

Data Quality Campaign Comments on ESSA Nonregulatory Guidance Topics

The Every Student Succeeds Act (ESSA) preserves the most positive legacy of the No Child Left Behind era—more accurate and transparent data about the performance of all students—and helps states take their efforts to use data in support of student learning to the next level. The Data Quality Campaign (DQC) appreciates the opportunity to provide input on topic areas for the US Department of Education (ED) to clarify by issuing nonregulatory guidance. We recommend that ED issue guidance on the following topics: effective public reporting, appropriate access to student data, educator data literacy, governance bodies, financial data, student privacy, postsecondary success data, new disaggregation requirements, state set-asides, and assessment participation requirements.

Producing Effective Public Reporting and School Report Cards

States can no longer churn out compliance-driven reports that mask school performance under jargon and multiple layers of webpages. This new era of accountability requires that states prioritize the creation of accessible, user-friendly report cards that meet the needs of educators, families, and communities.

To meet that goal, states will need guidance on the following issues:

- engaging stakeholders, including parents and educators, in the development of report cards that are accessible and provide the information necessary to inform decisionmaking at the local level
- going above and beyond compliance requirements by including additional data that provides significant value to local stakeholders in public reports
- involving governance bodies in the creation of state report cards
- making “layers” of data available in report cards (i.e., placing the topline information most important to parents on the first page and allowing “super users” to dig into more data, including open sources like downloadable spreadsheets)
- protecting the privacy and confidentiality of student information while producing high-quality report cards

See [Illinois](#) and [Ohio](#) as models for creating public reports that meet stakeholder needs.

To learn more, see DQC’s [Empowering Parents and Communities through Quality Public Reporting](#).

Improving School Performance by Getting Data in the Hands of Those Closest to Students

Using data in schools to set goals, personalize learning, and continuously improve has been proven to be critical to successfully improving schools. To maximize the power of data to improve schools, teachers must have access to student data from both state and local sources that is timely, is useful, and includes information beyond just summative test scores. Further, parents are critical but often overlooked

stakeholders for student data. When parents have access to information about their child, they are better able to support learning from home and be advocates for their child.

To meet those goals, states will need guidance on the following issues:

- providing teachers electronic access to student-level longitudinal data
- providing parents electronic access to student-level longitudinal data

See [Georgia](#) as a model for providing teachers access to state and local data.

To learn more, see DQC's [Roadmap for Teacher Access to Student-Level Longitudinal Data](#).

Ensuring That Teachers and School Leaders Have Data Literacy Skills

Schools and districts will never realize the goal of improving student achievement without having educators who know how to use data to personalize learning and inform decisionmaking. When teachers and school leaders are empowered with data—and have the needed skills and conditions to use it—students excel.

To meet that goal, states will need guidance on the following issues:

- aligning teacher licensure requirements with a state vision that helps teachers use data to personalize learning
- including data literacy and privacy training materials in teacher and administrator preparation programs
- using Title II funding to provide data literacy and privacy training to the teachers and administrators who need it most
- incentivizing data literacy training in districts and schools
- creating flexibility in policies around how time during the school day should be allocated to make data use possible

See [Delaware](#) as a model for providing data literacy training and time for teachers to collaborate with data.

To learn more, see DQC's [Teacher Data Literacy: It's About Time](#).

Governing P–20/Workforce (P–20/W) Data Systems

Governance bodies that are made up of high-level leaders across agencies, including prekindergarten, K–12, postsecondary, workforce, and others, foster transparency and trust in state data systems. These governance bodies are also critical to state capacity to link data systems. Linked data systems are the best way for states to calculate indicators such as postsecondary enrollment and remediation—critical to meeting the goals Congress established in ESSA.

To meet those goals, states will need guidance on the following issues:

- establishing the structure and function of a P–20/W data governance body
- determining the critical roles of that body, including identifying methods for calculating student growth; calculating indicators of postsecondary success; and protecting the privacy, security, and confidentiality of student data

While many states have already established data governance bodies, states need guidance in implementing best practices. See [Maryland](#) and [Kentucky](#) as models for implementing P–20/W data governance.

To learn more, see DQC’s [Pivotal Role of Policymakers as Leaders of P–20/Workforce Data Governance](#).

