National
Forum
on Education
Statistics

THE IDAHO STATE DEPARTMENT OF EDUCATION

GUIDE TO IMPLEMENTING NEW FEDERAL RACE AND ETHNICITY

Categories for Students and Staff

DEPARTMENT OF EDUCATION · STATE OF IDAHO

CONTENTS

Chapter 1. Making the Case: Background and Rationale

1.1 Leading up to the Change

Since 1997, federal agencies have been working to adopt the U.S. Office of Management and Budget (OMB) Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity. These standards replace those that have been in effect since 1977. The new standards separate race and ethnicity. There are five categories for data on race, and respondents are now allowed to choose more than one race. The new standards are as follows:

ETHNICITY
- Hispanic or Latino
- Not Hispanic or Latino

RACE (CHECK ALL THAT APPLY)
- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or Other Pacific Islander
- White.

In August 2006, the U.S. Department of Education (ED) released proposed plans for revising the way state education agencies (SEA) (states) and local education agencies (LEA) (school districts/systems) are expected to maintain, collect, and report data on race and ethnicity. After reviewing extensive comments and feedback, ED released *Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education* (*Final Guidance*) in October 2007 . The *Final Guidance*, effective as of December 3, 2007, drives future reporting of racial and ethnic data to all programs within ED. The guidelines specify both the new categories for individual-level data, and the aggregated categories to be used for racial and ethnic data reported to ED. In August 2008, a letter was released by Bill Evers, ED's Assistant Secretary for Planning, Evaluation and Policy

Development, to elaborate the *Final Guidance*. The letter is accompanied by a list of answers to related policy questions in both elementary/ secondary education and postsecondary education settings.

CATEGORIES FOR AGGREGATED FEDERAL REPORTING

Regardless of the race combinations of individuals, each individual must be counted in exactly one of the following race and ethnicity combinations when being reported to ED or other federal agencies:

- 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.

It is important to change to the new standards *now* because they

- allow individuals to more accurately identify themselves;
- are required for federal education eligibility and accountability reports;
- align with other agencies that are using the new standards, removing the need for "dual" reports;
- are consistent with Census data and other national data sets, facilitating state- and local- level policy analyses; and
- reflect population changes.

REPORTING REQUIREMENTS BY 2009-2010.

Idaho districts/systems are required to report aggregated data (not individual student records) to ED using these new standards by

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1 See the full text of "Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education," *Federal Register*, Vol. 72, No. 202, Friday, October 19, 2007.

the fall of 2010 for the 2009-2010 school year. Note that this does not include aggregated data for the 2008-09 school year. For example, dropouts and high school completers for the 2008-09 school year, which may not be reported until the winter of 2009, may be reported under the old race and ethnicity categories.

The new standards are part of federal education reports that districts and states submit to receive funds such as those provided through the Elementary and Secondary Education Act (ESEA). They are part of the required ED accountability reports collected through the ED*Facts* data collection system. Within ED, the Office for Civil Rights collects data at the school and district levels to assist with its enforcement of laws prohibiting discrimination on the basis of race and national origin, among other personal characteristics. Under the Individuals with Disability Education Act (IDEA), states are required to collect race and ethnicity data on students with disabilities. Data collected through the Office of Elementary and Secondary Education that account for progress in meeting the goals of No Child Left Behind (NCLB) Act include information about students' race and ethnicity. All these data collections are tied to federal funding, and comply with the new OMB guidance for collecting racial and ethnic data.

The new race and ethnicity categories will also be used by other federal agencies in civil rights compliance monitoring and equal employment reporting for the public and private sectors and for all levels of government. The new racial and ethnic data standards have already been implemented by many federal agencies.

More accurate statistical information.

Outside ED, the new race and ethnicity categories were used by the U.S. Bureau of the Census in data collection, tabulation, and reporting in the 2000 Census. Health agencies have since taken the initiative of adopting the OMB race and ethnicity categories in their data collections; the Federal Equal Employment Opportunities Commission (EEOC) began to collect data using the new race and ethnicity categories in fall 2007.

The evolving racial and ethnic composition of the school population also provides a strong incentive for reporting data that more accurately reflect the student body. Parents want the opportunity to more fully describe their children's heritage. Districts/Systems and states need data to track and assess racial and ethnic disparities and to measure the effectiveness of school programs in reducing performance differences between groups of students. An effective accountability system relies on precise data, and the new categories can benefit operational decisions as well by more specifically acknowledging racial and ethnic heritage. For example, districts/systems may use the more precise descriptions of their students' backgrounds to better provide instruction and services.

2 As of the writing of the *Final Guidance*, the new race and ethnicity categories are adopted in the Employer Information Report (EEO-1). "The EEOC plans to update the other reports to use the same race and ethnic categories as the new EEO-1 but, before doing so, will give respondents a full reporting cycle to change their recordkeeping." (Source: "EEO Surveys" at http://www.eeoc.gov/employers/surveys.html)

What Do the New Standards Mean to School District?

- Race and ethnicity data have always been collected and reported to ED. **Federal education funds** are allocated through data reported to ED.
- Continued **civil rights enforcement** is an important reason for maintaining accurate race and ethnicity information about individual students and staff members at the school and district levels.
- Collecting and reporting racial and ethnic data using these standards will better reflect the current racial and ethnic makeup of communities. It not only allows school district/systems to **allocate their human and financial resources** more accurately and equitably, but also validates such decisions within their communities.
- The new data collection format will afford individuals of multiracial background an opportunity to select categories that **better represent themselves**. It allows Hispanic populations to more accurately describe themselves, helping the school communities to better serve and support them.
- Although work is involved in changing to the new standards, the new format, once understood and implemented, is more **user-friendly** because it acknowledges the racial and ethnic heritage of students, parents, and staff members.

1.2 Let's Get Started

Some states have proactively implemented the new standards in their data systems, while others waited for ED's October 2007 release of the *Final Guidance*. To help readers quickly understand the key changes, a comparison chart is provided on page 8. ***Exhibit 1.1 U.S. Department of Education's Final Guidance*** At-A-Glance contains a quick review of the key elements of the *Final Guidance*, which states and districts/systems may use for a variety of training and communication purposes. This best-practice guide recommends ways and provides tools for state and local data systems to implement the changes specified in the *Final Guidance* released in October 2007, thus meeting the goal of submitting data for the 2009-2010 school year as required by ED. This guide addresses four broad areas of implementation:

- Developing needed policies and procedures
- Training with staff and communication with parents
- Re-identifying students' and staff members' race and ethnicity
- Coding, storing, and reporting data and the new standards to earlier years' reports.

Throughout the *Final Guidance*, many data quality concerns such as the following are addressed:

- Re-identifying individuals, including tips on observing the race and ethnicity of an individual;
- Converting from old to new data sets;
- Conducting school district/system-to-state-to-federal data aggregation and reporting;
- Selecting and adopting methodologies;
- Navigating a tight implementation timeline;
- Identifying the impact on state assessment systems and on such issues as adequate yearly progress (AYP) calculations; and
- Promoting comparability between new and longitudinal/historical data.

In this guide, you will also find:
- Case studies of states and school districts/systems that have changed their data systems;
- Vignettes showing the pros and cons of implementing various strategies;
- Checklists of steps in the process of adopting the new race and ethnicity standards;
- A suggested timeline for implementation;
- Sample documents, such as letters to parents and staff; and
- Links to other resources.

1.3 A Suggested Implementation Sequence for Idaho:

This section contains a suggested timeline for Idaho districts/systems to follow in implementing the new guidance. This chart is not intended to dictate a time table or schedule. Its main purpose is to illustrate the sequence of the process, showing milestones within each broad area of implementation taking place at state and local levels. Exhibit 1.1 summarizes the *Final Guidance* of the ED that states are required to follow.

Winter 2008
- Begin Policy and Procedure development
- Make changes to student information systems

Spring 2009
- Change forms and documentation
- Ensure Student Information Systems are compatible with new guidelines

Summer 2009
- Define training and documentation

Fall 2009
- Conduct district/system-level training
- Begin new collection format for new student registration (ongoing).
- Communicate with public
- Conduct re-identification

Fall 2010
- School buildings begin to submit data to districts/systems
- Districts/systems begin to submit data to the Idaho Department of Education (SDE)

2010-2011 School Year
- All data will be collected using the new standards
- All data will be reported using the new standards

Exhibit 1.1   U.S Department of Education's *Final Guidance* At-A-Glance

Data Collected and Maintained by Educational Institutions

1. **A two-part question must be used to collect data about students' or staff's race and ethnicity:**

The first part should consist of a question about the respondent's ethnicity:
- Hispanic/Latino or not – the term "Spanish origin" can be used in addition to "Hispanic/Latino".

The order of the questions is important. The question about ethnicity must be asked first.

The second part should ask the respondent to select <u>one or more</u> races from five racial groups:
- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or Other Pacific Islander
- White

Additional categories may be used, but they must be subcategories of these groups.

2. **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. (*This last advice is from EEOC instruction in its EEO-1 Collection, not directly from Final Guidance*.)

3. **States and district/systems are strongly encouraged to re-inventory their racial and ethnic data.** Though not mandated by this guidance, ED strongly encourages that current students and staff be allowed to re-identify their race and ethnicity using the 1997

OMB standards to ensure comparability of data and to accurately reflect diversity.

