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On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the civil and human rights of all persons in the United States, and The Leadership Conference Education Fund, we write to express deep concern regarding the U.S. Department of Education (ED)'s proposed changes to the EDFacts Information Collection for FY2025-26, 2026-27, and 2027-28 (with 2024-25 continuation), and to oppose the elimination of data elements that allow for the inclusion of nonbinary students. We also call on ED to reinstate the proposed revisions outlined in the November 2024 notice, including detailed, school-level, disaggregated data collection to increase transparency, accountability, and enable better data-driven decisions. We look forward to your review of our comment and are happy to answer any questions you may have.