



Data Disaggregation

Report to the Legislature

As required by Minnesota Statutes, section 120B.31

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As requested by Minnesota Statutes, section 3.197: This report cost approximately \$3,200 to prepare, including staff time, printing and mailing expenses.

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Table of Contents

For more information:	2
Legislative Charge	4
120B.31 SYSTEM ACCOUNTABILITY AND STATISTICAL ADJUSTMENTS.....	4
120B.35 STUDENT ACADEMIC ACHIEVEMENT AND GROWTH.....	5
Executive Summary	5
Introduction	6
Rollout Sites	7
Collection System	8
Stakeholder Engagement and Feedback	9
Future Reporting Opportunities	11
Lessons Learned	12
Data Related or “What Data is Collected” Lessons Learned	12
Procedural or “How Data is Collected” Lessons Learned	13
Conclusion	13
Attachment 1	14
Attachment 2	66
Attachment 3	70
Attachment 4	114
Attachment 5	119
Attachment 6	122
Attachment 7	125
Attachment 8	126
Attachment 9	130
Attachment 10	132
Attachment 11	136
Attachment 12	138
Attachment 13	141
Attachment 14	143
Attachment 15	145

Legislative Charge

During the Minnesota legislative session of 2017, Minnesota Statutes, sections 120B.31 and 120B.35, were revised to clarify the additional detailed demographic information to be collected for Minnesota students.

120B.31 SYSTEM ACCOUNTABILITY AND STATISTICAL ADJUSTMENTS.

Subdivision 1. Educational accountability and public reporting.

Consistent with the direction to adopt statewide academic standards under section [120B.02](#), the department, in consultation with education and other system stakeholders, must establish a coordinated and comprehensive system of educational accountability and public reporting that promotes greater academic achievement, preparation for higher academic education, preparation for the world of work, citizenship, and the arts.

Subdivision 2. Statewide testing.

Each school year, all school districts shall give a uniform statewide test to students at specified grades to provide information on the status, needs and performance of Minnesota students.

Subdivision 3a. Rollout sites; report.

- (a) The commissioner of education shall designate up to six school districts or charter schools as rollout sites.
- (b) The rollout sites should represent urban school districts, suburban school districts, nonurban school districts, and charter schools. The commissioner shall designate rollout sites and notify the schools by August 1, 2017, and the designated school districts or charter schools shall have the right to opt in or out as rollout sites by September 1, 2017.
- (c) The commissioner must consult stakeholders and review the American Community Survey to develop recommendations for best practices for disaggregated data. Stakeholders consulted under this paragraph include at least:
 - (1) the rollout sites;
 - (2) parent groups; and
 - (3) community representatives.
- (d) The commissioner shall report to the legislative committees having jurisdiction over kindergarten through grade 12 education policy and finance by February 1, 2018. The commissioner may research best practices from other states that have disaggregated data beyond the requirements of the most recent reauthorization of the Elementary and Secondary Education Act. The commissioner must consult with the stakeholders on how to measure a student's background as an immigrant or a refugee and provide a recommendation in the report on how to include the data in the statewide rollout. The recommendations may address:

- (1) the most meaningful use of disaggregated data, including but not limited to which reports should include further disaggregated data;
- (2) collection of additional student characteristics, including but not limited to ensuring enhanced enrollment forms:
 - (i) provide context and the objective of additional data;
 - (ii) are designed to convey respect and acknowledgment of the sensitive nature of the additional data; and
 - (iii) are designed to collect data consistent with user feedback;
- (3) efficient data-reporting approaches when reporting additional information to the department;
- (4) the frequency by which districts and schools must update enrollment forms to meet the needs of the state's changing racial and ethnic demographics; and
- (5) the criteria for determining additional data. This recommendation should include a recommendation for frequency of reviews and updates of the additional data and should also identify the approach of updating any additional census data and data on new enrollees. This recommendation must consider additional student groups that may face education disparities and must take into account maintaining student privacy and providing nonidentifiable student level data.

120B.35 STUDENT ACADEMIC ACHIEVEMENT AND GROWTH.

Subdivision 3. State growth target; other state measures.

(2) For purposes of paragraphs (b), (c), and (d), the commissioner must analyze and report separate categories of information using the student categories identified under the federal Elementary and Secondary Education Act, as most recently reauthorized, and, in addition to "other" for each race and ethnicity, and the Karen community, seven of the most populous Asian and Pacific Islander groups, three of the most populous Native groups, seven of the most populous Hispanic/Latino groups, and five of the most populous Black and African Heritage groups as determined by the total Minnesota population based on the most recent American Community Survey; English learners under section [124D.59](#); home language; free or reduced-price lunch; and all students enrolled in a Minnesota public school who are currently or were previously in foster care, except that such disaggregation and cross tabulation is not required if the number of students in a category is insufficient to yield statistically reliable information or the results would reveal personally identifiable information about an individual student.

Executive Summary

The Minnesota Department of Education (MDE) is charged with collecting detailed demographic student information. In order to implement the wide-ranging and complex new data disaggregation legislation MDE secured a federal

grant to assist in construction of the data collection system, and engaged with a broad array of diverse stakeholders to understand the implications for families, schools and student groups.

Through the legislative and stakeholder process, MDE heard about the benefits of disaggregated data and its uses for positive interventions and supports in schools. The theory is that with access to more detailed student information, districts, schools and teachers can better tailor in-school support to more effectively meet the unique needs of their students.

MDE also heard a great deal from stakeholders about potential negative unintended consequences of the new law. Many stakeholders had not had the opportunity to participate in legislative discussions and are just now recognizing the unintended consequences and potential negative implications of the law. Minnesota's American Indian communities expressed fear about the continued erosion of indigenous heritage and identity, frustration with contradictory definitions in state and federal law, and concerns that the confusion could result in undercounting American Indian students, which could diminish funding designed to help improve outcomes for Native students. Multiple stakeholders shared concerns that many families may not want to share detailed demographic information, citing concerns about how personal and sensitive information might be used, particularly in the context of heightened debates about immigration currently taking place nationally and in Minnesota. Despite assurances that any data collected would be used only for the purposes of school enrollment, there remains a fundamental distrust of institutions by many diverse stakeholders and community members. Finally, school districts expressed concerns that the system changes would require substantial training for district personnel and families.

Policymakers will need to understand and strike a balance between the positive intentions of more comprehensive data collection against the unintended and potentially negative impacts (or perceptions of such) on impacted schools, families and communities. Additionally, substantial changes to demographic collection requires sufficient time and resource to ensure successful implementation.

Introduction

This report will detail MDE's efforts to implement the legislation requiring student accountability reporting, particularly test results and graduation rates, using detailed demographic information. Currently, test results are reported using the student groups of American Indian/Alaskan Native, Asian, black/African American, Hispanic/Latino, Native Hawaiian/Pacific Islander, white, and two or more races. The legislation requires further disaggregation for seven of the most populous Asian groups, three of the most populous Native groups, seven of the most populous Hispanic/Latino groups, and five of the most populous black and African heritage groups as determined by the total Minnesota population based on the most recent American Community Survey.

To accomplish this goal, MDE has researched technological solutions to data collection and has engaged in personal outreach to refine the communication tools provided to parents. Efforts began as soon as the original data disaggregation legislation was passed in 2016. While the specific student groups to be collected have changed since 2016, the fundamental needs of the work remain the same: a technological solution minimizing districts' burden of providing detailed demographics to MDE and an initiation of community engagement to

ensure the communication materials used to collect the detailed demographics are clear, respectful, and convey MDE's understanding of the high level of sensitivity of the information. A snapshot of these efforts and details of plans past 2020 are included in this report.

MDE has also worked with parents and education advocates to discuss the most accurate and culturally appropriate way to gather this data. This outreach included three large stakeholder forums, one-on-one meetings with community organizations, and electronic communication.

While authentic and clear communication is critical when implementing any legislation and change, genuine communication is especially important for this implementation. This legislation requires parents to provide detailed information about their students. Since the legislation was passed in 2016, the climate around demographic information has increased the caution and scrutiny of parents in regards to providing this information. Compounding the complexities surrounding demographic information is funding implications. MDE continues to strive for a balance between concise and sufficient background and explanation within the documents provided to families and districts.

Rollout Sites

After the initial data disaggregation legislation was adopted during Minnesota's 2016 legislative session, MDE began work to collect detailed demographic information for students. To support this work, MDE submitted a grant application in November 2016 to the U.S. Department of Education. The grant application, *Disaggregating Student Data: Strengthening Assessment to Improve Educational Outcomes* (D2), was selected to receive a five-year award valued at approximately \$2 million over the life of the grant. Three districts or charter schools were part of the grant award: Community of Peace Academy, St. Paul Public School District, and Worthington Public School District. At the time of the grant application, MDE was working with a limited number of partner districts to represent Minnesota's variety of school types, locations, and student populations to the greatest extent possible.

