



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

**EDUCATION**

## **LEA Student Attendance Data Collection and Governance**

*Issued: October 24, 2018*

This document summarizes requirements for the collection and governance of attendance data submitted by local education agencies (LEAs) in the District of Columbia to OSSE. It supersedes previous guidance issued by OSSE, via the Deputy Mayor for Education (DME), on August 23, 2016.

The goals of this update are to:

- Increase transparency about attendance data and its collection, use and governance by OSSE.
- Describe the allowable uses of attendance data, including research, analysis, and evaluation as well as state-level and school-level reporting, while also protecting student privacy.

### **The Importance of Attendance and Attendance Data for Student Success**

The link between academic achievement and attendance is well established.<sup>1</sup> Students must be present in school to learn. Rates of chronic absenteeism and truancy hold back the progress of too many of the District's children and youth. Statewide attendance reports by OSSE from the [2015-16](#) and [2016-17](#) school years show that more than one-quarter of students are chronically absent and nearly the same proportion are truant.

Over the past two years, the Every Day Counts! Initiative and interagency Taskforce (previously referred to as the Truancy Taskforce) has promoted a citywide plan for government agencies to address barriers to attendance, created [attendance.dc.gov](http://attendance.dc.gov) as a resource hub for families and other stakeholders, and partnered with schools to reward students for improved attendance. LEAs, schools and community-based organizations serving students have also taken steps to improve attendance and reduce absenteeism.<sup>2</sup>

Understanding the effectiveness of these and other approaches to promoting attendance and reducing absenteeism is critical to sustaining progress. The Taskforce first requested that OSSE conduct statewide analyses of chronic absenteeism and truancy for compulsory aged students, and other statewide analyses using the same student-level attendance dataset in 2016. After conducting a self-assessment of the District's work, the Taskforce identified continued improvements in data reporting and sharing as critical to making progress and aligning with national best practices.

Providing attendance data in a responsible manner is one step OSSE can take to support such efforts. OSSE will also clarify how research and analysis by OSSE or other partners can help deepen

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<sup>1</sup> See the [Attendance Works website](#) for a comprehensive listing of research about absenteeism.

<sup>2</sup> See, for example:

[https://www.dcactionforchildren.org/sites/default/files/images/DCKIDSCOUNT\\_Early%20Absentee%20Policy%20Brief\\_April2014.pdf](https://www.dcactionforchildren.org/sites/default/files/images/DCKIDSCOUNT_Early%20Absentee%20Policy%20Brief_April2014.pdf)

understanding of the patterns and causes of absenteeism in District schools, explore how attendance and absenteeism may influence (or be influenced by) other education outcomes, explore what programs are working to improve attendance, inform work to provide comprehensive supports to students experiencing chronic absenteeism, and identify where programmatic investments or policy changes may be needed to support children, students and families.

### **District of Columbia and Federal Policy Requirements for Attendance Collections**

OSSE is required to collect and report attendance data to satisfy local reporting requirements under the School Attendance Clarification Emergency Amendment Act of 2016, effective June 1, 2016 (DC Act 21-410; 63 DCR 8202) (“Emergency Attendance Clarification Act”) and Section 2101.7 of Title 5-A in the District of Columbia Municipal Regulations. The Emergency Attendance Clarification Act mandates that OSSE publicly report on the state of absenteeism in the District each year by October 1.

In addition, the US Department of Education requires states to report on chronic absenteeism via EdFacts at the school level, beginning with data from the 2016-17 school year.<sup>3</sup>

### **Data Collection Details**

Beginning with the 2015-16 school year, all LEAs provide student-level attendance data to OSSE via a real-time data feed that ensures consistent reporting and definitions that meet all local and federal reporting requirements. OSSE regularly reviews the attendance data provided by LEAs and works with them to ensure accuracy and address data errors reported by OSSE.

