

October 07, 2021

Director, Strategic Collections and Clearance, Governance and Strategy Division  
Office of Chief Data Officer  
Office of Planning, Evaluation and Policy Development  
400 Maryland Ave. SW  
LBJ, Room 6W208B  
Washington, DC 20202–8240

RE: Comment Request; School Pulse Panel Data Collection (Docket No. ED-2021-SCC-0130)

Dear Director:

The undersigned organizations welcome the opportunity to respond to the U.S. Department of Education’s (ED’s) request for comments regarding the School Pulse Panel Data Collection. We submit these recommendations as a collaboration of national organizations seeking to advance shared education equity priorities through federal, state, and local policy and advocacy.

We commend the administration's continued efforts to advance policies focused on equity and improving outcomes for historically underserved students, especially students from low-income backgrounds, students with disabilities, students learning English, students experiencing homelessness, students in the foster care system, students who are incarcerated, undocumented students, Black and Brown students, Native students, Asian students, and students who identify as LGBTQ. We know these students are also those whose communities have been most impacted by the COVID-19 pandemic. Therefore, we appreciate ED’s efforts to collect information on the multiple needs and experiences of these students.

The pandemic exacerbated preexisting inequities and created new challenges for our nation’s students. The School Pulse Panel is a critical instrument to inform policymakers and the public on COVID-19’s impact on students and schools. This survey will help ensure that our schools are equipped with the policies, practices, and tools needed to address disparities in our education system.

First, **we support the disaggregation of data on enrollment, mode of instruction, and supports provided to students by student demographics.** The School Pulse Panel will provide national-level data on the experiences of students during the pandemic, including mode of instruction offered (virtual, hybrid, or in-person); enrollment and attendance rates cross-tabulated by instructional mode; mitigation strategies utilized, such as student and staff masking policies; activities to address lost instructional time; vaccination information; use of technology, computer devices, and high-quality internet access; access to mental health services; and staffing. Given the disproportionate impact of the pandemic on under-resourced communities and communities of color, we support NCE’s plan to disaggregate the data collected by race, ethnicity, English Learner (EL) status, disability status, homeless status, migrant status, and

socioeconomic background. Where feasible, we also ask ED to collect the data in such a way that will allow for cross-tabulation.

Second, **we support the commitment to collecting and disseminating real-time information on the experiences of schools, students, and educators versus a static, one-time survey.** Our understanding of the virus and the measures districts and schools should employ to combat it are constantly evolving. The National Center for Education Statistics (NCES) plans to update the survey quarterly with rotating questions based on future guidelines. We agree this will enable NCES to gather the most relevant, current data as conditions, best practices, and guidance shift over time. **We also urge NCES to continue to provide these data to the public as quickly as possible on its online data dashboard.**

Finally, **we strongly support the addition of high schools to the sample.** Unlike the National Assessment of Educational Progress (NAEP) 2021 School Survey, the new School Pulse Panel survey for the 2021-22 school year will include high schools. It is essential for ED to collect information about the educational experiences of high school students during the pandemic given data on the declines in [student engagement](#), increases in [class failure rates](#), and declines in [Free Application for Federal Student Aid \(FAFSA\) completion](#) and [subsequent college enrollment](#), particularly for students from high poverty high schools and students of color. High schools also warrant unique data collection to determine how well they are implementing the Center for Disease Control and Prevention's school reopening guidance, as the recommendations for high schools are distinct from elementary and middle schools (due to the differences in how the virus has been shown to spread among adolescents and the full approval of COVID-19 vaccinations for teenagers).

In the spirit of partnership, we offer the attached recommendations in response to the Department's full data collection instrument (OMB# 1850-0963 v.4) in addition to the broad comments above.

Thank you for your ongoing efforts in pursuit of educational equity and excellence. We offer our partnership and support in this endeavor and look forward to working with you on behalf of all of America's students, especially those who have been underserved.

With appreciation,

Alliance for Excellent Education  
Center for American Progress  
Education Reform Now  
National Center for Learning Disabilities  
National Urban League  
SchoolHouse Connection  
The Education Trust  
UnidosUS

## Attachment 1:

### Recommended Revisions for School Pulse Panel Questions

Please find below recommendations for revisions to current questions in the full data collection instrument (OMB# 1850-0963 v.4).

General Recommendation 1: In questions or responses that refer to “English language learners,” use “English learner” to be consistent with the definition of that group of students in the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act.

