

Forum Guide to

REPORTING CIVIL RIGHTS DATA



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National Cooperative Education Statistics System

The National Center for Education Statistics (NCES) established the National Cooperative Education Statistics System (Cooperative System) to assist in producing and maintaining comparable and uniform information and data on early childhood, elementary, and secondary education. These data are intended to be useful for policymaking at the federal, state, and local levels.

The National Forum on Education Statistics (Forum) is an entity of the Cooperative System and, among its other activities, proposes principles of good practice to assist state and local education agencies in meeting this purpose. The Cooperative System and the Forum are supported in these endeavors by resources from NCES.

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Foreword

National Forum on Education Statistics

The work of the National Forum on Education Statistics (Forum) is a key aspect of the National Cooperative Education Statistics System (Cooperative System). The Cooperative System was established to produce and maintain, with the cooperation of the states, comparable and uniform education information and data that are useful for policymaking at the federal, state, and local levels. To assist in meeting this goal, the National Center for Education Statistics (NCES) within the Institute of Education Sciences (IES)—a part of the U.S. Department of Education (ED)—established the Forum to improve the collection, reporting, and use of elementary and secondary education statistics. The Forum deals with issues in education data policy, sponsors innovations in data collection and reporting, and provides technical assistance to improve state and local data systems.

Development of Forum Products

Members of the Forum establish working groups to develop guides in data-related areas of interest to federal, state, and local education agencies. They are assisted in this work by NCES, but the content comes from the collective experience of working group members who review all products iteratively throughout the development process. After the working group completes the content and reviews a document a final time, publications are subject to examination by members of the Forum standing committee that sponsors the project. Finally, Forum members (approximately 120 people) review and formally vote to approve all documents prior to publication. NCES provides final review and approval prior to online publication. The information and opinions published in Forum products do not necessarily represent the policies or views of ED, IES, or NCES.

Document Purpose

The purpose of this guide is to illustrate a variety of effective methods through which local education agencies (LEAs) report civil rights data to ED's Office for Civil Rights (OCR). Once every two years, all public LEAs and some state-operated educational facilities are required to participate in the Civil Rights Data Collection (CRDC). This collection provides OCR with critical data needed to support OCR's mission to ensure equal access to education and to promote educational excellence through vigorous enforcement of civil rights in our nation's public schools. These data are also widely used by other ED offices and federal agencies, researchers, and policymakers who seek data on student education opportunity and equity. In recent years, several state education agencies (SEAs) have begun to assist their LEAs with reporting data for the CRDC. This guide provides examples of how SEAs can voluntarily help their LEAs with CRDC reporting.

Intended Audience

This guide was produced as a resource for LEAs and SEAs to use to develop strategies to effectively submit data for the CRDC. LEAs are ultimately responsible for reporting for the CRDC, so all LEAs may find this guide useful. SEAs that currently assist their LEAs with the CRDC, or those that may be considering assisting their LEAs, may also find this publication helpful. The guide is intended to help all education agencies improve their reporting of civil rights data to OCR in order to ensure timely and accurate data.



About This Guide

The guide is presented in the following chapters and appendices:

Chapter 1: The Civil Rights Data Collection presents an overview of the Civil Rights Data Collection (CRDC), a biennial survey administered by OCR.

Chapter 2: Challenges and Opportunities in Reporting Civil Rights Data explores common challenges in reporting civil rights data. It also examines various models of voluntary support offered by some SEAs.


Chapter 3: Reporting Civil Rights Data explains the CRDC submission process and presents six case studies that examine how specific education agencies report civil rights data.

Appendix A: Process Diagrams presents diagrams that depict the reporting process for (1) LEAs that receive no assistance from the SEA or the student information system (SIS) vendor, (2) LEAs that receive assistance from a vendor for CRDC reporting, (3) LEAs that receive data files from the SEA that can be used for CRDC submissions, and (4) LEAs for which the SEA prepopulates data in the CRDC Online Submission System.

Appendix B: Resources lists the resources used in developing the document as well as the resources found at the online CRDC Resource Center.

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Chapter 1:

The Civil Rights Data Collection

Once every two years, all public local education agencies (LEAs) in the United States and the District of Columbia are required to participate in the Civil Rights Data Collection (CRDC). This collection provides the U.S. Department of Education's (ED's) Office for Civil Rights (OCR) with critical data needed to support OCR's mission to ensure equal access to education and to promote educational excellence through vigorous enforcement of civil rights in our nation's public schools. These data are also widely used by other ED offices and federal agencies, researchers, and policymakers who seek data on student opportunity and equity; thus, the accuracy and timeliness of the data are critical.

The National Forum on Education Statistics organized a working group to develop this guide to provide information on the purpose of the CRDC and the many important ways in which the data are used, as well as to highlight effective methods that LEAs use to report accurate and timely civil rights data. This work supplements the numerous technical assistance materials provided by OCR to assist LEAs with their data reporting.

History of the CRDC

In 1968, three years after the initial passage of the Elementary and Secondary Education Act (ESEA), the federal government mandated the collection of data related to key civil rights indicators to help ensure that federal funds and program support authorized under the ESEA are equitably distributed and implemented in public schools. Formerly administered as the Elementary and Secondary School Survey, the collection is now known as the Civil Rights Data Collection (OCR 2016a).

OCR is responsible for administering the collection every other year. Initially, the CRDC was conducted as a sample survey of approximately 6,000 LEAs. More recently, OCR requested data from all LEAs for the 2011-12, 2013-14, and 2015-16 collections. As with every federal data collection, each CRDC must be approved by the U.S. Office of Management and Budget (OMB). The approval process includes opportunities for the public to comment on the proposed collection.

The CRDC gathers information about education programs in preschool through grade 12 from approximately 17,000 public school districts. Data are collected on all public schools, including long-term secure juvenile justice facilities, charter schools, alternative schools, schools serving only students with disabilities, and some state-operated facilities. OCR collects data that are needed to support its efforts to administer and enforce the nation's civil rights laws that prohibit discrimination in programs or activities within public schools that receive federal financial assistance from ED.

The collection has grown through the years, as OCR’s responsibilities have expanded to include enforcement of new civil rights laws.¹

What Is Included in the CRDC?

The CRDC collects key information on civil rights indicators, including student enrollment and educational programs and services, most of which is disaggregated by race and ethnicity, sex, limited English proficiency, and disability status. The CRDC includes data about

- enrollment demographics;
- preschool;
- math and science courses;
- Advanced Placement;
- SAT and ACT;
- school discipline;
- school expenditures;
- teacher experience;
- chronic student absenteeism;
- educational access in justice facilities;
- civil rights coordinators;
- sworn law enforcement/school resource officers; and
- access to distance education courses, credit recovery, and dual enrollment/dual credit programs.

OCR looks for opportunities to eliminate items from the CRDC when those data may be available from other ED sources. For example, to reduce the burden on LEAs, beginning with the 2009-10 CRDC, LEAs are no longer required to report disaggregated school data on the number of students served under the Individuals with Disabilities Education Act (IDEA) by disability category or educational environment. Instead, the CRDC uses the data that LEAs submit to the applicable state education agency (SEA) for required reporting under the IDEA. Likewise, high school completer data are no longer collected by the CRDC because ED already collects those data from SEAs through the *EDFacts* collection (CRDC

The 2015-16 Civil Rights Data Collection

The 2015-16 CRDC survey included two levels of data, LEA and School, each with two parts. The sections in each of the survey parts are listed below.

LEA

Part 1 – LEA Level

Section I: Students and Characteristics

Section II: Early Learning, Preschool, and Kindergarten

Part 2 – LEA Level

Section I: Distance Education

Section II: High School Equivalency Exam Preparation Programs

School

Part 1 – School Level

Section I: School Characteristics

Section II: Student Enrollment

Section III: Classes, Course Enrollment, and Program Enrollment

Section IV: School Staff

Part 2 – School Level

Section I: Algebra I Passing

Section II: Credit Recovery

Section III: SAT Reasoning Test, ACT, and Advanced Placement Exams

Section IV: Chronic Student Absenteeism

Section V: Student Retention

Section VI: Single-Sex Interscholastic Athletics

Section VII: Student Discipline

Section VIII: Offenses

Section IX: Harassment or Bullying

Section X: Restraint and Seclusion

Section XI: Teacher Absenteeism

Section XII: School Expenditures

Section XIII: Items for Justice Facilities Only

¹ Discrimination on the basis of race, color, and national origin is prohibited by Title VI of the Civil Rights Act of 1964; sex discrimination is prohibited by Title IX of the Education Amendments of 1972; discrimination on the basis of disability is prohibited by Section 504 of the Rehabilitation Act of 1973; and age discrimination is prohibited by the Age Discrimination Act of 1975. OCR also has responsibilities under Title II of the Americans with Disabilities Act of 1990 (prohibiting disability discrimination by public entities, whether or not they receive federal financial assistance). In addition, OCR enforces the Boy Scouts of America Equal Access Act (Section 9525 of the Elementary and Secondary Education Act of 1965, as amended by the No Child Left Behind Act of 2001). For more information on the relevant civil rights laws, see <https://www2.ed.gov/about/offices/list/ocr/aboutocr.html>.

2016a).² Each CRDC must go through the OMB approval process prior to the start of a collection. As part of this process, the public—including all data reporters—may submit comments to OMB regarding the content and reporting burden of the collection. Comments may include suggestions for alternate sources for the required data.

How Are the Data Used?

The data reported to OCR through the CRDC are used to support OCR's efforts to administer and enforce the nation's civil rights laws that prohibit discrimination in programs or activities within public schools that receive federal financial assistance from ED. In the eight years spanning 2009 and 2016, OCR received an average of 9,500 complaints each year, and OCR's ten regional offices monitored, on average, 2,000 resolved cases a year to ensure compliance with resolution agreements. The CRDC provides OCR with the data needed for initial fact-finding when investigating civil rights complaints. The data are also used in compliance reviews to check for potential violations. OCR provides technical assistance to agencies that may be at risk of receiving civil rights complaints.

OCR also uses the data to identify nationwide trends in civil rights compliance and detect emerging issues of concern. After the data are reviewed and analyzed, they are provided to the public in three main formats: published reports, the reporting website, and a data file. In addition, press releases provide quick summaries of trends detected in the data reported through the CRDC. See figure 1.

