



December 9, 2010

TO: Chancellor, District of Columbia Public Schools (DCPS)
Public Charter School Board
Public Charter School Directors

FROM: Beth H. Colleye
Interim State Superintendent of Education

RE: LEA Data Management Policy

CONTACTS: Gretchen Guffy, SLED Director
Nancy Sharkey, ED*Facts* Coordinator

PURPOSE

This Memorandum serves to clarify what is required of Local Education Agencies (LEAs) regarding data management to ensure valid, reliable, and timely data collection and submission in the District of Columbia. OSSE, in its role as the State Education Agency (SEA), has the responsibility to clarify expectations, provide necessary guidance, and establish a standardized format and timeframe for reporting student, school and financial information required to support compliant practices at the LEA level.

SCOPE

This policy governs student, school, LEA, and fiscal data. Unless otherwise specified, the term data should be read to infer student, school, LEA, and fiscal data.

BACKGROUND

As a condition of receiving federal funds, LEAs must maintain accurate records and report information in a timely fashion, as outlined in this Memorandum. Further, under federal rules, LEAs must create and retain appropriate student and financial records sufficient to account for the proper use of federal funds. The quality of each LEA's data collection and submission impacts federal education funding within the District of Columbia on an annual basis. Each LEA is ultimately responsible for the quality of its record. Incomplete, invalid, or inaccurate data submissions can result in findings of noncompliance at both the State Education Agency and Local Education Agency levels. A history of poor data quality and incomplete or invalid submissions has resulted in the District of Columbia's designation as a high risk grantee and the imposition of special conditions on all of its education grants and the need to disburse grants only on a reimbursement basis. It is imperative that the District improve data quality to ensure that necessary resources are allocated to the District's students and that decisions regarding resources can be data driven.

LOCAL EDUCATION AGENCY (LEA) OBLIGATIONS

In order to support valid, reliable, and timely data collection and submission in the District of Columbia, each LEA shall:

- Identify one point of contact to act as the LEA Data Manager for all data submissions, regardless of the IDEA or non IDEA nature of the submission by January 4, 2011 and then by August 1st annually via OSSE.LEADData@dc.gov;



- Identify one point of contact who will serve as the Special Education Data System (SEDS) Trainer for the LEA by January 4, 2011 and then by August 1st annually via OSSE.LEADData@dc.gov¹;
- Identify one point of contact who will serve as the LEA Financial Manager for all local and federally funded grants from OSSE by January 4, 2011 and then by August 1st annually via OSSE.LEADData@dc.gov. This individual will serve as the liaison between OSSE and the LEA for all formal communications related to financial matters regardless of the grant program or type. This person will be responsible for disseminating all financial reports, policies, memos and data requests to appropriate individuals within your LEA. Types of information that could be shared include but are not limited to the following: grant application deadlines, grant award notices, training opportunities, changes to policies and procedures, grant balances, payment reports, financial monitoring schedules, requests for supporting financial information, monitoring reports, corrective action plans, and other ARRA and related compliance reporting requests.
- Within five business days of a point of contact change, inform OSSE of Data Manager, SEDS Trainer and/or LEA Financial Manager change via OSSE.LEADData@dc.gov;
- Comply with all required data submissions and ensure necessary due diligence to comply with requirements for each data element, as outlined in the following section;
- Maintain documentation for a period of at least five (5) years to support any and all data submissions and ensure such documentation is available to the OSSE, the U.S. Department of Education and/or other authorized entities for review, upon request;
- Provide data certifications upon request signed by an authorized official of the agency that deems the information provided as valid and reliable.

STATE EDUCATION AGENCY (SEA) OBLIGATIONS

In order to support valid, reliable, and timely data collection and submission in the District of Columbia, OSSE shall:

- Provide each LEA with a unique LEA identification number and unique school numbers for the schools in the LEA;
- Assign Unique Student Identifiers (USIs) for students in each LEA;
- Maintain a list of authorized data managers as submitted by each LEA who will serve as official points of contacts to be contacted for any data submissions, requests, or clarifications regarding data submission;
- Maintain a list of authorized financial data managers as submitted by each LEA who will serve as official points of contacts to be contacted for any related financial data submissions, requests, or clarifications;
- Maintain a list of the Special Education Data System (SEDS) Trainers;
- Provide guidance annually regarding all required data submissions, including a data and reporting calendar;
- Provide guidance for resolving data quality issues as they arise (i.e. how to resolve dual enrollments);
- Provide advance notice related to other supplemental requests¹;

¹ As the SEA, OSSE has the authority to make ad hoc requests related to activities that must be conducted to fulfill its State-level obligations, such as audits, investigations, or other required reporting and monitoring activities that may fall outside of a regularly scheduled monitoring/reporting cycle. OSSE reserves the right to make these requests and the LEA must meet its responsibility to immediately provide the documents.



