

An ESP Whitepaper for Data-Driven Decision Making

Racial/Ethnic Data Reporting in Education

Meeting the Revised Requirements of the U.S. Department of Education

Extraordinary insight into today's education topics
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With a Foreword by Glynn D. Ligon, Ph.D.



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By Glynn D. Ligon, Ph.D.
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Racial and ethnic categories provide educators with a classic attraction/avoidance conflict. On the one hand, protecting the rights of students and employees from discrimination calls for reporting by racial/ethnic categories, but on the other hand, few educational interventions are based upon knowing the racial ethnic identities of students. So categorizing students by race/ethnicity tracks their progress while providing teachers little actionable information for planning instruction. Clearly, with the No Child Left Behind Act, subgroups of students must be disaggregated to ensure every one performs adequately, but the annual objective defining “adequate” is established for all students as a whole — not separately for each subgroup.

Racial categories raise both negative and positive connotations. Negative connotations tend to center around perceived or actual discrimination of certain groups. Positive connotations tend to relate to the feeling of group membership and shared cultural background. As the Office of Management and Budget (OMB) acknowledges, traditional and scientific definitions for race and ethnicity are less useful and appropriate than practical definitions that might categorize students (and employees) in the same ways they might encounter discrimination. Indeed some have proposed calling race and ethnic categories as something altogether different, like Population Groups, and the definition would be “the ethnic group or groups that people identify with or belong.”

Regardless of our own individual opinions on these issues, OMB’s categories and the U.S. Department of Education’s (USED) interpretation of them into reporting categories for states drive the way race/ethnicity is collected by individual schools, districts, and states. In this document, Barbara Clements has crafted an excellent and useful guide for states, districts, and software system vendors to relate OMB’s and USED’s history and recent declarations to how local and state information systems should handle collecting race/ethnicity data.



The federal government has identified new rules for identifying individuals' race/ethnic categories for monitoring adherence to civil rights laws. These new categories, six instead of five and all that are relevant for each individual, will require changes to existing education data systems. In addition, individuals will have to identify what categories are most relevant to them. State and local education agencies that maintain individual student and staff records will need to record this information in a way that makes federal reporting more efficient. State education agencies that collect aggregate data from school districts must decide what categories make the most sense to meet state and federal reporting needs. This paper provides guidance on identification, record-keeping, and reporting of race/ethnic data in education.

Background

Racial and ethnic data have been collected over the years for a variety of reasons. Since the early days of the Census, data have been collected to describe the characteristics of the U.S. population. In more recent years, racial and ethnic data have been used by the federal government to monitor and enforce civil rights laws, such as the requirements of the Voting Rights Act, the desegregation of schools, and the review of state redistricting plans. In addition racial/ethnic data are included in the statistical presentation of labor force, education, vital, and health statistics.

The determination of the categories currently used for collecting racial and ethnic data in education was made in the mid-1970's in part, in response to the need for better "coordination of educational activities at the Federal level." Beginning in 1974, a cross-federal agency committee worked on the standardization of categories to be used for collecting racial and ethnic data by federal agencies. After a trial adoption period, the Office of Management and Budget's (OMB) Statistical Directive No. 15, Race and Ethnic Standards for Federal Statistics and Administrative Reporting, was issued in May, 1977, indicating how federal agencies should collect, maintain, and report racial and ethnic data. This directive was reviewed in 1988 and again came under fire in 1993 because of the increasing diversity of the population and the perceived need for changes. After considerable research and discussion, OMB revised Directive 15 and on October 30, 1997, issued a new set of Standards for the Classification of Federal Data on Race and Ethnicity.

 **ESP Insight**
Since the 1970's, OMB has issued directives defining classifications for race and ethnicity.

Original Race/Ethnic Categories

OMB has stressed from the beginning that the race/ethnic categories included in Directive 15 "represent a social-political construct designed for collecting data on the race and ethnicity of broad population groups in this country, and are not anthropologically or scientifically based." Indeed, some would say that the categories should be called "population groups" rather than "races." Ideally, the individual self-identifies the category or group with which he or she most identifies.

