

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

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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/opepd/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.
- Observer identification should also be used if staff persons decline to identify race and ethnicity for themselves.

## 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.

<b>Race and Ethnicity Category</b>	<b>State Guidance</b>	<b>Alternative</b>
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



**MONTGOMERY COUNTY PUBLIC SCHOOLS**  
www.montgomeryschoolsmd.org

MARYLAND

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](http://www.montgomeryschoolsmd.org/info/ethnicityrace).

Respectfully,

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

JDW:mh  
Enclosure

Office of the Superintendent of Schools

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## Key State Contacts

- Project Manager – Kenneth Gu, PhD, [Kenneth.gu@ride.ri.gov](mailto:Kenneth.gu@ride.ri.gov), 401-222-8957
- Implementation & Support – RINET, [support@ride.ri.net](mailto:support@ride.ri.net), 401-295-9200, #1
- RIDE Help Desk – [helpdesk@ride.ri.gov](mailto: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>