Figure 1. Excerpt from a 2014 press release, available at <http://www.ed.gov/news/press-releases/persistent-disparities-found-through-comprehensive-civil-rights-survey-underscore-need-continued-focus-equity-king-says>

- Nationwide, 2.8 million K-12 students received one or more out-of-school suspensions—which is a nearly 20 percent decrease from the number of out-of-school suspensions reported two years ago.
- Black preschool children are 3.6 times as likely to be suspended as are white preschool students. In kindergarten through the 12th grade, black students are nearly four times as likely to be suspended as are white students. Black students also are nearly twice as likely to be expelled—removed from school with no services—as are white students.
- Students with disabilities are more than twice as likely as students without disabilities to be suspended in K-12 settings. They also represent two-thirds of students who are secluded from their classmates or restrained to prevent them from moving—even though they are only 12 percent of the overall student population.
- More than half of high schools do not offer calculus, four in ten do not offer physics, more than one in four do not offer chemistry, and more than one in five do not offer Algebra II, which is considered a gateway class for success in college. By many measures, some student groups are more likely than others to miss out on these opportunities:
 - Only a third of high schools with high black and Latino enrollments offer calculus, compared to 56 percent of those that serve low numbers of black and Latino students.
 - Less than half the high schools with high black and Latino enrollments offer physics, while two in three high schools that have low numbers of black and Latino student offer physics.
 - English learners have disproportionately low participation rates in Gifted and Talented Education (GATE) programs: while English learners are 11 percent of all students in schools offering GATE programs, fewer than 3 percent of GATE students nationwide are English learners.
 - Black and Latino students also participate at lower rates in Gifted and Talented Education (GATE) programs. Although black and Latino students make up 42 percent of students enrolled in schools that offer GATE programs, they are only 28 percent of the students who participate in those programs.
 - Girls are underrepresented in some advanced coursework such as physics, but not in others such as calculus.
- 10 percent of the teachers in schools with high numbers of black and Latino students are in their first year of teaching, compared to only 5 percent in schools with low numbers of black and Latino students.

² ED*Facts* is an ED initiative to centralize the collection and availability of performance data provided by SEAs. For more information, see <https://www2.ed.gov/about/inits/ed/edfacts/index.html>.

OCR publishes various reports that focus on key education issues. These include downloadable “data snapshots” and online, interactive “data stories.” For example, in 2014 ED released a data snapshot report on early childhood education based on 2011-12 CRDC data reported by LEAs through the CRDC. The report presented the data on suspension rates for preschool children, showing that Black children and boys were disproportionately suspended from preschool programs (ED 2014).³ Likewise, in 2016 ED released an online interactive data story titled *Chronic Absenteeism in the Nation’s Schools: An unprecedented look at a hidden educational crisis*. This report, based on 2013-14 CRDC data, revealed that one in seven public school students were chronically absent, meaning they missed 15 days or more of school (ED 2016a).⁴ These reports attracted significant attention from the media and national advocacy groups.

Accessing Civil Rights Data Online

OCR provides public access to civil rights data reported through the CRDC at <http://ocrdata.ed.gov/>. The website allows users to access reports on specific schools and districts, or drill down into detailed disaggregated data. A number of preformatted reports on the topics of English language learners, discipline, and educational equity can be generated for schools and school districts. In addition, the website provides reports on state and national estimations (or projections). Users can compare state estimations with those of other states or the nation as a whole. A user guide is available on the website.

In addition to publishing reports, OCR also makes the data available to the public through an online reporting tool found at <http://ocrdata.ed.gov/>. Users may search for data on a specific school or district, analyze the data using the available online data analysis tools, and create data reports. The website allows users to view and summarize the submitted data in several ways, as well as export data tables for analysis. Some organizations may use the data to produce reports that ultimately help shape education policy and practices. SEAs and LEAs may find some features of OCR’s online reporting tool useful, such as the ability to compare specific indicators across entities or view SEA and national estimations for key data elements, such as college and career readiness indicators.

Some of the data that LEAs report in the CRDC must now also be published in SEA, LEA, and school report cards (ED 2017). The reauthorized ESEA, also known as the Every Student Succeeds Act, requires SEAs and LEAs to include in the report cards specific information on measures of school quality, climate, and safety, including information for all students and student subgroups for the following data elements:

- In-school suspensions
- Out-of-school suspensions
- Expulsions
- School-related arrests
- Referrals to law enforcement
- Chronic absenteeism, including both excused and unexcused absences
- Incidents of violence, including bullying and harassment

³ *Data Snapshot: Early Childhood Education*. Issue Brief Number 2, March 2014. <https://www2.ed.gov/about/offices/list/ocr/docs/crdc-early-learning-snapshot.pdf>

⁴ *Chronic Absenteeism in the Nation’s Schools: An unprecedented look at a hidden educational crisis*. Initially released in June 7, 2016. Updated on October 27, 2016. <https://www2.ed.gov/datastory/chronicabsenteeism.html>

Chapter 2:

Challenges and Opportunities in Reporting Civil Rights Data

For many LEAs, the CRDC presents a number of reporting challenges:

- One challenge lies in the *size and scope of the collection*. The CRDC is one of the U.S. Department of Education's largest data collections. Approximately 100 data cells need to be filled at the LEA level, and about 1,650 data cells need to be filled at the school level. The actual number of cells that need to be filled at the school level may vary, however, as some data elements may not apply to all schools. For example, data concerning high school courses do not need to be reported for elementary schools.
- In addition to its size, the *variety of data collected* in the CRDC may also present a challenge for some LEAs, as data may need to be pulled from multiple data sources.
- Some LEAs may find that their *reporting dates for snapshot enrollment data are different* from the reporting dates for the CRDC. For example, many LEAs in Texas use the last Friday in October as the reporting deadline, rather than the CRDC October 1 date.
- The *nuances in the definitions* of some CRDC data elements adds another layer of complexity. The definition for a CRDC data element may vary slightly from the definition of a similar data element collected by the LEA, resulting in the need for a thorough analysis to accurately identify the appropriate LEA source for the CRDC data. For example, out-of-school suspensions reported for the CRDC may include suspensions in which the student is receiving educational services in an alternate setting. Some LEAs may not include students receiving educational services at an alternate site in their out-of-school suspension counts.

These challenges can result in a significant amount of staff time needed for CRDC reporting. This chapter details specific factors that can impact the amount of time required to report data for the CRDC, and highlights special considerations for maintaining data quality. In addition, this chapter examines the emerging role of the state education agency (SEA) in voluntarily supporting LEAs with CRDC reporting.

Time Required for CRDC Reporting

The basic process for CRDC reporting includes the following steps:

1. Map the required CRDC data elements to the locations where the corresponding data are stored in the LEA's data systems and create collection mechanisms for new data elements, if needed.
2. Pull (extract) the necessary data from the data systems.
3. Aggregate data as needed (for example, an LEA may aggregate student-level data for school-level reporting).
4. Combine the data in the proper sequence.
5. Format the file (if submitting a flat file).

6. Submit the data using the CRDC Online Submission System, by either loading flat files into the system or manually entering data into the online survey forms.
7. Review the data submission and correct any errors.
8. Certify the submission.

The time required to complete the reporting process varies across agencies. Although the size of a district may impact the amount of time needed to report the data, it is not necessarily the most significant consideration in predicting how much staff time an agency will need to devote to CRDC reporting. One key factor is the extent to which the SEA voluntarily prepopulates data in the CRDC Online Submission System. As discussed later in this chapter, some SEAs have sufficient staff capacity to prepopulate as much as 40 to 99 percent of the data needed for the CRDC for their LEAs. The majority of LEAs do not receive SEA assistance, however. The various factors other than SEA support that can impact an LEA's time requirement for CRDC reporting are outlined below.

Staff Expertise

Ideally, the LEA staff person responsible for CRDC reporting will have prior experience with the collection and in-depth knowledge of the LEA's data systems. It is important for staff to understand the intent of the collection and how the data elements are defined. This will help ensure that the proper data are reported, as definitions may vary among similar data elements. For example, data elements related to discipline will differ according to whether the count needed is for unduplicated discipline incidents or for the number of students disciplined. The less knowledge and experience the staff person has with the CRDC, the longer it will take him or her to report accurate data.

LEAs that have data governing boards may find it helpful to engage their governing board members at the beginning of each CRDC reporting cycle. Each governing board member will have expertise on data related to a particular program area. These individuals will likely be useful in translating the data definitions of the CRDC to the LEA's data definitions and identify the proper data sources.

Changes to LEA Data Systems

Most education agencies maintain education data in a variety of data systems that are used to manage the daily operations of the agency. Typically, LEAs maintain student enrollment, grades, and schedules in a student information system (SIS). Some LEAs have separate systems for collecting and maintaining data on student discipline and special education services. School, staff, and finance data are each usually maintained in discrete data systems. Any changes made to the LEA's source data systems since the last time the CRDC was completed will result in additional time required to remap the CRDC data elements to the new LEA source data systems and rewrite procedures for pulling and assembling the data.

Ability to Automate the Data Extracts

The extent to which an LEA has automated extraction routines to pull data from the LEA systems for the CRDC will greatly impact the amount of time required to complete the reporting. If there is no option for an automatic extraction of the data, the data will need to be either manually entered into a flat file that has been formatted to the CRDC flat file specifications, or manually entered into the survey forms in the CRDC Online Submission System.

Changes in the CRDC Collection

Changes to the data elements needed for the CRDC will affect the amount of time needed for LEAs to report the data to OCR. When new data elements are added, LEAs will first need to determine whether the data are currently collected from their schools. If the data are already collected from the schools, then LEA staff will need to update existing extraction routines to include the new data elements in the data files to be submitted for the CRDC. If the data are not already collected, the LEA will need to update the collection process from its schools to include the new data elements. The LEA will also need to enable the appropriate data systems to store the new data. LEAs may need as much as two years of lead time to incorporate new data elements into their data collections from schools.

Although OCR strives to provide as much lead time as possible for LEAs to adapt to changing requirements, critical policy needs may require that changes be made quickly. OCR attempts to mitigate the impact of new data elements on LEAs by usually making the reporting of new elements optional in the first year they are collected, and providing technical assistance for reporting new data elements. It should be noted that the U.S. Office of Management and Budget (OMB) requires all agencies to publicly announce all proposed data collections well in advance of the collection. SEAs and LEAs have the opportunity to comment on the availability of the proposed data elements at that time.

Vendor Support

Some LEAs receive assistance with CRDC reporting from the vendors who support the LEAs' data systems. Depending on the contractual agreements, some vendors can develop the extraction routines and prepare the data for submission to the CRDC Online Submission System. OCR is not able to work directly with vendors because reporting is the responsibility of LEAs, and only designated SEA and LEA personnel may officially submit data to OCR. However, vendors can access and use all of the templates and technical assistance documents available at the CRDC Resource Center (<http://crdc.grads360.org>). A vendor's interpretation of the collection definitions and requirements will greatly impact the quality of the LEA's CRDC submission. Vendors need in-depth knowledge of the CRDC in order to write proper extraction routines. Ultimately, LEAs are responsible for their CRDC submissions, and they will want to ensure that the vendor understands the data requirements.

Another consideration when working with vendors is how to manage errors that are found in vendor-created file templates that LEAs may use to produce their flat files. Once the submission window opens for the LEA, weekly conference calls with the vendor may be helpful to address the warnings and errors that are triggered in the CRDC Online Submission System when a file is submitted. Vendors will need to review the programming used in creating the template in order to troubleshoot any problems, and then fix the file template so that LEA staff can generate a corrected flat file. LEA staff can write queries or run SIS reports to compare the data retrieved using the updated file template against the data retrieved using the original template.

Maintaining Data Quality

At least two of the factors that impact the amount of time required for LEAs to complete the CRDC also impact the accuracy of the data that are reported for the CRDC. Using experienced staff to respond to the CRDC will help ensure that the data elements are properly mapped to the data in the LEA's source data systems, thereby improving data accuracy. Also, changes to the CRDC collection will impact data quality. LEAs may find it difficult to ensure good data quality for new data elements added to the CRDC. It may take up to two years before LEAs are able to report accurate data for a new data element. OCR typically presents new data elements as optional during the first reporting cycle to allow LEAs time to develop sound data collection methods.

