CALIFORNIA DEPARTMENT
OF EDUCATION

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To Whom It May Concern:

Subject: ED*Facts* Data Collection, School Years 2025–26, 2026–27 and 2027–28 (With 2024–25 Continuation) (OMB Control Number 1850-0925)

The California Department of Education (CDE) appreciates the opportunity to review and provide comments on the school years (SYs) 2025–26, 2026–27 and 2027–28 (With 2024–25 Continuation) ED*Facts* Data Collection as proposed in the Federal Register, Volume 90 on May 21, 2025.

The U.S. Department of Education's (ED) decision to withdraw all the proposed changes outlined in the 60-day notice package and to maintain the collection of the same data groups and categories as currently approved for ED*Facts* (SY2022–23 through SY2024–25) collection will not impact California's ability to report required data. However, the CDE continues to have concerns regarding the following topics that continue to be pending consideration by the ED in future reporting years.

Race and Ethnicity Data Standards

The CDE is committed to aligning California's education data systems with the revised Statistical Policy Directive No. 15 (SPD 15) standards to support equitable and accurate reporting for all students. However, implementation of these new federal requirements will require substantial changes across systems, policies, and operations at both the state and local levels. As the CDE works to align with the revised federal race and ethnicity standards, the CDE recognizes the complexity of this transition and is dedicated to ensuring the process is thoughtful, transparent, and well-supported across all stakeholders. To achieve a successful implementation, several critical areas must be addressed comprehensively.

First, category alignment and system readiness. The CDE will need to integrate the Hispanic or Latino and Middle Eastern or North African (MENA) identities into our race code sets. This integration requires retiring the existing ethnicity indicator and modifying

our statewide data system—CALPADS—along with updating business rules, validation logic, and aggregation methods. These foundational changes will impact every level of the data infrastructure. Additionally, the CDE collects detailed racial subgroup data within the Asian category—including Chinese, Japanese, Korean, Vietnamese, Asian India, Cambodian, Hmong, and Other Asian—and within the Native Hawaiian or Pacific Islander category—including Hawaiian, Guamanian, Samoan, Tahitian, and Other Pacific Islander. The CDE also recognizes and collects Filipino as a distinct racial category, consistent with California's longstanding practices.

Second, cross-system updates are essential. All interfaces—including public dashboards, websites, definitions, and reporting tools—must be comprehensively updated to incorporate the new race and ethnicity categories. This is a wide-reaching effort requires careful planning and clear communication to maintain consistency, avoid confusion, and prevent misinterpretation of the data.

Third, ensuring longitudinal data integrity. For researchers, policymakers, and community partners, the ability to track trends over time is essential. Given that the MENA category is entirely new—and the CDE is restructuring the race and ethnicity reporting framework, the CDE recommends maintaining two distinct datasets: one for the pre-implementation period and one for post-implementation. This approach preserves the accuracy of data interpretation and supports overall data quality.

Fourth, being mindful of local burden. Currently, the CDE only collects race and ethnicity data during new student enrollment or when the student's race or ethnicity is updated. Requiring all currently enrolled students to re-identify would be highly disruptive and would impose a significant administrative burden on schools and families. It would necessitate major changes to enrollment forms, local student information systems, and statewide data collection processes. Therefore, the CDE strongly recommends not mandating re-identification for students already in the system.

Fifth, staff data should be aligned with the revised standards. While the federal government currently does not collect race or ethnicity data on staff, the CDE does collect and report these data. To ensure consistency and equity across education data practices, the CDE recommends applying the revised federal race and ethnicity standards to staff data collection and reporting as well.

Sixth, accountability metrics must be clearly defined. The CDE respectfully requests clear federal guidance on how performance indicators should be calculated—especially for students who identify with more than one race. Should state report only one race per student, or all selected races? These critical decisions directly impact how equity and success are measured across diverse student groups. Furthermore, the CDE strongly urges the continued inclusion of a "Two or More Races" reporting category to ensure mutually exclusive reporting groups and accurate totals that do not exceed 100 percent

Seventh, we face significant historical data limitations. Because the MENA category has not been previously collected, there is no reliable baseline data for this group. Consequently, the CDE recommends treating the post-implementation period as a new starting point for tracking and reporting MENA student data to ensure accuracy and data integrity.

Eighth, privacy and data suppression must be carefully addressed. As racial and ethnic categories become more disaggregated, the risk of unintentionally identifying individual students in public reports increases—particularly in smaller populations or rural communities. To protect student confidentiality while maintaining the transparency our communities expect, the CDE's data systems will require significant reengineering to ensure student privacy through advanced suppression rules, improved aggregation techniques, and robust safeguards across all public-facing platforms.