4. **Newly collected racial and ethnic data must be retained for at least 3 years.** ED will indicate in its data collections the length of time educational institutions must maintain the original individual responses from students and staff. Racial and ethnic data as well as the original individual responses to the two-part question must be retained for at least 3 years or until the completion of any litigation involving those records.

Data Reported to the U.S. Department of Education

1. **Aggregated racial and ethnic data should be reported in the following seven categories:**
- Hispanic/Latino of any race; and, for individuals who are non-Hispanic/Latino only
- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or Other Pacific Islander
  - White
  - Two or more races.

2. **These aggregated categories are used for reporting data about students and for reporting data about staff to the Equal Employment Opportunity Commission (EEOC).**

Implications of Multiple-Race Responses for NCLB 2001
The introduction of multiple-race aggregation has implications for several ESEA requirements reauthorized under No Child Left Behind that involve racial and ethnic data, including AYP, report cards (for states and districts that receive ESEA Title I, Part A funds), and the 2-year trend comparisons included on state report cards. States will continue to determine which racial and ethnic groups will be used in the fulfillment of these requirements.

Exhibit 1.2 A Comparison of Existing and New U.S. Department of Education Race and Ethnicity Data Reporting Standards

School districts/systems and states are required to follow new standards in collecting individual-level race and ethnicity data, and in reporting aggregated categories to the U.S. Department of Education (ED). Below is a comparison of existing and new standards.

Existing Federal Reporting Standards	New Standards Outlined in ED's Final Guidance
Race and Ethnicity Categories	
American Indian or Alaska Native	Same (American Indian or Alaska Native)
Asian or Pacific Islander	Separate into two categories: • Asian • Native Hawaiian or Other Pacific Islander
Black or African American	Same (Black or African American)
Hispanic or Latino	Same, except that individuals are now asked to choose an ethnicity (Hispanic or Latino or not Hispanic or Latino) as the first part of a two-part question, as well as race(s).
White	Same (White)
Individual Data Collection Format	
Respondents are to select one of the five racial and ethnic categories above. The category that most closely reflects the respondent's recognition in his community should be used for purposes of reporting on persons who are of mixed racial and/or ethnic origins	Respondents are asked to select both an ethnicity and one or more of the above five racial categories. (Hispanic/Latino is considered an ethnicity, not a race category.)
Some data collections request race and ethnicity separately. If those were used, the minimum designations were: Race (Choose one): • American Indian or Alaska Native • Asian or Pacific Islander • Black • White Ethnicity (Choose one): • Hispanic origin • Not of Hispanic origin	A two-part question is mandatory, with the ethnicity part asked first. Ethnicity (Choose one): • Hispanic/Latino • Not Hispanic/Latino Race (Choose one or more, regardless of Ethnicity): • American Indian or Alaska Native • Asian • Native Hawaiian or Other Pacific Islander • Black or African American • White
Minimum Federal Reporting Categories	
If the combined format is used: • American Indian or Alaska Native • Asian or Pacific Islander • Black, not of Hispanic origin • Hispanic • White, not of Hispanic origin.	Each student is associated with exactly one of the seven aggregate reporting categories: • Hispanic/Latino of any race • American Indian or Alaska Native • Asian • Black or African American • Native Hawaiian or Other Pacific Islander • White • Two or more races
Dealing with Missing Information	
Individuals (or students' parents) are asked to self-identify themselves. Observer identification is required if individuals decline to choose a race/ethnicity.	Unchanged.
Recordkeeping	
Three years. However, when there is litigation, a claim, an audit, or another action involving the records, original responses must be retained until the completion of the action.	Unchanged.

1.4 Setting the Stage: Developing Policies and Procedures

Success in implementing the new race and ethnicity categories requires that ED, states, and school districts/systems work together at all levels of data collection. The new aggregated reporting categories are used for reporting data about students and staff. It is ED's responsibility to provide clear expectations of how race and ethnicity data will be reported under each of the federal education programs, and to provide leadership in guiding states and school districts/systems as they meet these requirements. The federal role does not end with the publication of the *Final Guidance*. Ongoing involvement extends to addressing the impact of changing race and ethnicity categories in ED's accountability systems, and providing guidance to states and school districts/systems as they revise their data systems and reports.

States and districts/systems are responsible for implementing the changes in their own data collection and reporting systems. To ensure the quality and comparability of data within these state and local systems, a thoughtful approach involving all of the key players—including data users and providers—is essential.

What Do the New Standards Mean to School District/Systems?

- Policy and procedure development begins at the state level, but it won't work without the close collaboration of district/systems and schools.
- Identifying a key person (or office) in charge of the change is crucial at the district/system level. In addition to collaborating with the state, this person/office could be in charge of conducting an inventory of existing data to identify the data sets that need to be updated with the new racial and ethnicity data; and responsible for collaborating with state officials regarding policies and procedures development.
- Vendors must understand that this change will affect all state and local data systems, not just one or two districts. Data systems will need to accurately capture the two-part race and ethnicity question from coding to recording and reporting. Local considerations, such as the capacity of the systems and reporting schedule, are taken into account in such changes.
- District/systems should emphasize to their vendors that this is a state-mandated reporting change and should, in most cases, be covered under their software support contract. District/ Systems should insist that vendor changes to data entry screens will facilitate accurate data entry.
- While the state can establish statewide policies, it is important for district/systems to set policies and procedures regarding the re-identification of individuals. See chapters 2 and 3 of this guide.

Surveying Ethnicity and Race, On Paper and Face-to Face:
A Massachusetts District Data Collection through Paper Surveys and Interviews

Following the state's decision to shift to the new 1997 race and ethnicity data standards, Massachusetts school districts were tasked with collecting the data with the new format beginning in the 2005–06 school year.

To aid the school districts in this transition, the Massachusetts Department of Education created a sample collection form accompanied by a letter to parents. The letters included the text, "If you would like to update the student data for your child, please complete the enclosed form and send it to your child's school by [date]. If we do not hear back from you, we will continue to report based on the student data we currently have." This option of not responding to the re-surveying process eased the burden on parents and school staff, since the state's population is predominantly White and does not tend to change its racial or ethnic identification from year to year. However, while this practice may work in areas with homogenous student bodies, in relatively diverse districts it may be advisable to resurvey all students rather than give parents the option to stick with the selections made under the old system.

In Everett Public Schools, one such heterogeneous district, a couple of extra steps were taken to ensure greater accuracy in the race/ethnicity data collected. More than 40 languages are spoken here, so the district translated the collection form into the five predominant languages, which represented over 90 percent of the district's language distribution. When the changes were first implemented by the state, all students in the districts were asked once to re-identify their race and ethnic categories. After that base-line effort, the district required parents of both new and returning students to fill out the enrollment forms at the district's Parent Information Center (PIC), located at one of the high schools. The opportunity for face-to-face interviews with parents at the PIC, in their native language, was important because many of the district's parents have limited literacy skills in their native languages. While staffing each school with translators would not have been cost effective, the PIC had translators on site to conduct interviews in a number of the area's languages. By tailoring its data collection practices to its population's needs, Everett was able to remove most of its language barriers and to collect more complete self-identified racial and ethnic data.

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[1] Returning students are those who have left the school system for another community and have returned.

Chapter 2. Getting on the Same Page: Training and Communication

Training and communication, available to state-, district/system-, and building-level staff, are essential to successful implementation of the new race and ethnicity standards. Besides fostering a culture of quality data that extends from the school to the SEA, effective communication ensures that everyone has the same understanding of the real world – what it looks like to a teacher or school data clerk working with parents as they enroll their children in school. This document is the primary guidance that will be provided to schools by the Idaho Department of Education; however support will be provided to school districts/systems as they train staff in their own central offices and districts/systems.

2.1 Training and Communication

Just as policy and procedures development begins at the state level, it makes sense for the school districts/systems to provide a broad framework for training and communication. These include:

- **Identify key players** who should be involved in training and communication. Both at the state and local level, broad support should be obtained from **leadership**. Presenting the new race/ethnicity standards at leadership meetings helps leaders and senior personnel understand the federal reporting requirements and the system changes that should be made at the state and local levels to implement the new reporting format. Senior leadership can also serve as a good sounding board for cost estimates. The anticipated outcome of this process is broad leadership support for the work needed to implement the new categories.

Data personnel whose responsibilities include collecting, maintaining, and reporting student

and staff racial and ethnic data should be trained so that they can:
- Understand the two-part question format and new race categories.
- Understand the federal aggregate reporting requirements.
- Identify specific changes to be made in their data systems to accommodate new requirements.
- Assign responsibilities for making such changes (in-house personnel or vendors), and identify contact person(s) for each area.
- Determine the implementation calendar, taking into consideration the agency's current data collection schedule.

Vendors are important players in this process. They should be involved in the early stage and be well informed of all the issues and changes in order to accomplish the following:
- Understand the two-part question format and new race categories.
- Understand the federal aggregate reporting requirements.
- Identify specific changes to be made in their systems or products and provide minimum data standards.
- Assign responsibilities for making such changes and identify a contact person.
- Determine the implementation calendar, taking into consideration the agency's current data collection schedule.

