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September 16, 2010

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

**FROM:** Kerri L. Briggs, Ph.D.  
State Superintendent of Education

**RE:** LEA Data Management Policy

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

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**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 and fiscal data.

**BACKGROUND**

As a condition of receiving federal funds, LEAs must maintain accurate records and report information in a timely fashion. Further, LEAs must retain appropriate student and financial records. The quality of each LEA's data collection and submission impacts federal education funding within the District of Columbia on an annual basis. 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 related to this status. It is imperative that the District improve data quality to ensure that necessary resources are allocated to the District's students and that decision regarding resources can be data driven.

**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 the Special Education Data System (SEDS) Trainers and LEA Grant Managers;



- Provide guidance annually regarding all required data submissions, including a data and reporting calendar;
- Provide advance notice related to other supplemental requests<sup>1</sup>;
- 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.

### 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 LEA Data Manager for all data submissions, regardless of the IDEA or non IDEA nature of the submission by August 1<sup>st</sup> annually;
- Identify one point of contact who will serve as the Special Education Data System (SEDS) Trainer for the LEA by August 1<sup>st</sup> annually;
- Identify one point of contact who will serve as the LEA Grant Manager. This person would act as the liaison between OSSE and your LEA for all communication and data requests related to financial reporting and the management of your LEA's federal grants. The Grant Manager would be responsible for all fiscal data responsibilities which include but are not limited to the following: receiving and submitting applications, submitting and modifying reimbursement requests, participating in webinar trainings, and serving as the point of contact for other ARRA and compliance fiscal monitoring data requests;
- Inform OSSE of Data Manager, SEDS Trainer and/or LEA Grant Manager changes immediately;
- 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.

### STUDENT LEVEL TRANSACTIONAL DATA

The LEA has a maximum of five (5) business days to enter or update their students' record in OLAMS or DC STARS from the time of a change. This includes, but is not limited to:

- Demographic information;
- Enrollment information;
- Withdrawal information;

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<sup>1</sup> As the SEA, OSSE has the authority to make ad hoc data 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. While OSSE will make every effort to give advance notice, this policy in no way interferes with OSSE's right to make these requests and in no way affects the LEA responsibility to immediately provide the documents.



- 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.

### **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.

### **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;
- Ten (10) business days to submit backup documentation requested for regular desktop and on-site fiscal monitoring reviews;
- 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.

### **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.

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.

#### **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.

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