, *Issue Brief: Credit Recovery* (2018), <https://www2.ed.gov/rschstat/eval/high-school/credit-recovery.pdf>.

²⁷ Nat Malkus, *American Enterprise Institute, Second Chance or Second Track? Credit Recovery Participation in US High Schools at 1* (2018), <https://files.eric.ed.gov/fulltext/ED592004.pdf>.

²⁸ *Id.*

further study and the data provided by the CRDC is key to continuing to evaluate the impact of credit recovery programs.²⁹

Advanced Placement Courses

Further, this proposal means that the Department would no longer collect disaggregated data on students enrolled in Advanced Placement (AP) courses or students who took one or more AP courses but did not take AP exams. Access to AP classes are very often questions of equity, and according to the Government Accountability Office, students in high-poverty schools have less access to AP courses.³⁰ CRDC data also show that Black and Latino students are less likely than their white peers to have access to AP courses.³¹ That lack of access has a real impact for such students. For instance, according to the College Board, Virginia students who earn AP credit are more likely to graduate in four years or less and spend \$24,200 less on tuition, fees, and board.³² It is also critically important to know if students are taking AP courses but do not sit for the exam at the end of the year. This information is essential to understanding if the experience of students of color taking AP courses differ from their more well-off peers. Elimination of these data elements calls into question OCR's ability to fully enforce Title VI, per current directives.³³

Concerns with the Impact on Implementation of ESEA

In aggregate, this proposal to eliminate data elements related to key school and district characteristics would undermine the bipartisan will of Congress to report vital information to parents and to the public on state, local, and school report cards. In drafting ESSA, Congress purposefully used CRDC data elements to avoid duplication of data requirements for states and districts, requiring that report cards contain CRDC data elements to ensure the increased transparency for all educational stakeholders, including parents and families. The unavailability of such data through the CRDC, a vital oversight mechanism, will impede implementation of ESSA, deny parents access to critical information about their children's schools.

Under Section 1111(h)(1)(C)(viii) of ESSA³⁴, states are required to include several data elements from the CRDC on their annual report cards for all students and student subgroups. The law specifically requires that states and school districts use CRDC data when reporting preschool enrollment data for school district administered programs on their report cards. The

²⁹ "Researchers have suggested sufficient data on these programs is already lacking, and schools with higher proportions of poor students and students of color, as well as urban and large high schools, enroll more students in credit recovery classes." Linda Jacobson, ED Dept plans to ax some teacher workforce preschool questions from Civil Rights Data Collection, September 23, 2019, <https://www.educationdive.com/news/ed-dept-plans-to-ax-some-teacher-workforce-preschool-questions-from-civil/563446/>.

³⁰ U.S. Government Accountability Office, K-12 Education: Public High Schools with More Students in Poverty and Smaller Schools Provide Fewer Academic Offerings to Prepare for College (2018), <https://www.gao.gov/assets/700/694961.pdf>.

³¹ U.S. Department of Education, Civil Rights Data Collection Data Snapshot: College and Career Readiness at 1 (2014), <https://ocrdata.ed.gov/Downloads/CRDC-College-and-Career-Readiness-Snapshot.pdf>.

³² Low-Income Students in Virginia: College Credit through AP. College Board.

³³ Office of Civil Rights, *Resource Comparability Materials*, U.S. Department of Education, <https://www2.ed.gov/about/offices/list/ocr/resourcecomparability.html> (last modified Sept. 25, 2018).

³⁴ Every Student Succeeds Act of 2015, Pub. L. No. 114-95 § 114 Stat. 1177 (2015-2016).

Department's proposal to eliminate data on preschool enrollment disaggregated by race, sex, disability status, and EL status from the CRDC would result in a discontinuation of such reporting, as required by ESEA.

Further, in its ESSA report card guidance entitled *Opportunities and Responsibilities for State and Local Report Cards*, the Department identified multiple CRDC measures that states are permitted to use to meet state and local report card requirements, such as the number of preschool children who received one out-of-school suspension and the number of children who received more than one out-of-school suspension.³⁵ The Department's proposed changes to eliminate CRDC preschool discipline data would make it more difficult for states to include this information to meet federal reporting requirements under ESSA. In fact, research by the Data Quality Campaign shows that 26 states already fail to include discipline data on their report cards and this change would only exacerbate the problem.³⁶ Without this data, parents would not receive critical information about school discipline practices in their child's school or school district.