 **ESP Insight**
OMB's race and ethnicity categories are social-political rather than anthropological or scientific.

The original OMB Directive identifies major race/ethnic reporting groups. The five categories identified are: White, non-Hispanic; Black or African American, non-

Hispanic; Asian/Pacific Islander; American Indian/Alaskan Native; and Hispanic. However, Directive 15 allows for more detailed subgroups to be identified as needed. In California, for instance, subgroups of Asian/Pacific Islander are often collected, such as Korean, Japanese, Chinese, Filipino, etc. In Florida, subgroups of Hispanic are often collected, such as Cuban, Puerto Rican, Mexican, etc.

In education, we have primarily treated the Hispanic category as equivalent to the other racial codes – each student associated himself or herself with only one of the five categories. In other federal data collections, such as the U.S. Census, Hispanic was treated as an ethnicity code, and the person could identify with any of the four race categories as well.

Revised Race/Ethnic Categories

In 1997, the five race/ethnic categories were reviewed and many potential revisions were considered. In the end, the “revised” categories include five race categories (American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White) and one ethnic category (Hispanic). The basic changes were:

- Federal surveys must ask for race and ethnicity using two questions: the first asking about Hispanic ethnicity and the second asking about race.
- The category “Asian or Pacific Islander” was split into two categories: “Asian” and “Native Hawaiian or other Pacific Islander.”
- Individuals must be given the opportunity to select more than one race category.

In all there are 63 possible combinations of the five race/ethnic categories. Every person for whom race/ethnic data are recorded should be allowed to pick all of the categories which are relevant to him or her.

Entities Affected by OMB Directive 15

The revised race/ethnic categories were used for the first time in the 2000 Decennial Census. They were expected to be implemented for the rest of the federal agencies no later than January 1, 2003. The U.S. Department of Education (USED) was allowed to wait until Fall 2001 to decide what aggregate reporting categories to use based on the frequency of occurrence of combinations within the population in 2000. State education agencies requested and were guaranteed three years in which to implement the new reporting categories because of the extensive requirements to upgrade systems, change forms, train staff, and survey staff and students using the new categories. As of August, 2005, USED has not published revised reporting categories for aggregate data; however some programs have attempted to collect data using the new categories. NCES now collects data from individuals using the new race and ethnic questions. Once USED publishes its aggregate reporting requirements, all education institutions and agencies receiving federal funding must have the capability to report race/ethnic information according to those standards.




Reporting Requirements

According to the revised OMB Directive 15, when individuals are surveyed by a federal agency, they are supposed to be able to identify all race/ethnic categories that are relevant. OMB guidance for civil rights reporting purposes recommended that data be reported on the five single-race categories, the four most commonly occurring combinations of two categories (American Indian or Alaska Native and White, Asian and White, Black or African American and White, and American Indian or Alaska Native and Black or African American), and "multiple race combinations that comprise more than one percent of the population of interest." In addition, the balance of individuals reporting more than one race may be reported.

Practical Considerations for Districts and States

Collecting, Maintaining, and Reporting Racial/Ethnic Data


 **ESP Insight**
All districts and schools should begin retooling their data systems to collect more detailed race/ethnic categories.

Given the requirement that schools, districts, and state education agencies have the capacity to report on race/ethnic groups of students and staff, planning must begin for the revision to the reporting requirements as soon as possible. Some state education agencies have already directed their districts to begin using the new categories, and they have plans for aggregating data as needed to do federal reporting. For state education agencies that collect individual student and staff records, this is essential. For state education agencies that collect aggregate data from districts, the issue is more complicated, and may warrant waiting for final USED decisions. Nevertheless, all districts and schools should be required to begin retooling their data systems to be ready for collecting the more detailed race/ethnic categories from individuals.

Identification of Race/Ethnic Categories for Individuals

Staff, parents and students should be informed that race/ethnic information is collected for the purpose of monitoring and enforcing their civil rights.

This information is reported by districts to state education agencies for the same purpose. In addition, these data are aggregated for reporting to the USED and the Equal Employment Opportunity Commission (EEOC).