Another factor that may influence data quality is how widely the data are used. LEAs have methods for ensuring the quality of all data they collect from their schools, and all LEAs certify that the data reported for the CRDC are of good quality. However, it is possible that data elements that are used by the LEA for multiple purposes may be of somewhat better quality than those used solely for CRDC reporting. This is true because each time data are used they are subjected to review and analysis by the data user.

Common Data Definitions

Many LEAs and SEAs have long advocated for the use of common data definitions by data collectors, including OCR and other offices within ED. LEAs and SEAs are likely to report better quality data when data collectors use standard data definitions, such as those used by *EDFacts* or the Common Education Data Standards (CEDS).⁵

The Emerging Role of SEAs in the CRDC

During the 2013-14 CRDC, OCR offered a pilot program for SEAs to voluntarily support their LEAs in CRDC reporting, primarily through prepopulation of the data. This effort came out of the recognition that over the past decade SEAs had increasingly been collecting and storing at least some of the data required by the CRDC in their statewide data systems. Some SEAs were seeking ways to fully leverage their data systems to help reduce the reporting burden of their LEAs. Eight states volunteered for the pilot for the 2013-14 collection. Building on the success of the 2013-14 pilot, OCR again offered SEAs the ability to prepopulate data in the CRDC for the 2015-16 CRDC. Eleven SEAs formally volunteered to assist their LEAs with that collection. These SEAs were generally able to provide anywhere from 40 to 99 percent of the data needed for the CRDC.

Prepopulation is not the only way that SEAs can support their LEAs with CRDC reporting. The general types of support that SEAs have provided include:

- communications and outreach, through which SEAs provide informational support to their LEAs;
- technical assistance for developing crosswalks between the CRDC and LEA data systems;
- providing LEAs with extracts of data from the state data system, which the LEAs can then format as needed and submit for the CRDC; and
- prepopulation of data on behalf of LEAs.

⁵ CEDS is an education data standards initiative whose purpose is to streamline the understanding of data within and across P-20W institutions and sectors. The CEDS initiative offers standard definitions for education data elements. For more information, see <https://ceds.ed.gov>.

See figure 2 for a list of specific actions that SEAs may voluntarily choose to take to assist their LEAs with CRDC reporting.

OCR does not provide financial compensation to states participating in CRDC reporting, nor does OCR expect all states to participate. For states that wish to participate, OCR provides technical assistance as well as a forum in which it regularly communicates with SEAs. SEA prepopulation of data can greatly reduce the reporting burden for its LEAs, and OCR has found that all LEAs that received any type of support from their SEAs were able to complete and certify the CRDC on time.

Figure 2. Examples of how SEAs can voluntarily support their LEAs. Taken in part from a resource, on the Civil Rights Data Collection's Grads360 website, titled *Ways States Can Support their LEAs with the CRDC*, available at <https://crdc.grads360.org/services/PDCService.svc/GetPDCDocumentFile?fileId=18811>

Communications

- Pass on information from the OCR to LEAs about the CRDC—including due dates, which data are collected, and where to find help.
- Send regular email updates highlighting resources available to LEAs or addressing topics of interest.
- Assist CRDC support staff in resolving errors in the LEA and school universe.
- Give CRDC support staff up-to-date contact information for each LEA.
- Provide information about the CRDC—including data definitions and file layouts—to SIS vendors in the state.
- Host a webinar or series of webinars about the CRDC submission process.

Planning Support

- Provide a crosswalk between state data collections and CRDC items to assist LEAs in knowing where to pull data.
- Provide a crosswalk of SEA course codes to CRDC subject areas.

Data Support

- Prepopulate data where possible, based on data collected by the state, on behalf of the LEAs.
- Prepare data reports or data files for LEAs to use in their CRDC submissions.

Reasons to Engage

- Help to reduce the data burden on LEAs and schools.
- Help to improve the timeliness and quality of data submitted to the CRDC.

Chapter 3:

Reporting Civil Rights Data

This chapter provides an overview of how local education agencies (LEAs) report data for the Civil Rights Data Collection (CRDC), and how some state education agencies (SEAs) voluntarily assist their LEAs with CRDC reporting. The six case studies included in this chapter offer a closer look at how some LEAs manage their CRDC reporting, either with or without SEA support. In addition, Appendix A presents four process diagrams that show the reporting process for (1) LEAs that report CRDC data with no assistance from vendors or the SEA; (2) LEAs that report CRDC data with vendor assistance; (3) LEAs that report CRDC data using data files provided by the SEA; and (4) LEAs for whom the SEA prepopulates a portion of the CRDC data in the CRDC Online Submission System.

The CRDC Reporting Process

The CRDC reporting process includes many steps, such as identifying the schools for which data must be reported, mapping the required data elements to the LEA's appropriate source data system, preparing files for uploading into the CRDC Online Submission System or organizing data for manual entry into the online survey forms, submitting the data, responding to error messages received during the submission process, and reviewing and certifying the data. These steps are discussed below.


Verifying the Schools

In the year prior to the opening of a collection, LEAs are asked to verify the schools in their districts using the CRDC Advance Website support tool. The U.S. Department of Education's (ED's) Office for Civil Rights (OCR), which administers the CRDC, develops the list of schools for each district based on the prior CRDC as well as schools reported in NCES's Common Core of Data (CCD) collection.

Preparing the Data for Submission

The first step in preparing to submit data for the CRDC is to review the data to be collected. Each CRDC collection may be slightly different, as elements may be added or deleted. OCR provides a change summary that clearly identifies what has changed from the prior collection. The definitions for any new data elements will need to be carefully reviewed.

Next, LEAs must map the data elements needed for the CRDC to where the data are stored in the LEA's data systems. In most LEAs, the bulk of the data will be entered using batch uploads. The flat files used in the batch uploads must meet the formatting specifications established for the CRDC. Many LEAs use some form of automation to extract the necessary data from their data systems and format the data for submission. These data extraction and formatting routines may be developed by LEA staff or by the LEA's data system vendor. In some cases, LEAs may choose to enter some or all of the data manually into the online forms. In these instances, LEAs will need to prepare the data for submission by identifying the source for the required data elements, retrieving the data, and performing any calculations needed to obtain the required values for reporting.



If an SEA voluntarily prepopulates some of the data for the LEA, the LEA will need to know which data the SEA will provide and which data the LEA will need to submit. The SEA will prepopulate available data into the CRDC Online Submission System prior to when the LEA begins submitting data. If necessary, the LEA can correct data submitted by the SEA. The LEA is then responsible for entering all remaining data.

Submitting the Data

LEAs report their civil rights data to OCR using the CRDC Online Submission System. Once the CRDC Online Submission System opens for LEA submissions, LEAs can begin uploading the data files into the system and manually entering any data that are not included in one of the flat files. OCR provides a variety of technical assistance resources for data submitters, including submission check sheets, sample flat files, and templates for flat files. A partner support center is also available to respond to specific questions from SEAs and LEAs and assist them with their data reporting. All LEAs have 75 calendar days to submit their data for the CRDC.

Responding to Edit Checks

There are two points in the CRDC cycle when data checks occur. The first point is when the data are entered into the CRDC Online Submission System. The system conducts real-time checks of the data and produces warning and error messages for the data submitter. The system also generates automated error reports that pinpoint where errors are located. After every collection, OCR refines and improves system checks to help ensure data quality.

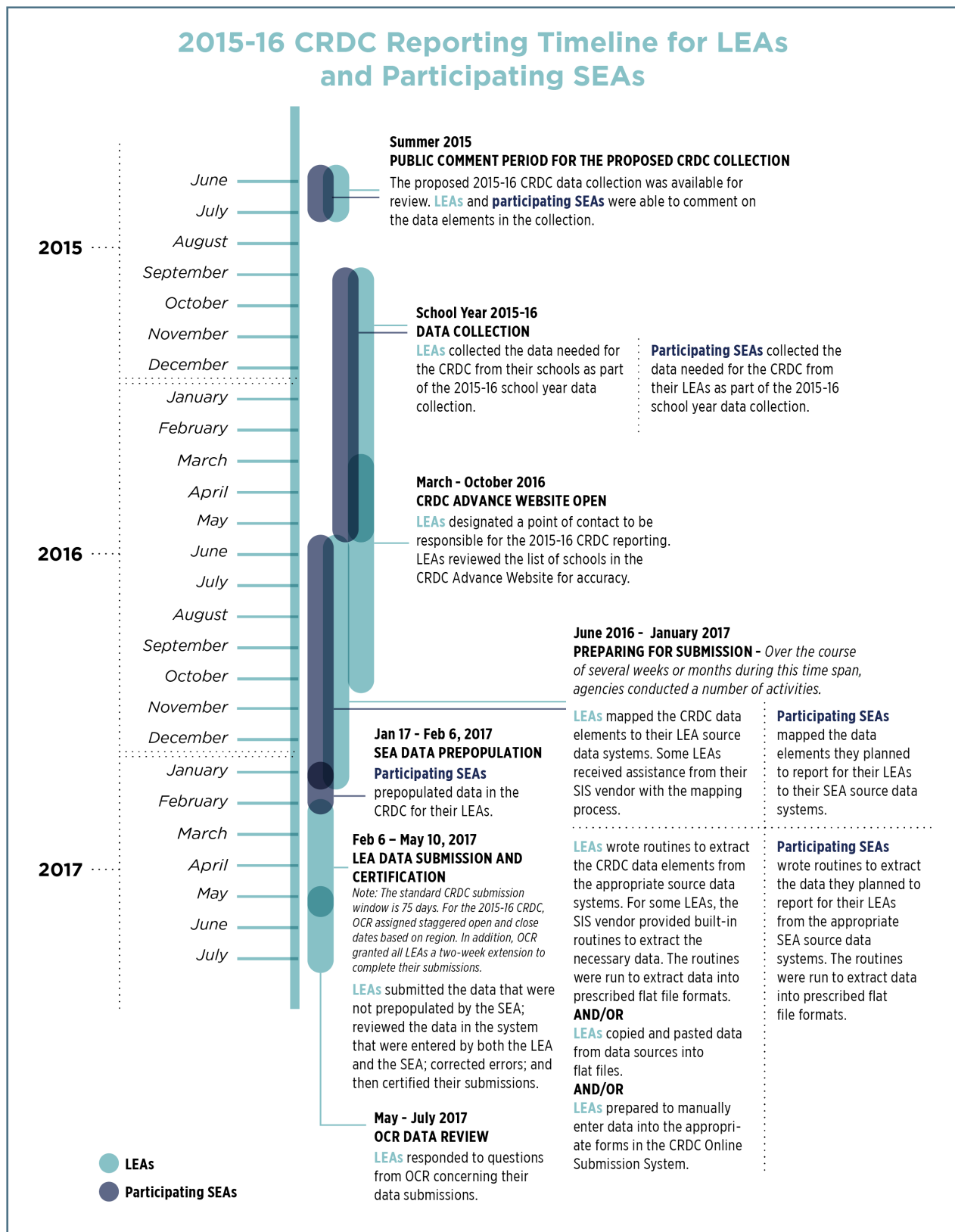
The second point at which data checks occur is after the submission window is closed and submissions have been certified. OCR staff review all of the data reported by LEAs. Typically, reviewers will look for discrepancies between the recently submitted data and the data submitted in the previous CRDC as well as any data outliers. LEAs are given the opportunity to explain or correct any data anomalies.