During the 2017 legislative session, specificity was added regarding the sites MDE would work with in an effort to ensure the data collection goes smoothly when deployed statewide. "The rollout sites should represent urban school districts, suburban school districts, nonurban school districts, and charter schools" (Minnesota Statutes, section 120B.31, subdivision 3a, paragraph b). Those rollout sites were to be identified by September 1, 2017. As described in the Data Collection section and detailed in Attachment 1, Feasibility Study, MDE also found it critical to include as many district Student Information System (SIS) vendors in the rollout sites as possible. The table below shows the current rollout sites with which MDE is collaborating.

Table 1. Rollout Sites

School or District	School or District Type	Location	SIS Vendor
Community of Peace Academy	Charter School	Urban	Synergy/TIES
Minnetonka Public School District	Independent District and Schools	Suburban	Skyward
Schoolcraft Learning Community Charter	Charter School	Nonurban	JMC
St. Paul Public School District	Independent District and Schools	Urban	Infinite Campus
Worthington Public School District	Independent District and Schools	Nonurban	Infinite Campus

While the legislation does permit up to six rollout sites, MDE has been successful recruiting only the five listed in Table 1. MDE did reach out to two other districts via letters and phone calls between July and September. One of the districts declined to participate, and the other district did not respond to communications by the September 1 deadline in statute for naming rollout sites.

Collection System

When the 2016 legislative session ended in May, MDE explored options for efficient and effective data collection of the detailed demographics. For students currently enrolled in a Minnesota public school, MDE has demographic information based on the federal reporting of student groups (American Indian/Alaskan Native, Asian, black/African American, Hispanic/Latino, Native Hawaiian/Pacific Islander, white, and two or more races). The legislation requires MDE to collect the more detailed group information for newly enrolled students and those students currently enrolled. Due to the complexities and magnitude of the new demographic data, a federal grant application was submitted August 1, 2016. The grant was awarded to MDE later in 2016. While the legislation limits the reporting of the detailed demographics to data collection systems relating to student accountability, ensuring a student's demographic information is consistent across all educational programs and reports is critical. Therefore, implementation of this legislation impacted several divisions, including finance, within MDE and schools/districts.

MDE and MN.IT conducted a feasibility study over the course of almost six months. While Minnesota stakeholders were critical to understanding the needs of schools and districts burdened by data collection, it was also important to learn how other states dealt with this burden. The need for Minnesota to have a more flexible and streamlined system to collect data from schools and districts was unanimous across stakeholders.

All system users, stakeholders, and other states emphasized the importance of efficient data collecting (by districts and by MDE) as well as the importance of fidelity of data across systems and program areas. The feasibility study is provided as Attachment 1, and details of those interviews are Appendices F, G, and H of Attachment 1.

In December 2017, MN.IT released a request for proposals (RFP) to develop a Minnesota solution that would allow MDE to satisfy the legislative requirement to collect detailed demographics while addressing district and stakeholder needs related to an efficient, flexible, and integrated system.

As mentioned previously, collaboration with SIS vendors will be critical in the implementation process. MDE's commitment to working with vendors is in an effort to maintain quality data and minimize the impact to districts. MDE has conducted background sessions for all SIS vendors related to data disaggregation. As the proposal process concludes and Minnesota's system is developed, further conversations will be held. SIS vendors for rollout sites will provide a trial of the process prior to statewide implementation.

Since mid-2016, MDE has consulted with staff from the Minnesota State Demographic Center. The primary objective of these conversations is to identify the specific detailed groups required by legislation based on the American Community Survey. These discussions have been very helpful for MDE staff in understanding the federal definitions/inclusions of groups and using this information to best revise Minnesota's detailed demographic groups.

Additionally, staff from the Minnesota State Demographic Center, very early in the process in 2016, highlighted the sensitive nature of these detailed demographic data elements not routinely shared with educators.

MDE's current plan is to collect immigrant and refugee status using an upload feature that will be, at least for a time, separate from the detailed demographic data elements. One reason for this approach is the current data systems. Another reason is to assure parents and other stakeholders that this information will be used only for educational data analysis purposes.

Stakeholder Engagement and Feedback

MDE enlisted partner districts and rollout sites to gather initial feedback regarding communication and necessary documents to implement the legislation. Schools and districts were unanimous in their desire for MDE to develop an enhanced enrollment form with the various categories to be used across the state. It was also requested that MDE accompany the enhanced enrollment form with a parent letter explaining why parents are asked to provide information that, to some extent, they have already provided to districts. After conversations and initial reviews of the draft enhanced enrollment form and parent letter, MDE also created a frequently asked questions (FAQ) document.

After those preliminary reviews by rollout sites, MDE sought feedback from the intended users of all three documents. The primary objective and focus of the phone calls, emails, and large stakeholder sessions was gathering input to revise the documents.

Invitations announcing an October 2, 2017 evening stakeholder meeting were sent out in late August. MDE invited individuals and organizations:

- involved in the legislative process related to this requirement in 2016 and 2017;
- that had previously indicated interest in the implementation of the legislation;
- representing non-majority student groups; and/or
- involved in Every Student Succeeds Act state plan.

The feedback notes from this session can be found in Attachment 2, Compiled Notes from October 2 Stakeholder Meeting. Shortly after the stakeholder feedback meeting, MDE and legislators received the letter in Attachment 3, Communication from Chinese American Community.

MDE has attended Tribal Nations Education Committee (TNEC) meetings to discuss the implementation of the data disaggregation legislation. In December 2017, MDE also met with the executive director of the Minnesota Indian Affairs Council. Additionally, a feedback session was held the evening of December 13 with invitations sent specifically to members of the American Indian community. The feedback notes provided in this meeting can be found in Attachment 4, Compiled Notes from December 13 Stakeholder Meeting.

Approximately 210 email invitations/announcements were sent, and approximately 100 individuals attended the feedback sessions in October and December either in person or via phone. Translated materials and an interpreter were available for the meeting.

MDE also offered rollout sites the opportunity to conduct feedback sessions for parents in their schools or districts. To date, no rollout sites have accepted the opportunity to host feedback sessions with their communities.

Additional advocacy groups MDE met with in 2017:

- Council on Asian Pacific Minnesotans – July 19
- Council for Minnesotans of African Heritage – August 10
- Coalition of Asian American Leaders – September 25
- Coalition of Asian American Leaders – October 26
- Tribal Nations Education Committee – November 14
- Council for Minnesotans of African Heritage – November 20
- Council on Asian Pacific Minnesotans – December 4

A complete list of Minnesota stakeholders MDE has contacted to date for feedback is provided in Attachment 5, List of Outreach. This list includes organizations, including schools and districts, who were invited and/or attended a feedback session.

Following all discussions and feedback sessions, MDE provides updates to participants regarding status, plans, and revised documents. MDE continues to receive feedback and revise future versions of the form and supporting documentation.

The current versions of the enhanced enrollment form, draft FAQ, and draft parent letter are provided as Attachments 6–8.

Attachment 9 is a document MDE received from Council on Asian Pacific Minnesotans. Attachment 10 is a letter MDE received from Coalition of Asian American Leaders. Attachment 11 is a letter from EdAllies and several other groups.

MDE anticipates receiving further feedback and formal communications from stakeholders. In order to finalize the report and make it accessible MDE is only including communications received by January 25, 2018.

Future Reporting Opportunities

Consistent with legislative requirements, MDE plans to provide the following reports based on 2018–2019 school year information from the rollout sites.

Type	Data Elements (currently available)	New Data Elements	Sample Analysis Available	Compare
Statewide tests results	Percent proficient by broad student groups	Percent proficient by multiple detailed student groups	Compare Asian student performance to: <ul style="list-style-type: none"> Hispanic student performance Hmong student performance Compare Hmong student performance to: <ul style="list-style-type: none"> Chinese student performance Mexican student performance 	Statewide only
Graduation rates 4-year and 7-year	4-year and 7-year graduation rates by broad student groups	4-year and 7-year graduation rates by multiple detailed student groups	Compare Black graduation rate to: <ul style="list-style-type: none"> American Indian graduation rate Nigerian graduation rate Compare Nigerian graduation rate to: <ul style="list-style-type: none"> Ethiopian-Oromo graduation rate Cherokee graduation rate 	Statewide only

Depending on data accuracy, user feedback, and feasibility after the 2018–2019 school year, MDE will explore future reports. Potential additional reports include growth or academic progress and comparing achievement levels. MDE will also explore reporting by districts and schools in addition to including filters for refugee and immigrant depending on data privacy, data accuracy, user feedback and feasibility.

Every five years (beginning in 2024–2025), MDE shall begin to evaluate reporting efforts to determine which reports are currently most valuable and which new reports would be beneficial.