Local school district/system personnel should be made aware of the process early on, with follow-up sessions throughout the implementation process, to help them:
- Understand the two-part question format and new race categories.
- Understand the federal aggregate reporting requirements.
- Understand the state guidelines that will facilitate development of district/system policies and procedures based on their district/system's environment, including re-

identifying students and staff, following up with parents for data, observing a student's race and ethnicity if parents decline to do so, and following coding requirements.

- Develop plans for re-identification; including how and when it will be conducted.
- Identify specific changes to be made in their data systems (e.g., student records, human resources records, testing) to accommodate new requirements.
- Understand the timeline for implementation.

Anticipating questions about race and ethnicity identification will help:

- Middle Eastern students should be identified as "White," not "Asian."
- Students from Spain should be identified as Hispanic and one or more of the racial categories.

Exhibit 2.1 Providing Advance Notice to the Public:

MCPS 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.

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

MONTGOMERY COUNTY PUBLIC SCHOOLS
New Federal Guidelines for Reporting Ethnicity
and Race Data for MCPS Staff and Students

**Update #1
(April 2008)**

◊MCPS

Overview

The U.S. Department of Education requires all states to collect information on the race and ethnicity of public school students and staff. The federal government has developed a new way to report ethnicity and race that includes new categories. The changes should provide a more accurate picture of the nation's ethnic and racial diversity. Beginning in the fall of 2008, families of all students will be asked to fill out a brief form to update the reporting of their children's ethnicity and race. Reporting of staff data will occur at a later date.

If I have already provided this information to the school system, why must I provide it again?

In the past, forms for reporting race and ethnicity to the federal government allowed individuals to be identified in only one racial category. The new form enables individuals to be identified in ethnic and racial classifications and in more than one racial category. The federal government is requiring that ethnic and racial information for all students and staff be reported in this new way in order to reflect the nation's diversity more accurately.

How will the information be used?

The data with the new ethnicity/race categories will be used in the same manner that racial/ethnic data are currently used. The new categories will replace the existing categories for use in all state and federally sponsored statistical data collections that include data on ethnicity or race. Some examples include student record cards and test results.

Who provides the information?

Parents will complete a brief form to identify their children's ethnic and racial identity. Staff members will receive a form to fill out their own information.

When and how will the new information be gathered?

Montgomery County Public Schools will follow the new federal guidelines beginning in the fall of 2008. The new form will be distributed to all schools. The families of newly enrolled students **AND** of all current students will be asked to complete the form and return it to the school. Staff members will be asked to fill out a form at a later time, yet to be determined.

Where can I find more information?

More information is available on the MCPS Web site at www.montgomeryschoolsmd.org/info/ethnicityrace

Exhibit 2.2 Sample Letter to Staff Members on Re-Identification

District Letterhead

Dear Colleagues:

Each year, every school district/system in Idaho is required to report to the Idaho Department of Education staff data by race and ethnicity categories that are set by the Federal government. Accurate racial and ethnic data help us conduct research and evaluation as well as comply with Federal and state equal employment opportunity laws.

The Idaho Department of Education uses staff data for a variety of state and federal reports. The Federal government recently changed the reporting categories for student and staff data. As a result, you have the opportunity to update your race and ethnicity data in your record, if you wish to do so. You may now identify yourself by ethnicity (either Hispanic/Latino or not Hispanic/Latino) and by *one or more* racial groups (American Indian/Alaska Native, Asian, Black/African-American, Native Hawaiian/Other Pacific Islander, White). Starting with the 2010-11 school year, all schools in Idaho will report student data to the State Department of Education using the new format and categories.

Please complete the enclosed form and return to your [school/agency name] by [date]. If we do not hear back from you, we will use the existing information contained in your file. However, if you refuse to identify a race and ethnicity, a designated school staff [or indicate position of staff] will observe and select racial and ethnic categories on your behalf, as required by the Federal government for aggregate reporting. Please contact [individual's supervisor, school principal, or district human resources] if you would like to check your race and ethnicity information currently on file.

For more information about the student data reporting categories, please contact [school contact name and information].

Sincerely,

XXX
Superintendent of Schools

Exhibit 2.3 Suggested Training Frameworks for State and School District/System Personnel and Vendors

Background (for All Participants)
- Review lists of data currently reported to ED (with an indication of which reports are funding-related).
- Review state requirements for collecting race and ethnicity of students and staff.
- Review current race and ethnicity data maintained at the state level, by data sets.
- Understand key requirements under the ED's *Final Guidance* (use Exhibit 1.1):
    - Two-part question format
    - New race categories
    - Multiple race selection
    - Federal aggregate reporting requirements

Policies and Procedures (for State Personnel)
- Understand guidelines that will be conveyed to school districts/systems.
- Identify specific changes to be made in their data systems to accommodate new requirements.
- Identify the personnel/department assigned for making such changes, both in-house personnel and vendors, and identify contact person(s) for each area.

Implementation (for State Personnel)
- Publish calendar of implementation, taking into consideration the agency's current data collection schedule.
- Publish coding scheme and structure to be adopted by school districts/systems.

Implementation (for School District/System Personnel)
- Understand guidelines that will be conveyed to districts/systems.
- Identify specific changes to be made in district/system's 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 (See Issue #3 in Chapter 3)
- Understand the difference between self versus observer identification, and the observation process (see Issue #3 in Chapter 3.)
- 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.

Exhibit 2.4 Questions and Answers about the New Changes from the Public

Q: Why do you need this information?

A: The demographics of our society have changed significantly in the last few decades. These changes will allow our students and staff to more accurately describe who they are. We (school district/system or state) are required by the Federal government to use the new categories. All states and school districts/systems are required to do the same. There are good reasons in addition to meeting federal requirements, though. We routinely report aggregate information to the federal government for funding and evaluation purposes, as well as civil rights compliance. We also use racial and ethnic data to evaluate our placement and program needs, providing the best services for all students. The U.S. Census in 2000 used the new categories. This is a trend that education and human service agencies will follow.

Q: Is the federal government checking my immigration status?

A: No. This information will be maintained in your employment or student records. It will not be reported to any federal agency in a way that identifies you or your child. No one will check for immigration status from the information you give here.

Q: Will the school release my student's race and ethnicity to other parties?

A: Individual student records are protected by the Federal Education Records and Privacy Act (FERPA). The new race and ethnicity standards have no effect on FERPA's protection of student records. FERPA does not designate race and ethnicity as directory information, and race and ethnicity have the same protection as any other nondirectory information in a student's education record.

Q: Haven't we given this information before? Why do you need to ask again?

A: This is indeed a major effort, but it would be more beneficial to ask everyone again and at the same time with the new format. This way no one will miss the opportunity to identify themselves in a more accurate way.

Q: I am Hispanic. Why do I have to answer more questions?

A: One of the major changes is the recognition that members of Hispanic populations can be of different races. The federal government would like to afford Hispanic/Latino populations the opportunity to better describe themselves according to their culture and heritage. So yes, you will be asked to select one or more races, even if you have indicated that you are Hispanic/Latino.

Q: How do I know I won't be discriminated against after I've told you I belong to a minority group?

A: This is exactly why we need to maintain better racial and ethnic data about our students and staff. We are required to maintain this information about each individual in his or her record, in case a civil right investigation surfaces. Again, state and local guidelines are in place to ensure that racial and ethnic data will not be reported elsewhere in a way that you may be identified. The state and districts/systems follow FERPA rules and regulations to safeguard the privacy of student records (see question above). For employment records, none of the equal employment opportunity rules has changed. Your race and ethnicity will not be used to determine your employment status or condition.

Q: You can't make me do it, can you?

A: No, we can't; but providing the information would be beneficial for you or your child. We are required to provide an answer on your behalf, if you choose not to provide such information. The federal government believes that in getting aggregate numbers from states and districts/systems, it would be more preferable to have complete data this way, than having missing data.

Chapter 3. Getting It Done: Re-Identifying an Individual's Race and Ethnicity

The *Final Guidance* addresses many concerns raised by the public regarding data collection. In general, there are three major issues related to such an effort: re-identification of an individual's race and ethnicity, the two-question format, and observer-identification.

What Do the New Standards Mean to School District/Systems?

School districts play the key role in collecting data using the new race and ethnicity categories. It is essential for district and school personnel to establish policies and procedures for conducting the re-identification, following up for nonresponse, and observation of individuals' race and ethnicity.

3.1   Issue # 1 - Re-identification of Individual's Race and Ethnicity

- Though not mandated, the *Final Guidance* encourages agencies to give all students (or their parents/guardians) and staff members the opportunity to re-identify their race and ethnicity according to the new categories. Such a process is beneficial for states and school districts/systems, because:
    - On the personal level, it provides students and staff of multiracial backgrounds the opportunity to express their races and ethnicity, and allows students or staff who previously identified themselves as "Asian or Pacific Islander" to select either "Asian" or "Native Hawaiian or Other Pacific Islander"; and
    - On the institutional level, it promotes data consistency and comparability within schools, districts/systems, and states.

- Resistance to change is to be expected when it involves a great number of respondents, staff time and resources are limited, or if there is distrust of the state or the federal government's reason for these changes. Resistance can come from many places including student, staff and parents. It is important for district/system- and school-level personnel to understand and buy into the data changes. Making the case (see Chapter 1) contributes to success at this introductory stage.