 **ESP Insight**

- *Inform students, parents, and staff of the use of this information for monitoring civil rights, and urge them to self designate.*
- *Collect race/ethnic information upon registration (students) and application (staff).*
- *Provide the six race/ethnic categories on the form and invite respondents to mark all that are applicable.*

The most appropriate way to collect information about an individual's race and ethnicity is to ask him or her when he or she applies to enroll in school or applies for a job within the education system. If a child is too young to understand and reliably answer that question, then the parent or guardian should be asked to note which categories are appropriate. According to federal law, persons applying for a job cannot be required to give their race/ethnic information; however, employers are required to report this information. (Anderson and Fienberg, p. 15)

Respondents should be given choices to check, rather than an open-ended blank. Following is the recommended way to ask about race/ethnic categories on a registration form or survey.

Select all of the race/ethnic categories to which you belong.

- American Indian or Alaska Native
- Asian
- Black or African American
- Hispanic
- Native Hawaiian or Other Pacific Islander
- White

Practical Considerations for Districts and States Collecting, Maintaining, and Reporting Racial/Ethnic Data continued

The race/ethnic categories in this question are in alphabetical order, but could be listed in the most frequently occurring order: White, Black or African American, Hispanic, Asian, Native Hawaiian or Other Pacific Islander, American Indian or Alaska Native. Collecting the information this way will provide maximum flexibility for reporting by schools and districts to state education agencies or the federal government. They should be used whenever an individual student or staff record is being created or updated. If additional subgroups of racial or ethnic categories are needed, then it must be possible to aggregate these into the original set of OMB categories.

If race/ethnic information cannot be obtained from the student, student's parent/guardian, or staff member, then a teacher or administrator may be asked to make a determination based on observation of the student. This is not the most desirable way to get the information, but it is inevitable in some cases.


It is important to have some notation of race and ethnic categories for monitoring. However, it is hard to give definitive guidance on how to identify a person's race. During earlier Censuses, interviewers were given diagrams of nose and lip shape, eye configurations, etc. to help them determine a person's "race." Skin color has also been used in the past. Persons with Hispanic surnames have been identified as Hispanic, whether or not it was appropriate. Some states have directed district personnel to use the mother's race as the race for the child, while other states directed that the father's race be used. The lack of clearly identifiable races in the US population makes it nearly impossible to accurately assign a race to a person based on observation. Hence, it is crucial to at least attempt to get the individual to select one or more race/ethnic categories.


Re-Identification of Race/Ethnic Categories for Individuals

Ideally information about a student's race/ethnic categories is collected when he or she enrolls to attend schools in the school district for the first time. For a staff person, it should be collected when the person applies for a job. Unfortunately, there are millions of students and staff persons already enrolled or employed in school districts, and there are already entries in student and staff data systems.

The easiest way to obtain revisions to race/ethnic categories is to survey or question students (or parents) and staff members. Some might say that the question needs to be asked only of the parents – not the students – because of the importance of reporting on the performance of subgroups of students in No Child Left Behind (NCLB). In order to be sure the revised information is placed with the appropriate individual, the individual's unique identifier must be included with the information.

Ideally, one would ask to obtain changes only from those who are claiming more than one race/ethnic category. The vast majority of US citizens claim only one race/ethnic category, according to Census. In the US Decennial Census of 2000, only 2.4% of the people noted they were of two or more races. Hispanics accounted for about 12.5% of all respondents. However, OMB guidance is that all persons should be given the opportunity to identify or re-identify their races and ethnicity.

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Provide an opportunity for all students and staff to update their existing information as soon as possible.

 **ESP Insight**
Unique identifiers are key to merging revised race/ethnic data to the correct student/staff member.

Practical Considerations for Districts and States

Collecting, Maintaining, and Reporting Racial/Ethnic Data continued

The first decision to be made will be whether or not to survey all students/parents and staff. If you are unsure of the quality of your data, you may want to conduct a survey of all individuals in each school district one time, on a given date, such as the first day of school or September 1. The survey could be in the registration forms packet filled out by each student's parents at the beginning of school. Staff could complete the survey when they report for duty at the beginning of the school year. Forms could be pre-coded with the student or staff member's unique identifier and name. Scanner forms could be used to create a file that could be merged with existing files.

