LEA Data Management Policy
(Last updated December 2017)

PURPOSE

The purpose of this policy is to clarify data management roles and responsibilities of the Office of the State Superintendent of Education (OSSE) and local education agencies (LEAs) to ensure valid, reliable, and timely data collection and reporting.

BACKGROUND

State and federal laws require LEAs to maintain and submit accurate and timely information to OSSE. For example, under Section 8306 of the Elementary and Secondary Education Act (as amended), LEAs are responsible for maintaining records for data submission and for timely submission of required data. All LEAs sign assurances to this effect in the Local Education Agency Consolidated Application for Title I, Part A; Title II, Part A; and Title III Part A funding; and the Individuals with Disabilities Education Act (IDEA) Part B.

Education Department General Administrative Regulations (EDGAR) also codify expectations for entities receiving federal funds, including potential steps that support and ensure compliance with all related requirements. These steps can include issuing findings, imposing additional requirements, and suspending or terminating awards or payments.

LEA submission of incomplete, invalid, or inaccurate data may have negative consequences including:

- Delayed OSSE reporting to the US Department of Education (USED), which may impact statewide funding;
- Misalignment of resources allocated to District of Columbia students;
- Inaccurate public reporting, which places limitations on using data to improve student outcomes;
- Findings of noncompliance by the federal government both for OSSE and for LEAs; and
- Findings of noncompliance by OSSE on LEAs, which could result in additional requirements on LEAs or suspension or termination of funding for LEAs that are out of compliance.

LOCAL EDUCATION AGENCY (LEA) OBLIGATIONS

Under federal and state law, LEAs are responsible for ensuring the accuracy of their records and data submissions. To that end, LEAs must ensure that all data and reports are reviewed for

completeness, accuracy, and validity prior to submission to OSSE using prescribed protocols. LEAs have a number of other responsibilities as it relates to data management and data quality in the District of Columbia:

- Ensure timely and accurate data submissions
- Attend training and monitor communications
- Identify and update LEA points of contact
- Fulfill records requests from parents and guardians and students who are over 18 years old or attending a postsecondary institution.

Ensure Timely and Accurate Data Submissions

Given that data quality and reporting are related, LEAs must:

- Ensure that students' records are entered or updated in their Student Information System and the relevant statewide database within **a maximum of five business days** from the time of a change. This requirement applies to all OSSE requests for data, including demographic, enrollment, withdrawal, and program information (including information for students with disabilities).
- Maintain documentation for a period of at least five years to support any and all data submissions and ensure such documentation is available to OSSE, USED and/or other authorized entities for review, upon request.
- Provide clarifications and answer data submission questions within five business days upon request from OSSE.

Attend Training and Monitor Communications

LEAs should assign a designee or representative to attend all trainings and meetings regarding updates to data systems, data collections, and overall LEA data management. These meetings include the monthly LEA data manager discussion meeting, webinar trainings regarding data collections, and the LEA Data Manager Orientation course. LEAs should also monitor communications from OSSE including but not limited to the *LEA Look Forward*, direct emails from the Division of Data, Assessment, and Research (DAR), and other ad-hoc communications.

Identify LEA Points of Contact

OSSE requires LEAs to identify key personnel who will serve as points of contact for several contact types. There can be multiple staff for one contact type but, each type should have at least one person listed. An exhaustive list of each contact type along with the descriptions may be found in Appendix A. By August 1 of each year and using the eSchoolPLUS Statewide Student Information System, LEAs should identify at least one point of contact for each role listed in Appendix A.

Once the staff member is identified, the LEA is responsible for informing OSSE of a point of contact change, within five business days, via eSchoolPLUS. Because of the nature of this guidance document, the following roles are expounded upon below.

LEA Data Managers serve as the POC for all data submissions, regardless of the IDEA or non-IDEA nature of the submission. The LEA Data Manager shall:

- Ensure complete, valid, accurate, and timely submission of all required data collections and verifications to OSSE;
- Identify and ensure that appropriate LEA representatives have the necessary access to the Statewide Longitudinal Education Database (SLED), Qlik, the Special Education Data System (SEDS), eSchoolPLUS, the Enterprise Reporting System, and any other relevant statewide data systems;
- Be knowledgeable of the requirements in the OSSE Standard Student Entry and Exit Code Guidance;
- Be knowledgeable about the Enrollment Audit and LEA Membership Tracker processes;
- Ensure students are enrolled and unenrolled properly and within stipulated timeframes;
- Coordinate the resolution of all unified data errors within five business days of receipt; and
- Complete all required data mapping for the LEA, where applicable.