In addition, ESSA requires states to report on their report cards the number and percentage of all students and each student subgroup enrolled in accelerated coursework, such as AP courses. In accordance with the Department's ESSA report card guidance, states may use CRDC measures such as the number of students enrolled in at least one AP course.³⁷ Thus, the Department's proposal to eliminate disaggregated data for the number of students enrolled in at least one AP course would remove a critical mechanism for states to report this information on their state report cards.

Concerns with Proposed Reporting on Religious Discrimination

This proposal would require school districts to report allegations of harassment or bullying of K-12 students based on perceived religion and disaggregate religious affiliation by 14 categories. While we must always ensure that no student is discriminated against because of their religion, there are several questions as to how this proposal would be operationalized, starting with OCR's lack of direct jurisdiction over religious discrimination.³⁸ While the proposal specifically mentions bullying or harassment based on "perceived religion," it is unclear how schools will be able to implement this new mandate without unlawfully collecting the religious information of students.

³⁵ U.S. Department of Education, *Opportunities and Responsibilities for State and Local Report* (2019), <https://www2.ed.gov/policy/elsec/leg/essa/report-card-guidance-final.pdf>.

³⁶ Data Quality Campaign, *Show Me the Data*, <https://dataqualitycampaign.org/showmethedata/> (last updated Apr. 4, 2019).

³⁷ U.S. Department of Education, *Opportunities and Responsibilities for State and Local Report Cards* (2019), <https://www2.ed.gov/policy/elsec/leg/essa/report-card-guidance-final.pdf>.

³⁸ See, e.g., Office of Civil Rights, *Title VI and Title IX Religious Discrimination in Schools and Colleges*, U.S. Department of Education, <https://www2.ed.gov/about/offices/list/ocr/religious-rights2004.html> (last modified Sept. 25, 2018) (Although OCR's jurisdiction does not extend to religious discrimination, OCR does aggressively enforce Title VI, which prohibits discrimination on the basis of race or national origin, and Title IX, which prohibits discrimination on the basis of sex. In OCR's experience, some cases of religious discrimination may also involve racial, ethnic or sex discrimination.).

Concerns with Proposed Revisions on Reporting of Incidents of Sexual Violence

Under this proposal, the Department would collect more data on allegations of sexual assault, rape, and attempted rape at schools, along with whether such allegations were followed by resignation, termination, discipline, or retirement. While increased reporting on instances of sexual violence is a positive step, reporting should include instances on allegations of sexual assault, rape, and attempted rape that occur outside of school when they involve students and school personnel, or have the potential to effect the educational learning environment. Such conduct is unfortunately far too common and not relegated to campuses and OCR's recent enforcement action against the Chicago Public Schools involved conduct that occurred outside of school premises.³⁹ Additional data reporting would also help shed light as to whether students of color and low-income students are less likely to report such incidents⁴⁰

Conclusion


The Department's proposed elimination of critical data to the CRDC will mask educational inequities, undermining federal interventions to remedy such actions and in contravention of the mission of OCR and enforcement of federal civil rights law. We urge the Department to immediately rescind this proposal.

Thank you for your consideration of this matter.

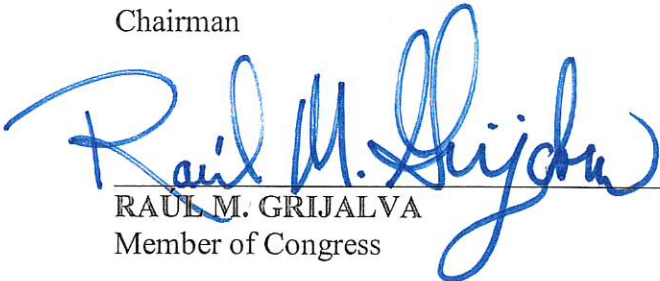
Sincerely,



ROBERT C. "BOBBY" SCOTT
Chairman



SUSAN A. DAVIS
Member of Congress



RAUL M. GRIJALVA
Member of Congress



JOE COURTNEY
Member of Congress

³⁹ Matt Masterson, *CPS Ordered to Overhaul Sexual Violence Policies After Scathing Federal Review*, PBS <https://news.wttw.com/2019/09/12/cps-ordered-overhaul-sexual-violence-policies-after-scathing-federal-review>.

⁴⁰ Also of concern is the impact that ED's Title IX rule will have on the accuracy of the data collection and reporting and whether school districts will be able to adequately investigate such allegations.



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The Honorable Betsy DeVos

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