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- Provide required formats and/or tools to the LEAs for data reporting;
 - Acknowledge receipt of certifications received from LEAs and maintain these certifications;
 - Review LEA data submissions to OSSE and request any clarifications of the data from the LEAs;
 - Coordinate agency data requests to avoid unnecessary duplication; and
 - Communicate scheduled system downtimes, upgrades, features impacting LEAs or end users, data requests and other items that may impact usability or data quality in a timely manner.

STUDENT LEVEL TRANSACTIONAL DATA

Unless otherwise communicated, the LEA has a maximum of five (5) business days to enter or update their students' records in the Public Charter School Board's data management system (OLAMS) or DC STARS for DC Public Schools from the time of a change. This includes, but is not limited to:

- Demographic information;
- Enrollment information;
- Withdrawal information;
- Program related information, including information for students with disabilities in the Special Education Data System (SEDS) and related data systems; and
- Records information related to transfer students.

Transactional Data for Students Transferring into the LEA from another LEA

The LEA has a maximum of ten (10) business days to enter information related to students who transfer into the LEA from another LEA within the District or from outside of the District.

ANNUAL DATA COLLECTIONS

The LEA must provide reports to OSSE on all planned data collections by the deadlines prescribed in the annual calendars for financial and programmatic information and related addenda provided by the OSSE.

AD HOC DATA REQUESTS

Upon receipt of a specific data request from OSSE, the LEA must comply with the request within ten (10) business days of the request, or by the deadline set by the SEA.

LEA OBLIGATIONS RELATED TO ENSURING DATA QUALITY

The LEA will create and adhere to data quality processes to ensure that all data provided to the OSSE and or collected within OSSE and LEA systems is valid, reliable complete and accurate.

Under federal law, LEAs are responsible for ensuring the accuracy of their records and their data reporting. To that end, the LEA will ensure that all data and reports are reviewed for completeness, accuracy and validity prior to submission to the OSSE using prescribed protocols.

LEAs will certify all data submissions using OSSE's LEA certification form(s). The data submissions will be deemed incomplete until OSSE is in receipt of a certification indicating approval by the authorized official of the agency that deems the information provided as valid and reliable.

LEAs will provide clarifications and answer data submission questions upon request from the OSSE within three (3) business days.



SEA OBLIGATIONS RELATED TO ENSURING DATA QUALITY

OSSE will create and follow data quality processes to support LEAs in their submission of valid, reliable complete and accurate data. However, OSSE maintains its right to conduct same day requests and unannounced on-sight visits when warranted. OSSE will ensure that all data and reports are reviewed for completeness, accuracy and validity prior to submission to federal entities.

OSSE will ensure certification of all data submissions using OSSE's LEA certification form(s). The data submissions will be deemed incomplete until OSSE is in receipt of a certification indicating approval by the authorized official of the agency that deems the information provided as valid and reliable.

OSSE will work to ensure that LEAs have at a minimum:

- When applicable, fifteen (15) business days to complete Phase I Formula Grant Applications;
- When applicable, ninety (90) calendar days to complete Phase II Formula Grant Applications;
- Five (5) business days advance notice before OSSE offers a grant training through a webinar.
- Three (3) business days to provide OSSE with any clarifying information needed to approve a pending reimbursement request.

Tools for data collections scheduled on the annual calendars will be provided no later than thirty (30) business days prior to the LEA reporting deadlines, unless stated otherwise. Should an extenuating circumstance arise due to technological challenges, OSSE will consider an extension of the deadline, to the extent of its ability, to ensure that LEAs are not unduly penalized.

COMPLIANCE AND MONITORING

In order to ensure LEA compliance with OSSE's data policy, OSSE will regularly monitor the quality and timeliness of data submissions in coordination with its other regular monitoring activities.

ADDITIONAL GUIDANCE

This memorandum supersedes all previous policy, memorandum, and/or guidance promulgated by the DC State Education Agency (SEA). Further guidance and or clarification may be provided by OSSE in the form of a Frequently Asked Questions (FAQ) document. Please direct any questions regarding the content of this document to Gretchen Guffy, SLED Director, or Nancy Sharkey, ED*Facts*Coordinator.

ⁱ The SEDS trainer must complete all course requirements as outlined by the SEA.