- Besides the mandated requirements parents, students and staff must understand the benefits of these changes for the populations they serve, such as finally allowing multiracial individuals full recognition of their heritage, and identifying Hawaiian Natives and Other Pacific Islanders as a distinct group sharing a common heritage. Be sure that everyone understands that the new categories are required for new enrollees, and that data systems must be using new categories by the 2009-2010 school year. Changes are inevitable, and state staff members are there to help districts/systems make the transition as smoothly as possible.

- There may be resistance from some parents (such as undocumented immigrants) who refuse to provide the information out of fear of authority, or of being stigmatized. Be ready to explain to respondents the difference between the new and old race and ethnicity categories. It is also vital to explain that although these categories are required by the federal government, only aggregate racial and ethnic data are reported.[5]   Race and ethnicity data are not considered

"directory information" under FERPA. School districts/systems should offer reassurance by referring to the protection of individually identifiable information under FERPA, and indicate that student and staff information is sent to the Federal government in ways that ensure no individual is identifiable. See sample included in Chapter 2.

[5] ED research or statistical studies that collect information from individual students or staff members do not collect data in a way that permits the identification of individual respondents.
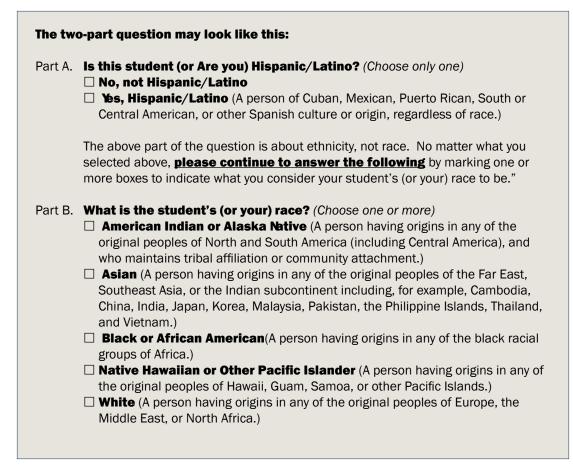
- The *Final Guidance* specifies how the race and ethnicity question should be presented, but does not mandate how an individual should answer the question. For example, some individuals may answer by the race and ethnicity with which they mostly comfortably identify, while others may answer based on their ancestry. The important issue is that the two-part question is being asked consistently across the state, districts/systems, and schools.

- Implementing the re-identification is done most easily during the enrollment period for new students and at the beginning of the school year for returning students. Another approach is staggering data collection throughout the year but this is more difficult to manage. Large and diversely populated school districts/systems may choose to re-survey every year, while others might conduct a one-time survey, asking students or staff members to respond by a certain date to change their race and ethnicity on record. If the second approach is used, it is recommended that a notice be sent to parents or staff members to allow re-identification. (See sample letter in exhibit 2.1.) New forms could be designed to just ask the two questions on race and ethnicity, or forms preloaded with existing data could be sent to students or staff members for verification and change if applicable. Either way, a specific date should be included by which the students or staff members are asked to return the information. Indicate that current data will be used, or race and ethnicity will be assigned, if new information

is not received. Allow students or staff members to check their record if they do not remember what race and ethnicity codes they had selected previously. Included later in this chapter is a case study of current difficulties in identifying the race and ethnicity of students and staff. State leadership in providing resources would contribute to the success of the process.

- The actual re-identification may be accomplished in different ways. Some districts/systems have students fill out forms in their home rooms, while others mail out either a request for information or a verification of pre-loaded information requiring a parent's signature or entry on a web-based process. However, since the *Final Guidance* indicates that the selection of a student's race and ethnicity is primarily made by parents or guardians (see Chapter 3.3), it is preferable to send the form to parents, asking them to identify the student's race and ethnicity, and then to sign and return the form. If a school district/system traditionally obtains data more quickly and accurately from high school students than from their parents, it would be preferable to ask students to provide this information themselves.

- To re-identify staff members' race and ethnicity, it is important to reiterate that this information is **not** a condition of employment. The federal rules and regulations on equal employment compliance have not changed.

3.2 Issue #2 - The Two-Part Question: Ethnicity First, Race Second

- The *Final Guidance* requires the use of the two-part question format. The first part of the question asks whether or not an individual is Hispanic/Latino. The definition used for Hispanic/Latino is "a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture

The two-part question may look like this:

Part A. **Is this student (or Are you) Hispanic/Latino?** *(Choose only one)*
☐ **No, not Hispanic/Latino**
☐ **Yes, Hispanic/Latino** (A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.)

The above part of the question is about ethnicity, not race. No matter what you selected above, **please continue to answer the following** by marking one or more boxes to indicate what you consider your student's (or your) race to be."

Part B. **What is the student's (or your) race?** *(Choose one or more)*
☐ **American Indian or Alaska Native** (A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.)
☐ **Asian** (A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.)
☐ **Black or African American**(A person having origins in any of the black racial groups of Africa.)
☐ **Native Hawaiian or Other Pacific Islander** (A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.)
☐ **White** (A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.)

or origin, regardless of race." While this part of the question pertains to ethnicity, to avoid confusion the word "ethnicity" need not be mentioned. The second part of the question asks an individual to select one or more races from the following five racial groups: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. Note that an alternative such as "some other races" or "race unknown" is not an option.

• The Hispanic population has grown in the last few decades, becoming the largest minority group in many school districts/systems. Census studies found that Hispanic reporting was more accurate with the two-part format. Asking respondents whether or not they are Hispanic before asking them to identify a race reduces the tendency to confuse race with country of origin (e.g. Peruvian, Boliviano).

• People of Hispanic origin may be of any race and should answer the part of the question on race by marking one or more race categories (presented in the second part of question). It is important to design the form in a way that enables respondents to understand that **both parts of the question** are to be answered. Many Hispanic/Latino respondents may be accustomed to calling "Hispanic" a race. Therefore, a transition line between the ethnicity and race questions such as this can be helpful: "The Hispanic/Latino part of the question is about ethnicity, not race. No matter what you selected above, please continue to answer the following by marking one or more boxes to indicate what you consider your race to be."

• Nothing prohibits states and school districts/ systems from offering additional racial and

ethnic categories for their own purposes. To reflect the diversity of its population, a state may collect a more detailed breakdown of a racial category (such as Korean, Japanese, or Chinese as separate categories for Asians). The only requirement is that these additional categories must be collapsed into the five federal races and one ethnicity category. The original information, which is maintained on an individual's education or employment records, must be collected using the two-part question format. And, the districts/systems or state must be able to report racial and ethnic data to ED in the seven aggregate categories described in the *Final Guidance* and in Chapter 1 of this guide. <u>The Idaho Department of Education does not intend to use additional categories</u>.

3.3 Issue #3 - Self-identification or Observer-identification

Principle 1: Self-identification is preferable.

1.1 Individuals must always be encouraged to identify their own race and ethnicity. Staff members may be asked to re-identify themselves in their records. Self-identification of racial and ethnic categories is strongly recommended in the *Final Guidance* as the choice for collecting the data, although respondents are *not required* to do so. If a parent, student, or staff member declines to select the student's or staff's race and ethnicity, identification by observers *should* be used. Observer identification is a last resort to identify the race and ethnicity of a student and this practice is allowable.

> Self-identification is the preferred choice of selecting an individual's race and ethnicity, though a person is not required by law to make these selections.

1.2 Aside from the instructions in the *Final Guidance,* self-identification of race and

ethnicity is found to be the most consistent and accurate mode of racial and ethnic data collection. It is also the approach that is most socially acceptable, most cognizant of individual privacy, and promoted by the 1997 OMB Standards as respectful of "individual dignity." While observer identification (as a last resort) provides information about how individuals are perceived in their communities, self-identification allows each individual to assert his or her own racial and ethnic identity.

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[6] Postsecondary institutions and Rehabilitation Services Administration grantees use self-identification only and do not use observer identification. They will be allowed to use the "race and ethnicity unknown" category when reporting data to ED

1.3 In the case of elementary and secondary students, self-identification includes the selection of race and ethnicity categories by a student's parents or guardians. The *Final Guidance* indicates that the identification of a student's racial and ethnic categories is to be made *primarily* by parents or guardians (i.e., the parent's choice should be used; this is not considered "observer" identification.) If there is a conflict between the choices of a student and his or her parent, the parents' choice should be used for the record.

1.4 If a parent refuses to identify the race or ethnicity of a student, but the student later volunteers to self-identify themselves, the data should be used, unless there is a reason to question the accuracy of the information. The designated observer should verify the response according to school district/system procedures.

Principle 2: Observer-identification is required as a last resort.

2.1 The *Final Guidance* recognizes the burden placed on school and district/system personnel in observer identification, and that the practice may not yield data as accurate as those from self-identification. However, absent self-identification or existing records, observer identification is considered preferable to having no data at all. Students and parents who are reluctant to self-identify should be informed that observer identification will be used. This

may discourage them from refusing to self-identify.