LEA Special Education Points of Contact shall:

- Train colleagues on the Special Education Data System (SEDS);
- Identify and ensure that appropriate LEA staff have access to SEDS;
- Coordinate with the LEA Data Manager in the collection and timely submission of all data related to IDEA;
- Ensure overall compliance with IDEA data requirements; and
- Fulfill records requests from parents and guardians and from students who are over 18 years old or enrolled in postsecondary institutions.

Fulfill Records Requests by Parents, Guardians and Adult Students

The Family Educational Rights and Privacy Act (FERPA)[1] gives parents and guardians of students who are minors and students who have reached the age of 18 or who are attending a postsecondary institution at any age the right to inspect and review their education records[2]

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[1] Pub. L. 90-247, 81 Stat. 783 (Jan. 2, 1968), as codified at 20 U.S.C. § 1232g.
[2] FERPA defines "education records" as files, documents, or other materials containing information directly relating to a student and maintained by an educational agency or institution or by a party acting for the agency or institution. 20 U.S.C. § 1232g(a)(4)(A); 34 C.F.R, 99.3. FERPA specifically excludes the following from the definition of education records: personal notes of teachers, principals, and administrative school staff; law enforcement records; an educational agency's personnel records; and medical treatment records of adult students or students

within 45 days of receipt of a request. Requesters may also designate another party, such as an attorney, to receive the requested records. It is the responsibility of LEAs and schools to fulfill these requests, unless special circumstances where the responsibility would fall to OSSE (for example, if the student attended a school in a closed LEA).

STATE EDUCATION AGENCY (SEA) ASSURANCES

OSSE, in its role as the state education agency (SEA), is responsible for clarifying expectations, setting policy, providing guidance, and establishing and ensuring compliance with standardized formats and timeframes for LEAs to submit student, school and LEA data for reporting and other purposes. OSSE has a set of responsibilities as it relates to the management and submission of data, including to:

- Maintain data systems and infrastructure
- Support data quality and LEA data submissions
- Provide training and technical support
- Reduce reporting burden on LEAs

Maintain Data Systems and Infrastructure

OSSE shall maintain and support the Statewide Longitudinal Education Database (SLED) and maintain a system through which LEAs identify authorized points of contact. To support valid, reliable, and timely data collection and submission, OSSE shall provide each LEA with a unique LEA identification number, unique school identification numbers for the schools in the LEA, and unique site identification numbers for the locations where educational services are provided by the LEA. OSSE shall also assign a Unique Student Identifier (USI) for each student in each LEA through SLED. Lastly, and concerning data systems, OSSE will provide advance notice of scheduled system downtimes, upgrades, and other features affecting data systems or usability.

Support Data Quality and LEA Data Submissions

OSSE will create and follow data quality best practices to be used by LEAs to ensure the submission of valid, reliable complete and accurate data. Data management is essential for making decisions regarding students, families, and schools. When LEAs submit data, DAR will acknowledge receipt of the certifications from LEAs and maintain them in a secure location. OSSE will endeavor to provide data collection tools, including required formats and templates, no later than 30 days before the LEA reporting deadline. Should extenuating circumstances arise due to technological challenges outside of LEA control, OSSE may consider extending the deadline, to the extent possible, to ensure that LEAs are not unduly burdened or penalized.

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attending a postsecondary institution. 20 U.S.C. § 1232g(a)(4)(B); 34 C.F.R. 99.3.

Provide Training and Technical Support

DAR will provide direct and indirect, i.e. through the "train the trainer" delivery model, training and support to LEAs to support overall data quality, timely data submissions, and other efforts. Training and technical assistance shall include the creation of guidance documents, presentations, data collection templates, and an annual data collection calendar. To support LEAs with resolving data quality issues and data errors, OSSE will provide guidance that is accurate and timely.

Reduce the Reporting Burden on LEAs

To assist with reducing the reporting and administrative burden on LEAs, each division within OSSE will work collaboratively on requests for LEA data. Moreover, OSSE will limit the number of same-day supplemental data requests to the maximum extent practicable.[3]

COMPLIANCE AND MONITORING

OSSE will regularly monitor the quality and timeliness of data submissions in coordination with its other regular monitoring activities. Before submission to federal agencies, OSSE will review all data and reports for completeness, accuracy and validity.