Another way to survey the students/parents would be to ask that only those wishing to revise their race/ethnic categories complete a form on paper or online. Again, the student identifier will be key to getting the information merged with the correct student.

Maintenance of Race/Ethnic Categories in an Education Data System

In the past, it was sufficient to record only the most relevant category identified by the student or staff person. With the new record-keeping and reporting requirements from USED, it will be important to know all race/ethnic categories that are relevant to each student or staff person. As a result, an education organization must be able to record all categories that are applicable.

Option 1: One way to record race/ethnic categories is to have one data element with 63 codes (01-63) to indicate all possible combinations, such as included in the following table. However, the codes will not be easy to remember and may be overwhelming to persons asked to make the determination. The following table was developed by Dennis Powell of the Illinois State Board of Education.


Value	HI	AI	AS	BL	NH	WH	Value	HI	AI	AS	BL	NH	WH
00							32	HI					
01						WH	33	HI					WH
02					NH		34	HI				NH	
03					NH	WH	35	HI				NH	WH
04				BL			36	HI			BL		
05				BL		WH	37	HI			BL		WH
06				BL	NH		38	HI			BL	NH	
07				BL	NH	WH	39	HI			BL	NH	WH
08			AS				40	HI		AS			
09			AS			WH	41	HI		AS			WH
10			AS		NH		42	HI		AS		NH	
11			AS		NH	WH	43	HI		AS		NH	WH
12			AS	BL			44	HI		AS	BL		
13			AS	BL		WH	45	HI		AS	BL		WH
14			AS	BL	NH		46	HI		AS	BL	NH	
15			AS	BL	NH	WH	47	HI		AS	BL	NH	WH
16		AI					48	HI	AI				
17		AI				WH	49	HI	AI				WH
18		AI			NH		50	HI	AI			NH	
19		AI			NH	WH	51	HI	AI			NH	WH
20		AI		BL			52	HI	AI		BL		
21		AI		BL		WH	53	HI	AI		BL		WH
22		AI		BL	NH		54	HI	AI		BL	NH	
23		AI		BL	NH	WH	55	HI	AI		BL	NH	WH
24		AI	AS				56	HI	AI	AS			
25		AI	AS			WH	57	HI	AI	AS			WH
26		AI	AS		NH		58	HI	AI	AS		NH	
27		AI	AS		NH	WH	59	HI	AI	AS		NH	WH
28		AI	AS	BL			60	HI	AI	AS	BL		
29		AI	AS	BL		WH	61	HI	AI	AS	BL		WH
30		AI	AS	BL	NH		62	HI	AI	AS	BL	NH	
31		AI	AS	BL	NH	WH	63	HI	AI	AS	BL	NH	WH

LEGEND

- AI - American Indian or Alaska Native
- AS - Asian
- BL - Black or African American
- HI - Hispanic or Latino
- NH - Native Hawaiian or Other Pacific Islander
- WH - White

Option 2: A better way to record race/ethnic information is to use six data elements, one for each race and ethnic category, each indicating yes/no. This will enable you to “slice and dice” your data any way needed. It will help you to break out the reporting categories needed for USED and any reporting categories needed within your state or community.

Race/Ethnic Category	Options
American Indian or Alaska Native	Yes, No
Asian	Yes, No
Black or African American	Yes, No
Hispanic	Yes, No
Native Hawaiian or Other Pacific Islander	Yes, No
White	Yes, No

 **ESP Insight**
The most flexible way to record race/ethnic data is to maintain granular data for individuals with six yes/no (Boolean) fields.

Practical Considerations for Districts and States

Collecting, Maintaining, and Reporting Racial/Ethnic Data continued

Revisions to Existing Data Systems

Eight years ago when the revised Directive 15 was published, a critical question was how to make changes to existing systems. Most local education agencies had existing student records and human resources systems that recorded race/ethnic data only according to the five categories then in use. In the intervening years, most system vendors have considered how this should be handled in their systems.

