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Chicago Public Schools (City of Chicago District 299) has the following comments about the upcoming Office of Civil Rights Data Collection for the 2021-22 school year.

1) We have concerns regarding the proposed summer of 2023 submission window for 2021-22 data. This window will likely inhibit our ability to provide complete data and do a thorough quality check of our data in a timely manner for the following reasons:

a) Schools will be out of session and operating with very limited or no staff during the summer submission window. While this impacts all of our schools, this especially affects charter and contract schools that self-maintain data needed for certain modules and who enter data for many modules directly into the submission system. In addition, for data prepared and submitted by central office staff, our ability to work with school staff to resolve errors will be constrained.

b) The extraordinary length of time between the collection year (2021-22) and the submission window (summer following the 2022-23 school year) adds additional risk to collecting and submitting accurate data for charters or contract schools that may close or where key staff may have left, especially in regard to error resolutions. We recommend that OCR do one of the following: provide final collection guidance by November 30, 2022 and open the collection during the usual February 2023 window but extend the final deadline – or – skip the 2021-22 collection altogether and resume with 2022-23 or 2023-24.

2) We have concerns about newly introduced questions (e.g. the proposed new questions on virtual instruction) being required instead of optional. We ask that OCR follow the typical practice of making new questions optional and not required until the following collection. The same goes for any significant changes to existing questions. This will give us adequate time to implement any needed data collections.

3) We would like to note that delays in approving the 2021-22 collection have made it extremely hard to prepare for submission. Although districts can use past collections as a rough guide, there are some especially burdensome collections that can't be completed until we have confirmation that they are necessary and that the collection guidance remains unchanged. This delay increases the risk that we will be unable to fulfill some of the data submission.