Certifying the Submission

After all of the data are loaded or entered into the system and error messages are addressed, LEAs certify in the system that the submission is complete and accurate. A data submission cannot be certified unless the data are complete and all system-detected errors have been corrected or properly explained. LEAs are responsible for certifying all of their data, including any data that may have been prepopulated by the SEA.

Figure 3 (next page) presents an overview of the reporting timeline for LEAs for the 2015-16 CRDC. It also shows the reporting timeline for participating SEAs that voluntarily prepopulated data in the CRDC system for their LEAs.

Figure 3. 2015-16 CRDC Reporting Timeline



Case Studies

The case studies presented in this guide detail the actual experiences of LEAs in reporting the data required for the CRDC. The case studies are grouped according to CRDC Collection Year; case studies 1-2 are from the 2013-14 Collection Year, and case studies 3-6 are from the 2015-16 Collection Year. The case studies comprise a range of models for how LEAs manage CRDC reporting. These include LEAs that have limited capacity to automate the preparation of their files for CRDC reporting and/or receive no assistance from their SEA or data system vendor, as well as LEAs for which the SEA submits most of the required data for the CRDC. Each case study includes the information outlined below.

- An overview of the LEA for which the case study is written, including the number of schools in the LEA, total student enrollment, and the percentage of students who are English language learners or students with an Individualized Education Program (IEP).
- The CRDC collection year for which the case study is written.
- An overview of the data sources the LEA used for CRDC reporting.
- A description of the type of assistance received from the SEA or data system vendor.
- The approximate percentage of data reported to the CRDC by the LEA and SEA.
- A description of the LEA's overall reporting burden, including the LEA staff involved in CRDC reporting along with a total, approximate number of staff hours needed for CRDC reporting.
- A description of the LEA's CRDC reporting process.
- For LEAs that received voluntary assistance from the SEA, an overview of the SEA, including the number of LEAs in the state and the total number of students enrolled, and a description of the SEA's reporting process.
- A description of the lessons learned for streamlining the reporting process and reporting accurate data.

Case Study #1. Bossier Parish Schools (Louisiana)

LEA Overview

Bossier Parish Schools has 33 schools in the district and a student enrollment of approximately 22,000. About 3 percent of the students are English language learners and about 12 percent are students with IEPs.

CRDC Collection Year

2013-14 CRDC

LEA Data Sources

The student data that Louisiana LEAs report to the SEA consist of unit records that have much of what the CRDC requires, such as student demographics; enrollment history; attendance totals; limited English proficiency (LEP) indicators; special education information, including students with disabilities served under Section 504 of the Rehabilitation Act of 1973; discipline events with actions taken; snapshot class schedules; and high school transcript data. The data reported to the state comes from local SISs, so it is feasible to complete much of the CRDC by utilizing vendor extracts or LEA queries against the local database. Other possible approaches include querying the source data files used for state reporting, and/or utilizing any feedback data files provided by the SEA. Bossier Parish Schools chose to use the feedback data files provided by the SEA because these data files were more readily available and in a format more suitable for CRDC reporting purposes.

In addition to building queries from state feedback reports to complete the student and staffing portions of the CRDC, the district also sought input from the local finance department, which computed the required financial elements using their department resources. Other information that was not in state feedback reports nor in any local database was obtained by surveying local program offices for either summary data (e.g., school athletics data) or paper reports (e.g., bullying investigation forms). This information was compiled into the proper format and manually entered into the Excel template provided by OCR for inclusion in the batch upload.

SEA or Vendor Assistance

No assistance was received from the SEA or from a vendor.

Percentage of Data Reported, by Source

LEA: 100 percent


SEA: 0 percent

LEA Reporting Burden

One LEA staff person was responsible for compiling and reporting the data needed for the CRDC. The total number of hours spent on preparing the data for submission, submitting the data, correcting any errors, and certifying the report came to approximately 250.

LEA Reporting Process

The state-reported data used to help complete the CRDC were originally submitted by the LEA to the SEA in either separate collections, or in separate tables or records within a single collection. All collections had a unique state identifier and a local identifier as part of each student record. The LEA compiled all pertinent CRDC data into a set of tables within a PC software applications database. The database software had built-in functionality to create and run



crosstab queries.⁶ A single crosstab query with inner joins (on student ID) between tables that had unit record data was created to produce the information needed in the proper format to complete a single CRDC table.

The LEA created one or more separate crosstab queries for each specific CRDC table. It typically took three queries to complete each table: one to do the racial breakdown, another to do the English language learner counts, and another to do the counts of students with disabilities. To complete the 2013-14 CRDC, over 200 queries were created.

The LEA used the CRDC spreadsheet template to organize and upload the data. This approach allowed the LEA to gather the required data offline and use the copy/paste function to reduce the likelihood of data entry errors, and then use the functionality of the spreadsheet to create the flat file for upload. This minimized the time spent online when the CRDC Online Submission System could be slow, such as during peak times near deadlines.

Lessons Learned

The district found that the biggest challenge in CRDC reporting was the time it took to write and run the hundreds of queries needed to complete the report. However, most of the queries could likely be reused against an updated data source for future reporting. In addition, the district found that using the OCR-provided template to prepare data files for submission was much easier than entering data manually for multiple schools.

⁶ A crosstab is a function that combines data from one or more sources into a concise format for analysis or reporting. Crosstabs typically display the joint distribution of two or more variables. For example, using the unique student identifier as the common variable, a crosstab might pull demographic data about the students, such as sex, from an enrollment database and combine it with course enrollment data to produce a report that shows the number of students enrolled in a particular course by sex.

Verifying the Completeness and Accuracy of CRDC Data

Recommendations from Bossier Parish Schools

Prior to an LEA's certification of the CRDC submission, the data must be complete and error free. The CRDC School Submission Form within the CRDC Online Submission System can be used to verify completeness. Users can select a school they wish to check, and the form will show the "Percentage of Required Cells Filled" for each module in the survey. If the data are not required for a particular module, an "N/A" (not applicable) will show in the field. There is also a checkbox that LEAs can use to indicate when they have finished entering data. However, if the percentage of required cells filled is less than 100 percent, it would not make sense for the LEA to indicate that data entry is complete.

To check that the submission is error free, LEAs can use the Current Submission Status Form. This form shows the total completeness of the survey (all modules combined) for each school in the district as well as for the LEA-level data. It also shows the error and warning count for each school. The user can drill down to the error report for each school to see the summary of warnings and errors by category, and then drill down further to see the errors and warnings within each category.

In cases of errors, the system requires resolution. The LEA should either correct incorrect values or explain the error condition by using the resolution reason codes (such as "Different Count Dates" or "High Mobility School") and providing explanatory comments. It is good practice to provide as much information as possible in the comments field in order to adequately explain the situation. Otherwise, the LEA may be contacted by the CRDC Partner Support for additional clarification.

In addition to resolving all errors, it is good practice to review warnings as well. Warnings often originate when values are not consistent over multiple questions. Investigating the warnings can help locate errors of omission. For example, if a school reports in the survey that they do not have preschool, but values for preschool enrollment are reported, a warning will show. Even values of zero can trigger the warnings if the survey is expecting no value (N/A). In order to clear this particular warning, either the preschool grade level indicator needs to be modified to "Yes" in the School Characteristics/Grades with Students Enrolled table and valid numbers (including zeros) entered in the various preschool count fields, or—if there are truly no preschool students—the grade level indicator should be "no" and the preschool count fields need to have no values (N/A); or an explanation for the discrepancy between data tables needs to be provided.

Case Study #2. Bonner Springs/Edwardsville Unified School District 204 (Kansas)

LEA Overview

Unified School District 204 in Bonner Springs/Edwardsville has seven schools in the district and a student enrollment of approximately 2,700. About 6 percent of the students are English language learners and about 13 percent are students with IEPs.

CRDC Collection Year

2013-14 CRDC

LEA Data Sources

Most of the data that were not prepopulated by the SEA for the instructional component of the CRDC were pulled from the district's SIS. Part of the reason that the district chose its particular SIS is because the vendor provided specific reports to help reduce the time needed for data reporting. Specifically, the company advertised on its website that "The Civil Rights Data Collection report is coded directly into your [Company Name] solution." Additional data needed for the CRDC came from the district's school accounting system, which is used for payroll and purchasing.

SEA or Vendor Assistance

The SEA prepopulated approximately 20 percent of the CRDC data into the CRDC Online Submission System. The LEA's SIS vendor provided the district with an extraction process that helped pull approximately 30 to 35 percent of the information needed for the CRDC from the LEA's SIS. The vendor also provided assistance in completing the extraction process through multiple webinars and online resources.

Percentage of Data Reported, by Source:

LEA: 80 percent

SEA: 20 percent

LEA Reporting Burden

The district's director of elementary instruction was responsible for CRDC reporting and coordinated the LEA's reporting process. Other individuals—including the payroll clerk, the district accountant, and the director of business—gathered information related to school personnel (such as licensure and absenteeism) and district financial data. The total time that LEA staff spent on preparing the data for submission, submitting the data, correcting any errors, and certifying the report came to approximately 100 hours. Much of the burden was related to submission errors. For the 2013-14 CRDC, many of the errors were caused by the need to add zeroes to the file, as blanks were not allowed if a valid count was required. Staff needed to manually go through each field and add zeroes where needed.

LEA Reporting Process

After the SEA prepopulated data into the CRDC and the CRDC Online Submission System opened for district data submission, the LEA reviewed and corrected the data prepopulated by the state and submitted the remaining data. Approximately 90 percent of the data reported by the LEA were submitted as batch loads of flat files. As noted above, the LEA used a vendor-provided template for extracting data from the SIS to create the necessary flat files. District staff aligned the specific fields that matched the data requested to the template. It was important to align the fields accurately, because if there was an error in a data field, it would not only cause that file to upload improperly, but also affect all data after that point. Other data needed for the CRDC that were not available from the SIS were manually pulled from the source data system and formatted for manual entry into the CRDC's online survey forms.

SEA Overview

The Kansas Department of Education (KSDE) has 286 LEAs and a total student enrollment of about 477,010.