2.2 School district/system policy should indicate the steps to be taken before an observer makes a selection. These steps may include reviewing the enrollment form with the parent at registration, or sending a second letter or making a phone call to follow up with the parent when the information is not volunteered. In any case, the observers should be prepared to explain, if asked, that the school district/system and state are required to provide such information as an aggregate to the federal government; that the school district/system is required to select race and ethnicity categories for students on their behalf if parents or students decline to answer the questions; and that the school district/system will maintain the confidentiality of individual race and ethnicity records. Also be ready to explain federal law and state policy regarding the confidentiality of racial and ethnic data and the benefits of the new categories in allowing a person to choose his or her race and ethnicity. All observers should be trained on the procedures for racial and ethnic identification. These include the steps taken to ensure that respondents have refused to self-identify after being given the choice rather than simply having overlooked the question, and the statements to be made when asked about the process. (See exhibit 3.1 Suggestions for Conducting Observation for further information.)

2.3 It is generally a good practice to designate one administrator to be the observer to select on the students' behalf. However, states and districts/systems vary in how they assign this responsibility. In Wyoming, the principal is the only staff member authorized to perform observer identification. Elsewhere, the responsibility falls on others such as school clerks or may be shared among many staff members. School districts/systems may choose to allow multiple staff members to perform observer identification; for example, they may designate an individual who speaks the parent's native language. There are advantages to placing the responsibility with

the school principal/superintendent, rather than sharing it among clerks and other staff. This policy offers two main benefits: (1) it improves the consistency of the data collection process, and (2) in the event that students, staff members, or parents become dissatisfied with the observer identification process, this policy seats responsibility with one authoritative source, thus avoiding the confusion that might result if the burden were spread among numerous staff members.

2.4 The Idaho Department of Education recommends that local districts/systems establish policies:
• *That address who* would identify a student's race and ethnicity if the student and his or her parent did not self-identify;
• *That outlines how* a parent should be alerted that an observer will identify if no such information is provided, not only to encourage response from the parent, but also to protect the school and district/system if the parent later objects to the selection; and
• *That determines whether* data selected through observer identification are flagged in the data set. SDE does not intend to flag this information at the state level.

2.5 For staff data, note that an agency may obtain the racial and ethnic information from existing employment records or observer-identification if an employee declines to self-identify.

2.6 It was the experience of Everett School District, Massachusetts, that more changes (and self-identification) in racial and ethnic categories were obtained through interviews than through surveys. This was especially true when interviews were in the parent's language (other than English). The school district found that some parents had limited literacy skills in their native languages. Because of this, the district carried out one-on-one interviews in addition to sending a letter. In these interviews, parents were more likely to change their children's race and ethnicity than were parents who filled out printed surveys. While interviewing seems to be a more accurate way

to collect the information, school districts/ systems will have to balance this advantage with the additional cost.

> The federal government requires the use of observer identification of elementary and secondary school students' race and ethnicity, as a last resort, if such information is not provided by the students and their parents.

2.7 Observers should not tell a student, a parent, or a staff member how he or she should classify themselves. When asked, simply restate the question, explaining the definition within a race or ethnicity category. If a parent just states that a student is Hispanic, observers should encourage the parent to also select one or more race categories because people of Hispanic origin may be of any race.

2.8 Observers should be encouraged to stay within their own comfort zone. Visual identification of multiple race background is a difficult task. Observers should attempt this if they are comfortable doing so. Supporting information, such as personal information from a teacher or knowledge about common race combinations within the community, can be helpful in making such determinations.

2.9 There is no federal requirement to "flag" a student's record in the information management system if his or her race and ethnicity categories are selected by an observer. However, while this is an additional expense, it would be a helpful piece of information kept at the school or district/ system level. It need not be transmitted to the state.

2.10 Observer identification may not be feasible in cases such as distance education. Following up with parents via telephone or electronic mail are probably the only feasible options. In some extreme cases of geography, for instance, it can be almost impossible to observe a student. For example, in Yukon-Koyukuk School District in Alaska—a district that spans nearly 65,000 square miles and is roughly the size of Wisconsin—a distance education program administrator cannot stroll over to the child's classroom or call his or her parents in for a meeting. Data collectors from the school or district can speak to the student or parents and try to allay any reservations about providing race and ethnicity information. However, parents are free to refuse to give this information no matter how hard one tries to convince them to do so. In distance education or other virtual programs, the state should provide guidelines about methods school districts/systems should employ to collect racial or ethnic information and to handle refusals.

[7] See "Questions and Answers—Implementation of Revised Race and Ethnic Categories" by the U.S. Equal Employment Opportunity Commission at http://www.eeoc.gov/eeo1/qanda-implementation. html

Exhibit 3.1 Suggestions for Conducting Observer Identification

The OMB Guidance requires the use of observer identification at the elementary and secondary school level as a last resort, if racial and ethnic data are not self-identified—by the student or more typically the student's parents or guardians. If you are the individual assigned by your school or district/system as an observer, these are some suggestions to help you perform this duty. First of all, remember that:

• **Observer identification is used as "a last resort" after other efforts to increase the chance of having a parent identify the student or a student to identify themselves have failed.** Check your district/system's policies for such

procedures. Typically, they will include following up with parents, through e-mail or phone communication, to determine whether the parent or student is refusing to self-identify rather than simply overlooking the question.

• **Self-identification is based on how people define themselves and their children.** Assigning a race and ethnicity to an individual is a somewhat arbitrary exercise because these are not scientific or anthropological categories. While assigning race and ethnicity to another person is a difficult task, given the emotionally charged feelings and deep beliefs that many people have concerning the issue, your job as an

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**Definition of Race and Ethnic Categories
Used for Federal Reporting**

Ethnicity:
Hispanic/Latino
A person of Mexican, Puerto Rican, Cuban, South or Central American, or other Spanish culture or origin, regardless of race.

Race Categories:
American Indian or Alaska Native
A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.

Asian
A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

Black or African American
A person having origins in any of the black racial groups of Africa.

Native Hawaiian or Other Pacific Islander
A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

White
A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

observer for federal reporting purposes is simply to assign race and ethnicity categories to the best of your ability. It is important that you are consistent in your observation, and make your judgments objectively.

In addition to visual observation there are ways to help you determine an individual's race and ethnicity. Rely first on existing information before you actually "observe" the race or ethnicity of the student, but check your information source to the best of your ability. For example:
• Check the student's *prior record* to determine whether a racial category was selected in the past. This can narrow down the possibilities, but you may still need to determine whether the student is multiracial or has selected one of the "old" categories that has been separated (e.g., Asian and Pacific Islander, or Hispanic with no race identified).
• Check whether a *student's sibling* in the school has re-identified a race and ethnicity during the re-identification. There is, however, a possibility of different race and ethnicity among siblings as a result of adoption and blended families.

If sufficient existing information is lacking, you may look for clues from other sources such as:
• first-hand knowledge about the student

or his/her family (check with a teacher or counselor);
• the student's and parent's country of birth or country of origin;
• the student's home language or parent's language of preference; and
• knowledge about the community to which the school belongs.

Selecting an Ethnicity

If, in prior records, an individual has indicated that he or she was Hispanic, then the ethnicity question is answered. Your job is to observe and select a racial category. Many Hispanic individuals consider "Hispanic" as their race (partly due to past experience of using this as if it were a racial category). They may look for "Hispanic" or "some other race" in the race question. When they do not find it, they leave it blank. Following up might be all that is needed to collect the information directly from the student or parent.

A student may volunteer his or her ancestry rather than answering "yes" to the Hispanic/Latino ethnicity question. The following is a list of Hispanic ancestry groups to which Hispanic individuals may refer themselves:

Spaniard	Andalusian	Asturian	Castillian	Catalonian
Balearic Islander	Gallego	Valencian	Canary Islander	Mexican
Mexican American	Mexicano	Chicano	La Raza	Mexican American Indian
Mexican State	Costa Rican	Guatemalan	Honduran	Nicaraguan
Panamanian	Salvadoran	Central American	Canal Zone	Argentinean
Bolivian	Chilean	Colombian	Ecuadorian	Paraguayan
Peruvian	Uruguayan	Venezuelan	Criollo	South American
Latin American	Latino	Puerto Rican	Dominican	Hispanic
Spanish	Californio	Tejano	Nuevo Mexicano	Spanish American
Cuban				

Selecting a Race

In general, the new federal requirements bring together race and geographic/national origin. For example, "White" is defined to include people who originate from Europe, the Middle East, and North Africa. Though not an exhaustive list, the following chart may help in connecting geographic/national origin with a race, as defined in the *Guidance*:

