



**State of Rhode Island and Providence Plantations
ELEMENTARY AND SECONDARY EDUCATION**

255 Westminster Street
Providence, Rhode Island 02903-3400

Peter McWalters
Commissioner

January 23, 2009

Dear Colleagues,

I'm writing to inform you about new guidelines from the U.S. Department of Education (ED) regarding the collection of data on race and ethnicity for public-school students and staff.

The federal government, which requires all states to collect this information, has developed a set of new reporting standards in order to provide a more accurate picture of the nation's ethnic and racial diversity. These new standards enable individuals to be identified in more than one racial or ethnic category. In the past, data collections allowed individuals to be identified in only one racial or ethnic category.

Beginning this fall, RIDE will ask all districts to start reporting to us their race and ethnicity data using both the current race and ethnicity data categories (in which individuals are identified by only one racial or ethnic category) and the new federal standards (in which individuals may be identified by more than one category). By the 2010-11 school year, all districts will be required to report the data using the new federal standards only.

To ensure successful transition to this new system of data collection and reporting, I ask you to identify a key person or office to be in charge of conducting an inventory of existing data and to identify the data sets that need to be updated with the new race and ethnicity data. This person will be responsible for working with us regarding the development of policies and procedures to implement the new federal standards.

RIDE and ED will use the data with the new racial and ethnic categories just as we currently use race and ethnicity data. For example, we disaggregate by student race and ethnicity the test results that we report to ED and to the public at large. We will continue to do so, but we will use the new race and ethnicity data categories for these disaggregations.

The attached guidance sheets provide additional information about these new reporting standards. In the coming months, RIDE will work with districts to implement these new collection and reporting standards. Information regarding the collection of data on race and ethnicity is available on the ED Web site, at: <http://www.ed.gov/about/offices/list/opepd/index.html>.

Sincerely,

Peter McWalters
Commissioner

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Policy Questions on the Department of Education's 2007 Guidance on Collecting, Maintaining and Reporting Data by Race or Ethnicity

U.S. Department of Education

August 2008

What does the two-part question to be used for collection look like?

There are two different parts to the question, requiring two distinct responses. The first part asks about the broad category of ethnicity, and the second part asks about the more narrow divisions of race. The first part asks the respondent to identify his or her ethnicity as a Hispanic or Latino. The second part asks the respondent to identify his or her race or races. Provided below is an example (see http://nces.ed.gov/statprog/2002/std1_5.asp) of the questions.

The ethnicity question is:

What is this person's ethnicity?

1. Hispanic or Latino
2. Not Hispanic or Latino

The race question is:

What is this person's race? Mark one or more races to indicate what this person considers himself/herself to be.

1. White
2. Black or African American
3. Asian
4. American Indian or Alaska Native
5. Native Hawaiian or Other Pacific Islander

There is no "multiracial" or "other race" category used when collecting data from individuals using this two-part question for ethnicity and race. However, a respondent may report having more than one race.

What are the aggregate reporting requirements for elementary and secondary education institutions and agencies?

For Federal reporting requirements aggregate data about all elementary and secondary students will be reported to the Department using one of the seven aggregate reporting categories discussed in the guidance. These reporting categories are --

1. Hispanic/Latino of any race,

For individuals who are Non-Hispanic/Latino:

2. American Indian or Alaska Native
3. Asian
4. Black or African American
5. Native Hawaiian or Other Pacific Islander
6. White
7. Two or more races

If an individual (or the parent on behalf of the individual) does not complete the two-part question, then the educational institution should take steps to collect and document information that enables the school to include the individual in one of the seven Federal reporting categories. The Department's existing policy of using observer identification in these cases remains unchanged from previous guidance provided by the Department.

For further information, see: <http://ed.gov/policy/rschstat/guid/raceethnicity/questions.html>

Guidance on Collecting/Reporting Race and Ethnicity Data Under New Federal Standards

Department of Elementary and Secondary Education
Office of Network and Information Systems
January 16, 2009

Key New Requirements in *Final Guidance* by USED

States will be required to report aggregated data to ED using these new standards by the fall of 2010 for the 2010–11 school year. These are the seven categories for reporting:

- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or Other Pacific Islander
- White
- Two or more races
- Hispanic of any race

See Guidance on Collecting, Maintaining and Reporting Data by Race or Ethnicity by US Department of Education-<http://www.ed.gov/about/offices/list/oepd/index.html>

Two Part Question Format

The *Final Guidance* require that States to maintain and collect the data using the two-question format.

1. Are you Hispanic or Latino? (choose only one)
 - Yes
 - No
2. What is your race? (choose one or more)
 - American Indian or Alaska Native
 - Asian
 - Black or African American
 - Native Hawaiian or Other Pacific Islander
 - White

State Implementation

- Synchronized transition to new standards across all systems, including the student ID system (SASID), the state testing and accountability systems, program-based Census, and all local information systems.
- All source systems will use the Two Question Format to collect data.
- State collects responses using the Two Question Format and reports by seven categories to ED

Schedule for Implementation

- Fall 2008 – initial assessment of local systems, understanding state and federal reporting requirements, timelines
- Winter 2008-Spring 2009 – local and state systems adjustments, local collection of additional information
- Summer 2009 – initial optional reporting of additional information
- Fall 2009 – first required reporting of race/ethnicity data in new categories by districts, in addition to current race/ethnicity
- 2009-10 – data quality and validation checks, resolve problems
- 2010-11 – first year reporting only by new race/ethnicity categories to ED

Self Identification vs. Observer Identification

- Whenever possible, students and staff should be allowed to self-identify their race and ethnicity.
- At the elementary and secondary levels, students' parents or guardians are typically the more appropriate source of race/ ethnicity information.
- If self-identification is not practicable or feasible or the respondent has been provided adequate opportunity to self-identify, but still leaves the item blank or refuses to self-identify, observer identification should be used.