SEA Reporting Process

The KSDE collects data from its districts through the Kansas Individual Data on Students (KIDS) reporting system. KIDS is the core data collection system that assigns the state student ID numbers. The goal of the KIDS system is to eliminate duplication of data reporting and support the management of longitudinal records for state and federal reporting and program monitoring. Some of the data collected in KIDS are needed for the CRDC. Beginning with the 2011-12 CRDC, the KSDE prepopulated the 28 questions below:

- LEA-01: Count of students
- LEA-02: Count of Schools
- LEA-12: Preschool Program Provided by the LEA Indicator
- LEA-14: Preschool Age for non-IDEA Children
- LEA-15: Preschool Eligibility-All Children
- LEA-16: Pre-school Eligibility-Student Groups
- LEA 17: Kindergarten Program Indicator
- SCH-01-1: Grades with Students Enrolled
- SCH-02: Preschool Eligibility-All Children
- SCH-08: Preschool Enrollment
- SCH-09: Enrollment of Limited English Proficient Students
- SCH-11: Gifted/Talented Education Programs
- SCH-12: Gifted/Talented Student Enrollment
- SCH-13: Classes in Algebra 1
- SCH-15: Classes in Geometry
- SCH-18: Classes in Mathematics Courses in High School
- SCH-20: Classes in Science Courses in High School
- SCH-25: Different AP-Advanced Placement courses
- SCH-50: Teachers-FTE Count and Certification
- SCH-51: Teacher years of experience
- SCH-52: School Counselors
- SCH-01-02: Middle School Students who Passed Algebra 1
- SCH-02: High School Students who Passed Algebra 1
- SCH-07: Student participation in SAT Reasoning Test or ACT
- SCH-09: Students who received a qualifying score on Advanced Placement AP Exams
- SCH-15: Preschool suspensions and expulsions
- SCH-32: Students Disciplined for Harassment or Bullying
- SCH-39: Full-term Equivalency Count and Salary Amount for Teachers funded with State and Local Funds

Lessons Learned

The size and timing of the CRDC contributed to the challenges for LEA reporting. During the spring, district staff are involved in many other activities, including state assessments, and staff must balance CRDC reporting with additional priorities. In addition, sufficient time needed to be allocated for uploading files to the CRDC Online Submission System. Staff had to be prepared for the possibility of limited access to the system if many other districts were attempting to upload files at the same time.

Case Study #3. Columbine Elementary (California)

LEA Overview

Columbine Elementary is a single-school district in Tulare County, CA, with a student enrollment of approximately 200. About 10 percent of the students are English language learners and about 2 percent are students with IEPs.

CRDC Collection Year

2015-16 CRDC

LEA Data Sources

Columbine Elementary does not have a student information system (SIS). Student data are stored in spreadsheets. Information is updated monthly as needed, and a spreadsheet is created for each month. Most of the CRDC data are included in the monthly spreadsheets for the collection year. Financial data are stored in a countywide system, and the district receives regular financial reports from the county. These reports are used as the data source for some of the CRDC data elements.

SEA or Vendor Assistance

No assistance was received from the SEA or from a vendor.

Percentage of Data Reported, by Source

LEA: 100 percent

SEA: 0 percent

LEA Reporting Burden

Two staff persons worked on CRDC reporting: the district superintendent and an administrative assistant. A total of approximately 40 staff hours were needed to prepare the data for submission, submit the data, correct any errors, and certify the report.

LEA Reporting Process

The administrative assistant reviewed the data elements to be collected, identified the appropriate spreadsheets and reports to be used as data sources, and prepared the data to be entered. The superintendent manually entered all of the required data into the online forms in the CRDC Online Submission System and certified the submission.

Lessons Learned

The district has found that given its size and the amount of data they are required to report, it is easier and faster to enter the data manually into the online forms than it is to create flat files for the data submissions. In addition, the district has found that new data elements significantly increase the amount of time needed for reporting, as the data elements must be accurately defined and located in the correct data source.

Case Study #4. Loudoun County Public Schools (Virginia)

LEA Overview

Loudoun County Public Schools has 91 schools and centers in the district and a student enrollment of approximately 79,000. About 16 percent of these students are English language learners and about 12 percent are students with IEPs.

CRDC Collection Year

2015-16 CRDC

LEA Data Sources

Most of the data for the 2015-16 CRDC came from the district's SIS. The following offices provided data for the collection: Career and Technical Education, Virtual Learning, School Administration, Testing and Diagnostic Services, Head Start, Gifted, Financial Services, Human Resources and Talent Development, Athletics, Discipline, and Counseling.

SEA or Vendor Assistance

The Virginia Department of Education populated most of the enrollment portion of the survey. However, the data for LEP, IEP, and Section 504 students were not included in the prepopulation. The SEA also sent periodic emails notifying the LEA of key dates in the CRDC timeline. The LEA does not contract with a vendor specifically for support in completing the CRDC submission; rather, the SIS vendor provides an extract tool with data fields mapped.

Approximate Percentage of Data Reported, by Source

LEA: 90 percent

SEA: 10 percent

LEA Reporting Burden

For the 2015-16 CRDC, multiple offices were involved in data reporting. Altogether, approximately 234 staff hours by two staff working full time and six staff working part time were needed to review the data submitted by the state, prepare the remaining data for submission, submit the data, correct any errors, and certify the report. Multiple submission trials were required before the report was completed.

LEA Reporting Process

Listed below are the steps in the reporting process that the LEA followed for the 2015-16 CRDC.

- Identify all required schools to be reported and preregister in the CRDC Advance Website.
- Review the requirements and definitions for the new data collection for 2015-16.
- Contact CRDC support with questions throughout the process as needed.
- Send out notices to appropriate designees within the LEA (Human Resources, Budget, Information Management, Offenses, Discipline, Athletics, Gifted and Talented, Math, Science, etc.).
- Convene an information session with participating staff regarding the CRDC requirements, such as due dates, specific documentation for each designee, and other details.
- Gather and extract enrollment, schedules, programs, testing, discipline, and other data points for processing by the Research Office.
- Collaborate with the SIS Information Management team to ensure the accurate use and interpretation of the data. Revise data extracts and processes as necessary from the SIS conversion and any new data collection items requested by the CRDC.

- Complete the quality assurance and quality control process.
- Prepare the CRDC flat file for upload.
- Format and upload the data received from designees.
- Run and correct error reports in conjunction with multiple uploads.
- Validate the reports with the schools and central office staff.
- Certify the CRDC report.
- Present the final results of the CRDC report to participants and key stakeholders.
- Archive the final report.

SEA Overview

The Virginia Department of Education has 132 LEAs and a total student enrollment of about 1.28 million.

SEA Reporting Process

The 2015-16 CRDC was the first collection for which the SEA was able to prepopulate CRDC data for its LEAs. The SEA had planned to create data files for CRDC submission if the data were previously collected from the LEAs as part of the annual state reporting requirements. For the 2015-16 CRDC, the SEA was able to prepopulate only portions of the enrollment data for its LEAs as a proof of concept before delving into a more comprehensive prepopulation effort for the next CRDC.

As with all state collections, each data element is defined to ensure that the data collected are reliable. In terms of using existing state data for the CRDC, the SEA recognized that there could be mismatches or slight variations in data definitions. If the SEA blindly submitted existing data for similarly named data elements, the reliability of state prepopulation would diminish significantly, which would ultimately lead to more work for the LEAs to certify the CRDC. To avoid that, the SEA needed to complete an element to element study before sending data to CRDC on behalf of the LEAs. For the limited amount of data the SEA was able to prepopulate for the 2015-16 CRDC, it required approximately 16 hours by one staff person working full time to prepare and submit the data, plus an additional 22 hours by SEA staff in program offices to review and validate the data prior to submission. Although the SEA began prepopulation efforts in mid-2016, it did not have sufficient available staff time to do more than a minimal prepopulation of enrollment data for the 2015-16 CRDC collection. Efforts continue, and the SEA is on target to prepopulate 50 percent or more of the CRDC data for the next collection.

Lessons Learned

LEA: The difficulties in completing the 2015-16 CRDC revolved around new staff who were not familiar with the CRDC process. This was resolved through information sessions with staff before the 2015-16 CRDC submission window opened, as well as ongoing follow-up during the data collection process.

SEA: The ability to prepopulate data in the CRDC is largely dependent on the availability of knowledgeable SEA staff both in Information Management and the program offices, as well as coordinated efforts of an LEA advisory group.

Case Study #5. Paulding County (Georgia)

LEA Overview

The Paulding County School District has 33 schools and a student enrollment of about 29,000. About 2 percent of the students are English language learners and about 1 percent are students with IEPs.

CRDC Collection Year

2015-16 CRDC

LEA Data Sources

Paulding County uses a single source SIS. Data from this system are used for mandated state reporting, such as the Full Time Equivalency (FTE) and Student Record collections. These two data collections were used to compile some of the data required for the CRDC. The LEA also used data received from other agencies and organizations, such as The College Board. Survey sections relating to teacher absenteeism and teacher salaries were given to the LEA's payroll department for completion, and sections relating to school expenditures were provided to the finance department for completion.

SEA or Vendor Assistance

The Georgia Department of Education assisted its LEAs with the CRDC by prepopulating pertinent data previously collected from the LEA.

Percentage of Data Reported, by Source:

LEA: 30 percent

SEA: 70 percent

LEA Reporting Burden

After the SEA provided prepopulation support, the Paulding County School District needed approximately 275 additional hours to create data queries to run the necessary reports and to manually enter the data into the online survey forms. If the SEA had not assisted, schools and the district would have spent considerable additional time completing the CRDC: assistance from the SEA saved approximately 3-4 hours per school in completing the CRDC. It also reduced the district-level reporting burden by approximately 1-2 hours per school. In addition, prepopulation of data by the SEA helped to reduce errors that could be caused by the manual entry process used by the district.

LEA Reporting Process

The first step in the reporting process was to review the data elements that had not been prepopulated by the SEA, and determine the source system for those elements. School staff were directly involved in entering data for the CRDC. The LEA sent a copy of the school sections of the survey to the schools so that school staff could see what was needed for the collection. The LEA created data queries that schools could run to pull the necessary data. A work session was held in a computer lab for each level of school (i.e., elementary, high school, etc.). During the work sessions, school staff entered data for their schools directly into the CRDC online survey forms. LEA staff were present at the work sessions to answer questions and help resolve errors.

SEA Overview

The Georgia Department of Education (GaDOE) has 207 LEAs and a total student enrollment of about 1.76 million.

SEA Reporting Process

The GaDOE began assisting its LEAs with the CRDC beginning with the 2011-12 collection. For that collection, the GaDOE provided reports to the LEAs containing the answers to about half of the questions in the survey. The LEAs could use these reports to manually enter the data into the survey. The LEAs then needed to identify the data sources for the remaining data elements and complete the remainder of the survey.

For the 2013-14 CRDC, the GaDOE participated in a pilot wherein states prepopulated data for their districts into the CRDC Online Submission System. Through this process, the SEA was able to provide about 70 percent of the data required for the survey. The SEA notified districts of its plan to enter data on their behalf, and districts were asked to not enter any data into the survey tool until the SEA had finished uploading data. Once the SEA uploaded the files and corrected any errors, the districts were informed that the GaDOE file upload process was complete and they could change any or all of the data that the GaDOE had uploaded.