Lessons Learned

Data Related or “What Data is Collected” Lessons Learned

1. MDE has received feedback from stakeholders indicating there was disconnect between the intended goal of legislation and the realities of implementation. This is due in large part to the sensitivity of the information.
2. It is critical to have community members directly involved in the development and implementation of successful legislation.
 - a. Members of the Chinese American community had representation attend the October 2 feedback session at MDE. Following that meeting, MDE and legislators received Attachment 3.
 - b. The American Indian community has raised concerns of American Indian loss of heritage, namely with using the current most populous tribes rather than the tribes that were the most populous several generations ago. Attachment 12 provides a resolution from the Minnesota Indian Affairs Council (MIAC). Attachment 13 provides an additional letter from MIAC. Attachment 14 is a resolution from the Bois Forte Band of Chippewa. Attachment 15 is a letter from the Nett Lake School.
3. When there is an extreme level of sensitivity related to the data, it is important to work to develop materials that demonstrate a commitment of respect. A key component of this work is timely responses to questions and concerns raised.
4. Having different thresholds for different groups is confusing and deeply concerning to all stakeholders.
 - a. After this legislative requirement is fully implemented, MDE will explore the opportunity of expanding/refining student groups collected with community members. This conversation would include collecting more detailed information from federal groups not specifically named in the current state legislation.
5. The difference between the federal and state definitions of “American Indian or Alaska Native” and the impact these definitions have in regards to state aid needs to be communicated clearly and openly.
6. Clarity is important in communication materials, specifically clarity in what will happen if families do not provide the information (what districts are required to fill in and what they are not if left blank) and how the information will and will not be used. This will positively impact the response rate and accuracy of data collected.

7. Due to the constant change in population, a process and timeline to update the demographic collection form must be developed. MDE recommends that every five years (beginning in 2024–2025) the evaluation to update detailed demographics to meet the needs of the state’s changing racial and ethnic demographics shall begin.

Procedural or “How Data is Collected” Lessons Learned

1. Legislation needs to be revised for Asian/Pacific Islander group to just Asian in order to match the federal category.
2. Ensuring the most populous detailed groups are included is not a trivial task. Depending on the specific detailed group’s size, the margin of error, or variability of the data collected, and shifts in population trend make it difficult to be completely confident the most populous detailed groups are reported. Statute should allow the state demographer to use the best, statistically available information to make determinations of populations.
3. In collecting any data elements, especially those already reported to MDE, it is critical to consider the impact to and burden on local education agencies.
4. In an effort to improve engagement and response time, especially by roll out sites:
 - host face-to-face meetings;
 - host at a variety of times, especially those convenient for participants;
 - announce with sufficient notice;
 - announce translated or alternative formats available; and
 - provide materials in advance of meetings.
5. Work with all impacted partners, including, but not limited to, SIS vendors and districts. MDE anticipates that working with SIS vendors to develop a more user-friendly interface for districts and parents will result in a greater response rate and improved clarity.
6. While initially the legislation appears to limit the impact, ensure conversations are comprehensive to fully understand the reach for other programs and potentially the entire agency.

Conclusion

In order to implement the law well, stakeholder engagement is key. Not only is allowing enough time to actively engage stakeholders necessary, but flexibility to update or change the law based on stakeholder feedback is needed. Without showing an openness to adapt or change the law or implementation of the law, getting stakeholders to engage is more difficult. Second, it is important to learn from partner districts before implementing the law, then share partner district experiences statewide. Leading up to the implementation of the law, districts have shared their perspectives on how to implement, and we expect that we will learn more from them during their implementation of the law. Third, this law cannot be implemented in isolation. This law may have impacts on potential data privacy changes, potentially on funding streams or even federal law.



Attachment 1: Student Data Disaggregation

Feasibility Study for Data Automation

06/30/2017

Student Data Disaggregation

Document Name: Student Data Disaggregation Feasibility Study for Data Automation

Publication Date: June 2017

Contract Number: MN Department of Education, SWIFT 122227, ER1323, PO# 3-18758

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Minnesota Department of Education

MN.IT Services

Contents

Management Summary	- 2 -
1. Introduction	- 3 -
1.1 Purpose	- 3 -
1.2 Project History.....	- 3 -
1.3 Methodology.....	- 4 -
1.4 References	- 4 -
2. General Information	- 5 -
2.1 Current Systems and Processes	- 5 -
2.1.1 Current Operations	- 8 -
2.2 Program and Technical Requirements	- 9 -
2.3 Assumptions (necessary for project to succeed)	- 10 -
2.4 Constraints	- 10 -
2.5 Issues, Challenges and Risks	- 10 -
3. Alternatives.....	- 11 -
3.1 Alternative I - MN.IT@MDE In-House Web Services	- 12 -
3.1.1 Web Services Description.....	- 12 -
3.1.2 Web Services Benefits and Costs	- 13 -
3.2 Alternative II - Ed-Fi Technology	- 14 -
3.2.1 Ed-Fi Description	- 14 -
3.2.2 Ed-Fi Benefits and Costs.....	- 14 -
3.3 Alternative III - SIF	- 17 -
3.3.1 SIF Description.....	- 17 -
3.3.2 SIF Benefits and Costs	- 17 -
3.4 Comparison of Alternatives	- 19 -
3.4.1 Vendor Cost Estimates	- 19 -
3.4.2 Comparison of Solutions	- 21 -
3.4.3 SWOT Analysis.....	- 22 -
4. Impact Analysis	- 23 -
5. Recommendations and Conclusions.....	- 24 -
Appendixes.....	- 25 -
Appendix A – Acronym Guide	- 25 -
Appendix B – MDE and District Stakeholders	- 27 -
Appendix C – Implementation Vendor Contact Information.....	- 28 -
Appendix D –SIS Vendor Contact Information.....	- 29 -
Appendix E - State Contact Information	- 31 -
Appendix F – State Survey Summary	- 33 -
Appendix G - Program User Survey Summary	- 44 -
Appendix H - District Survey Summary	- 47 -

Management Summary

This feasibility study focuses on data automation as it relates to the Student Data Disaggregation project and the Absolute Priority 1 Disaggregating Data (D2) grant from the U.S. Department of Education's Office of English Language Acquisition. The Minnesota Statute 120B.35 subd. 3 (2) as amended by 2016 Laws Chapter 189, Article 25, Section 25, wants to ensure that districts and schools have access to disaggregated data with a focus on Asian American Pacific Islander (AAPI) English Learner (EL) subgroups. The statute is in close alignment with the goals of the D2 grant program.

Part of the D2 grant is to develop an automated data collection system so that districts can input data on AAPI and EL subgroups no later than September 2018. How can MDE add additional racial and ethnic categories and improve reporting capabilities in a reasonable amount of time and without adding additional collections? 10 states, 4 student information system vendors (SIS), 4 MN.IT@MDE employees, 7 program users, 3 district employees and 4 implementation vendors were interviewed. Information was gathered about data automation, state technical solutions, SIS and assessment vendors and program requirements while conducting the study.

In technology new software, new versions and updates are constantly being released. A technology that once was in the forefront does not always stay that way, as in the case of SIF (student interoperability framework). In 1998 SIF was new technology that offered data automation and streamlined collections. In recent years SIF released version 3.x to align with [Common Education Data Standards](#) CEDS and is now in competition with a new technology called Ed-Fi. Ed-Fi and the Ed-Fi Alliance have started a movement across some states sharing knowledge and solutions. This study examines 4 states using SIF and 4 states using Ed-Fi technology. Both these technologies have several components to them and states differ in what they chose to implement. Other states use technology they have developed in-house. This study will research Illinois Web Services as an alternative for an in-house solution.

SIS vendors are the key to change in data automation. It goes without saying that district participation is essential to project success but SIS vendors hold the key to opening up the door to district participation. SIS vendors will be the ones updating their systems to send data through the pipeline to the state. SIS vendors will most likely be the first call for help from district users. Data submissions happen in the backend and the SIS vendors will be responsible for updates to their system and be responsible for updating their SIS user interface with additional racial and ethnic categories. Formal and frequent communication between SIS vendors, districts, IT and program users will contribute to a project's success.

District participation in new technology can be a challenge for smaller districts and schools that do not have technical resource availability. This study will look at challenges, issues and risks moving forward with new technology. This study focused on adding additional racial and ethnic categories and how we can automate and streamline the collection of that data. What we have learned will go beyond the scope of this study and if approved to move forward, MN.IT@MDE can implement new technology for data automation that will be flexible and expandable to other collections in the future.

To help assist readers of this study an acronym guide has been created.

[See Appendix A for acronym guide](#)

1. Introduction

1.1 Purpose

The purpose of the Student Data Disaggregation project at MDE is to ensure excellence and equity in education for all by using efficient and streamlined processes and technology to collect valid and reliable student disaggregated data creating a single source of data for analysis and reporting which in turn will allow schools and districts to develop and implement a range of strategies that will strengthen academic programs and close achievement gaps for AAPI and English Learner subgroups.

