Data Quality Campaign Comments on ESSA Report Card Resource

Parents, educators, advocates, and policymakers need timely information about their students and schools to make informed decisions and advocate for student success. The Every Student Succeeds Act (ESSA) builds on a critical component of No Child Left Behind Act (NCLB) by maintaining the requirement for states to publish annual report cards, providing families and the public with transparent information about student outcomes. Since ESSA was signed into law in 2015, many states have taken innovative steps to make report cards more useful for families and other stakeholders. Still, work remains to ensure that information on report cards is easy to understand and represents all students.

The Department of Education (ED) should support states in their efforts to make report cards understandable and useful by making sure that basic requirements are clear and reflect best practices. ED's newly released resource can serve as a tool to clarify expectations and push states to continuously improve their report cards. The Data Quality Campaign (DQC) recently looked at report cards for all 50 states and the District of Columbia, and together with the organizations below, offer the following comments on the proposed report card resource.

Making Report Cards Useful for Families and Other Stakeholders

Report cards must be easy to use and understand.

Report cards have historically been difficult to find, use, and understand. As states have updated their report cards to meet ESSA requirements, many have also taken the opportunity to rethink their design to make these tools more useful for families, educators, and policymakers. DQC was pleased to see that ED's newly released report card resource reflects this priority, and explains how states can go beyond compliance with the law to make report cards more useful for families. In particular, we were glad to see that the report card resource addresses:

- The importance of considering your target audience in the design of report cards, including reminding states to design mobile-friendly formats;
- Best practices for engaging with parents and other members of the public in the process of designing report cards;
- The need to use parent-friendly language;
- The importance of timing; specifically, that report cards are most useful to parents if they are released early in the school year.

While states have made progress, they must have support to do more to make report cards easy for all users to understand and use. ED's resource can go further to address issues DQC identified in its research on ESSA report cards:

- Only 15 states translate report cards into languages other than English, meaning that many families will not have an easy way to understand information on their child's school. While translations are addressed in a question that references the Civil Right Act (question A-7), states' responsibilities with respect to offering translations on report cards remain unclear.

- Parent-friendly language and definitions are important, but the best report cards go further to explain why the data will help parents and other stakeholders make meaning of the information. Often, the most important factor in making report card information meaningful is the context that surrounds it, including what other information it is paired with and questions it can answer. For example, stakeholders will need a lot of context about how per-pupil expenditure data are calculated and how it can be used with other information included on report cards. Stakeholders will want to know if a school is getting enough resources to support its needs, how student expenditures are aligned to outcomes; how much money schools are getting compared to other similar schools. States will need to think about how data can be displayed in ways that allow policymakers to use their report card as a communication tool to answer these questions while avoiding misinterpretation.
- 36 states currently offer data in a downloadable format. The resource should encourage states to make data downloadable, so that researchers, community leaders, and advocates can conduct further analysis and provide value to their communities.
- Descriptions of best practices are helpful, but visual examples of how to display lots of data in an understandable format can help states think through changes to their report card design.

> **DQC recommendations for ED guidance:**
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> 1. Encourage states to translate their report cards. Some states have done this by embedding Google translate into their website. Clarify the existing question on translations so it is easier to understand what states are required to do.
> 2. Provide suggestions for how states may frame questions and provide interpretation guides for data elements that are new, complex, or easy to misunderstand.
> 3. In an appropriate location in document, encourage states to make data downloadable to allow for more community analysis.

Report cards should include all the data that matters to families and communities.

Report cards will be most useful if states go beyond minimum requirements to include other data that is important to their communities and provides a full picture of the schools and *all* students that it serves. ED's report card resource includes suggestions for a number of important metrics that go beyond compliance, and suggests including information on postsecondary persistence and remediation, career and technical education, and kindergarten readiness (among other topics). DQC strongly supports encouraging states to include these and other additional data points, and also suggests that ED consider adding:

- Further information on teachers: 1) teacher diversity; and 2) teacher effectiveness.
- An additional category related to postsecondary pathways: students entering directly into the workforce.

- Further subgroup detail: Asian and Pacific Islander (AAPI) disaggregation, to the extent that states have the data and a large enough n-size to display publicly.

> **DQC recommendations for ED guidance:**
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> 1. Consolidate all suggestions for additional data states could include on report cards into a single location in the document with: a) the addition of the items suggested above; and b) context for why this information is valuable.

Shining a Light on the Performance of All Students

Report cards must include all important information about student performance.