Noncompliance with required data submissions is factored into OSSE's LEA risk assessment. OSSE's intent in compliance monitoring is to support LEAs with addressing identified noncompliance when it is initially identified. OSSE may impose additional conditions on LEAs found noncompliant, consistent with EDGAR §200.207. In addition, if OSSE determines that noncompliance cannot be remedied by additional conditions, it may take additional actions as deemed appropriate, in accordance with EDGAR §200.338 and 200.339, including suspending or terminating awards and payments to LEAs.

ADDITIONAL GUIDANCE

Please direct any questions regarding the content of this document to OSSE.datasharing@dc.gov.

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[3] 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 cycle. OSSE reserves the right to make these requests, and LEAs must meet their responsibility to provide the documents as immediately as possible.

OSSE LEA Points of Contact (POC) Descriptions

Overview

This document describes Points of Contact (POCs) listed in eSchoolPLUS. LEAs are required to add and update these POCs throughout the school year. Relevant divisions at OSSE often use these Points of Contact to reach out to LEAs. For example, the Division of Health and Wellness may contact listed Health POCs.

Points of Contacts

POC Type	Description
Leadership POCs	
Chief Academic Officer	Develops and implements short- and long-term plans for the LEA, including educational activities, strategic and operational planning, and compliance with OSSE and US Department of Education requirements, regulations, and policies
Chief of Staff	Assists LEA leadership in coordinating educational programs and services
Executive Director	Responsible for day-to-day operations, including general administration of all instructional, business, and other operations
Head of School	Responsible for overall administrative leadership
Principal	Responsible for leadership of an entire community within a school
Data & Technology POCs	
ADT Technical Manager	Maintains the Automatic Data Transfer (ADT) machine
Faculty and Staff POC	Responsible for managing and reporting faculty and staff data
Information Technology Contact	Responsible for technical support with computers and network services

POC Type	Description
LEA Approver	Manages changes to students' authoritative data at the LEA level
LEA Data Manager	Ensures all data requests from OSSE are completed in a timely manner and maintains eSchoolPLUS POCs and calendars
LearnDC POC	Liaison for data on LearnDC
Person Completing Contact Information	Updates contact information in eSchoolPLUS
School Approver	Manages changes to students' authoritative data at the school level
Enrollment POCs	
Admissions and Enrollment Staff Member	Manages recruiting, admitting, and enrolling students
LEA Enrollment Audit Point of Contact	Coordinates and manages the enrollment audit, including ensuring deadlines are met, reviewing data for accuracy and completeness, preparing for site visits, coordinating documentation, and uploading documents
Finance POCs	
Business Manager	Responsible for financial and administrative activities
Chief Financial Officer	Directs fiscal functions
LEA Finance/Grants Manager	Responds to financial and grant-related report requests and questions
Health POCs	
Athletics Staff Member	Manages athletic programs
Health POC	Responsible for health matters, including Healthy Schools Act implementation, annual health assessment, and biennial Youth Risk Behavior Survey
School Mental Health Professional	Ensure students receive needed social and emotional or behavioral health services
School Nurse	Responsible for providing on-site, school-based health services and referrals to community-based services
Special Populations POCs	
Homeless Liaison	Responsible for identifying homeless students, connecting them with services and documenting referrals

POC Type	Description
LEA Special Education POC	Responds to OSSE requests related to special education, including updates to data systems and training and assistance to other LEA and school staff related to the Special Education Data System (SEDS)
LEP Coordinator	Responsible for the identification and classification of students who are English Learners and for ACCESS test activities
Pre-K Special Ed POC	Responds to all OSSE requests about students in pre-K who are special education students, including updating data systems and providing training and assistance to other staff for SEDS and DC Corrective Action Tracking System (DC CATS)
Other POCs	
Assessment Specialist	Responsible for student assessment activities
Campus Emergency Contact #1	Serves as the primary contact in emergencies
Campus Emergency Contact #2	Serves as the secondary contact in emergencies
Comms/Govt/Outreach Staff Member	Responsible for communication and outreach, including media relations and publications, and engagement with parents, educators, students, and the public
Transportation Manager	Responsible for completing and maintaining Transportation Request Forms (TRFs) in the Transportation Online Tool for Education (TOTE)