If an individual considers themselves to be:	...or comes from one of the following countries or regions:	...and assuming single-race, the individual may be identified as:
European American	*Northern Europe* such as: Britain (Scotland, Ireland, Wales) Denmark, Estonia, Finland, Iceland, Latvia, Lithuania, Norway, Sweden *Western Europe* such as: Belgium, France, Holland, Luxembourg *Central Europe* such as: Austria, Czech Republic, Germany, Hungary, Poland, Slovakia, Switzerland *Eastern Europe* such as: Belarus, Bulgaria, Romania, Russia, Ukraine *Southern Europe* such as: Bosnia, Catalonia, Croatia, Cyprus, Greece, Italy, Macedonia, Malta, Montenegro, Portugal, Serbia, Slovenia, Spain *Other* such as: Caucasus, Armenia, Georgia, Azerbaijan	White
Middle Eastern American	Afghanistan, Egypt, Israel, Iraq, Jordan, Lebanon, Palestine, Saudi Arabia, Syria. Turkey, Yemen	White
North African American	Algeria, Egypt, Morocco	White
Black, African American, Afro-American	Bahamas, Barbados, Botswana, Ethiopia, Haiti, Jamaica, Liberia, Madagascar, Mozambique, Namibia, Nigeria, Nigriti, South Africa, Sudan, Tobago, Trinidad, West Indies, Zaire	Black
Asian American	Asian Indian, Bangladesh, Bhutan, Burma, Cambodia, China, Taiwan, Philippines, Indonesia, Japan, Korea, Laos, Malaysia, Mongolia, Nepal, Okinawa, Pakistan, Singapore, Sri Lankan, Thailand, Vietnam; or ancestry groups such as Hmongs, Mongolians, Iwo Jiman, Maldivian	Asian

If an individual considers them-selves to be:	...or comes from one of the follow-ing countries or regions:	...and assuming single-race, the individual may be identified as:
Pacific Islander	Caroline Islands, Fiji, Guam, Ha-waiian Islands, Marshall Islands, Papua New Guinea, Polynesia, Samoa, Solomon Islands, Tahiti, Tarawa Islands, Tonga	Pacific Islander
Australian or New Zealander – not an indigenous person	Australia, New Zealand	White
Aborigine, Indigenous Australian, Torres Straits Islander, Melane-sian	Australia, New Zealand, Torres Straits Islands	Pacific Islander

Though not exhaustive, the following is a list of American Indian and Alaska Native tribes or self-descriptions that may help in your observation:

American Indian Tribes				
Abenaki	Algonquian	Apache	Arapahoe	Arikara
Assiniboine	Assiniboine Sioux	Bannock	Blackfeet	Brotherton
Burt Lake Band	Caddo	Cahuilla	California Tribes	Canadian and Latin American
Catawba	Cayuse	Chehalis	Chemakuan	Chemehuevi
Cherokee	Cherokee Shawnee	Cheyenne	Cheyenne-Arapaho	Chickahominy
Chickasaw	Chinook	Chippewa	Chippewa Cree	Chitimacha
Choctaw	Choctaw-Apache	Chumash	Clear Lake	Coeur D'Alene
Coharie	Colorado River Indian	Colville	Comanche	Coos, Lower Umpqua, and Siuslaw
Coos	Coquille	Costanoan	Coushatta	Cowlitz
Cree	Creek	Croatan	Crow	Cumberland
Cupeno	Delaware	Diegueno	Eastern Tribes	Esselen
Fort Belknap	Three Affiliated Tribes of North Dakota	Fort McDowell	Fort Hall	Gabrieleno
Grand Ronde	Guilford	Gros Ventres	Haliwa-Saponi	Hidatsa
Hoopa	Hoopa Extension	Indians of Person County	Iroquois	Juaneno (Acjachemem)
Kalispel	Karuk	Kaw	Kickapoo apoo	Kiowa
S'Klallam	Klamath	Konkow	Kootenai	Lassik
Long Island	Luiseno	Lumbee	Lummi	Maidu
Makah	Maliseet	Mandan	Mattaponi	Menominee
Metrolina	Miami	Miccosukee	Micmac	Mission Indians
Miwok	Me-Wuk	Modoc	Mohegan	Monacan
Miwok	Me-Wuk	Modoc	Mohegan	Monacan
Mono	Nanticoke	Nanticoke Lenni-Lenape	Narragansett	Navajo

Nez Perce	Nipmuc	Nomlaki	Northwest Tribes	Omaha (Umo N Ho N)
Oneida Tribe	Oregon Athabaskan	Otoe-Missouria	Ottawa	Paiute
Pamunkey	Passamaquoddy	Pawnee	Penobscot	Peoria
Pequot	Pima	Piscataway	Pit River	Pomo and Pit River Indians
Pomo	Ponca	Potawatomi	Powhatan	Pueblo
Puget Sound Salish	Quapaw	Quinault	Rappahannock	Reno-Sparks
Round Valley	Sac and Fox	Salinan	Salish	Salish and Kootenai
Schaghticoke	Seminole	Serrano	Shasta	Shawnee
Shinnecock	Shoalwater Bay	Shoshone	Te-Moak Tribes of Western	Shoshone Indians of Nevada
Sioux (Lakota, Dakota, Nakota)				
Paiute-Shoshone	Siletz	Siuslaw	Spokane	Stockbridge-Munsee
Tohono O'Odham	Tolowa	Tonkawa	Trinidad	Tygh
Umatilla	Umpqua	Wailaki	Walla-Walla	Wampanoag
Warm Springs	Wascopum	Washoe	Wichita	Wind River
Winnebago	Wintun	Wintun-Wailaki	Wiyot	Yakama
Yakama Cowlitz	Yaqui	Yavapai Apache	Yokuts	Yuchi
Yuman	Yurok			
Alaska Native Tribes				
Alaska Native	Alaska Indian Tribes	Alaska Indian	Alaska Native	Alaskan Athabascans
Tlingit-Haida	Tsimshian	Sealaska	Southeast Alaska	Eskimo Tribes
Greenland Eskimo	Inuit	Inupiat Eskimo	Siberian Eskimo	Cupiks Eskimo
Yup'ik	Aleut Tribes	Aleut	Alutiiq Aleut	Bristol Bay Aleut
Chugach Aleut	Eyak	Koniag Aleut	Sugpiaq	Suqpigaq
Unangan Aleut				

Languages can be an indication of an individual's race and ethnicity. Of the more than 5,000 languages and dialects spoken in the world, these are the ten most common ones and their probable "race/ethnicity" designations:

If an individual's native or home language is:	He/she is likely:	Therefore…
Chinese	Asian	
Hindi (India)	Asian	
English	White	Check "country of birth or origin" (as the language is also used in U.S. Virgin Islands)
Spanish	Hispanic, with one or more of any racial categories	Check "country of birth or origin"
Bengali (India and Bangladesh)	Asian	
Portuguese	White, Black, or Asian. *Note that Portuguese-speaking groups are not considered Hispanic.*	Check "country of birth or origin" (as the language is used in South American countries such as Brazil, Asian countries such as Macao, or the Caribbean)
Russian	White	
Japanese	Asian	
German	White, some could be Hispanic in ethnicity	Check "country of birth or origin" (as the language is spoken by a few in South America and South Africa)
Korean	Asian	

Exhibit 3.2 Questions and Answers about Re-Identification and Observation

Q: Does the [state/school district/system] encourage schools to resurvey current employees and students using the new race and ethnicity categories as soon as possible?

A: Yes. Opportunities for individuals to self-identify using the new categories should be provided as soon as possible. Employment and registration forms should be updated to reflect the changes. Supplemental pages for existing forms could be used to minimize additional costs of printing. For some districts/systems that have already allowed employees access to the internal private website, staff members could be asked to voluntarily and confidentially self-identify. Other methods that achieve the same result would be acceptable.

Q: Do we *have to* re-identify everyone? Since the U.S. Department of Education only requires seven categories, could we just ask students or staff who are currently "Asian/ Native Hawaiian or Other Pacific Islander" to re-identify themselves?

A: The U.S. Department of Education *encourages* schools and agencies to allow all students and staff the opportunity to re-identify their race and ethnicity under the new standards. Although this is not a requirement, there are a couple of disadvantages to re-identifying only selected groups. First, the *Final Guidance* requires the new information to be available at the local level for civil right compliance. Second, re-inventorying only some students could create a perception among

respondents that schools are singling out one racial group. It would also deny individuals who want to self-identify with multiple races the opportunity to do so.

Q: We routinely collect more categories than the five racial groups required by the *Final Guidance*. Should we change?

A: Not if the additional categories your agency collects are subcategories of the five, such as Japanese, Korean, Chinese, Asian Indian, or Vietnamese under "Asian." These subcategories can always be collapsed into the five categories.

Q: What should we do if an individual who self-identifies as Hispanic/Latino does not answer the part of the question about race?

A: It is an important part of the process to educate data providers and collectors about the Federal requirement to separate ethnicity and race. Correspondence and forms need to explain that these are two parts of one question. Follow up for racial identification will be needed in many cases. As a last resort, an observer may fill in the information.

Q: What should we do if we believe that a student or a staff member is of a different race or ethnicity than he/she claims to be?

A: The school or district/system must accept an individual's self-identification of his or her race and ethnicity. Self-identification is a basic principle underlying these changes. The *Final Guidance* specifies that in elementary and secondary level, the identification of a student's racial and ethnic categories is made primarily by parents or guardians. A high school student may self-identify his or her own race and ethnicity category.

Q: What should we do if an individual refuses to self-identify using the new race and ethnicity categories?

A: As a next-to-last resort, an observer may look for this information in existing employment or student records. If these sources are not available, the observer may rely on visual observation for the purpose of selecting one or more race and ethnicity categories. See exhibit 3.1 for specific guidance in this regard.