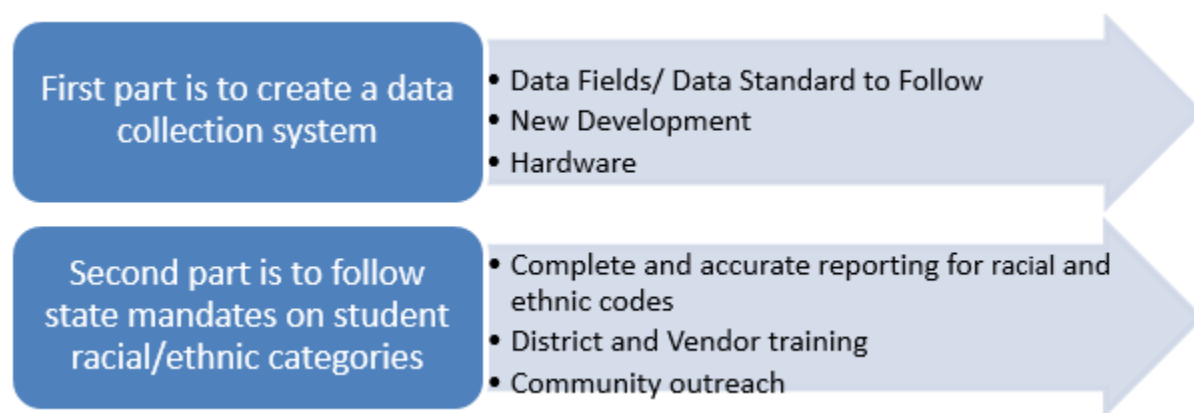
Scope Statement for Feasibility Study

This feasibility study and cost benefit analysis will be conducted for the Student Data Disaggregation project on viable solutions and technology options that support collecting student racial and ethnic data from school districts that will be sent to the Minnesota Department of Education. These viable solutions and technical options will consider cost and time for implementation, ability to meet business and user needs, challenges and risks, flexibility and growth potential, maintainability and future costs. The focus will be on long term solutions.

1.2 Project History

The State of Minnesota has mandated that MDE collect additional codes for racial and ethnic categories. MDE has the generous support of an Absolute Priority 1 Disaggregating Data (D2) grant from the U.S. Department of Education's Office of English Language Acquisition for the Student Data Disaggregation project.

The D2 Grant has Two Parts



"Minnesota Statute 120B.35 subd. 3 (2) as amended by 2016 Laws Chapter 189, Article 25, Section 25, requires MDE to collect student data on all populations reporting 1,000 or more residents in the most recent decennial census, beginning in the 2017-2018 school year. The intent of the statute is to ensure that schools and districts have access to disaggregated data that can strengthen academic programs and close the achievement gap. The statute addresses all racial subgroups and is in close alignment with the goals of the Disaggregating Data grant program and its focus on Asian American Pacific Islander English Learner subgroups." (from D2 Grant Document) Here is the [news release](#) for the states awarded the D2 grant.

In preparation for a possible deadline of 2017/18 school year the MN.IT@MDE development team created a solution that is ready for the 2017/2018 school year if necessary. It has not been implemented and is in staging awaiting approval from program users before moving to production. A form has been created that districts and vendors can use to capture additional racial and ethnic data and is also waiting final approval. In the course of this study additional racial and ethnic codes were approved and effective for the 2018-2019 school year and later.

1.3 Methodology

Surveys were created for program, district and state interviews. MDE program users from MARSS, SSDC, MN.IT@MDE, Assessments and Data Analytics were interviewed 1x1 and requirements were gathered. Districts that will partner with MDE for the Student Data Disaggregation project were interviewed via web-ex and 1 on-site visit.

[See Appendix B for MDE and District Stakeholders](#)

[See Appendix H – District Survey Summary](#)

States were chosen via recommendations from the SLDS State Support Team, by participation in the D2 grant and by data automation solutions. A total of 10 states were interviewed via web-ex.

[See Appendix E for State Contact Information](#)

[See Appendix F for State Survey Summary](#)

See table below for states selected and solutions used. This chart is also located in the State Survey Summary.

State Data Collection Solutions	AZ	HI	IA	ID	IL	MA	MI	NE	OK	WA
ED-FI	X						X	X	X	
SIF version 2.x			X			X			X	X
CEDS aligned (with variations)		X		X						X
Web Services					X					
In House				X	X					X

1.4 References

Sources of information/reference that were used to conduct the feasibility study.

Documents

- d2 with ToFC 7-28-16 - GRANT DOCUMENT
- Data Collection Automation Service Project Summary_2-14-17
- MARSS Data Flow DiagramV2_5-3-17
- SIF Implementation Lessons from Massachusetts_11-2014
- AZ Review by WestEd CELT
- MDE-CPSI Data Flow with Hardware
- StreamliningStateReporting-020915-021115 (Data Portability Project)

Informational Links

- [Access 4 Learning Community](http://www.a4l.org/) (former SIF Association): (http://www.a4l.org/)
- [SIF Utilization](#):
- [Common Education Data Standards](http://c.ymcdn.com/sites/www.a4l.org/resource/collection/00F1EAD6-732D-404B-83A4-FF7A4308DF14/Just_The_Facts__On_The_Ground_SIF_Utilization.pdf): (http://c.ymcdn.com/sites/www.a4l.org/resource/collection/00F1EAD6-732D-404B-83A4-FF7A4308DF14/Just_The_Facts__On_The_Ground_SIF_Utilization.pdf)
- [Double Line Partners](http://www.doublelinepartners.com/): (http://www.doublelinepartners.com/)
- [ED-FI Alliance](https://www.Ed-Fi.org/): (https://www.Ed-Fi.org/)
- [Infinite Campus and Worthington](https://www.infinitecampus.com/company/success-stories/minnesota/worthington-schools): (https://www.infinitecampus.com/company/success-stories/minnesota/worthington-schools)

2. General Information

2.1 Current Systems and Processes

Assessments

MDE does not collect any locally given assessments at the state level. Teacher created material could be anything and would be impossible to standardize and stays at the district. MDE does not collect NWEA assessment data at the state level. Administration of the NWEA test is determined at the local level and stays with the district. OLPA, which is developed by Pearson (vendor) stays at the district. Currently MDE receives Access, MCA-III and MTAS assessment data from Pearson and WIDA (vendor). Vendors can be added or changed at any time. During program interviews it was suggested that in the future there could be capability of Infinite Campus (SIS Vendor) giving MDE that data. This has not been researched.

MDE does receive ACT data on a CD from ACT and after minor adjustments is ready to post. There is no automated collection of ACT at the state level. Other data (AP and IB) comes from a secure site and an Excel file is downloaded. The Excel file is then stored on the MDE T drive. This is also where ACT data is stored. Additionally, MDE receives SAT and PSAT from College Board who is the vendor for AP. Read Well by 3rd grade data is collected by an MDE website and data is stored in a small SQL database. In all, assessment data is collected via vendors, websites and CDs and stored in 4 different collections which makes reporting difficult.

For the data that has race/ethnicity, each assessment defines race differently. AP, IB, SAT, and PSAT aren't reported anywhere in the MDE Data Center so there has never been a need to link these or store them anywhere else. Program interviews revealed that race/ethnicity and gender collections are sometimes a reporting issue when a child "changes" what race, ethnicity or gender they are between tests.

MARSS

The Minnesota Automated Reporting Student System (MARSS) data is reported electronically via the MARSS Web Edit System (WES). 8 billion dollars in revenue for school districts and charter schools are generated based on data collected through the MARSS system. MARSS has two files when submitting. There is an A file (grades served, number of days and number of minutes, Title program, and kindergarten schedule) and a B file (student enrollment, program participation and demographic data). Files for districts or charter schools with more than five percent in error are prevented from uploading. There are 9 SIS vendors certified for MARSS reporting.

Data Submissions

A MARSS coordinator, at a large district, submits data for 83 schools and programs once a week. This will take one full day to work through approximately 150 problems/errors for 72,000 records each submission. There are 22 submissions due to the state in varied formats and all hinge on MARSS.

MDE Data Steward says anguish of data submissions on districts is huge. Want to be in the business of school not data submissions. Example: Student taken out of class (dropped or withdrawn) and they have no grade. Shows up blank. Upload to MCCC and if that field is blank it just disappears. Lots of data manipulation to get that right at local schools to correct this.

Districts

There are approximately 517 school districts and numerous schools and sites under the districts. We have approximately 872,400 (Tableau) students in the state of Minnesota. *"Districts do activities in TestWES before statewide testing begins and after it ends. Tasks in TestWES are working with pre-code files, requesting an alternate assessment waiver, performing essential posttest edits, submitting an Adequate Yearly Progress (AYP) appeal and verifying site readiness for online testing."* (MDE Website)

District SIS Vendors

For this study we called and emailed five SIS vendors. Phone interview notes were documented. See below.

