



Education Information Management Advisory Consortium

RECOMMENDATIONS FOR CHIEFS *OCTOBER 2009*

Action Items for Chiefs:

In recognition of the emerging potential of longitudinal data systems, **Chiefs should provide leadership in redefining the state education agency's role in providing data analysis and information to districts and other education stakeholders.** This includes **building capacity** within the state education agency to better utilize the longitudinal data system; and advocating for and actively participating in **sustainability efforts** to maintain and continuously improve the system.

EIMAC urges Chiefs to **notify LEAs about the proposed changes to the Office of Civil Rights (OCR) data collection** and encourages both Chiefs and LEAs to **submit comments regarding the [collection notice](#)** prior to the November 10, 2009 deadline. EIMAC encourages comments addressing:

- The data regarding bullying & harassment (targets, incidents, discipline, and policy) and restraint & seclusion for both IDEA and non-IDEA students. These elements will significantly increase data burden on LEAs and are poorly defined.
- The requirement of LEAs to report on 2009-10 data. This data collection period precedes the approval of the collection. It does not provide LEAs with adequate notice to be able to collect the required data elements and report them in the timeframe proposed by OCR.
- The use of common definitions for the OCR data collection and the use of ED*Facts* data as much as possible.

Chiefs should **leverage collective state action through CCSSO to build partnerships among organizations whose involvement is needed to create a common service for data related to students' postsecondary attendance, course work, etc.,** as required by the America COMPETES Act and the assurances for receipt of State Fiscal Stabilization Funds

- In the short-term this means possibly negotiating a contract with the National Student Clearinghouse for all states to have access to postsecondary data and fulfill ARRA reporting requirements.
- A more long-term solution may involve creating a common service for states to share non-K-12 data (postsecondary, early childhood, workforce, etc).

Chiefs should **be aware that the 2009 NAEP math release of October 14 was followed by an update of the NAEP State Profiles Tool and the State Comparison Tool, both of which display numerical ordering or rankings of states.** The EIMAC Assessment Task Force has reviewed the tools, determined that the numerical ranking is not statistically valid, and will formally request the correction of the numerical ranking.

In order to link students to teachers, Chiefs should encourage data collections of school courses, teachers, and numbers of students enrolled. Collections should include the core academic subjects as defined by ESEA as well as physical education, health, and career technology education. (ESEA defines core academic subjects as English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history and geography.)

Federal Advocacy Items:

The reauthorization of two major federal programs (ESEA and IDEA) is fast approaching.

Alignment of data collection, reporting, and usage requirements is essential to promoting data credibility, clarity and efficiency. In advocating for reauthorization, EIMAC would like Chiefs to:

- **Support the elimination of the redundancies and conflicts** between state reporting requirements under the implementing regulations of each law (e.g., grade level versus age level reporting).
- **Support the identification of Response to Intervention (RTI) and Positive Behavior Support (PBS)** as primarily general education initiatives under ESEA.
- **Support revision to statutory language related to significant disproportionality** and targeted use of funds for Coordinated Early Intervening Services (CEIS) (e.g., remove required inclusion of Part B 619 funds in calculating the 15%).

Chiefs should **advocate for standardization of the business rules** to make data more comparable across states (e.g., subgroup membership for cohort graduation rate calculations).

Chiefs should **advocate that the U.S. Department of Education modify states' existing peer review findings and requirements** as states are anticipating completion of the common core standards, transition to these standards and subsequent assessments, and reauthorization of ESEA.

The report on [IDEA Part B Maintenance of Effort Reduction and Coordinated Early Intervening Services](#) (IDEA Part B 618 Table 8), an emergency collection, is open for public comment until November 30, 2009. **EIMAC would like Chiefs to support us in establishing this as a temporary collection** ending with the reporting of FY10 (2010-11) data.

Action Items for CCSSO:

EIMAC encourages **CCSSO and NGA to supplement the initial review of the K-12 grade-by-grade common core content standards with a longer, more in-depth review period to allow the public and states to provide more feedback and clarifications.** This type of meaningful feedback is needed due to the fact that these standards will drive instruction and will be used for accountability. There will need to be adjustments to professional development, curriculum, and materials in order to effectively implement the standards.

EIMAC would like **CCSSO to provide leadership in the coordination of the common core content standards and any related assessment development activities** with federal timelines and requirements to anticipate sequencing and roll-out in a way that will ensure the development of valid and reliable assessments.