RESTART & RECOVERY:
ACCOUNTABILITY INTERRUPTED: GUIDANCE FOR COLLECTING, EVALUATING, AND REPORTING DATA IN 2020-2021

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INTRODUCTION

The country has experienced extraordinary disruptions in nearly every aspect of our lives in recent months, due to the COVID-19 pandemic. We still do not know if this is a temporary interruption or a turning point that calls for us to rethink how the United States should conduct the business of public education over a longer term. In the absence of any clear answers, state education leaders are faced with the need to make near-term decisions based on limited information about what is happening in our schools now, and what the situation might look like in the coming year.

School accountability and reporting are both impacted by COVID-19 disruptions. Typically, state education agencies (SEA) annually produce public information on a wide range of indicators for schools and student groups, as required by the Every Student Succeeds Act (ESSA). In late March and early April 2020, however, the U.S. Department of Education (ED) waived school accountability and many reporting requirements for the 2019-2020 school year (SY20) for all states, territories, and the Bureau of Indian Education (U.S. Department of Education, 2020).

While many federal requirements were lifted, states have not abandoned their commitment to collect and share useful information to help stakeholders better understand and support students and schools. State leaders may be asking questions such as:

- What information should we publicly report for SY20 and beyond, and for what purpose?
- How can we determine whether the information we collect will be useful for the intended purpose?
- What kind of new information should we collect and report?
- How can we facilitate the appropriate interpretation and use of the information we report?

These are challenging issues, and there is no easy path forward, but this paper provides guidance for state leaders striving to address such questions. Most leaders understand that a complete freeze on sharing information would not be wise—but neither would proceeding in a "business as usual" manner. The following framework will help state leaders find the best option for their schools, by providing a guide for decision-making related to the collection, reporting, and distribution of data.

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CONTEXT

Before introducing this framework, it is helpful to review the context and constraints influencing state leaders' reporting decisions in SY20, with particular focus on the reporting and accountability requirements required by ESSA.

Federal Reporting Requirements

The Elementary and Secondary Education Act of 1965, as amended by ESSA, establishes requirements for SEAs and local education agencies (LEA) to prepare and disseminate annual report cards on the performance of schools and student groups in an understandable and uniform format (U.S. Department of Education, 2019). States have discretion regarding when report cards are issued, but they are encouraged to provide the reports before the start of the next school year or as early in the next school year as possible. These report cards generally are expected to include information about public schools pertaining to:

- student achievement data, based on state assessments
- state accountability system information
- data for the Civil Rights Data Collection[1]
- educator qualifications
- per-pupil expenditures
- state performance on the National Assessment of Educational Progress (NAEP)
- postsecondary enrollment rates for each high school

An SEA's report card may include additional information it believes will best inform parents, students, and other stakeholders about the progress of each elementary and secondary school (U.S. Department of Education, 2019). For example, an SEA may also include the percentage of students requiring remediation in postsecondary education, acquiring career and technical education certifications, or dropping out of school. Further, SEAs can choose to disaggregate student achievement information by groups beyond what the law requires, such as youth in the juvenile justice system or different proficiency categories of English learners.

ESSA State Plans Assessment Waivers

As noted, due to the pandemic, ED approved state waivers releasing states from certain requirements in SY20—student achievement data based on state assessments and state accountability system information. More specifically, states were released from submitting the following report card information:

- accountability system description
- assessment results
- other academic indicator results
- English language proficiency assessment results
- school quality or student success indicator results
- progress toward meeting long-term goals and measurements of interim progress
- percentage of assessed and not-assessed students
- number and percentage of students with the most significant cognitive disabilities taking an alternate assessment
- information showing how students in an LEA and each school performed on the academic assessments, as compared to students statewide

Other report-card requirements were not waived, however. These include:

- high school graduation rates
- data from the Civil Rights Data Collection
- educator qualifications
- per-pupil expenditures
- state performance on NAEP
- post-secondary enrollment rates for each high school

[1] CRDC includes rates of in-school suspensions, out-of-school suspension, expulsions, school-related arrests, referrals to law enforcement, chronic absenteeism (excused/unexcused), incidents of violence, number of students enrolled in preschool programs, and the number and percentage of students enrolled in accelerated coursework to earn postsecondary credit while still in high school.