General Recommendation 2: In questions that ask about the experiences of “some” or “all students,” revise the response categories to be more specific. For example, in Q6, Q9, and Q12, modify the response categories from “some students” and “all students” to: all students, most students (more than 50% of students), or some students (less than 50% of students). Likewise in Q72 and Q80, modify the response categories from “some students” and “all or most students” to: all or nearly all students (at least 95% of students), most students (more than 50% of students), or some students (less than 50% of students).

Q7 As of  $\{e://Field/filldate\}$ , which students were offered full-time in-person learning? (p.3)

Recommendation 1: Add a response category for students that are further behind academically.

Recommendation 2: Add an “other (please describe)” response category

Q10 As of  $\{e://Field/filldate\}$ , which students were offered full-time remote learning? (p. 6)

Recommendation: Add an “other (please describe)” response category

Q13 As of  $\{e://Field/filldate\}$ , which students were offered a hybrid of remote and in-person learning? (p. 8)

**Recommendation:** Add an “other (please describe)” response category

*Q15 Enrollment data may be more easily accessible for staff in your district or local education agency office. We encourage you to work with other school staff or district central office to assist with the administrative data part of this survey. The survey can be shared with district or other school staff using this unique survey link:  $\{e://Field/Q\_URL\}$*

*Or you can print the page using your web browser’s print screen options so you can share a copy of this page with others.*

As of  $\{e://Field/filldate\}$ , please enter your total student enrollment count by ethnicity and race. (p. 10-11)

**Recommendation:** Add columns to collect enrollment count data for additional groups of students based on socioeconomic status, disability status, English Learner status, students experiencing homelessness, and migrant students, as included in later questions (i.e., Q90, Q20, Q21, Q23, and Q22) that break down enrollment by mode of instruction.

Q24 As of  $\{e://Field/filldate\}$ , what is the average daily attendance percentage for each ethnicity and race?

*Attendance data may be more easily accessible for staff in your district or local education agency office. We encourage you to work with other school staff or district central office to assist with the administrative data part of this survey. (p. 18-19)*

**Recommendation:** Add columns to collect average daily attendance data for additional groups of students, specifically economically disadvantaged students, students with disabilities, English Learners, students experiencing homelessness, and migrant students.

Q57 Does your school require that all students who are not yet eligible for a vaccine wear a mask inside the building? (p.31)

Recommendation: The wording of the question and response categories are difficult to follow. To help clarify, revise the question to read: **If your school has students that are not yet eligible for a vaccine, does your school require the students to wear a mask inside the building?** In addition, revise the “Not Applicable - There are no students eligible for the COVID-19 vaccine in this school” option to read: “Not Applicable - There are no students **that are not yet** eligible for a vaccine in this school.”

Q60 During the  $\{e://Field/CurrentAcademicYear\}$  school year, has your school done any of the following to help students handle the COVID-19 pandemic? (p. 33-34)

Recommendation 1: Add a response category for providing mental health support and services in the primary language(s) spoken at home by students.

Recommendation 2: Add a response category for adopting or integrating social emotional learning into the curriculum.

Recommendation 3: Add a response category for providing social and emotional support for staff and educators.

Recommendation 4: Add a response category for evaluating and addressing students’ social and emotional well-being.

Q68 As of  $\{e://Field/filldate\}$ , is your school offering any of the following activities? (p. 37)

Recommendation 1: Add a response category for work-based learning programs.

Recommendation 2: Add a response category for off-campus dual or concurrent enrollment programs that occur on college campuses.

Q71 As of  $\{e://Field/filldate\}$ , have your teachers conducted any diagnostic assessments with students? (p.40)

Recommendation: Clarify the type of diagnostic assessment (i.e., a standardized tool versus teacher-created tools) by modifying the question to read “have your teachers conducted any **standardized** diagnostic assessments with students?”

Q72 Which students have participated in these diagnostic assessments? (p.40)

Recommendation: Add a “do not know” response category.

Q73 What groups of students have participated in these diagnostic assessments? (p. 40)

Recommendation: Add three new response categories for students learning in a remote setting, students learning in hybrid settings, and students learning in person.

Q148 What groups of students will be offered any of the above additional services or programs during the  $\{e://Field/CurrentAcademicYear\}$  school year? (p.44)

Recommendation 1: Add a response category for students experiencing homelessness.

Recommendation 2: Add a response category for migrant students.

Recommendation 3: Add a response category for students who are academically behind.

