

September 1, 2005

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

Dear Secretary Spellings:

The growing diversity of the US student population requires a change in how race/ethnicity data is collected in many districts and states. Thus, State Education Agencies understand the reasoning behind the 1997 guidance from the US Office of Management and Budget expanding race/ethnicity categories to be used in federal data collections. Nevertheless, the announcement in the July 29 Federal Register of the new race/ethnicity categories to be used for the NCES Common Core of Data has caused concern among SEAs. We do not believe that instituting new race/ethnicity categories on a collection-by-collection basis is an effective approach for the US Department of Education to take in changing the way it gathers this data from the states. We believe a set of categories must be defined that will be consistently used by all program offices. In addition, we believe that a single deadline must be established at which point the new categories will be used in all USED data collections. We believe this is consistent with the goals of the Education Data Exchange Network project, and will in the long run reduce data burden and increase data quality.

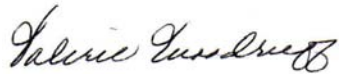
As most of us in education are aware, the capacity of SEA and LEA data systems varies widely among the states. Some states currently have in place student information systems that use expanded race/ethnicity categories. In addition, those states have already worked with their districts to resurvey students and staff using the new race/ethnicity categories. Other states, however, do not have that kind of system capacity, and they are still using the current five race/ethnicity categories. Those states will need to revamp multiple data collections, local schools will need to resurvey all students and staff, and districts will need to revamp systems so that new data can be submitted to the state. Judging from a recent EIMAC survey, roughly 11 percent of states fall into the first category, 81 percent fall into the second category, and 8 percent are somewhere in-between. States that cannot currently provide the new race/ethnicity categories for CCD estimate that it may take between one and four years for them to be able to provide the data in all USED data collections.

CCSSO's Education Information Management Advisory Consortium (EIMAC) exists to facilitate dialogue between the US Department of Education and state education agencies on data

collection and assessment issues. We respectfully request an opportunity for representatives of EIMAC—comprised primarily of SEA data managers and assessment directors—to meet with appropriate USED staff to discuss this issue and collaboratively define a set of new categories to be used and set a reasonable deadline for all states to begin using the new categories. EIMAC will be holding its fall meeting in Washington, D.C. October 4-5. We will be inviting USED staff to talk to states about the race/ethnicity issue. We would like to offer our assistance in developing race/ethnicity categories and collection schedules that will be acceptable to USED programs as well as states, districts, and schools.

Thank you for your attention to this request. We look forward to working with you in improving the way race/ethnicity data is collected.

Sincerely,



Valerie Woodruff
Secretary of Education for Delaware
CCSSO President-Elect and CCSSO Board Liaison to EIMAC

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