SIS Vendor and Location	Phone Interview Notes
NW Regions One Moorhead, MN	NW Region One hosts district data and supports Edupoint Synergy. They have about 75 districts. Majority of districts are very small. Districts in NW Region One can share data. Anoka Hennepin uses Edupoint Synergy. SIF or Ed-Fi are not used for MN collections. There is real time data for districts, meaning users are doing manual entry directly into a system. They have screen validation and once the screen is validated it is stored into a SQL backend. Data goes up to the state by using extracts that districts run on their data and stored in a file format needed for submission. NW Region one said every one of the vendor products that exist in MN have something slightly different and some are programming their extract to do certain things while they are uploading.
Edupoint Synergy SIS, Assessment AZ and CA	Edupoint has told us they currently serve 213,886 students in the state of MN. (Tableau report 201,668). Edupoint works with TIES, Region ONE and Anoka. They support largest districts in State. They are Ed-Fi licensed and SIF agent and MARSS certified and work with MCCC. Edupoint has done a lot of work with Ed-Fi. Worked with AZ, TN, OR, NE and currently working with Maine. How do you handle adding 25 additional racial codes? Will work with MDE and support any solution they move to. Edupoint has already started adding in those fields for other states including CA. They will not start work for MN until they get confirmation that changes are needed. It will take 3 months to implement.
Infinite Campus Blaine, MN	Infinite Campus supports larger districts in the state. EP, Bloomington, Edina (came onboard this year), Centennial, SPPS. Market analysis in Dec 2015 show Infinite Campus has 42% of the student count in the state and 111 districts. According to Tableau report 2016/17 they have 370,910 students in MN. They are Ed-Fi licensed, SIF 2.3 and MARSS certified. Infinite Campus works with Visual Software but as a company they have started to move away from SIF because of the high fees to maintain certification. Infinite Campus would not charge districts to report to the state via Ed-Fi. Infinite Campus has a statewide system "edition" (ICSE) which is an off-the-shelf statewide data collection system. If MN would go with ICSE they would charge \$2.00 per student to the state for districts not using Infinite Campus District Edition (ICDE) at a cost to the state of approximately 1M a year. For current ICDE customers they would take \$2 off their licensing fee. Example, if Edina pays \$6 they reduce Edina by \$2.00. The Sales rep said that compared to the actual costs behind implementing Ed-Fi, SIF or other initiatives; ICSE is cheaper and gives you more functionality. This option was not considered a viable solution but was researched. How did Infinite Campus come up with \$2 per student? The \$2.00 figure is there to cover our cost. We view ICSE as a way to lower our development cost for state reporting, help our SEA partners do the same and that it gives ICDE a natural advantage on the open market place. How do you handle adding 25 additional racial codes? Will have to get it in, but not sure yet how to handle it.
JMC INC Lake City, MN	Supports smaller districts in State. JMC has 40% of the schools, charters. JMC considers charters same as public when counting. 40% of districts does include smaller schools. Approximately 58,436 students (Tableau). Ed-Fi licensed. MARSS Certified. JMC is working with WI and NE currently on Ed-Fi implementations. Huge effect on JMC, ripple effect on support when implementing Ed-Fi. Bringing in Ed-Fi in a matter of years is a good idea. Would like it if MDE would go with Ed-Fi 3.x. Whatever MDE decides JMC will support. How does JMC handle adding additional codes? JMC technically could turn it out in a few weeks.
Skyward, WI	Support around 50- 58 districts in Minnesota and have approximately 144,540 students (Tableau). They said Ed-Fi is the way most states are leaning. Double Line said that Skyward was one of the first SIS vendors that became Ed-Fi certified. How do you handle adding 25 additional racial codes? Don't foresee it being a problem, it would take some time, making sure we had the list and what reports it needed to be implemented in.

[See Appendix D – SIS Vendor Contact Information](#)

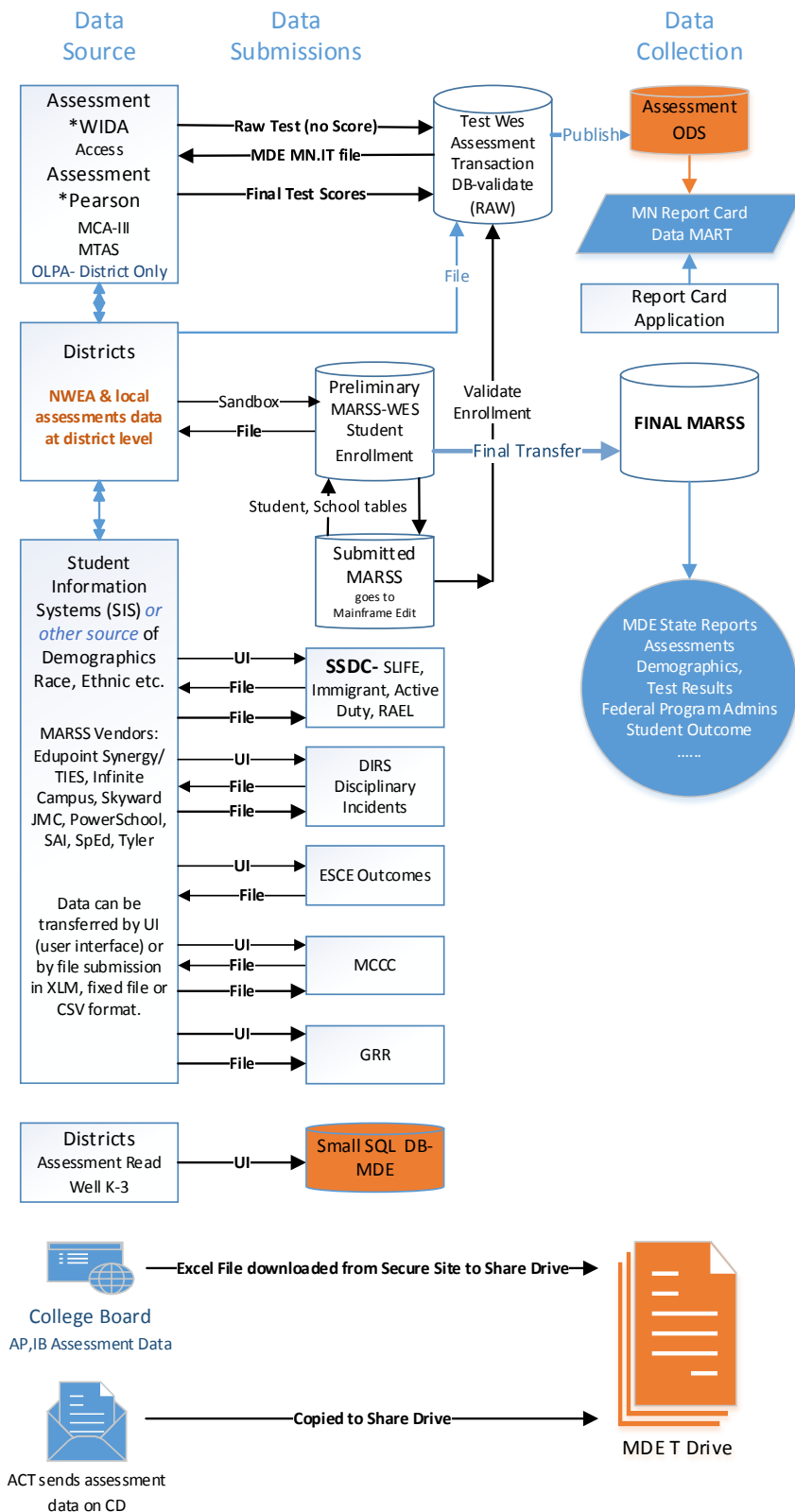
Working with SIS vendors will be the key to successful data automation and standardization. Infinite Campus sent a Tableau report of all Minnesota SIS vendors on June 16, 2017. Finding accurate counts can be a challenge for example the Tableau report below says that Synergy has 201,868 student, however Synergy had responded to that question saying they have 213,886 students. SIS vendors will work with districts to get them onboard with new technology.

Product and Minnesota State Detail – SIS Report

Product & State (Combined)	
Infinite Campus District Edition, MN	156 / 370,910
Synergy Education Platform, MN	79 / 201,868
Skyward SMS, MN	56 / 144,540
JMC Next Generation, MN	112 / 58,436
Discovery, MN	1 / 38,000
PowerSchool, MN	35 / 31,149
TSIS, MN	24 / 19,241
JMC Legacy, MN	10 / 3,016
None SIS, MN	14 / 2,346
Cornerstone School Management, MN	2 / 947
NetClassroom, MN	1 / 731
Genius SIS, MN	1 / 500
Home Grown SIS, MN	1 / 300
SchoolMaster, MN	2 / 280
HeadMaster, MN	1 / 140

2.1.1 Current Operations

This diagram focuses on MARSS and Assessment data submissions and collections. There are approximately 75 user interfaces used today and MN.IT@MDE uses file formats to submit data. That can mean XML, Fixed File or CSV formats. Every district has the same file format. There are several data dictionaries in use today.



2.2 Program and Technical Requirements

Program users and 3 districts were interviewed and a list of items they would hope a new system/process would include were documented. These “wants” for a new system focus on the D2 grant and its purpose but also reflect the need for system flexibility and future growth. Grant goals and objectives were reviewed and added to the requirements if needed. These requirements will be the criteria used to determine what solutions are viable for the Student Data Disaggregation project. See requirements list below.