The data that the SEA uploaded into the CRDC Online Submission System for its LEAs came from data that were previously reported to the SEA by the LEAs. The types of data the SEA collects from its LEAs fall into the following categories:

- Student Attendance and Enrollment Data
- Student Class Schedules
- Student Demographic Data
- Student Discipline Data
- Student Program Participation
- Staff Certification and Assignment Data
- Staff Demographic Data
- Private School Enrollment Data
- Quality Basic Education (QBE) Funding Data
- Career, Technical, and Agricultural Education (CTAE) End of Pathway Data

The actual collection process occurs using a system created by GaDOE. Each LEA selects an SIS vendor of its own choice. There are 11 SIS vendors in Georgia, with two of those vendors representing 92 percent of the districts. GaDOE provides each vendor with a file specification for each collection cycle to create the data extract. LEAs extract and upload the data required for state reporting purposes by using the state system's web portal, where validation rules are applied and reports are generated. All errors must be corrected before the LEA superintendent can certify the data as accurate and complete. Because the SEA is not responsible for reporting data for the CRDC, some data needed for the CRDC remain in each LEA's SIS and are not uploaded through the web portal. These data cannot be prepopulated and must be provided by each LEA.

Lessons Learned

LEA: Nuances in definitions of the data required for the CRDC presented challenges in finding and reporting the necessary data. For example, the CRDC defines "allegation" as a claim or assertion that someone has done something wrong or illegal, typically made without proof. However, the school district tracks bullying or harassment incidents *only* if the claim is substantiated; it does not track allegations only.



Reporting ACT and SAT scores for the CRDC also presented a challenge for the district. District staff had to review the data provided by The College Board in order to accurately report the data by sex, race/ethnicity, disability status, and limited English proficiency status. This took many staff hours.

Another lesson learned is that the printed version of the data collection elements were numbered, but the website version was not numbered. This presented a challenge when keying data from the data report based on the printed version into the online survey forms.

SEA: Initially, GaDOE found that the biggest challenge in assisting LEAs with CRDC reporting was finding enough resource time to write the queries to extract and format the necessary data to prepopulate the survey. Once the queries were written, prepopulation required less time in subsequent years.

Case Study #6. Clark County (Kentucky)

LEA Overview

The Clark County Public Schools school district includes nine schools and has a student enrollment of about 5,300 students. About 2 percent of the students are English language learners and about 13 percent are students with IEPs.

CRDC Collection Year

2015-16 CRDC

LEA Data Sources

Kentucky has a statewide SIS and a statewide financial system. The SEA and all of the LEAs in the state use the same SIS and the same financial system. This allows the SEA to extract data populated in the local SIS and financial system for required state reporting. Districts have the flexibility to customize their SIS and financial system at the local level to collect and store additional data beyond what is required for state reporting. Some of the additional data collected by Clark County were needed for the CRDC. The SEA was able to prepopulate 92 percent of the necessary data in the CRDC Online Submission System using the data it pulled from the local SIS and financial system. The LEA only needed to submit additional data that were not collected and used by the SEA for state reporting. This included data related to school and school support staff, school security staff, and discipline offenses.

SEA or Vendor Assistance

The SEA assisted with approximately 92 percent of the required data reporting. All other data was prepared and submitted locally without additional vendor assistance.

Percentage of Data Reported, by Source:

LEA: 8 percent

SEA: 92 percent

LEA Reporting Burden

The LEA's reporting burden for the CRDC was greatly reduced by the SEA's ability to prepopulate the majority of the required data. For the 2015-16 CRDC, one staff person spent approximately 15 hours total to prepare the data for submission, submit the data, correct any errors, and certify the report.

LEA Reporting Process


The SEA prepopulated 92 percent of the required data in the CRDC. Once the CRDC Online Submission System opened for LEAs to submit data, the LEA verified the data the state had reported during the SEA-defined validation window. When the state validation period was over, the LEA manually entered data into the remaining fields for which the SEA did not submit data. Once all data had been entered and verified, the LEA certified its report in the CRDC system.

SEA Overview

The Kentucky Department of Education (KDE) has 173 LEAs and a total student enrollment of about 655,500.

SEA Reporting Process

KDE and all of its districts use the same SIS. This allows KDE to access data in the local SISs. Kentucky also has a statewide financial reporting system. These two data systems contain much of the data required for the CRDC. For the



2011-12 CRDC collection, KDE was able to provide minimal support by creating a set of ad hoc queries that LEAs could use. The queries allowed LEAs to pull CRDC data elements for their schools from the local SIS in a way that was consistent across the state. For the 2013-14 CRDC, KDE extracted data from the state data system to prepopulate the CRDC for its LEAs. For that collection, the SEA was able to provide about 80 percent of school-related data and 50 percent of LEA-related data.

By refining its process for extracting the data, KDE was able to provide 95 percent of school-related data for the 2015-16 CRDC and 54 percent of LEA-related data—in total, 92 percent of all data. Data already in the LEA’s SIS or part of the district financial report were used to report to the CRDC. No additional data were collected by the SEA for the purpose of CRDC reporting. Kentucky created ETL (Extract, Transfer, and Load) scripts to pull data from the SIS in the CRDC format.

The steps in the KDE reporting process were as follows:

1. LEA and school data were collected and stored in the local SIS and financial reporting system.
2. These data were then available to the KDE, which extracted data from the system for uploading to the CRDC Online Submission System.
3. LEAs entered additional data and certified their CRDC reports.

KDE established a reporting timeline once OCR notified agencies of the collection window dates. KDE informed LEAs when the SEA completed its data upload and the KDE-established validation window was open. The validation window provided LEAs an opportunity to review the data, and it also reserved time for the state to reload data if necessary. If the SEA had to reload data, anything a district had loaded would be overwritten. During the district data entry period, the state served as a resource for LEAs to help answer questions until the CRDC collection window closed.

Lessons Learned

LEA: Prepopulation by the SEA through data extracts generally results in more accurate data than keying data into a flat file or the online survey forms. It is important that LEAs adhere to the state-established timelines, so the SEA conducts a number of trainings to ensure that LEAs are aware of the timeline and expectations. If an LEA does not follow the timeline and procedures, it may end up entering data that are ultimately overwritten if the SEA needs to reload data during the state-established validation period.

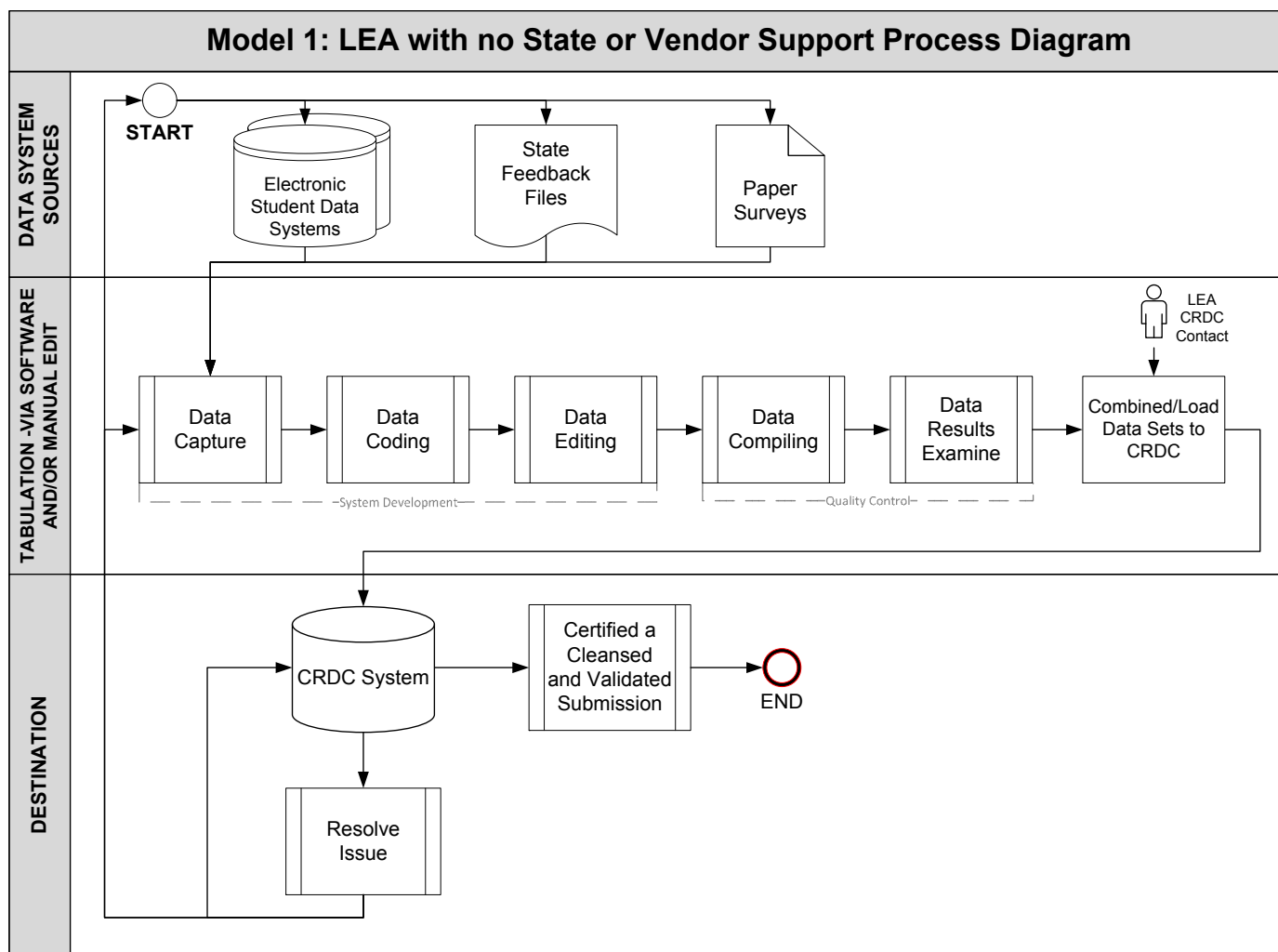
SEA: KDE found that prepopulating data for the CRDC for the first time was more work than expected. No additional staff were hired. Existing staff wrote the extracts, pulled the data, and entered the data into the CRDC Online Submission System. As much work as possible was done during the slower summer months preceding the CRDC collection window. Once the scripts were written to extract the data, the time requirement was lower. Changes to the biennial collection can create additional and ongoing difficulties, but communication and early planning can ease this burden. Communication throughout the process is a key component in successful reporting. KDE communicates with districts through webcasts and in-person trainings. A state CRDC web page (<http://education.ky.gov/districts/tech/sis/Pages/KY-CRDC.aspx>) is used as a one-stop shop for updates and information. LEAs are encouraged to use a team approach to CRDC reporting by involving applicable data stewards to help with reporting and validation.

Appendix A: Process Diagrams

The four process diagrams in this appendix visually depict the reporting process for the Civil Rights Data Collection. The first diagram shows the reporting process for a local education agency (LEA) that does not receive assistance from either a vendor or the state education agency (SEA). The second diagram shows the reporting process for an LEA that receives assistance from a vendor. The third diagram shows the reporting process for an LEA that receives data files from the SEA that can be used for CRDC reporting. The fourth diagram shows the reporting process for an LEA for which the SEA prepopulates data in the CRDC Online Submission System.