And finally, while fully committed to aligning with the revised federal race and ethnicity standards, the CDE requires adequate funding and clear federal guidance to successfully implement these changes. Achieving compliance will necessitate substantial investments—not only for upgrading data systems but also to support local educational agencies (LEAs) through training, technical assistance, and effective comprehensive communication efforts. To ensure aligned guidance and consistent implementation across federally funded programs, the CDE urgently needs clear and timely direction from the ED regarding definitions and reporting protocols, a mapping crosswalk from existing to revised race and ethnicity standards, and clear compliance expectations and timelines. Without timely, coordinated federal guidance, the CDE faces the risk of costly delays as the CDE cannot begin developing a comprehensive state-level implementation strategy. The absence of clear direction could also result in increased burdens on LEAs, and inconsistencies across states, ultimately undermining the collective goal of more accurate, equitable, and transparent education data reporting.

Challenges in Timely EDFacts Reporting

As the CDE continues our efforts to improve education data transparency and equity, the CDE would also like to highlight a significant challenge the CDE continues to face: the timeliness of reporting certain ED*Facts* files to the ED. Despite our commitment to high-quality data, several ED*Facts* files remain burdensome due to the complexity of data sourcing, validation, and cross-agency coordination. Below are the specific challenges we encounter annually:

1. **FS032 Dropouts file**: This file relies entirely on data from our CALPADS Fall 1 collection. However, that data is not finalized and available for processing until after the CALPADS amendment window closes—typically at the end of January. Only then can our team begin the work of cleaning, validating, and compiling the data, which takes no less than six weeks. This schedule places tremendous

pressure on our staff and creates significant difficulty in meeting federal reporting deadlines.

2. **FS160 Postsecondary Enrollment file**: This file is even more complex. It combines data from the same Fall 1 CALPADS collection with enrollment outcomes from the National Student Clearinghouse (NSC), an external vendor in which California must pay for a subscription to gain access to our student data. Again, because Fall 1 data is not finalized until late January, we face the same time constraints. The integration of the NSC data adds another layer of coordination, quality checks, and matching, which further extends our timeline. Additionally, while the CDE had a direct subscription with NSC on an inconsistent basis for many years, due to extraordinarily high increases in cost over those years, the subscription became unaffordable to maintain. Subsequently, the newly established California Cradle-to-Career system obtained an NSC subscription in Spring 2025 and the CDE will need to collaborate with this agency to obtain these data moving forward. The dependency on NSC and C2C to access these data will most likely lead to continued delays in submitting these data. Finally, even after the CDE is provided with access to the data, it usually takes several weeks for NSC to complete their data match even after the CDE has provided them with a clean high school completer file.

3. **FS203 Teachers file**: This file requires a coordinated effort between the CDE and the California Commission on Teachers Credentialing (CTC), our external credentialing authority. It starts with the CDE providing CALPADS staff demographics, course enrollment, and assignment date from the Fall 2 CALPADS collection to the CTC. The CTC then processes the data using the California Statewide Assignment Accountability System (CalSAAS), where it is matched with credentialing records. Once the matching is complete, the CTC sends back validated indicators that the CDE uses to populate the FS203 file. The entire process is governed by a detailed data-sharing agreement, and it requires time-intensive, multi-step coordination across systems and agencies.

In all three cases, the structure and timing of our CALPADS data collection—coupled with dependencies on external data sources—make it infeasible to meet EDFacts timelines without extended lead times or flexibility. The CDE recognizes the importance of timely federal reporting, but we ask for an understanding of the operational realities involved when working with external agencies and over 1,000 school districts.

The CDE welcomes the opportunity to assist the ED to explore meaningful, collaborative solutions. Specifically, the CDE recommends the ED consider adjusting the deadline dates for certain ED*Facts* file where state data simply is not available within the current federal timeline, and better aligning state and federal reporting cycles to reduce the burden on our systems and staff.

The CDE is committed to transparent, high-quality data reporting. With improved alignment and sustained federal support, we are confident in our ability to meet federal reporting expectations while continuing to serve the needs of California's schools, educators, and students with accuracy, integrity, and efficiency.

If you have any questions regarding this letter, please contact Addie Sherman, Acting Education Administrator, Data Access and Strategy Office, by phone at 916-319-0438 or by e-mail at ASherman@cde.ca.gov.

Sincerely,

Cindy Kazanis, Director
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