Q82 As of  $\{e://Field/filldate\}$ , What changes are expected to the typical administration of federally mandated student assessments (i.e., standardized tests) at your school? (p.46)

Recommendation: The current response options include responses that would violate federal law (e.g., cancelling statewide assessments in Spring 2022 or administering local assessments instead of statewide assessments) and are typically decisions made by the state educational agency, not an individual school that would be responding to the survey. Instead, we recommend revising the question for pulse surveys administered in the beginning of the 2021-22 school year to probe how statewide assessment data from Spring and Fall 2021 are being used by school leaders and educators. As the 2021-22 school year progresses, it may be more timely to add questions regarding plans for Spring 2022 state assessments, such as plans to shorten assessments or allow for social distancing and other COVID mitigation strategies.

Q112 For this school year ( $\{e://Field/CurrentAcademicYear\}$ ), how difficult or easy was it to fill staff vacancies in each of the following fields?

*Please include full or part-time positions that were vacant for the  $\{e://Field/CurrentAcademicYear\}$  school year that may or may not have been filled before the start of the school year.*

*Do NOT include vacancies for teachers who teach only prekindergarten or adult education.(p.49-52)*

**Recommendation:** Remove the question as it probes respondents' perceptions of difficulty in filling vacant roles when quantitative data on staff vacancies and hiring would be available comparing the current school year to prior ones.

If the question is not removed, we would, as an alternative, recommend revising the question to "For this school year, were staff vacancies filled in each of the following fields?" and replacing the response categories of "Very difficult," "Somewhat difficult," "Somewhat easy," and "Very easy" with a response category of "Filled the vacancy."

Q113 Compared to a typical school year before the COVID-19 pandemic, were there more, fewer, or about the same number of staff vacancies before the  $\{e://Field/CurrentAcademicYear\}$  school year? (p.52)

**Recommendation:** Remove the question as it probes respondents' perceptions of the degree of staff vacancies when quantitative data would be available comparing vacancies in the current school year to prior ones.

## Attachment 2:

### Recommended Additions for School Pulse Panel Questions

Please find below recommendation for additional questions to the full data collection instrument (OMB# 1850-0963 v.4).

1. Add a question to the COVID-19 Mitigation block that distinguishes the type of remote learning available to quarantined students (e.g., synchronous instruction with a teacher versus asynchronous instruction videos versus learning packets created by teachers) as a follow up to Q117.
2. Add a question to the COVID-19 Mitigation block that asks whether the school has a plan to support students who are immune-compromised (either remotely or in-person).
3. Add a question to the Pandemic-Related Learning Needs block about whether and how the results of diagnostic assessments are being shared with parents/families as a follow up to Q74.
4. Add a question to the Pandemic-Related Learning Needs block about how much time has been added to the school day as a follow up to Q76.
5. Add a question to the Pandemic-Related Learning Needs block about how much time has been added to the school year as a follow up to Q77.
6. Add a question to the Pandemic-Related Learning Needs block about high-impact tutoring (Q76-Q78).
7. Add questions to the Pandemic-Related Learning Needs block about which categories of students are receiving *each* intervention, as opposed to “any of the above” interventions in Q80, Q148, and Q149.
8. Before Q81 in the Pandemic-Related Learning Needs block, add a question about administration of Spring or Fall 2021 federally mandated student assessments that asks about changes made to the typical administration of such assessments at the school, with response categories that include:
  - Assessments were cancelled
  - Assessments were delayed
  - Social distancing or other safety measures were implemented during testing
  - Local assessments were substituted for federally mandated assessments
  - Fewer assessments were administered to students
  - Assessments were abbreviated (e.g., by testing fewer students in fewer subject areas)
  - The requirement for 95 percent of students to take assessments was waived
  - Students and families were required to opt-in to take the assessments
  - Students attending school 100% virtually were not required to take assessments
  - Assessments were administered virtually
  - Other, please specify

9. Add questions to the Pandemic-Related Learning Needs block asking what percentage, with ranges, of students have access to the internet and technology (Q85-87).
10. Add a question to the Pandemic-Related Learning Needs block regarding changes to high school graduation requirements in addition to the existing question (Q84) on changes to grade promotion policies.
11. Add a question to the Pandemic-Related Learning Needs block (similar to existing Q75-Q79) that outlines additional activities offered at the school in addition to school day and school year extensions, including whether schools provided:
  - a. Evidence-based high dosage tutoring during the school day.
  - b. Evidence-based high dosage tutoring after school.
12. Add a question to the Pandemic-Related Learning Needs block that asks whether additional opportunities were offered to high school students to assist in transitioning from high school to college, including:
  - a. Enhanced college advising
  - b. Summer bridge programs
  - c. Assistance with completion of the Free Application for Federal Student Aid (FAFSA)
  - d. Expansion of dual enrollment programs or early college high school
  - e. Other, please specify