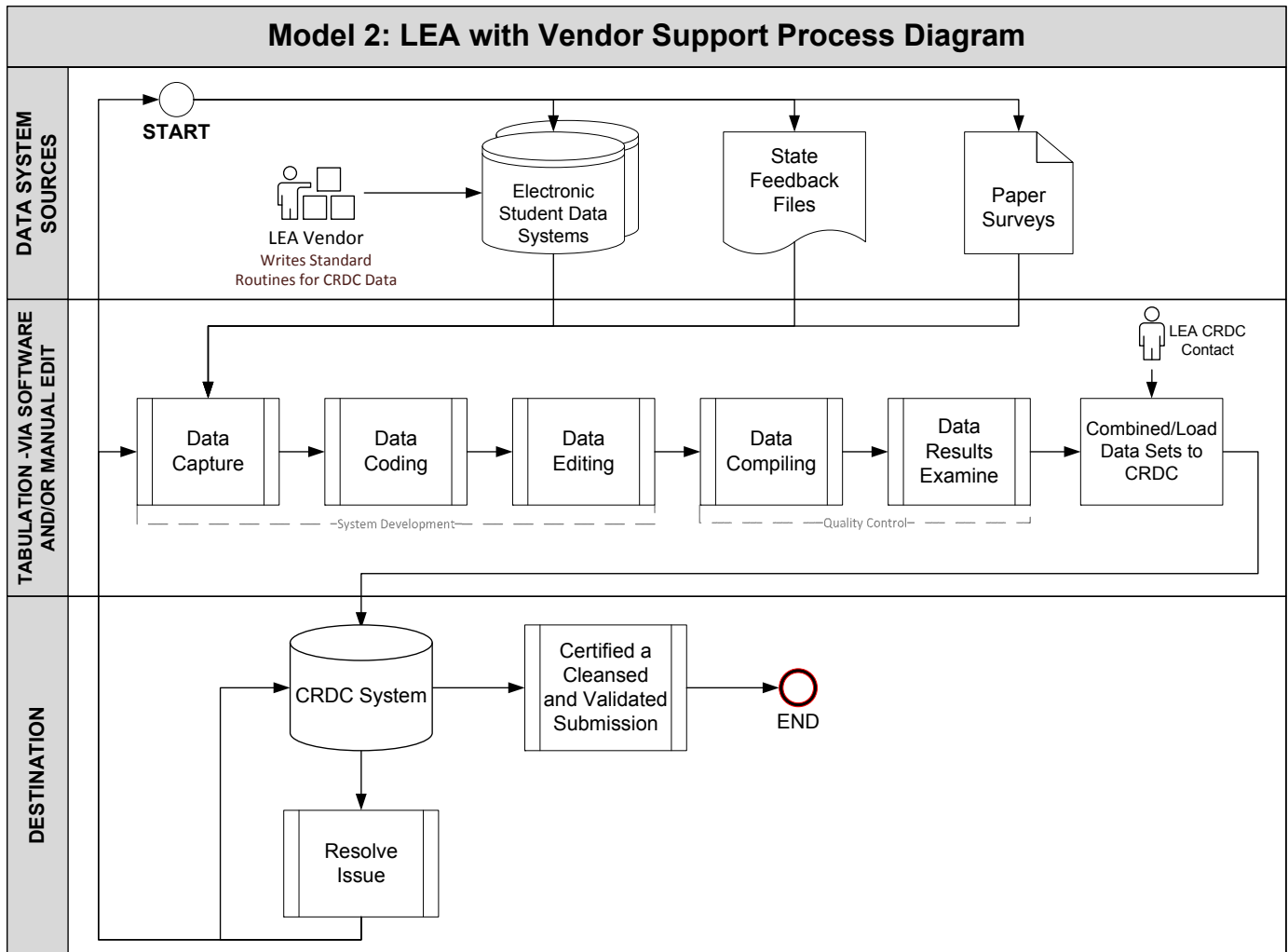
LEA with No Support

The diagram below shows the CRDC reporting process for an LEA that receives no support from a vendor or from the SEA.



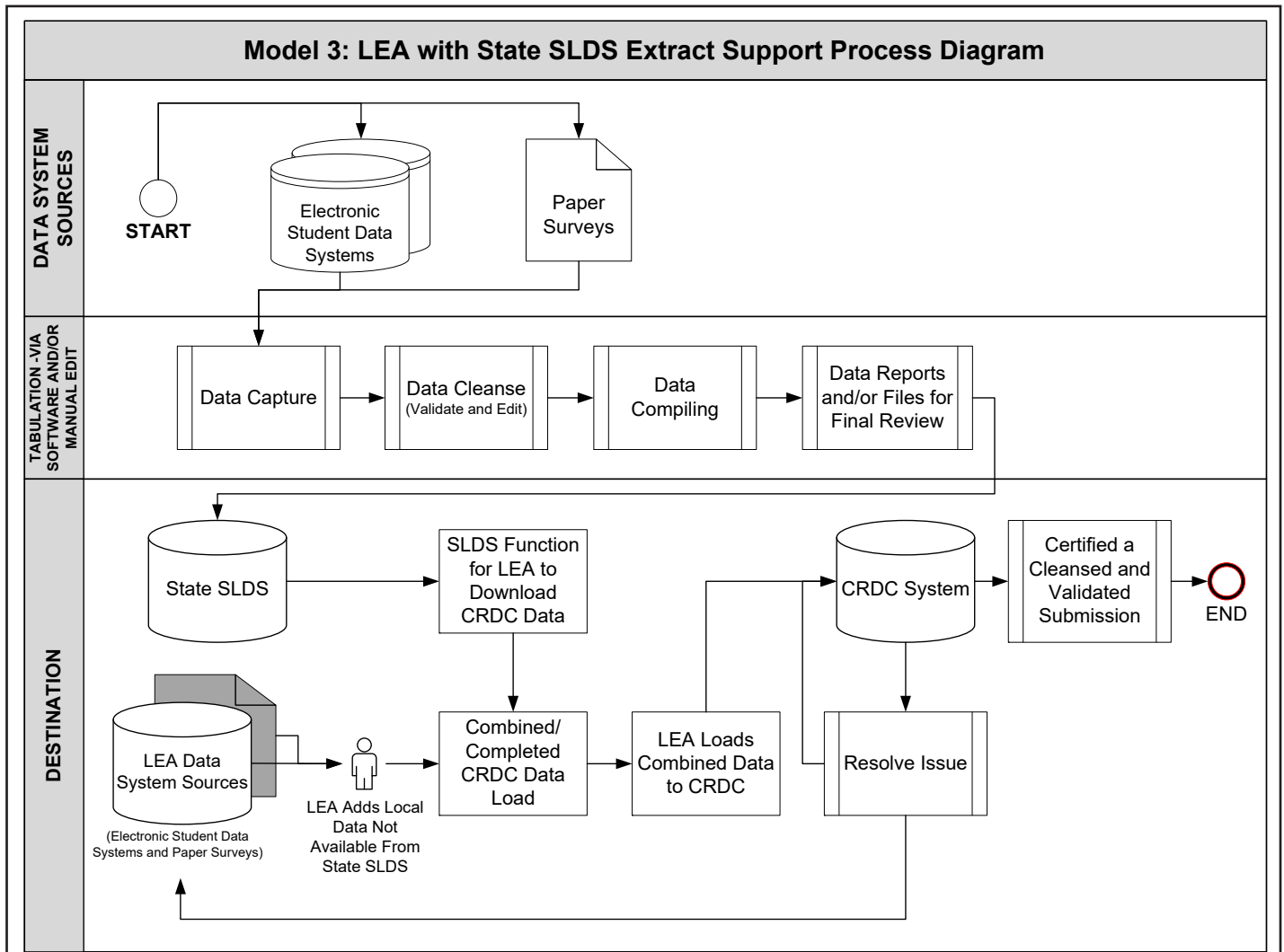
LEA with Vendor Support

The diagram below shows the CRDC reporting process for an LEA that receives vendor support in creating CRDC data files.



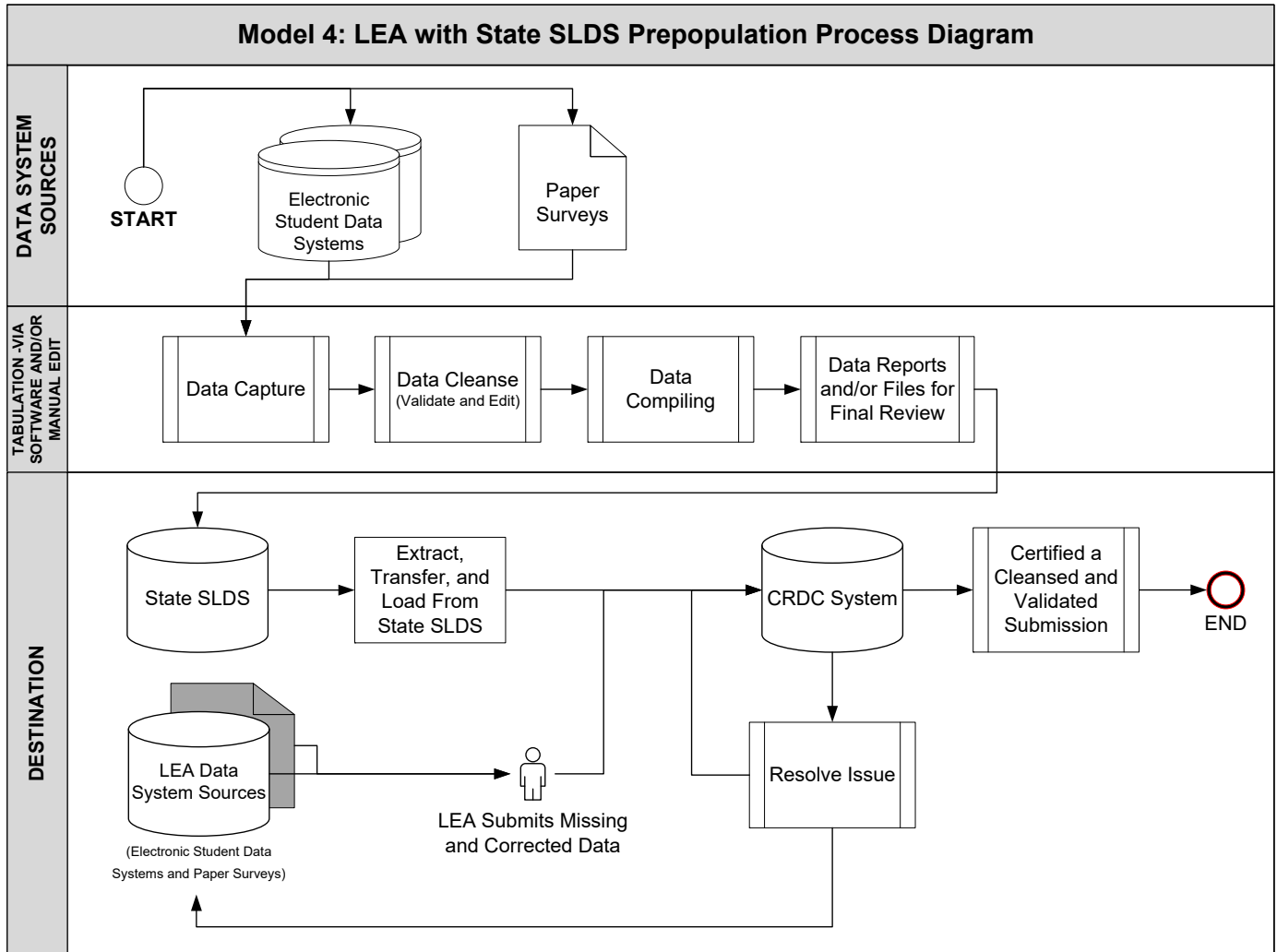
LEA with State Extract Support

The diagram below shows the CRDC reporting process for an LEA that receives CRDC data from the SEA. In this case, the SEA does not prepopulate data in the CRDC Online Submission System. The SEA provides data to the LEA to use for CRDC reporting.