Some systems have user-defined fields that could be used for recording the six categories. Other systems have been revamped for use on new hardware or in distributed systems and contain the needed elements. If your system does not have the required six categorical elements, you have several options:

1. Use user-defined data elements to record the six categories.
2. Use a single 2-digit data element to record combinations 01-63.
3. Maintain a separate file with minimal student information, including unique student identifier with the race/ethnicity categories.



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There are several ways to maintain these data in existing systems.

- User-defined elements
- 63 codes in a single field
- Separate file

Outcomes of Not Using the OMB Race/Ethnic Categories

Penalties for not using the required race/ethnic categories, including potential combinations, are not clear. If the recommended changes are not made, then the quality of the data reported to USED will likely be suspect or, at best, incomplete.

A review of five student registration forms currently used in school districts in Illinois, California, Massachusetts, Florida, and Virginia indicates that there is much variability in how race/ethnic data are requested from students. Two of the school districts' registration forms ask for the standard five categories that have been used for years. These two districts can provide data that meets USED reporting standards as they exist today. However, they will not be able to meet new reporting requirements when they are specified by the USED.

One district's form asks for the student/parent to pick one of the five (new) race categories, Hispanic ethnicity or Multiracial. Another district's form includes all of these seven categories, however in addition it splits out American Indian from Alaska Native. These two districts may be collecting data according to state requirements; however these requirements will mean that federal reporting requirements cannot be accurately met. Since these two districts are using the new race categories, they must aggregate counts of Asian and Native Hawaiian or Other Pacific Islander students to meet existing reporting requirements. How they are reporting the multi-racial students is unknown. In states that use a multi-racial category, counts of multi-racial students are often handled one of three ways for federal reporting:

1. Collapse multi-racial students with the largest racial group of students.
2. Distribute multi-racial students proportionally among the rest of the groups.
3. Leave the multi-racial students out of the counts.



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There is much variability in how school districts record race/ethnic data now.



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Current reporting of multi-racial categories includes:

- Collapsing into the largest major group
- Proportional distribution
- Omitting the counts

Recommendations for State Collection of Racial/Ethnic Data from Districts

The fifth district includes all of the new race categories, some of which are divided into subgroups, plus a “Decline to state” category. “Decline to state” or unknown is not considered acceptable for USED reporting. In addition, the form asks the student to select the Primary Ethnic Identity and a Secondary Ethnic Identify. This helps with current reporting requirements, and may be able to handle reporting requirements implemented by USED.

These examples provide an indication of the problems associated with standard reporting when districts are not provided guidance on how best to maintain their data. State education agencies should urge districts to use the new OMB race/ethnic categories because they provide most of the flexibility needed. States can, of course, add subgroups of these race/ethnic groups as needed.

State education agencies that collect individual student and staff records should collect the granular data for each individual, i.e., the six race/ethnic categories. This will enable the data to be analyzed as needed. State education agencies that collect aggregate data from school districts may choose to collect counts of all 63 combinations or some subset of these combinations based on what will be required by USED and what is needed for strategic planning for the state.

If a state education agency collects aggregate counts of students and staff, then there may be problems if the reporting categories change or if different combined categories are needed within your state. This could lead to multiple reporting, something which should be avoided. Since USED has not yet published its reporting requirements, it is difficult to say what are the best categories for state education agencies to collect. Even though the dual race categories requested by USED may not represent a substantial group of students in your state while there are other combinations that are substantial, the safest thing to do would be to collect all combined categories requested by USED plus any combinations that are important within your state. These other categories should be able to be crosswalked into the USED categories.

USED Reporting

Because there has been no decision on reporting categories to be used by all of USED, some program offices have proposed ways to collect data more consistent with the new Directive 15. USED, however, has discouraged program offices from making these changes until the Secretary releases the plan for the whole agency.