Requirements

- **Automate** Data Collection – replace manual file uploads, eliminate file uploading (Districts)
- **Streamline** Data Collection – collect data once / combine collections
- **Real Time** Data Transfer by student (MARSS student ID)
 - Timeliness
 - Student Centered (e.g. Districts do not need to upload a file for the entire school when one student has transferred)
 - Continuously Available System (e.g. student is constantly in the system so that fields can be updated without having to upload an entire file)

NOTE: Real Time Terminology examined, see examples from States

Arizona (Ed-Fi) near real time, we do daily aggregation/daily rules and they happen every night. Funny but users want real time (immediate) even though we had a big improvement from 20 days to overnight.

Iowa (SIF) Enters in information and then immediately sends thru SIF and Assessments – might be delayed a few seconds to a few minutes. Student IDs in SIF go out immediately.

Oklahoma (SIF) Vendors claim that once a district makes a change in their SIS they immediately send the SIF event message which makes it real time. Others keep theirs together and send them to us a couple times throughout the day in bulk. We also have a schedule that we do requests for the data. Most changes will come in real time.

- **Centralize** Data - feed into one system for better reporting
 - One source of truth
- Develop data collection system with capacity to collect, analyze and report on disaggregated student data
 - Accommodate new AAPI subgroups
- System must be expandable and flexible
 - More rapid onboarding of data requirements
- Increase interoperability with other data systems for better reporting
 - Link and connect databases
 - Integrated student database managed and connected at the state level
 - Align across programs
 - Data must sync with MARSS, MARSS (Assessment) (Graduation)
 - Reporting data needs to be combined and timely
- Want to think long term - no more one off solutions for student level information
- User friendly for MDE and Districts – data analytics needs easier access
 - Assessments needs uninterrupted basic enrollment data
- Data Requirements
 - Racial option that allows “not reported” instead of guessing or defaulting to “white”
 - If more racial and ethnic codes are added keep history
 - Integrate past and present racial and ethnic codes into one collection (7 Federal and 5 State)
- No data governance, don’t have that, no one owns that. Who will own data collections?
- Reduce and cleanup duplicate data collections, eliminate spreadsheets
- Outreach to families, school and LEAs to increase accuracy & reliability of AAPI and EL enrollment data.

Out of Scope Requirements

- Statewide SIS, one integrated student database managed and connected at the state central level. South Dakota has this. (Districts)
- Electronic file transfer between Districts, Districts using Infinite campus have this. (Districts)

For complete program interview results [See Appendix G – Program User Survey Summary](#)

2.3 Assumptions (necessary for project to succeed)

- Available Resources - PM, Developer, Data Steward to name a few
- Depending on solution chosen will need Data Hub (Mart) Administrator / Data Owner
- Communication plan between MN.IT@MDE, Programs, Vendors, Districts
- MARSS (and other collections) current operation of distributing school funds will not be disrupted.
- All student data will be validated with MDE State Student ID (MARSS student number)
- Training and support will be provided for any new system that is implemented.

2.4 Constraints

- Time – long term goal of project
- Grant Funding (grant \$396,000 per year over 5 years?)
- Staffing and Resources
 - Availability of Resources
 - Skilled workforce retiring and staff turnover
 - Support Staff
 - Districts available resources for technology changes
- Infrastructure Scaling
 - Improvement of production environment
 - Optimization of performance
 - Update and/or New Hardware
 - Update and/or New Software

2.5 Issues, Challenges and Risks

There is a risk of not doing anything. In the current MN.IT@MDE environment the only way to add additional racial and ethnic categories by fall 2017 is to add another collection. In the past few months MN.IT@MDE has added two additional collections and this will continue to grow as more information is asked to be collected. Program users do not want additional collections. Adding additional collections make room for errors, duplication and frustration for person entering in data. Adding additional collections does not meet program requirements to **streamline** data collections.

Communication will be a challenge but with proper planning this challenge can become an opportunity to create working relationships with vendors, districts, IT and program users that will contribute to the success of the project. Massachusetts comment on communication: *“State needs collaboration with IT, districts, and SIS Vendors. When districts have issues we have point people on either side and work together. Trying to avoid the blame game. Call vendor, no you call state. Learned a lesson there. We can’t avoid it, we have to work closely with the vendor and Districts, schools and business side at the state. We genuinely thought it was the vendor side and the vendor thought it was the state side. We changed that concept up.”*

SIS and Assessment vendor communication is critical. We asked Edupoint Synergy how they would handle the request for additional racial and ethnic categories and they said *“MN.IT@MDE should give the vendors one year notice but this has eroded down to 3 – 6 months and this lack of lead time does not make vendors happy.”*

Iowa had this to say about Assessment vendors, *“Assessment vendors are not interested in being in SIF, so still on flat file or CSV. Long running relationship and no need to mess with what is working well. Would like to get them all on SIF, don’t see the interest from the assessment vendors. Would like to get back to vendors and reopen conversation.”*

Possible issue when replacing manual file uploads was brought up by NW Region One. They said, *“If a solution is chosen that eliminates the file upload, MN.IT@MDE needs to be aware that some districts/vendors are programming their extract to do certain things while they are uploading”*. This is the case where data submissions and data processing are happening at the same time.

Districts mentioned lack of training and support can contribute to data entry errors. MDE Data Steward gave us an example of a “Student taken out of class” (dropped or withdrawn) and they have no grade. This will show up blank in the system. When uploaded to MCCC and field is blank it just disappears. There is a lot of data manipulation to get that right. They do have codes to use in that situation but it is not communicated. Data steward said, *“PSCO has unreal gymnastics to go thru to get data in.”*

There can be resistance to change when a revolutionary approach is taken for data automation. Region One person said *“We will run into BIG egos. We have egos but we check them in at the door. We run into some people that it’s their way or the highway.”*

3. Alternatives

For the first round of solution analysis the MN.IT@MDE team looked at existing collections and determined these collections would not meet program requirements. TestWes Demographic, Assessment, SSDC and MARSS were reviewed. See table below for details. The last column on the right was part of this feasibility study and results are listed in Alternatives 3.1, 3.2, and 3.3”.

Data Collections	TestWes Demographic Assessment Collection	Student Support Data Collection SSDC	Minnesota Automated Reporting Student System MARSS	“Automate” Data Collection / HUB
Analysis Results	Adds another separate collection, would meet immediate need	Adds another separate collection for each element	Not Flexible, racial ethnic changes take time, adds more fields to finance DB	See Alternatives 3.1, 3.2, 3.3
Program /Product Owner	Research & Assessments	Student Support	School Finance	Owner – Is this Research & Assessments?
Timeframe / Cost	2 – 3 weeks cheap	2 – 3 months inexpensive	Timeframe/Cost? includes IT, program & vendor impact	Time-intensive Timeframe/cost part of the feasibility study
Demographic Data Elements	Race / ethnic origin for now to meet the statute of 2018. Can be extended	SLIFE, Immigrant, Active Duty Parent, (RAEL)	Ethnicity, EL, ... Prefer to limit to finance related demographics only	Must include race / ethnic origin. Other Assessments.
Extensibility (ease to add attributes)	Easily extensible 24 – hour	Relatively easy extension but limited (UI & file & DB)	Hard to extend (requires all vendors to change)	Must be highly extensible
Lifetime	System is long term. Expectation is temporary feature	May or may not be temporary	Long-term	Plan for Long – Term
Data	Need to have child enrolled at district	Separate concept on how records are for a lifetime	Entire file sent even for single change	

Infinite Campus State Edition (ICSE) was researched as a possible solution but it was determined that ICSE would only be viable if MN had plans to move to Infinite Campus District Edition (ICDE) statewide. South Dakota uses ICDE and ICSE and is a state that utilizes one statewide SIS vendor. Here are some benefits going with ICSE.

