July 19, 2023

Manager of the Strategic Collections and Clearance Governance and Strategy Division
United States Department of Education
400 Maryland Ave SW
LBJ, Room 4C210
Washington, DC 20202

  Re: Comment Request; Statewide Longitudinal Data System Survey 2023–2025 (ED-2023-SCC-0091)

Dear Manager of the Strategic Collections and Clearance Governance and Strategy Division,

Thank you for the opportunity to comment on the shift to a biennial collection of the Statewide Longitudinal Data System (SLDS) Survey administered by the National Center for Education Statistics (NCES). The Data Quality Campaign (DQC) is a national non-profit organization that advocates to change the role of data so that it better serves all users. Knowledge Alliance (KA), a non-profit, non-partisan organization, is composed of leading education organizations committed since 1971 to the greater use of high-quality and relevant data, research, evaluation and innovation in education policy and practice at all levels. NCES's SLDS Survey is an important source of information for our and other organizations on the status of SLDSs, the progress states are making in updating them, and the choices states are prioritizing as they update. This information is critical in understanding whether SLDSs are meeting the data access and use needs of individuals, the public, and policymakers.

As users of the SLDS Survey data, DQC and KA support the Survey's continuation on a biennial basis. We believe extending the collection period could yield benefits for NCES and states without compromising the utility of the information gathered. The benefits of biennial data collection include reduced burden for states through logically paced intervals, and faster, more productive reporting on NCES survey results.

Reduce Burden on States through Logically Paced Intervals
An important benefit of biennial reporting of the NCES survey is the easing of data collection burden for local and state agencies. Annual data collections can be a time-consuming task for state agencies, as it requires substantial effort from staff members to gather, verify, and submit the required information. Transitioning to a biennial schedule would alleviate some of this burden, while also allowing for larger capacity to ensure cleaner and improved data quality when reported. Moreover, a biennial survey would provide a more comprehensive and accurate picture of trends and progress states are making on their SLDSs. At the state level there is currently neither sufficient nor significant progress being made on
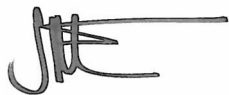
SLDSs on an annual basis to require such reporting. With more time between survey collections, state institutions and agencies would have more capacity to implement changes and initiatives, allowing for meaningful progress to be documented.

Faster Reporting from NCES

Longer intervals between collection periods would make it easier for NCES to deliver robust and timely reports on the progress states are making on their SLDSs. NCES should use the added time and capacity between collections to ensure that insights and data files produced from the survey can be published quickly enough, either by NCES or through collaboration with a partner. Working with a partner organization to release high-level findings from the survey while NCES takes the time necessary to produce more granular data would provide timely value to the field. In turn, timelier reporting can support more actionable findings and recommendations for policymakers, educators, and researchers and ensure that the NCES survey remains the official source of information related to all SLDSs.

Thank you for considering our ideas on the continuation and biennial implementation of the NCES SLDS Survey. We would be pleased to respond to any questions you have about these recommendations and to share other ideas for supporting this important work. For questions or additional information, please contact Data Quality Campaign Vice President, Federal Policy Kate Tromble, kate@dataqualitycampaign.org, or Knowledge Alliance President and CEO Rachel Dinkes, rdinkes@knowledgeall.net.

Sincerely,

Jennifer Bell-Ellwanger
President and CEO
Data Quality Campaign

Rachel Dinkes
President and CEO
Knowledge Alliance