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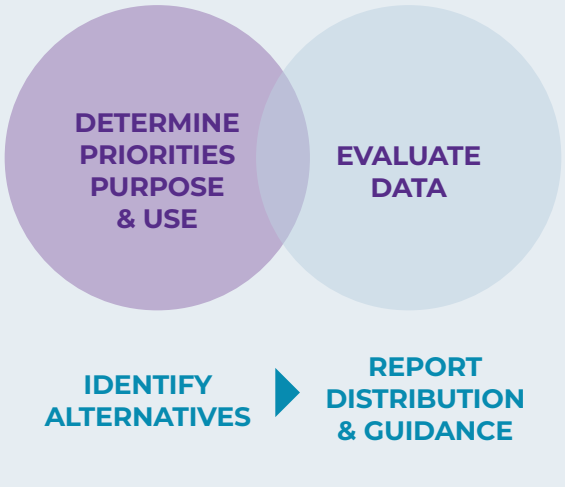
FRAMEWORK FOR SUPPORTING DECISIONS ABOUT DATA COLLECTION, REPORTING, & DISTRIBUTION

This section provides a framework to inform decision-making about data collection and reporting. Although it focuses on data required for federal reporting, the framework can be applied more broadly, as well. As *Figure 1* shows, this framework is neither discrete nor linear. A state may begin by determining its reporting priorities and purpose, then specify use-cases for the reports generated. However, it is equally valid for a state to first evaluate the current data context in light of federal reporting requirements. Alternatively, a state may wish to consider how it evaluates its data and determines priorities, purpose, and use as two overlapping components. The key decisions a state makes regarding these first two components will inform the options, which then will direct the approach for distribution and guidance. Each component in the framework is considered below.

FIGURE 1

Considerations to Inform State Decision Making about Reporting



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DETERMINE PRIORITIES, PURPOSE, & USE

In this time of interrupted accountability, providing useful information for decision-making in schools, districts, and states has never been more important. Identifying and prioritizing the key use-cases which must be supported is a critical step. It informs decisions about (a) what data to report, if not federally required, and (b) how to contextualize and report on the data which are required but are incomplete or lacking in some way.

To help states determine their priorities and use-cases, SEAs are encouraged to consider the following questions:

- What is the state's highest priority?
- In light of this priority, what decisions do we need to make?
- Who needs information to make those decisions, and what kind of information do they need?
- Is it feasible to collect this information?
- Are there potential, unintended negative consequences associated with collecting or reporting the information?
- How will the data be used and interpreted?

Attending to these questions will help the state initially classify data-reporting decisions into one of the four categories shown in *Table 1*, below.

TABLE 1 DETERMINING INITIAL DATA COLLECTION & REPORTING ACTIONS

	Information is Available & Suitable for Proposed Use Case	Information is not Available or Questionable for Proposed Use Case
HIGH-PRIORITY USE CASE	Move forward	Further evaluation necessary
LOW-PRIORITY USE CASE	Move forward after other priorities are met	Suspend data collection and/or reporting

Naturally, the state can move forward without delay in any area where the data associated with a high-priority use case have not been affected by COVID-19 disruptions. The challenge, however, will be how to support the high-priority needs when data either are not available or have been compromised by these disruptions. This dilemma leads to the next component of the framework.

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EVALUATE DATA

To support high-priority use cases, leaders will need to determine whether the available information can be used for its intended purposes. A reasonable starting point would be to appraise the condition of any legacy information the state typically collects. One way to accomplish this would be to evaluate the data elements with respect to these criteria:

COMPLETENESS: To what extent are data elements missing?

CONSISTENCY: Were data properties altered?

IMPACT: Is it likely that data values, such as performance, will change substantially?

PRACTICALITY: Is it feasible and reasonable to collect and report the data?