Re-identification

Though not mandated by the USED, ED strongly encourages that current students be allowed to re-identify their race and ethnicity to ensure comparability of data and to accurately reflect diversity.

Record Maintenance

Because the collection of the data is associated with the disbursement of Federal funds, the regulatory requirement for maintaining original individual responses is a minimum of three years unless there is an audit, inspection, review, or investigation that has not been resolved (in that case, the responses must be maintained until resolution is complete). Institutions must maintain the information in the responses as it was collected using the two-part question, in case the Department needs it in the exercise of its oversight and enforcement responsibilities. In addition, other statutes or regulations, such as the Common Rule for the Protection of Human Subject in Research (34 CFR 97), may require that individual responses be retained for a longer period for some data collections.

Implementation (for Districts)

- Understand guidelines that will be conveyed to schools.
- Identify specific changes to be made in districts' data systems to accommodate new requirements.
- List personnel/department assigned for making such changes, both in-house personnel and vendors; and identify contact person(s) for each area.
- Understand the self-identification process: rationale, requirements, methodology
- Understand the difference between self versus observer identification, and the observation process
- Understand record retention requirements.

System Requirements (for Vendors)

- Understand the two-part question format and new race categories.
- Understand the federal aggregate reporting requirements.
- Identify specific changes to be made in vendor systems or products and provide minimum data standards.
- Assign responsibilities for making such changes and identify a contact person.
- Determine the calendar of implementation, taking into consideration the agency's current data collection schedule.
- Make user-friendly software changes to data entry screens that reflect the two-part question.

Data Coding Standards

The federal guidance does not indicate any coding schemes. States are allowed to design their own coding structure, as long as they are able to report the racial and ethnic data using the seven aggregate categories. We assign each race/ethnicity group as 'Y/N' in State reporting, we recommend do the same in their collection systems. '1/0' can also be used to assign to each category, but must be converted to 'Y/N' when data are submitted to the State.

Race and Ethnicity Category	State Guidance	Alternative
Hispanic/Latino	Y/N	1/0
American Indian/Alaska Native	Y/N	1/0
Asian	Y/N	1/0
Black or African American	Y/N	1/0
Hawaiian Native/Other Pacific Islander	Y/N	1/0
White	Y/N	1/0

Sample Letter to Parents and Guardians



April 28, 2008

Dear Parents and Guardians:

I am writing to inform you about new guidelines from the U.S. Department of Education regarding the collection of data on race and ethnicity for public school students and staff. The federal government, which requires all states to collect this information, has developed a new way to report ethnicity and race that includes new categories.

The federal government has developed these new categories in order to provide a more accurate picture of the nation's ethnic and racial diversity. This will enable individuals to be identified in ethnic and racial classifications and in more than one racial category. In the past, forms allowed individuals to be identified in only one racial category.

Currently, Montgomery County Public Schools (MCPS) asks families to provide information on students' race and ethnicity at the time of enrollment. Beginning in fall 2008, we will ask the families of newly enrolled students AND of all current students to complete a brief form to update information on their children's ethnicity and race. The collection of data from staff will occur at a later date.

The data with the new ethnicity and race categories will be used in the same manner that such information is currently used. For example, the federal government uses racial and ethnic data in reporting and analyzing test results, such as the Maryland School Assessment and the High School Assessments. The new categories will replace all existing categories for use in state and federal data collections that include data on ethnicity or race.

The enclosed question-and-answer sheet provides additional information about these changes. You will receive details about the new form and the process for completing it at a later date. Information regarding the collection of data on race and ethnicity also is available on the MCPS Web site at www.montgomeryschoolsmd.org/info/ethnicityrace.

Respectfully,

Jerry D. Weast, Ed.D.
Superintendent of Schools

JDW:mh
Enclosure

Office of the Superintendent of Schools

850 Hungerford Drive, Room 122 ♦ Rockville, Maryland 20850 ♦ 301-279-3381

Key State Contacts

- Project Manager – Kenneth Gu, PhD, Kenneth.gu@ride.ri.gov, 401-222-8957
- Implementation & Support – RINET, support@ride.ri.net, 401-295-9200, #1
- RIDE Help Desk – helpdesk@ride.ri.gov, 401-222-8968

District Contacts

- District IT or Data manager

Online Resources on Collecting and Reporting Race and Ethnicity Data

- The Dear Colleague letter from Assistant Secretary Bill Evers is at:
<http://www.ed.gov/policy/rschstat/guid/raceethnicity/letter.html>
- Answers to related policy questions is at:
<http://www.ed.gov/policy/rschstat/guid/raceethnicity/questions.html>
- A summary that allows you to access these (and other) related documents is:
<http://www.ed.gov/about/offices/list/oeped>
- You can also get to them through the following links
 - <http://www.ed.gov/policy/rschstat/guid/raceethnicity/index.html>.
 - <http://www.ed.gov/policy/landing.jhtml>
 - <http://www.ed.gov/policy/rschstat/guid/edpicks.jhtml>.
- The Forum Guide to Race/Ethnicity Data Implementation is now available online at:
<http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2008802>