Now that the preparatory work is done, it is time to complete the data entry, perform quality checks, and store and report the data. While individual records should contain the full level of detail on race and ethnicity, ED has provided some guidelines for reporting aggregate data.

What Do the New Standards Mean to School District/Systems?

A little preliminary preparation can save considerable time.

- A data entry screen designed in a simple way, mimicking the actual data collection form, would increase the accuracy of the process.
- Training should be provided to data entry personnel to ensure the quality of data, and data validity and quality checks should be implemented throughout the process.
- Though there are 64 possible combinations that can be coded, only 7 categories are required to be reported to ED.

4.1 Data Entry

- Assign data entry personnel at the school or district/system level, based on what is realistic according to the size and structure of the school district/system. Data entry staff should be trained so that they understand the context and the content of the changes.

- The data entry screen should be simple, mimicking the actual data collection form, capturing the initial data accurately. Remind personnel that the order of "old" categories may be different from the "new" ones. For

example, although "White" may have been the first option of race selection in previous year's data entry screen it would now be the last one listed if the state or school district/system chooses to follow the order of the *Final Guidance*.

- Implement audit checks of data in the system to ensure the quality of the data entered.

4.2 Data Coding

4.2.1 Student Data: Student race and ethnicity will be collected in the local Student Information Systems. Data will be collected in a two-question format.

Question 1: Ethnicity

Hispanic Indicator [Student: Hispanic Ethnicity Indicator (144)]

Provide the code indicating if this student is identified with an ethnicity of Hispanic/Latino - a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

Code	Description
1	Yes
2	No

Question 2: Race

Race 1 Code [Student: Ethnic Code Short (27)]

Provide the code indicating this student's identified race.

Code	Description	Explanation of Use
AM	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
AS	Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
BL	Black or African American	A person having origins in any of the black racial groups of Africa.
PI	Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
WH	White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Race 2 Code [Student: Race 2 Code (146)]

Provide the code indicating this student's second identified race, otherwise leave blank.

Code	Description	Explanation of Use
(blank)	No Second Race	This student has not identified a second race.
AM	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
AS	Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
BL	Black or African American	A person having origins in any of the black racial groups of Africa.
PI	Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
WH	White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Race 3 Code [Student: Race 3 Code (147)]

Provide the code indicating this student's third identified race, otherwise leave blank.

Code	Description	Explanation of Use
(blank)	No Third Race	This student has not identified a third race.
AM	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
AS	Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
BL	Black or African American	A person having origins in any of the black racial groups of Africa.
PI	Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
WH	White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Race 4 Code [Student: Race 4 Code (148)]

Provide the code indicating this student's fourth identified race, otherwise leave blank.

Code	Description	Explanation of Use
(blank)	No Fourth Race	This student has not identified a fourth race.
AM	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
AS	Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
BL	Black or African American	A person having origins in any of the black racial groups of Africa.
PI	Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
WH	White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Race 5 Code [Student: Race 5 Code (149)]

Provide the code indicating this student's fifth identified race, otherwise leave blank.

Code	Description	Explanation of Use
(blank)	No Fifth Race	This student has not identified a fifth race.
AM	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
AS	Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
BL	Black or African American	A person having origins in any of the black racial groups of Africa.
PI	Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
WH	White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

- A value must be provided for **Hispanic Indicator [Student: Hispanic Ethnicity Indicator (144)]** or the data loading process will reject the record.
- A value must be provided for **Race 1 Code [Student: Ethnic Code Short (27)]** or the data loading process will reject the record.
    - Race codes of students with multiple races can be provided in any order but those codes must be provided in:
    - Race 1 Code [Student: Ethnic Code Short (27)] and Race 2 Code [Student: Race 2 Code (146)] if two races are identified.
    - Race 1 Code [Student: Ethnic Code Short (27)], Race 2 Code [Student: Race 2 Code (146)] and Race 3 Code [Student: Race 3 Code (147)] if three races are identified.
    - Race 1 Code [Student: Ethnic Code Short (27)], Race 2 Code [Student: Race 2 Code (146)], Race 3 Code [Student: Race 3 Code (147)], and Race 4 Code [Student: Race 4 Code (148)] if four races are identified.
    - In all five fields if five races are identified.
- Records containing the same race code value in more than one race field will be rejected by the data loading process.
- It is important to ensure the accuracy of data. Technology can help data quality through automation of edit checks. Data entry staff, administrators, and technology personnel can work together to produce and implement these edit checks. For example, staff should re-check the information if the existing data in a record are different from the new data and it is:
    - Not one of the "split out" categories such as from "Asian or Other Pacific Islander" into "Asian" or "Native Hawaiian or Other Pacific Islander;"
    - A single-race selection but with a different category.

4.2.2 Staff Data: Staff race and ethnicity will be collected in the Idaho Student and Staff Record System
 (NSSRS) via the Staff template. Data will be collected in a two-question format

Question 1: Ethnicity

Hispanic Indicator [Staff: Hispanic Ethnicity Indicator (69)]

Provide the code indicating if this staff person is identified with an ethnicity of Hispanic/Latino - a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

Code	Description
1	Yes
2	No

Question 2: Race

Race 1 Code [Staff: Ethnic Code Short (21)]

Provide the code indicating this staff person's identified race.

Code	Description	Explanation of Use
AM	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
AS	Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
BL	Black or African American	A person having origins in any of the black racial groups of Africa.
PI	Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
WH	White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Race 2 Code [Staff: Race 2 Code (78)]

Provide the code indicating this staff person's second identified race, otherwise leave blank.

Code	Description	Explanation of Use
(blank)	No Second Race	This staff person has not identified a second race.
AM	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
AS	Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
BL	Black or African American	A person having origins in any of the black racial groups of Africa.
PI	Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
WH	White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Race 3 Code [Staff: Race 3 Code (79)]

Provide the code indicating this staff person's third identified race, otherwise leave blank.

Code	Description	Explanation of Use
(blank)	No Third Race	This staff person has not identified a third race.
AM	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
AS	Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
BL	Black or African American	A person having origins in any of the black racial groups of Africa.
PI	Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
WH	White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Race 4 Code [Staff: Race 4 Code (80)]

Provide the code indicating this staff person's fourth identified race, otherwise leave blank.

Code	Description	Explanation of Use
(blank)	No Fourth Race	This staff person has not identified a fourth race.
AM	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
AS	Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
BL	Black or African American	A person having origins in any of the black racial groups of Africa.
PI	Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
WH	White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Race 5 Code [Staff: Race 5 Code (81)]

Provide the code indicating this staff person's fifth identified race, otherwise leave blank.

Code	Description	Explanation of Use
(blank)	No Fifth Race	This staff person has not identified a fifth race.
AM	American Indian or Alaska Native	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
AS	Asian	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
BL	Black or African American	A person having origins in any of the black racial groups of Africa.
PI	Native Hawaiian or Other Pacific Islander	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
WH	White	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

- A value must be provided for **Hispanic Indicator [Staff: Hispanic Ethnicity Indicator (69)]** or the data loading process will reject the record.
- A value must be provided for **Race 1 Code [Staff: Ethnic Code Short (21)]** or the data loading process will reject the record.
- Race codes of staff with multiple races can be provided in any order but those codes must be provided in:
    - Race 1 Code [Staff: Ethnic Code Short (21)] and Race 2 Code [Staff: Race 2 Code (78)] if two races are identified.
    - Race 1 Code [Staff: Ethnic Code Short (21)], Race 2 Code [Staff: Race 2 Code (78)] and Race 3 Code [Staff: Race 3 Code (79)] if three races are identified.
    - Race 1 Code [Staff: Ethnic Code Short (21)], Race 2 Code [Staff: Race 2 Code (78)], Race 3 Code [Staff: Race 3 Code (79)], and Race 4 Code [Staff: Race 4 Code (80)] if four races are identified.
    - In all five fields if five races are identified.
- Records containing the same race code value in more than one race field will be rejected by the data loading process.
- It is important to ensure the accuracy of data. Technology can help data quality through automation of edit checks. Data entry staff, administrators, and technology personnel can work together to produce and implement these edit checks. For example, staff should re-check the information if the existing data in a record are different from the new data and it is:
    - Not one of the "split out" categories such as from "Asian or Other Pacific Islander" into "Asian" or "Native Hawaiian or Other Pacific Islander;"
    - A single-race selection but with a different category.

4.3 Data Reporting

- The *Final Guidance* requires education institutions to report data in seven aggregate racial and ethnic categories:
    - Hispanic/Latino of any race; and for individuals who are non-Hispanic/Latino only
    - American Indian or Alaska Native
    - Asian
    - Black or African American
    - Native Hawaiian or Other Pacific Islander
    - White
    - Two or more races

These aggregate categories are consistent with staff data collected by EEOC.

- The *Final Guidance* lists the following examples that may be helpful in understanding how the reporting will work:

Scenario	Ethnicity	Race(s)	Federal Reporting Category
1 For Hispanic *and* any one race, report as "Hispanic"	Hispanic/Latino	Asian	Hispanic/Latino of any race
2 For Hispanic *and* any combination of races, report as "Hispanic"	Hispanic/Latino	• Asian • Black or African American	Hispanic/Latino of any race
3 For Non-Hispanic *and* any *one* race, list that race	Not Hispanic/Latino	Native Hawaiian or Other Pacific Islander	Native Hawaiian or Other Pacific Islander
4 For Non-Hispanic *and* any combination of races, report as "two or more races"	Not Hispanic/Latino	• American Indian or Alaska Native • White	Two or more races

ED does not require aggregate reporting of race(s) for the Hispanic population due to burden and cost concerns. However, the two-part question format is still required. ED will require agencies to keep the original individual responses using the two-part question from staff and students for the length of time indicated in the instructions to each ED data collection. This will allow ED access to important information when needed for civil rights purposes.