Completeness

Initially, it will be important to evaluate the extent to which the data will capture the full breadth and depth of information that was expected prior to the COVID-19 disruptions. For example, a complete assessment data file would include all planned assessments for all districts and schools, for all participating students.

As a practical matter, the criterion for "completeness" is rarely 100 percent. Educational data typically have missing cases—students were absent or declined to test; there were testing irregularities; and so on. It is more appropriate, therefore, to evaluate completeness with respect to the degree of deviation from pre-pandemic standards. It is important to keep in mind, however, that a file can appear to be complete overall, yet contain pockets of missing data (e.g., the disproportionate exclusion of cases in a given school or district). For this reason, all checks for completeness should include multiple disaggregations (e.g., by school, student group, program, etc.).

Consistency

Did COVID-19 disruptions change how the data were defined, calculated, or collected? For example, a district may have relaxed graduation requirements as a result of the pandemic. Or, in lieu of grades, perhaps a Pass/Fail policy was adopted to determine course credits and report student performance. In such circumstances, the resulting metrics (e.g., performance in advanced courses, graduation rate) would be affected, as would the aggregations for units such as student groups, schools, and districts.

Impact

Performance summaries and other results will be affected if the underlying data are incomplete or their properties have been altered. This is referred to as *impact*. For example, state test proficiency rates or the percentage of students earning course credit will likely change wherever cases are missing or calculations were based on different rules.

The impact to indicators can change even where data are complete, and their properties are unaltered. If students did not have an adequate opportunity to learn, for example, assessment performance likely would decline. Similarly, COVID-19 disruptions undoubtedly would affect teachers' and students' responses on a school climate survey. This situation raises questions about whether the data should be reported in the usual manner—and if so, how.

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EVALUATE DATA (cont.)

Practicality

Finally, leaders are encouraged to include a "reasonableness check" when making decisions about whether/how to collect and report data. For example, will collecting the data cause an undue burden on schools and districts and/or detract from higher priorities? Is it likely the data could be misunderstood, misinterpreted, or misused, despite providing appropriate guidance and support? If so, the data arguably should not be collected or reported.

It might be helpful for a state to summarize its evaluation according to these four criteria. For example, the state might "bin" each data element on the basis of the evaluation, as illustrated in *Table 2*, using color-coded categories:

GREEN: It is likely feasible and appropriate to proceed with reporting the data elements.

YELLOW: More information or analyses are needed to determine whether/how to report and use the data elements.

RED: It is not feasible or appropriate to proceed with reporting the data elements.

TABLE 2 DETERMINING INITIAL DATA COLLECTION & REPORTING ACTIONS

	COMPLETENESS	CONSISTENCY	IMPACT	PRACTICALITY	BIN
DATA ELEMENT 1	√	√	√	√	GREEN
DATA ELEMENT 2	X	√	X	√	YELLOW
DATA ELEMENT 3	X	X	X	X	RED

Note that failing to meet any criterion likely would preclude an assignment to the green category. Moreover, failing to meet the practicality criterion is sufficient reason to assign a data element to the red category. For elements in the red category, a state may decide to defer reporting to a subsequent cycle, or perhaps launch a new data collection and reporting initiative for the most urgent priorities. Leaders might further examine all elements coded yellow to determine the most appropriate alternative for reporting.

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IDENTIFY ALTERNATIVES

When an evaluation of legacy data reveals gaps in the adequacy of information to support the state's reporting priorities, state leaders can either modify the current approach or initiate a new data collection.

Initially, Modify Current Approach

Modifications refer to changes in the state's standard procedures for calculating or reporting data. For example, a leader might choose to change the business rules for producing a reported indicator, such as the data element, "chronic absenteeism." The business rules currently pertain to the number of days absent to classify a student as chronically absent, as well as the enrollment period required to include a student in the calculation. The state could change both aspects of these rules to report a modified indicator—i.e., by shifting the end of the enrollment period to a date prior to the suspension of in-person attendance and, in turn, identifying a threshold for "chronic" that maintains the same proportion of absences, as was used for the legacy indicator (e.g., 10%).