LEA with State Prepopulation Support

The diagram below shows the CRDC reporting process for an LEA whose SEA prepopulates data directly into the CRDC Online Submission System.



Appendix B: Resources

The following references were used in creating this guide.

Civil Rights Data Collection, Grads 360 website (CRDC 2016a). *2015–16 Civil Rights Data Collection: General Overview, Changes, and List of Data Elements*. Downloaded February 28, 2017 from <https://crdc.grads360.org/#communities/pdc/documents/9937>

Civil Rights Data Collection, Grads 360 website (CRDC 2016b). *2015-16 Civil Rights Data Collection: List of Elements (Flat File Specs)*. Downloaded November 21, 2016 from <https://crdc.grads360.org/#communities/pdc/documents/5076>

Civil Rights Data Collection, Grads 360 website (CRDC 2016c). *Civil Rights Data Collection Planning Checklist*. Downloaded November 21, 2016 from <https://crdc.grads360.org/#communities/pdc/documents/5238>

Civil Rights Data Collection, Grads 360 website (CRDC 2016d). *How to Organize Data Submissions*. Downloaded November 21, 2016 from <https://crdc.grads360.org/#communities/pdc/documents/5592>

Civil Rights Data Collection, Grads 360 website (CRDC 2016e). *Introduction to the Civil Rights Data Collection SY 2015-16*. PowerPoint presentation. Downloaded November 21, 2016 from <https://crdc.grads360.org/services/PDCService.svc/GetPDCDocumentFile?fileId=18652>

Civil Rights Data Collection, Grads 360 website (CRDC 2016f). *SEA Support Matrix by Item*. Downloaded November 21, 2016 from <https://crdc.grads360.org/#communities/pdc/documents/11959>

Civil Rights Data Collection, Grads 360 website (CRDC 2016g). *Tips to Avoid Common Flat File Submission Mistakes*. Downloaded December 27, 2016 from <https://crdc.grads360.org/#communities/pdc/documents/6725>


Civil Rights Data Collection, Grads 360 website (CRDC 2016h). *Ways States can support their LEAS with the CRDC*. Downloaded November 21, 2016 from <https://crdc.grads360.org/services/PDCService.svc/GetPDCDocumentFile?fileId=18811>

Office for Civil Rights (OCR 2016a). *Civil Rights Data Collection*. Downloaded November 21, 2016 from <http://www2.ed.gov/about/offices/list/ocr/data.html>

Office for Civil Rights (OCR 2016b). *Civil Rights Data Collection, Frequently Asked Questions*. Downloaded November 21, 2016 from <http://ocrdata.ed.gov/downloads/FAQ.pdf>

Office for Civil Rights (OCR 2016c). *Civil Rights Data Collection, Frequently Asked Questions*, Downloaded November 21, 2016 from <http://www2.ed.gov/about/offices/list/ocr/frontpage/faq/crdc.html>

Office for Civil Rights (OCR 2016d). *Civil Rights Data Collection Reporting Tool*. Downloaded November 21, 2016 from <http://ocrdata.ed.gov/>



Office for Civil Rights (OCR 2016e). *OCR Complaint Process*. Downloaded January 3, 2017 from <https://www2.ed.gov/about/offices/list/ocr/complaintprocess.html>

Office of Management and Budget (OMB 2017). *Mandatory Civil Rights Data Collection, OMB Control Number 1870-0504*. Office of Information and Regulatory Affairs. Downloaded February 28, 2017 from https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201507-1870-001

National Center for Education Statistics (NCES 2016). *SLDS Topical Webinar Summary State Support for Local Education Agencies' Civil Rights Data Collection*, National Center for Education Statistics, May 5, 2016. Downloaded November 21, 2016 from <https://slds.grads360.org/services/PDCService.svc/GetPDCDocumentFile?fileId=23276>

U.S. Department of Education (ED 2014). *Data Snapshot: Early Childhood Education*. Issue Brief Number 2, March 2014. Downloaded November 21, 2016 from <https://www2.ed.gov/about/offices/list/ocr/docs/crdc-early-learning-snapshot.pdf>

U.S. Department of Education (ED 2016a). *Chronic Absenteeism in the Nation's Schools: An unprecedented look at a hidden educational crisis*. Initially released in June 7, 2016. Updated on October 27, 2016. Downloaded November 21, 2016 from <https://www2.ed.gov/datastory/chronicabsenteeism.html>

U.S. Department of Education (ED 2016b). "Persistent Disparities Found Through Comprehensive Civil Rights Survey Underscore Need for Continued Focus on Equity, King Says," press release issued by the U.S. Department of Education, June 7, 2016. Downloaded November 21, 2016 from <http://www.ed.gov/news/press-releases/persistent-disparities-found-through-comprehensive-civil-rights-survey-underscore-need-continued-focus-equity-king-says>

U.S. Department of Education (ED 2017). *Every Student Succeeds Act State and Local Report Cards Non-regulatory Guidance*, January 2017. Downloaded on February 28, 2017 from <https://www2.ed.gov/policy/elsec/leg/essa/essastatereportcard.pdf>

The Civil Rights Data Collection Resource Center

The online Civil Rights Data Collection (CRDC) Resource Center can be found at <https://crdc.grads360.org/#program>.

The home page of the website includes contact information for the CRDC Partner Support Center, a link to the CRDC Online Submission System, and links to the following resources:

- *A New User Starter Kit* for LEA staff who are new to CRDC reporting
- *Preparation Resources* and *Submission Resources* for the 2015-16 CRDC (described in detail below)
- The *Getting Started* page, which contains videos that provide an overview of the CRDC and the necessary tools and resources to begin the submission process for the CRDC

Preparation Resources

The *Preparation Resources* page contains the following resources:

- Pre-Collection Tools
 - 2015-16 CRDC LEA Form
 - 2015-16 CRDC LEA Form Worksheet
 - 2015-16 LEA-Level Table Layout
 - 2015-16 CRDC All Schools Form
 - 2015-16 CRDC Elementary School Form (up to Grade 6)
 - 2015-16 CRDC Elementary/Middle School Form (up to Grade 8)
 - 2015-16 CRDC School Form Worksheet
 - 2015-16 CRDC School-Level Table Layout
 - 2015-16 CRDC Excel Data Collection Template LEA Form
 - 2015-16 CRDC Excel Data Collection Template School Form
 - 2015-16 CRDC Excel Data Collection Template Instructions
 - 2015-16 CRDC Flat File Specifications
 - Template for Adding LEAs or Schools
 - Course Code Mapping Template
 - School Courses for the Exchange of Data (SCED) Course Codes
 - SEA Support Matrix by Item
- Resource Documents
 - 2015-16 CRDC Calendar for Data Activities
 - Introduction to the CRDC
 - About the CRDC
 - 2015-16 CRDC General Overview, Changes, and List of Data Elements
 - Complete List of 2015-16 CRDC Data Elements
 - Master List of 2015-16 CRDC Definitions
 - Changes in the 2015-16 CRDC
 - CRDC Crosswalk for 2015-16 and 2013-14
 - 2015-16 CRDC Planning Guide and Task Tracker
 - 2015-16 CRDC Planning Guide and Task Tracker for Elementary and Middle School LEAs

- 2015-16 CRDC Planning Guide and Task Tracker for Juvenile Justice Facilities
- 2015-16 CRDC Planning Checklist
- 2015-16 CRDC Data Topics by Timeframe
- 2015-16 CRDC How to Select a Principal Contact Person
- 2015-16 CRDC How to Create an Action Plan for Missing Data
- 2015-16 CRDC Who Reports My Charter School?
- 2015-16 CRDC Which Schools Do I Report?
- 2015-16 CRDC Common Scenarios for Where to Report Students
- 2015-16 CRDC Ways SEAs can Support LEAs
- ED*Facts* and the CRDC
- 2015-16 CRDC Advance Website Instructions
- PSC Communications
 - Change to Data Element for 2015-16 CRDC: Current Year and Previous Year Teachers
 - 2015-16 CRDC Pre-Launch Broadcast to LEAs
 - Change to Data Element for 2015-16 CRDC: GED/HSE
 - 2015-16 OCR Letter to Superintendents
- Instructional Videos
 - Getting Started with the CRDC
 - How to Use Flat File Submissions

Submission Resources

The *Submission Resources* page contains the following resources:

- Submission Tools
 - 2015-16 CRDC Excel Data Collection Template LEA Form
 - 2015-16 CRDC Excel Data Collection Template School Form
 - 2015-16 CRDC Excel Data Collection Template Instructions
 - 2015-16 CRDC Flat File Submission Instructions
 - 2015-16 CRDC Flat File Specifications (List of Elements)
- Resource Documents
 - 2015-16 CRDC Managing Flat File Submissions
 - 2015-16 CRDC Using the Error Resolution Report
 - 2015-16 CRDC Skipped Field Warnings
 - 2015-16 CRDC How to Organize Data Submissions
 - 2015-16 CRDC Tips to Avoid Common Flat File Submission Mistakes
 - 2015-16 CRDC How to Import CSV Files into Excel Files
 - 2015-16 CRDC How to convert Excel Files into CSV Files
 - 2015-16 CRDC Troubleshooting School or LEA IDs Converted by Excel
- PSC Communications
 - Change to Data Element for 2015-16 CRDC: Current Year and Previous Year Teachers
 - 2015-16 CRDC Pre-Launch Broadcast to LEAs
 - Change to Data Element for 2015-16 CRDC: GED/HSE
 - 2015-16 OCR Letter to Superintendents

- Instructional Videos
 - How to Use CRDC Reports

How to Use CRDC Reports *(This information is taken from the instructional video mentioned above.)*

CRDC reports are available to authorized users of the CRDC Online Submission System. Users may access the reports through the link on the right side of the ribbon at the top of the CRDC Online Submission System website. Available reports include the following:

- Submission review reports
- Submission progress reports
- The SEA certification progress report, which allows state users to see the progress of each LEA in the state toward completion of the CRDC
- A data feedback report, which allows state users to see district data on specific indicators such as AP courses, special education, and harassment and bullying broken down by student groups
- The error resolution report, which is designed for advanced users (The report allows data submitters to see the results of all system validation checks. Users can enter reason codes and comments to explain errors. They may also enter new data to correct errors, and the report will correct the data in the system without the user having to do a new submission. Instructions are provided in the report.)

Additional Resource

Shining a Light on Equity: Opportunities to Use Data to Serve All Students

Published by the Data Quality Campaign in June 2017, this two-page resource discusses how states can use equity data to improve transparency and take action on behalf of all students. Available at <https://dataqualitycampaign.org/resource/shining-a-light-on-equity-opportunities-to-use-data-to-serve-all-students/>.