- If ED determines that additional information is needed to perform its functions effectively in a specific instance, ED will request this information from agencies.

- The *Final Guidance* allows postsecondary institutions, but not elementary and secondary districts/systems, to report "race and ethnicity unknown." Experience has shown that a substantial number of college students refuse to identify a race and there is rarely a mechanism for college administrators to use observer identification. At the elementary and secondary school level, parents or guardians typically identify the race and ethnicity of their children and observer identification is required; therefore, "race or ethnicity unknown" or "missing data" *cannot* be used for federal reporting at those levels.

4.4 Data Storage

- For ED to have access to this information when needed for civil rights enforcement and other program purposes, the *Final Guidance* requires educational institutions to store the original responses using the two-part question format for 3 years, unless a given collection specifies otherwise. This is consistent with current regulations (under 34 CFR 74.53 and 80.42) by which ED grantees or sub grantees are required to retain for 3 years all financial and programmatic records, support documents, statistical records, and other records, as specified. In most cases, this practice is already in place. This requirement—maintaining auditable records for 3 years—has not changed.

- One exception to the general 3-year period is cases in which litigation, a claim, an audit, or another action involving the records that has started before the 3-year period ends has occurred. In these cases, the records must be maintained until the completion of the action.

It would be good practice to maintain the original paper record at the location where it was received, typically at the school or district/system level. Once data are electronically transmitted to the State Department of Education, electronic archived records would be maintained.

No Child Left Behind (NCLB) Reporting Under the Final Guidance

- States will continue to have discretion in determining which racial groups are "major" for the purposes of fulfilling accountability requirements for making AYP determinations and issuing state and local report cards.
- States will continue to be able to count individual students as a part of the same "major" racial groups for AYP purposes in the same manner that they do currently.
- States are not required to change the race and ethnicity categories used for AYP determinations.
- States are not required to change the manner in which individual students are identified at the school level for the purposes of making AYP determinations. For example, if a state currently uses the "Asian or Pacific Islander" group for AYP determinations it can continue to use this category as a "major" racial group rather than using the two new categories of "Asian" and "Native Hawaiian or Other Pacific Islander."
- If a student is currently identified as African American for AYP purposes at the school level when the student would be Hispanic and African American under re-identification, the school may continue to identify the student as African American for AYP determinations. For other data reporting to ED, however, this student would be counted as Hispanic.
- States will have discretion to change the "major" racial groups used to make AYP determinations, pending a submission of an amendment to the state's *Consolidated State Accountability Workbook* to ED. States may therefore use bridging and allocation methods to ensure that accountability determinations accurately account for the possible shifts in demographics and are not due to the change in the manner in which students are included in the major racial and ethnic groups.

Exhibit 4.1 Full List of Sixty-four Possible Combinations of New Race and Ethnicity Codes as Found in NCES Statistical Standards Program

	Hispanic/Latino	Non-Hispanic/Latino
Single Race		
White	1	33
Black or African American	2	34
Asian	3	35
American Indian or Alaska Native	4	36
Native Hawaiian or Other Pacific Islander	5	37
Combination of Two Races		
White *and* Black or African American	6	38
White *and* Asian	7	39
White *and* American Indian or Alaska Native	8	40
White *and* Native Hawaiian or Other Pacific Islander	9	41

	Hispanic/Latino	Non-Hispanic/Latino
Black or African American *and* Asian	10	42
Black or African American *and* American Indian or Alaska Native	11	43
Black or African American *and* Native Hawaiian or Other Pacific Islander	12	44
Asian *and* American Indian or Alaska Native	13	45
Asian *and* Native Hawaiian or Other Pacific Islander	14	46
American Indian or Alaska Native *and* Native Hawaiian or Other Pacific Islander	15	47
Combination of Three Races		
White *and* Black or African American *and* Asian	16	48
White *and* Black or African American *and* American Indian or Alaska Native	17	49
White *and* Black or African American *and* Native Hawaiian or Other Pacific Islander	18	50
White *and* Asian *and* American Indian or Alaska Native	19	51
White *and* Asian *and* Native Hawaiian or Other Pacific Islander	20	52
White *and* American Indian or Alaska Native *and* Native Hawaiian or Other Pacific Islander	21	53
Black or African American *and* Asian *and* Native Hawaiian or Other Pacific Islander	22	54
Black or African American *and* Asian *and* American Indian or Alaska Native	23	55
Black or African American *and* Native Hawaiian or Other Pacific Islander *and* American Indian or Alaska Native	24	56
Asian *and* Native Hawaiian or Other Pacific Islander *and* American Indian or Alaska Native	25	57
Combination of Four Races		
White *and* Black or African American *and* Asian *and* American Indian or Alaska Native	26	58
White *and* Black or African American *and* American Indian or Alaska Native *and* Native Hawaiian or Other Pacific Islander	27	59
White *and* Asian *and* American Indian or Alaska Native *and* Native Hawaiian or Other Pacific Islander	28	60
White *and* Black or African American *and* American Indian or Alaska Native *and* Native Hawaiian or Other Pacific Islander	29	61
Black or African American *and* Asian *and* American Indian or Alaska Native *and* Native Hawaiian or Other Pacific Islander	30	62
Combination of Five Races		
White *and* Black African American *and* Asian *and* American Indian or Alaska Native *and* Native Hawaiian or Other Pacific Islander	31	63
No Race Specified or Refused		
Includes not reported (postsecondary only, not allowed for K12)	32	64

SOURCE: NCES Statistical Standard Programs, as found on http://nces.ed.gov/statprog/2002/appendixa.asp.

Sample Parent Letter

Dear Parent or Guardian:

Every year, local school districts in Idaho are required to report student race and ethnicity data to the Idaho State Department of Education as per federal guidelines. Though the individual student data is not reported to the U.S. Department of Education, the state is required to report the total number of students in various race/ethnicity categories by school.. This data is used to track changes in student enrollment and ensure all students receive the educational programs and services to which they are entitled.

Recently, the U.S. Department of Education adjusted the federal requirements for reporting student data. Starting in Fall 2009, all schools in Idaho will report student data to the Idaho State Department of Education using the new race/ethnicity categories. Because of these new requirements, you will need to work with your child's school to update data. The new federal requirements do not allow school districts to leave the category unanswered.

Please assist your local school in updating your child's student data by completing the enclosed form and sending it to your child's school by (DATE HERE). If we do not receive a response from you, an employee of the district will be required to provide this information based on observation. Please contact your child's school principal if you would like to check the student data currently on file for your child.

For more information about the data reporting categories, please visit the Race/Ethnicity Regulations page at XXXXXXXXXXX.

Sincerely,

[NAME OF SUPERINTENDENT]
Superintendent of Schools

Enclosure:

Sample-Enrollment Form/ Student Information Sheet

SCHOOL NAME/#/address

Student Full Legal Name:		
Mailing Address:		
City:	State:	Zip Code:
Home Phone:	Cell Phone:	
Unique State ID:	Grade:	Birth date:

Race and Ethnicity: *(Note: Both Part A and Part B of the question must be answered.)*

Part A:	**Is this student Hispanic/Latino?** (Choose only one) ☐ **No, not Hispanic/Latino** ☐ **Yes, Hispanic/Latino** (A person of Cuban, Mexican, Puerto Rican, Cuban, South or Central American, or other Spanish culture or origin, regardless of race.)

The above part of the question is about ethnicity, not race. No matter what you selected above, **please continue to answer the following** by marking one or more boxes to indicate what you consider your student's race to be.

Part B:	**What is the student's race?** *(Choose one or more)* ☐ **American Indian or Alaska Native** (A person having origins in any of the original peoples of North and South American (including Central America), and who maintains tribal affiliation or community attachment.) ☐ **Asian** (A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.) ☐ **Black or African American** (A person having origins in any of the black racial groups of Africa.) ☐ **Native Hawaiian or Other Pacific Islander** (A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.) ☐ **White** (A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.)

Language Spoken at Home:		

Father/Guardian Name:		
Home Address:		
City:	State:	Zip Code:
Home Phone:	Cell Phone:	
Employer:	Work Phone:	
Email Address:		

Mother/Guardian Name:		
Home Address:		
City:	State:	Zip Code:
Home Phone:	Cell Phone:	
Employer:	Work Phone:	
Email Address:		

In case of emergency, we will attempt to contact parent/guardian first. In the event we cannot contact them, please provide the name of a relative or close friend that we may contact:

Name:	
Relationship to student:	
Home Phone:	Work Phone:
Doctor:	Phone:
Dentist:	Phone:

I attest that the information contained herein is correct to the best of my knowledge.

_____   _____

(Legal Parent/Guardian Signature)   (Date)

_____   _____

School Representative   (Date)