A variety of statistical adjustments can be considered as well, such as imputing missing data or altering the weights of a data file to achieve representativeness. Note that, although these statistical approaches are included in this paper for the sake of completeness, their usefulness in the era of COVID-19 disruptions is questionable. It will be important to include the appropriate policymakers and technical experts (such as the state's Technical Advisory Committee) in a careful evaluation of the perceived benefits and limitations of such approaches.

Collect New Data

When legacy data, either intact or modified, are not available to support the state's high-value use cases, it may be advisable to consider a new data collection and reporting initiative. This paper focuses on alternative initiatives specifically related to COVID-19 disruptions. These initiatives are classified under two broad categories: understanding impact and identifying areas of support.

Understanding Impact

This category refers to the collection of data to assess the impact of the pandemic on districts and schools. For example, a state may have allowed more flexibility with regard to course-credit or graduation requirements in spring 2020. In this case, it would be important to understand how districts have responded to that flexibility. Among other benefits, conducting such research would give the state a better context in which to support the proper interpretation and use of graduation-rate data and other important indicators.

It also is important to understand the range of practices deployed to support teaching and learning in a distributed and remote environment. Which approaches did districts and schools use, and what data did they collect to gauge the efficacy of those approaches (e.g., student/parent feedback, participation, or engagement)? Note that these data would not be suitable for high-stakes accountability, but the information could help those states seeking to partner with districts to identify and share promising practices.

Identifying Areas of Support Needed

A second reason to collect new information is to identify support needs—that is, ways the state can partner with districts and schools to address challenges associated with the pandemic. For instance:

- How did districts satisfy the needs of food-insecure students?
- What are the primary support-service needs for students with disabilities?
- Did districts and schools have adequate technology, training, and other instructional resources?

States can collect these data in a variety of ways: by conducting surveys, holding virtual meetings with district leaders, etc. Again, the purpose is not to collect this information for high-stakes decision-making, but rather to help states identify and support their districts' high-priority needs.

Another use-case for collecting new data is to help states develop their plans moving forward—for example, when issuing guidance for the timing and manner in which schools will resume in-person teaching when the pandemic ends. As states support the use of the guidance, it will be vital to understand the districts' and schools' capacities and what they will need in order to implement that guidance.

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REPORT DISTRIBUTION & GUIDANCE

In many ways, best practices for reporting are the same as they were pre-pandemic. Effective reporting follows directly from its (1) defined purpose, (2) intended use, and (3) audience. It is important to clearly articulate each of these three elements prior to working out the details of the design and distribution of the reports. When reporting follows these principles, the corresponding content is less likely to be misunderstood, misinterpreted, or misused and more likely to be actionable, efficient, and effective. With this in mind, this paper recommends addressing both presentation and support when developing their plans for reporting and distribution.

Presentation

Assessment reports should (a) reflect the needs of the intended audience, (b) attach clear and accurate meaning to the information reported, and (c) pay careful attention to how information is displayed (Zenisky, Mazzeo, & Pitoniak, 2016). This requires leaders to consider the different user groups and, further, what level and type of information each user group requires. For example, reports for the general public may need only high-level summaries, whereas more detail about score-meaning may be warranted for educators and parents. Policy-, technical-, or research-oriented consumers may require yet another view of the results, including fine-grained details. Note that, while this guidance pertains to assessment reports, it also applies to a wider range of reporting practices.

With respect to public presentations of performance data, this paper offers two cautions:

1. Because the purpose of SY20 reporting is not to assess, rank, or classify school performance, it would be inadvisable to use characteristics or metrics associated with the state's school accountability system. For example, many systems aggregate elements and assign an index score for one or more indicators, such as a "college readiness index" or an "academic performance score." Even if the data are available to produce such indices in the traditional manner, it would be unwise to do so, given the likelihood of inappropriate interpretation. It would be preferable to simply report the information in its "native metric" (e.g., percentage of students who earned a credential by category).
2. When presenting information, leaders are encouraged to provide additional narrative and visual cues highlighting any data elements that are not comparable to the corresponding elements in previous reports. For instance, if chronic absenteeism rates are being reported using a different business rule(s) than in the past, it will be important to conspicuously clarify those differences. Further, it is best to avoid graphic or tabular presentations that compare current rates with those reported in previous years. It also will be helpful to adopt a distinctive presentation style and naming convention (e.g., "modified" or "partial-year" rate) for the unique indicator(s). The objective of making these adaptations is to minimize the likelihood of users making unwarranted inferences.