- Free local SIS, health and IEP system for MN district 1,000 students and below to use.
- Student and Staff numbering, identity, tracking (and horizontal data transfers between districts using ICDE).
- **Real time** enrollment overlap management
- Object orientated longitudinal data schema allowing for advanced historical (multiyear) tracking of data.
- Data validations and certification tools that allow MDE to create an endless number of data validations that districts must run and correct prior to certification.
- Bi-Directional Data Flow between districts and state. MDE can push down course masters, state assessment results, custom data fields, etc.
- It is an Off the Shelf System (this is subject to interpretation (gf))

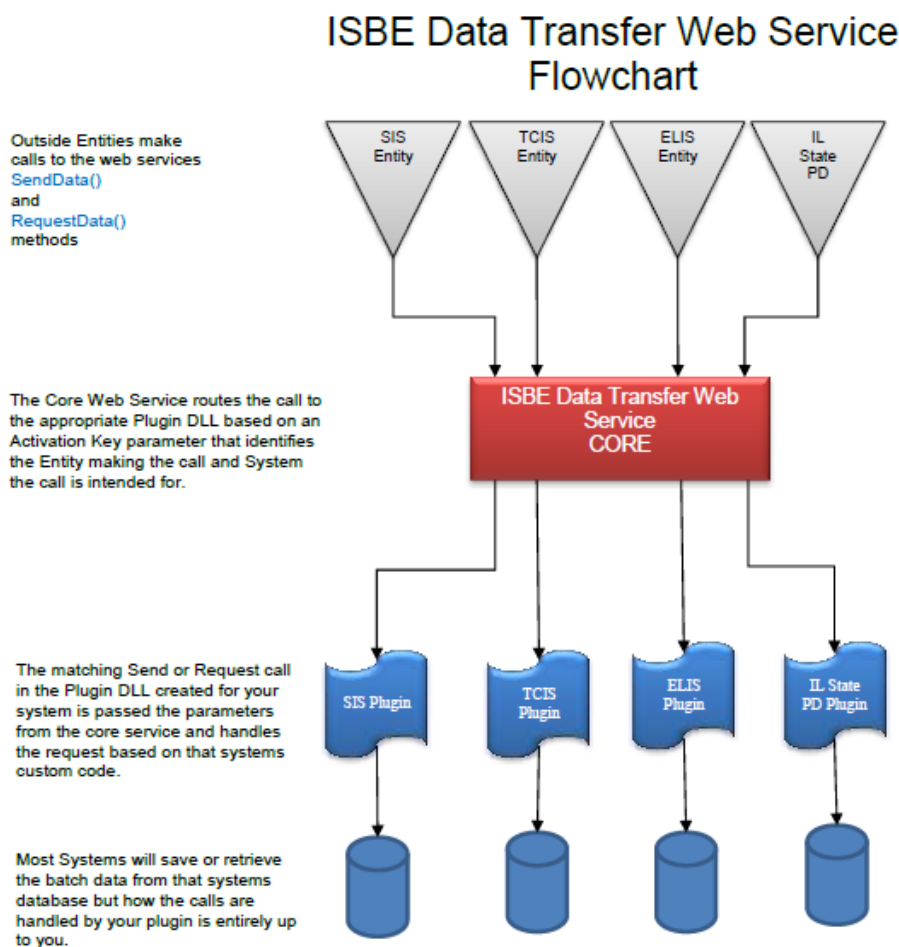
Infinite Campus stated that not all districts are required to use ICDE to utilize ICSE. If MN would go with ICSE they would charge \$2.00 per student to the state for districts not using Infinite Campus District Edition (ICDE) at a cost to the state of approximately 1M yearly for support and maintenance. For current ICDE customers they would take \$2 off their licensing fee. Example, if Edina pays \$6 they reduce Edina by \$2.00. The costs are high to encourage all districts to move to ICDE. If all districts use ICDE that would result in no cost for ICSE to the state. MN cannot consider moving to ICSE solution at this time. In the future if MN decides to move to one statewide SIS vendor this alternative solution can be revisited.

3.1 Alternative I - MN.IT@MDE In-House Web Services

3.1.1 Web Services Description

An in- house solution that MN.IT@MDE could use for data automation is Web Services. Here is a look at the Illinois solution from an in-house perspective. Illinois designed a custom framework for data transmissions to and from districts. They are willing to share knowledge and code with Minnesota. Within SIS a user can go in and generate a key from a custom designed page. That key identifies who they are and what system they want to talk to. Every file that comes in is processed (edit checks, loaded into table) and two more fields are added - result code and result message. Sometimes file will come back. There is always TWO WAY communication. They cannot allow bad data in. When done uploading data and applying to DB sender gets messages. Web Services works very well for Illinois because it helps centralize web service transmissions and security. This is a viable solution for MDE that takes an evolutionary approach versus revolutionary and does not disrupt current processes. It does NOT **streamline** data and is not **real time** but can replace the manual upload process with **automated** file submissions.

Below is the Illinois State Board of Education (ISBE) Data Transfer Web Service Flowchart.



3.1.2 Web Services Benefits and Costs

The development of Web Services is relatively cheap. By Illinois estimates, MDE would need approximately 1 FTE for 2 months to write up code for Web Services for a cost of approximately \$18,333. Annual MN.IT@ MDE salary rate used is \$110,000. This rate is based on average charges MN.IT Central bills customer agencies for IT time. (2016 rate). Another cost would be security. Security would need to be identified and this would take a large effort for the initial solution but then additional solutions would be small effort. Security development cost estimates have not been completed for Web Services at this time.

Hardware costs for MN.IT@MDE would not be affected because this alternative is only automating file transfer and does not affect current hardware configurations.

Web Service Benefit

This basic system would allow MDE to keep existing formats and have an API that could be used by SIS vendors to send and receive files most likely via a REST based system. It would replace the manual file upload that we have today with automated file submissions. Changes to existing collections could be required but a complete overhaul of each system should be avoided when implementing this system.

3.2 Alternative II - Ed-Fi Technology

3.2.1 Ed-Fi Description

The Ed-Fi technology is a data standard combined with free development tools and was created by the Ed-Fi Alliance with funding from the [Michael & Susan Dell Foundation](#) and launched in July 2011. Double Line Partners (Strategy and Implementation vendors) were hired to do technical development of the education data standard and tool suite for the Dell Foundation. The Ed-Fi Alliance is a social/network community that owns and issues licenses for the Ed-Fi technology. The licensing process is relatively simple and at no cost. States are required to submit a license application if the Ed-Fi technology is used. Only the installing entity needs a license.

The data standard includes a unifying data model (UDM) and a data exchange framework. Ed-Fi data standard uses CEDS. Ed-Fi version 1.2 is aligned to CEDS 3.0. Note, Ed-Fi data standard uses CEDS as a reference model and aligns to it wherever possible however they are not identical. Ed-Fi technology is built on XML standards for ease of implementation.

Development tools include an application framework, dashboard source code and Common Education Data Standard templates. These tools enable states and districts to develop dashboard systems that provide permission based views into student level data. For more Ed-Fi information see [FAQ page](https://www.ed-fi.org/getting-started/faq/) (https://www.ed-fi.org/getting-started/faq/)

3.2.2 Ed-Fi Benefits and Costs

The cost of implementing Ed-Fi technology will depend on complexity of the implementation and other factors including vendor selection, staff augmentation and customizations. There is no charge for licensing, usage or new versions of Ed-Fi technology. States, districts, schools, and vendors can obtain a free, non-transferable license to use Ed-Fi technology. This license provides unrestricted access and usage rights to its components. See [License Ed-Fi Technology](#) link to license info from Ed-Fi. (https://www.ed-fi.org/ed-fi-solution-works/license/)

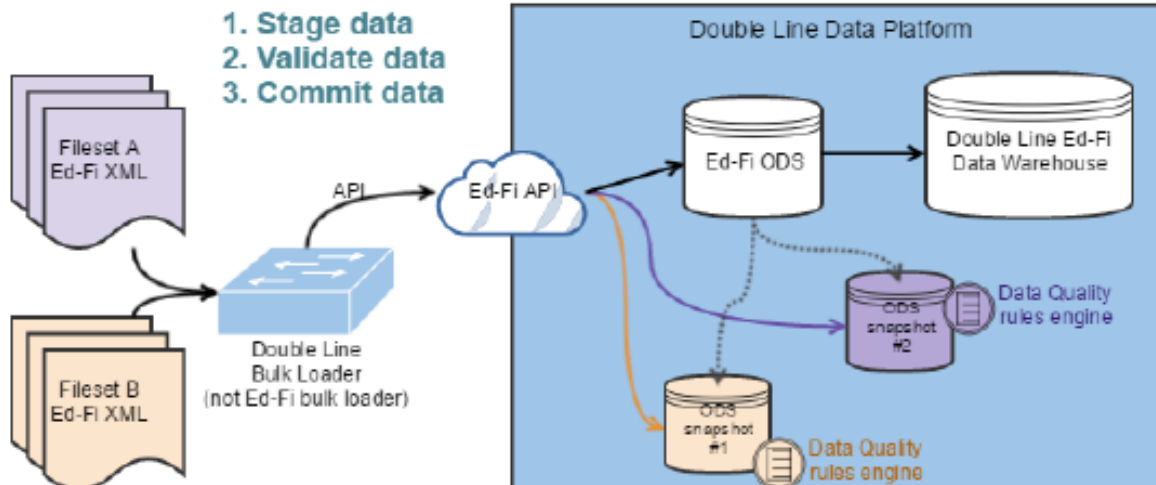
We contacted two vendors for high level estimates on strategy and implementation costs for Ed-Fi. Double Line partners (DLP) and Learning Mate were the vendors contacted. Double Line responded quickly and Learning Mate required two phone calls to get an implementation cost. We also asked these vendors for 3 year cost estimates for maintenance and support. Learning Mate was unable to give us those costs. See below chart for information and costs for these vendors.