To calculate accurate state-level metrics under the Emergency Attendance Clarification Act, attendance information must be student-level and include unique student identifiers, student name, date of birth, and other information linked to individuals for all students to prevent duplicative counts. This is because students may accrue trancies or unexcused absences at multiple schools or LEAs. Due to student mobility, OSSE can only report accurate student counts and metrics at various levels (school, LEA, state) if it can identify that it is the same student by matching across schools, LEAs, and sectors. Without student-level information, students could be counted multiple times, resulting in inaccurate reporting of the number of students who are truant or chronically absent.

In addition, OSSE requires data points beyond the aggregate data LEAs were previously required to submit. For example, chronic absenteeism is defined in the Emergency Attendance Clarification Act as, “The incidence of a student missing more than 10% of school days, including excused and unexcused absences.” As a result, OSSE requires LEAs to report data on excused and unexcused absences.

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<sup>3</sup> The US Department of Education defines chronic absenteeism as the unduplicated number of students absent 10% or more school days during the school year. In accordance with guidance from the Office of Civil Rights, chronically absent students include students who are absent for any reason (e.g., illness, suspension, the need to care for a family member), regardless of whether absences are excused or unexcused.

## **Data Governance**

Attendance data are governed as described below. Any changes to these processes will be informed by data governance best practices, changing needs and requirements, and feedback from stakeholders.

### ***Data Storage and Access***

- With the exception of student attending non-public schools, attendance data submitted by LEAs are not stored in SLED.<sup>4</sup>
- Attendance data are housed in a secure format outside of this system, and access is limited to OSSE staff who are responsible for local attendance reporting and maintain expertise in managing personally identifiable information.

### ***Data Use by OSSE***

In addition to fulfilling local and federal reporting requirements, OSSE's use of attendance data includes, but is not limited to:

- School accountability, including for metrics in the STAR Framework and in the state, LEA and school report cards
- Validating student enrollment records, including resolving duplicative enrollments during the annual Enrollment Audit
- Analysis, research, evaluation, and monitoring purposes, as needed

### ***Data Sharing***

- OSSE will make available aggregate (state, school, LEA) reports of attendance information:
  - In response to data requests aligned with informing policy and supporting services for children, students, and families, to the extent capacity exists.
  - In accordance the Family Educational Rights and Privacy Act (FERPA), using best practices for data suppression to protect personally identifiable information.<sup>5</sup>
  - Under the District's Freedom of Information Act (FOIA), as appropriate.
- OSSE will make available student-level attendance data:
  - In accordance with FERPA, specifically limiting access to parties:
    - With a legitimate educational interest.
    - That have entered into a written agreement with OSSE consistent with an applicable exception to FERPA's parental consent requirement.
  - In alignment with informing policy and supporting services for children, students, and families.

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<sup>4</sup> Attendance data for students in non-public schools, which are submitted to OSSE by non-public schools through SEATS, are stored in SLED and made available in the Nonpublic Attendance Report module.

<sup>5</sup> For more information, see:

[https://studentprivacy.ed.gov/sites/default/files/resource\\_document/file/FAQs\\_disclosure\\_avoidance\\_0.pdf](https://studentprivacy.ed.gov/sites/default/files/resource_document/file/FAQs_disclosure_avoidance_0.pdf)

**For More Information**

For more information about OSSE attendance data collection and reporting, please contact Darrell Ashton ([Darrell.Ashton@dc.gov](mailto:Darrell.Ashton@dc.gov)) or Stephanie Davis ([Stephanie.Davis3@dc.gov](mailto:Stephanie.Davis3@dc.gov)).

For more information about receiving access to OSSE attendance data for use in research or evaluation, please review information at the [OSSE Data Request Portal](#) or contact [OSSE.Datasharing@dc.gov](mailto:OSSE.Datasharing@dc.gov).

For more information about the Every Day Counts! Taskforce, please contact Aurora Steinle ([Aurora.Steinle@dc.gov](mailto:Aurora.Steinle@dc.gov)).