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REPORT DISTRIBUTION & GUIDANCE (cont.)

Support

States are encouraged to provide additional supports to bolster the accurate interpretation of assessment results, by emphasizing the unique circumstances under which the data were collected. Additional supports could include supplemental documents and/or training sessions tailored to the intended audience(s), clearly articulating appropriate interpretations and uses of the data. Alternatively, leaders may embed these supports in their reporting, provided that they pay attention to the clarity and consistency of the message. For example, reports could highlight key text noting important contextual considerations and clarifying which interpretations are not supported by the data. Such supports are especially important if the data was modified prior to reporting.

Additionally, it will be important to provide contextual information on such matters as student engagement; teacher and student access to/use of technology supports; and variable policies across districts and schools (e.g., rules for assigning course credit). Providing such context will be especially important in situations where a misunderstanding of these variables might influence interpretation and use of the reported data.

Finally, states are encouraged to keep detailed records and documentation of all procedures for calculating, evaluating, and distributing the information. Doing so will support the complete and consistent application of procedures.

Distribution

A reporting plan also needs to address who is to receive what information, and for what purpose. There generally are three categories of distribution: (a) reports that are explicitly public, (b) reports that are for private use but not protected, and (c) secure reports for private use that are protected.

Explicitly public reports are available to all stakeholders, most commonly through the state's Web-based reporting platform. This information is typically higher level and requires considerable support to help users interpret the data accurately and use it appropriately. The data in these reports require a high degree of quality-assurance oversight, which typically involves careful evaluation and methodical review before release. Reports that are neither public nor protected have a more limited distribution, such as to district leaders. These reports may contain more detail than public reports, as they are written for a more technical reader, and they may be accompanied by additional guidance and documentation. Such reports, however, are not secure, and they are available to the public by request. For this reason, states should be prepared to provide appropriate guidance and support for public release, as needed. In contrast, secure reports are shielded from public release. For most states, this is likely to be a narrow reporting category, such as reports that contain Personally Identifiable Information.

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SUMMARY: THE DOS & DON'TS FOR REPORTING

This paper recommends the following actions and considerations related to reporting:

- Establish the use-cases and audience for each report.
- Determine the level of information required.
- Design reports for clear communication, to prevent misinterpretation.
- Consider alternative reporting formats or data visualizations.
- Consider the inclusion of relevant contextual information.
- Where the potential for misunderstanding or misuse is high, offer the intended audience additional documentation and/or training.

State leaders are encouraged to mitigate chances of misinterpretation or misuse of data, by:

- Avoiding the use of incomplete or pandemic-influenced achievement data to draw strong conclusions overall, by student groups, or about trends.
- Avoiding the use of indicators for high-stakes purposes, especially if those indicators (e.g., chronic absenteeism, suspensions, graduation) were skewed by the limited ability to collect accurate data to examine trends.
- Providing supports to help users understand context and interpret data appropriately.

FINAL THOUGHTS

It may be tempting to think of SY20 as a "one-off"— an extraordinary year that prevents any meaningful effort to collect and distribute data. However, this paper recommends taking another perspective: While the reporting challenges are substantial, so too is the need for good information to inform school-support initiatives. Effective reporting practices will require resolve and resourcefulness, but these efforts are critical. It is too soon to know if the COVID-19 disruptions will persist in 2020-2021, but the early signs suggest that states will continue seeing some deviation from pre-pandemic practices. If so, state leaders will need to continue developing innovative solutions to produce, share, and support relevant and actionable reports.

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