Many states have engaged in hard work to create report cards that include all data required by ESSA, but most still fall short when it comes to including every element on their report cards in a way that is easy to find for the average user. Comprehensive information that provides context about student learning is essential for parents and other stakeholders. ED's report card resource will serve as an important guide to what states must include on their report cards. Specifically:

- The document lists which subgroups are required for each element, serving as an important reminder to states that disaggregation is crucial for providing a complete picture of student outcomes.
- The document includes detailed information on most required elements.
- Information is consolidated in a useful appendix that states can use as a checklist for all required data elements.
- The document also reminds states that they must protect student data and provides links to privacy resources.

While the document contains helpful information, a few changes could help ensure that the most important messages are clear to states, especially in the cases where states are currently not meeting report card requirements.

- In DQC's review of each state's report card, we found that 41 states do not included disaggregated achievement data for at least one federally required subgroup. Subgroup data was also often missing for a number of other data elements. While the guidance addresses subgroups that are required, it could go further by discussing its importance and ensuring that requirements are as clear as possible.
- States' reporting on elements in their accountability system is inconsistent, and it may not be clear to them what they are required to report. For example, ten states that are holding schools accountable for student growth did not include growth data on their report card. Growth data is important for communities to understand how schools are helping students progress toward and beyond proficiency.

- While states are taking their responsibility to protect privacy seriously, they are not always transparent about their approach and what it means in terms of the data that are available. It was frequently unclear whether data were missing because they were not available, not reported, or because they did not meet the state's n-size.

DQC recommendations for ED guidance:

1. Make guidance related to subgroup disaggregation prominent, and make sure that any question discussing subgroup disaggregation also links to the appendix. Consolidate questions that list required subgroups and that provide subgroup definitions to keep the information in the same place.
2. Clarify what states must report with respect to their accountability systems by providing examples (e.g., if states use growth data in their accountability system, provide an example of what they would be expected to include on their report card related to growth).
3. Include best practices for displaying data that have been protected for privacy. For example, consider suggesting that states should still list a subgroup that is below its n-size with a notation that it has been suppressed, instead of excluding the subgroup completely.

Prioritizing Continuous Improvement

Resource should consider where states are now in the development of their report cards.

Having a resource will be useful for states to reference for answers to technical questions as they continue to update their report cards. That said, this document was released *after* most states released their ESSA-aligned report cards, so the Department should consider how its resource can support states in a process of continuous improvement. State report cards that lead to conversation and action in support of improved schools are not a one-time project. Based on DQC's review of report cards, states could use guidance on the following as they consider enhancements to report cards:

- ED's resource should update its framing to address why report cards matter, and why it is important to include all the required content (such as growth data, school climate data, and disaggregations) to encourage states to update their report cards to include information that is currently missing.
- There are three approaches that most states have taken in designing the interface of their report cards. Each of these approaches can be done in a way that is effective, or can be done in a way that leaves room for improvement. ED's resource should provide best practices for each typical format, so that states that need it have a guide for how to improve.
- ED's resource should address issues that currently make it hard to find report cards, such as issues with search optimization. Many states have taken seriously the requirement to prominently display their report card, and have included a link on the state education agency (SEA) homepage. However, some of them cannot be found when doing a simple internet search for the phrase "[state name] school report cards." Since many people may arrive at report cards through a search and not through the SEA homepage, states should take steps for the report card to be found more easily.

- In most states, report cards for each school appear to be centralized in one location. In cases where they are not, it is challenging to find information and use it. While ESSA permits districts to have separate report cards from the state, ED's resource should do more to ensure that states make data easy to find and use.

DQC recommendations for ED guidance:

1. Add language in appropriate places throughout the document with context on why report cards matter, and to remind states that report cards are an ongoing effort.
2. Update existing content related to report card formats to align it to the three display approaches that states are currently using to share report card data, and share best practices based on those approaches.
3. In the appropriate location in the document, provides states with guidance on search optimization so that report cards results show up at the top of a search.
4. Instead of addressing state and local report cards separately, consider consolidating into one section so that the guidance reflects current practice for most states, and also signals a best practice.

Conclusion

DQC staff welcome the opportunity to further discuss these topics with ED staff. We know that the information in these public tools will be a helpful resource for families, educators, and policymakers, and that the Department can play a valuable role in signaling to states the value of using education data to improve student outcomes.

Sincerely,

Data Quality Campaign

In partnership with:
- Achieve
- Advance CTE
- The Alliance for Excellent Education
- Attendance Works
- Chiefs for Change
- The Education Trust
- Faith and Education Coalition – National Hispanic Christian Leadership Conference
- KnowledgeWorks
- National Center for Learning Disabilities
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