

21st Century School Fund Comments on Data Collection to the

U.S. Department of Education Office of Civil Rights:

August 2013

This submission is from the 21st Century School Fund. It is based on 20 years of working to secure healthy, safe and educationally appropriate public school facilities for ALL children. The 21st Century School Fund has worked with local public school districts, state facilities agencies and with community based organizations that have done research, advocacy and litigation to ensure that no children are in public school facilities that are a barrier to their achievement, health, or community well-being. For extensive background on these issues I refer to a July 27, 2011 paper of the Advancement Project and the 21st Century School Fund: ***Facilities: Fairness and Effects, Evidence and Recommendations Concerning the Impact of School Facilities on Civil Rights and Student Achievement***, which was submitted to the U.S. Department of Education Excellence and Equity Commission and signed off on by the Center for Cities and Schools, UC Berkeley, California; National Clearinghouse for Educational Facilities, Washington, DC; Innovative School Facilities, Portland, Oregon; Public Education Network, Washington, DC; Healthy Schools Network, New York; Designs for Change, Chicago, Illinois; and the ACLU of Maryland, Baltimore, Maryland.

Unfortunately, the Commission's report was glaringly mute on school facilities. The OCR is currently being asked to look at multiple complaints related to school facility access, closings and conditions, but they have no facilities data with which to evaluate these complaints. In our comments, we will specifically address the data collection that OCR should do in this critical and neglected area.

Facility data collection is needed due to strong research evidence that facility condition, design and utilization are distributed as a function of community wealth, race and ethnicity within states. But since there is so little data collection on school facilities, that an understanding of these conditions is primarily anecdotal. Facilities finance litigation has forced data and information on facilities into the light of day, but there are limited state and no federal assessments or monitoring of public school facilities conditions, design, utilization or access.

Basic data that should be collected by the U.S. Department of Education OCR at the district level is:

1. Gross square footage of the school
 - a. Where there are multiple buildings, the gross square footage of each building
2. Age of original school building and of each building/addition
3. Site size of the school

4. Cost and description of facilities improvements (this should be collected annually—or if survey is done periodically, it should include improvements for years since the last survey)
5. Enrollment capacity of the school
6. Utility expenditures, by school and type of utilities
7. Maintenance expenditures by district—for repairs, preventative maintenance, routine maintenance by buildings and by grounds
8. Whether the school is accessed through student assignments, lottery, or admissions requirements.
9. Mean travel distance of students from their homes to school

The data and information should be longitudinal facility data linked to longitudinal school level data.

This information can be used to understand the distribution of space, the condition of the space, and how students have access to it. It will assist educators and the public identify when there are facilities barriers to other programs or interventions that they are investing in, so they can eliminate facilities condition, design, utilization and location as a barrier to the success of their efforts.

Most school districts maintain basic facilities data in spreadsheet or databases already. A limited set of data collection points will not be burdensome to them. There are technologies that will enable districts to upload completed spreadsheets on each facility data point, so no single school data entry should need to be done.

There is no other federal data collection of this information. This is why there is a strong call for another GAO survey. Neither the Common Core of Data, nor the F-33 financial information collected from school districts includes these data points. Although the F-33 collects district level maintenance and operations data, it is conflated and so the data point is of little use. It is not possible to tell whether utility costs are going up or down, or maintenance costs are going up or down—these changes mean very different things, so the combining of them makes the data point useless from a facilities perspective.