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U.S. Department of Education  
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Dear Ms. Valentine:

Thank you for your feedback from the initial comment period for the 2021-22 Civil Rights Data Collection (CRDC). We would like to take this opportunity to provide additional data regarding the impact of educator diversity on student outcomes, such that the Department can enhance the quality, utility, and clarity of the information to be collected. To this end, we urge you to consider the following recommendations:

**The CRDC should disaggregate and cross-tabulate the number of teachers at the school level by race, ethnicity, and sex.**

Fair representation of teachers matters: a racially and culturally diverse teacher workforce<sup>1</sup> is beneficial for all students, and especially beneficial for students of color.<sup>2</sup> For low-income Black male students, exposure to Black teachers has the potential to cut high school dropout rates by 39 percent,<sup>3</sup> which can also have profound health consequences: those who do not graduate high school are likelier to report poor health and suffer from chronic health conditions.<sup>4</sup> Additionally, a 2018 report by the Learning Policy Institute shows that the number of both Black and Native teachers has been declining over the past several decades.<sup>5</sup> Overall, **although 52 percent of K-12 public school students are people of color, about 80 percent of teachers are white,**<sup>6</sup> indicating a stark representation gap between students and teachers. In order to obtain a diverse teaching workforce that has students' best interests in mind, we urge the CRDC to require the disaggregation and cross-tabulation of teachers by race, ethnicity, and sex for the 2021-2022 school year, which will offer transparency and accountability around present conditions. With this data, we can identify areas within the teacher workforce that require further attention to support the needs of our students.

**The CRDC should add data collection on school principals to its existing counts of other school staff.**

Including additional data collection on school leadership, particularly principals, can have profound impacts on students, as **school leaders account for 25 percent of a school's impact on student learning.**<sup>7</sup> Furthermore, diversity in school leadership remains a challenge. In the 2017-18 school year, **only 22 percent of school principals identified as people of color** despite 52 percent of students identifying as people of color.<sup>8</sup> Additionally, school leaders of color are more likely than white leaders to hire and retain teachers of color – who, as aforementioned, are beneficial for all students' achievement.<sup>9</sup> Research also indicates that Black students' math achievement increases in schools led by Black principals, even without direct instruction from a Black teacher<sup>10</sup>; similarly, Hispanic students' attendance and likelihood to take advanced classes increases when attending schools led by Hispanic principals.<sup>11</sup> This data demonstrates the importance of diverse school leadership, and mandating data collection of school principals will allow us to track and remedy the existing representation gaps. Access to relevant data on school leadership will bolster our attention towards teachers and students alike, as school leaders are foundational to student achievement, and, ultimately, the success of their schools.

Thank you for this opportunity to provide additional comments. If you have any questions or would like to discuss further, please contact [policyteam@newleaders.org](mailto:policyteam@newleaders.org).

Sincerely,

Achievement Network (*list continued on next page*)

<sup>1</sup> The Education Trust. "Teacher Diversity & Equity Policy Scan." The Education Trust, October 18, 2022. <https://edtrust.org/educator-diversity/>.

<sup>2</sup> Gershenson, S. et al. (2018) "The long-run impacts of same-race teachers." Available at: <https://doi.org/10.3386/w25254>.

<sup>3</sup> Gershenson, S. et al. (2018) "The long-run impacts of same-race teachers." Available at: <https://doi.org/10.3386/w25254>.

<sup>4</sup> U.S. Department of Health and Human Services. "High School Graduation." High School Graduation - Healthy People 2030. <https://health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/high-school-graduation>

<sup>5</sup> Carver-Thomas, Desiree. "Diversifying the Teaching Profession: How to Recruit and Retain Teachers of Color," 2018. <https://doi.org/10.54300/559.310>.

<sup>6</sup> "Drive Task Force - The Hunt Institute." The Hunt Institute, March 24, 2021. <https://hunt-institute.org/equity-in-education/drive-taskforce/>.

<sup>7</sup> Leithwood, K., Seashore Louis, K., Anderson, S., & Wahlstrom, K. (2004). How Leadership Influences Student Learning. Center for Applied Research and Educational Improvement. Retrieved from: <https://www.wallacefoundation.org/knowledge-center/Documents/How-Leadership-Influences-Student-Learning.pdf>.

<sup>8</sup> National Center for Education Statistics. (2022). "Characteristics of Public School Principals." Condition of Education. U.S. Department of Education. Retrieved from <https://nces.ed.gov/ipeds/data/ipedsreports/condition-of-education/characteristics-of-public-school-principals/>.

<sup>9</sup> Grissom, J.A., Egalite, A.J., & Lindsay, C.A. (February 2021). How Principals Affect Students and Schools: A Systematic Synthesis of Two Decades of Research. The Wallace Foundation.

<sup>10</sup> <https://www.wallacefoundation.org/knowledge-center/Documents/How-Principals-Affect-Students-and-Schools.pdf>.

<sup>11</sup> Bartanen, B. & Grissom, J. (2019). School Principal Race and the Hiring and Retention of Racially Diverse Teachers. Annenberg Institute at Brown University. Retrieved from <http://edworkingpapers.com/ai19-59>.

<sup>12</sup> Grissom, J., Rodriguez, L., and Kern, E. (2017)

Advance Illinois  
All4Ed  
Deans for Impact  
EDGE Consulting Partners  
Education Research and Development  
Educators for Excellence  
Latinos For Education  
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MCEL (Men of Color in Educational Leadership)  
National Association of Elementary School Principals  
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National Council of Teachers of Mathematics  
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New Classrooms  
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Philadelphia Academy of School Leaders, Inc.  
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School of Education, Loyola Marymount University  
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The Education Trust  
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