Reporting Per-Pupil Spending

ESSA implementation is an opportunity for states to increase the amount of high-quality education data that is available to families and other stakeholders. New public reporting provisions by and large ask state leaders to release information that they have some level of experience collecting, such as postsecondary enrollment data. However, the per-pupil expenditure reporting provision will require most states to collect financial data at the school level for the first time.

Financial data, when viewed side-by-side with student outcome information, can show how various investments in education help raise student achievement. But states will need support from ED in order to build the capacity needed to publicize this important information. Specifically, states will need guidance on:

- calculating actual personnel expenditures at the school level
- disaggregating per-pupil spending by source of funding
- providing appropriate context on report cards to help families understand per-pupil expenditure data

To learn more, see DQC’s [Using Financial Data to Support Student Success](#).

Protecting Student Information

As states use data to meet education goals, they must also make sure that student information is kept private, confidential, and secure—particularly in light of recent concerns raised by parents and policymakers.

To meet that goal, states will need guidance on the following issues:

- engaging governance bodies in the effort to protect student data
- recognizing the necessity of transparency and actively communicating with the public about how data is used and kept secure
- determining how to support districts in protecting student information

See [Colorado](#) as a model for being transparent about policies and practices in place to protect student data.

To learn more, see DQC’s [Roadmap to Safeguarding Student Data](#).

Calculating Indicators of Postsecondary Success

Indicators about students’ postsecondary success are among some of the most valuable information for families and communities. ESSA language requires states to calculate and report indicators of postsecondary enrollment “where available,” and many states have previously reported postsecondary

enrollment, persistence, and remediation information. States had also been required to collect and report postsecondary success data as a condition of receiving funding through the State Fiscal Stabilization Fund program. The ESSA postsecondary data provisions are an opportunity to provide states strong guidance that they should continue to calculate and use these measures.

To meet that goal, states will need guidance on the following issues:

- using governance bodies to maintain needed linkages between K–12 and postsecondary data (that best facilitate the calculation of these indicators) while protecting and securing student information
- making the information available and easily accessible to school leaders, parents, and the public

See [Kentucky](#) as a model for sharing postsecondary success information with schools and the public.

Disaggregating Data in New Ways

ESSA requires states to disaggregate student data in new ways so that policymakers and the public can better understand how schools are serving our more vulnerable student populations, including students in foster care. States may approach the linkages and collection of information about these students in ways that will not ultimately serve the intended purpose.

To best serve these students, as well as to reduce burden on districts and to provide some comparability in how states report about these subgroups, states will need guidance on the following issue:

- collecting, linking, and reporting information about these subgroups

Maximizing the Value of State Set-Asides

States will have a large number of options when making decisions about how to use various funding streams under ESSA. For example, states have more than 21 allowable uses for the Title II set-aside they receive. Guidance from ED would help states navigate these choices and make spending decisions that provide the most value for educators, students, and families.

To meet that goal, states will need guidance on the following issues:

- determining how to solicit information on district-level needs and factor those needs into spending decisions
- examples of specific activities that would satisfy ED’s interpretation of allowable use requirements

Meeting the 95 Percent Assessment Participation Requirement

Assessments should inform classroom instruction in meaningful ways by measuring what matters. ESSA retains the requirement that states assess at least 95 percent of their students, and DQC urges ED to support state efforts to meet this threshold by issuing relevant guidance.

Specifically, states will need guidance on the following issues:

- determining how to design a plan for conducting audits of state and local assessments

- developing strategies for communicating with stakeholders about the value of assessment data and the importance of ensuring that test-takers reflect the school population
- additional examples of steps that states can take to raise assessment participation, such as those found in the December 2015 [letter](#) to Chief State School Officers from Ann Whalen

Conclusion

DQC staff welcome the opportunity to further discuss these topics with ED staff. We are optimistic about the opportunity that ESSA creates for states to employ data to meet education goals.

The Data Quality Campaign is a nonprofit policy and advocacy organization leading the effort to bring every part of the education community together to empower educators, families, and policymakers with quality information to make decisions that ensure that students excel. For more information, go to www.dataqualitycampaign.org and follow us on Facebook and Twitter (@EdDataCampaign).