The National Center for Education Statistics (NCES) has submitted its Common Core of Data collection for approval. As of September 1, 2005, the CCD is undergoing public review. NCES has proposed maintaining the existing categories for the 2005-2006 school year. The following eleven categories for reporting of race/ethnic data would be an option for reporting beginning with the 2006-2007 school year.

- 1 Hispanic of any race
- 2 Non-Hispanic, American Indian/Alaska Native
- 3 Non-Hispanic, Asian
- 4 Non-Hispanic, Black or African American



State education agencies should require their school districts to begin collecting race/ethnic data according to the new classification as soon as possible so that they will be ready when the reporting requirements change.



State education agencies with individual student and staff records systems should maintain the granular data so that subgroups can easily be aggregated to meet federal and state needs.

If aggregate data are collected from districts, state education agencies should collect all of the categories required by the federal government as well as any combinations that are needed by the state.

Recommendations for State

Collection of Racial/Ethnic Data from Districts continued

- 5 Non-Hispanic, Native Hawaiian or other Pacific Islander
 - 6 Non-Hispanic, White
 - 7 Non-Hispanic, American Indian or Alaska Native and White
 - 8 Non-Hispanic, Asian and White
 - 9 Non-Hispanic, Black or African American and White
 - 10 Non-Hispanic, American Indian or Alaska Native and Black or African American
 - 11 Non-Hispanic, balance of multiracial respondents
- Options 7-10 represent the largest groups of combined races occurring in the 2000 Census.

For school years 2006-2007 and 2007-2008, NCES proposes to collect data from state education agencies using either the old set of five categories or the new set of eleven categories. It is possible that beginning in 2007-2008, however, state education agencies may be expected to report using the new eleven reporting categories. The use of the 11 categories for aggregate reporting is contingent on USED's approval.

USED has assured state education agencies that it will report only those categories that meet a preset standard for reporting education data and that guard the confidentiality of respondents.

Handling Time Series Data

States and districts handle changes in assessments, entry/withdrawal codes, and other elements continually. Several alternative approaches are used.

1. Crosswalk the old categories to new ones; adopt rules to combine categories as necessary.
2. Make a clear division between reporting old and new categories by not including both in the same tables and graphs.
3. Compare categories that can be crosswalked cleanly and combine all other categories into a single loosely defined group.

It is very likely that NCES will provide guidance to state education agencies about doing time series analyses, as they will need to be able to do this as well.

Effect on NCLB Reporting

The No Child Left Behind Act requires states to identify "major" race/ethnic categories for reporting subgroup performance. Different subgroups have been identified by states to reflect their populations, but they have used the five categories in current practice. The changes discussed here might create new subgroups large enough to be of interest. However, this does not necessarily pose a problem for determination of adequate yearly progress by subgroup because NCLB does not specifically require the same subgroups to be reported each year. In fact, subgroups may come and go based on the changes in the population over the years. The size of these subgroups will, however, affect confidentiality and reliability requirements.



There are ways for state education agencies to handle time series data, such as crosswalking old categories into the new categories. States and districts can make a clear division between reporting old and new data by not including the data in the same tables and graphs.

Revisions to the reporting requirements on race/ethnic students and staff offer challenges to state and local education agencies, but they are not insurmountable. State education agencies must take a leadership role in helping districts handle re-identification of students and staff, provide guidance on record-keeping, and set standards for reporting data.

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About ESP Solutions Group

ESP Solutions Group provides its clients with *Extraordinary Insight™* into K-12 education data systems and psychometrics. Our team is comprised of industry experts who pioneered the concept of "data driven decision making" in the 1970's and now help optimize the management of our clients' state and local education agencies.

ESP personnel have advised all 52 state education agencies as well as the U.S. Department of Education on the practice of K-12 school data management. We are regarded as leading experts in understanding the data and technology implications of the **No Child Left Behind Act (NCLB)**, **Performance Based Data Management Initiative (PBDMI)** and **EDEN**, and the **Schools Interoperability Framework (SIF)**.

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This document is part of *The Data-Driven Decision Making Whitepaper Series*, designed to help education data decision makers analyze, manage, and share data in the 21st Century.

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