Implementation Vendors for Ed-Fi	Ed-Fi License	SIF Cert	Location	High Level Estimate "ballpark" Cost	Notes
Double Line Partners DLP	X		Austin, Texas	1-1 ½ day Strategic Review: No charge Technical implementation \$600K - \$900K \$100K per year for maintenance /support, 3 year costs range between \$800K - \$1.1 million.	Worked with AZ (strategy only) NE, MI, DE, TX, AR, PA, FL, TN and for Colorado the city of Denver.
Learning Mate	X		Arizona	2-day Strategic Review: No charge Technology review of "as-is", discussions and development with Full Team Fixed Fee \$48,000 or Time and Materials at a blended rate of \$150hr. Technical Implementation \$500,000 to \$600,000	AZ, IL, OK - Strategy and Implementation

[See Appendix C – Implementation Vendor Contact Information](#)

Ed-Fi Hardware Requirements and Costs

See diagram below provided by Double Line vendors. They have included their own bulk loader used for validation.



Assuming data sources are district SIS, state sources and other sources such as assessment vendors, submitting data will be through a combination of the Ed-Fi REST API and bulk Ed-Fi XML. Double Line was asked to recommend setup for 200,000 students and here is what they gave us.

- 1 load balancer
- 2 web servers
- 1 application server

SQL Server in a High Availability Configuration (MN.IT@MDE probably already have this)

One very small server on which we can run orchestration (we can put this on one of the other servers, but it's better from a network separation / security standpoint and redundancy standpoint to separate it)

At 200k students, the driver here is primarily redundancy/failover. That means you can reduce the server count from the 200K recommendation, but Double Line would want to walk MDE team through what we are trading off. Virtualization/VMs will work fine, and that is our set up at MDE.

To scale to 1 million students (future growth), here is what Double Line suggests for 1 million students:

- 1 load balancer
- 3-4 web servers
- 1 application server

SQL Server High Availability cluster

One very small server on which we can run orchestration (we can put this on one of the other servers, but it's better from a network separation / security standpoint and redundancy standpoint to separate it)

If MDE wants the Ed-Fi Dashboards, plan on additional web servers based on the number of educators and administrators who will use the Dashboards, plus 1 application server.

MN.IT@MDE infrastructure support costs would apply for Ed-Fi technology hardware and SQL licenses.

MN.IT@MDE estimates \$39,000 for a low ballpark estimate for hardware and when considering other factors such as firewall, network, and building space etc. the cost would most likely be around \$50,000 a year to implement and maintain an Ed-Fi implementation. These costs consider the need for 2 backups, storage space, and SQL licenses for development, stage and production environments.

MN.IT@MDE would like the vendor to work with them in a "co-development" approach and transfer knowledge to the team so they could handle future customizations, maintenance and support. NE is currently using this approach with their implementation of Ed-Fi.

Ed-Fi District and State Costs

Infinite Campus would not charge districts to report to the state via Ed-Fi. Infinite Campus is considering a state reporting fee if states do not stick to core Ed-Fi product. JMC would give us a cost if needed depending on implementation plan. If Ed-Fi was “feathered in” costs would be minimal. Edupoint would need to get a project leader involved to discuss potential costs. MN SIS vendor costs will need to be determined if Ed-Fi is implemented.

Ed-Fi Benefit – System Flexibility

A benefit using Ed-Fi is the flexibility of the system and the ability to add in extra fields in a timely manner. MDE needs to know how a solution would handle a change request for additional racial and ethnic categories so the question was asked, “How would Ed-Fi accomplish this”?

Double Line said that in Ed-Fi they use a concept called Descriptors. Descriptors allow customized codes. For example, Minnesota might have 5 codes that map to “American Indian – Alaskan Native”, Ed-Fi captures the lower level granularity and can still understand that they roll up to the standard values for use in Ed-Fi’s existing processing. Ed-Fi’s Extension Framework allow extensions to be defined in MetaEd, an English-like language that describes the model. MetaEd includes auto-generators that will generate the database model, XML schemas, updated documentation, etc. to reflect the added fields.

Michigan uses Ed-Fi and they said they would *“Add extra values to the descriptors. Ed-Fi has a default set of race types, we would add rows to the table, modify default race type or add another field quickly to modify the Cockpit and send out to all the districts. This would take a couple of hours to send out change. Then we need 6 SIS vendors to add in the new field and train users which would take much longer. We do have templates we use for changes then push out the changes.”*

We asked Double Line/Ed-Fi what they would do for Districts or small charters that were unable to get onboard with Ed-Fi. 100% participation of Districts, unless mandated, most likely will not happen at MDE for some time. To handle this use case, Double Line defines an intermediary format in a simple comma separated (or similar) format, and then the complexity of getting that into Ed-Fi is handled by a conversion utility. Double Line includes the utility as part of their services, so there is no fee.

Ed-Fi Benefit – Return on Investment

Michigan Data Hub Ed-Fi – Michigan Statewide Data Hub ROE study in 2016 shows a projected savings of 56.34M per year using the statewide data hub. These saving are from elimination of duplicate effort in district data integrations, shared tools and **streamlining** collections. Districts are projected to save 16.27M by standardizing and **automating** data submission processes.

Study: [The Michigan Data Hub – A Strategic Alignment and ROI Study](http://22itrig.org/downloads/data_integration/michigan_data_hub_roi_study.pdf)
(http://22itrig.org/downloads/data_integration/michigan_data_hub_roi_study.pdf)

Arizona Ed-Fi – When the Associate Superintendent from Arizona was interviewed and asked “What is working well with your automated data collection for your state”, there reply was “Independent 3rd parties did some monitoring (review) and they estimated that we are saving the State 40M by improvements in data quality.

Review: [Quarterly Performance Review of the Arizona Education Learning Accountability System: AELAS](https://cms.azed.gov/home/GetDocumentFile?id=5877d97faadebe183c5d5d80)
(<https://cms.azed.gov/home/GetDocumentFile?id=5877d97faadebe183c5d5d80>)

Nebraska Ed-Fi – Nebraska is another state implementing Ed-Fi and estimated in the past they spent 655,000 hours sending data and 100M a year was spent to accomplish that feat of getting data and reporting to federal. Nebraska wanted to improve hours and money spent and choose Ed-Fi technology. Double Line did a report in 2014 and estimated ROI of 31.3M in savings after the third year of investment or the 2nd year after it accomplishes NEDS (Nebraska Education Data System) rollout. These savings include 18.7M saving on reduced technology costs for Districts systems when NEDS fully implemented and 12.6M on reduced accountability costs in Districts by redirecting 50% of FTE’s time that was spent on data submissions.

Study: [Nebraska Education Data Systems – Legislative Study](https://www.education.ne.gov/wp-content/uploads/2017/07/NEDataSystemsLegislativeStudyLoRes.pdf)
(<https://www.education.ne.gov/wp-content/uploads/2017/07/NEDataSystemsLegislativeStudyLoRes.pdf>)

3.3 Alternative III - SIF

3.3.1 SIF Description

SIF stands for Schools Interoperability Framework and has been in the US since 1998. SIF is an Educational data model. MN.IT@MDE has a history with SIF visiting the technology in 2008, 2011 and 2014. There was a pilot in 2011/12 with vendor CPSI Ltd. but it did not take off and SIF hardware set up was dismantled.

There have been significant changes with SIF the last few years. The SIF Association has been renamed the Access 4 Learning (A4L) Community and has approximately 3000 members. This community is a collaboration of schools, districts, local authorities, states, US and International Ministries of Education, software vendors and consultants. SIF has released Implementation Specifications 3.x (significant change from 2.x) based off XML which includes separation of data model and infrastructure and REST based infrastructure with targeted functionality via xPress API line. SIF 3.x defines a dynamic application to application data transfer framework, which is fully CEDS compatible architected to incorporate the CEDS Logical Data Model. SIF Infrastructure Implementation Specification 3.2.1 was released April 24, 2017. Note, the states interviewed for this study were all on SIF 2.x release.

SIF has a 15 year old voluntary testing certification program and is open to any member of the A4L Community. The SIF Certification Agreement and the Trademark License Agreement constitute the set of requirements and obligations for achieving certification. SIF vendors that were interviewed build off the SIF framework and create their own agent software that is available for a yearly license fee.

SIF applications are in use in all US States to some degree. In 2016 12 states are utilizing SIF interoperability. In Minnesota SIF is utilized in 50 Districts and 200K student in MN according to the A4L document on SIF Utilization. [See references for link to SIF Utilization document](#)

3.3.2 SIF Benefits and Costs

Similar to Ed-Fi, the cost of implementing the SIF technology will depend on complexity of the implementation and other factors including vendor selection, staff augmentation and customizations. Certification costs for vendors can be costly according to Infinite Campus and the SIF agent yearly license costs charged by vendors is high.

Vendors for SIF include Visual Software and CPSI Ltd. High level estimates were received and are listed in the table below. If MDE were to choose SIF the vendor CPSI Ltd. would offer a discount to MDE for being a previous customer.

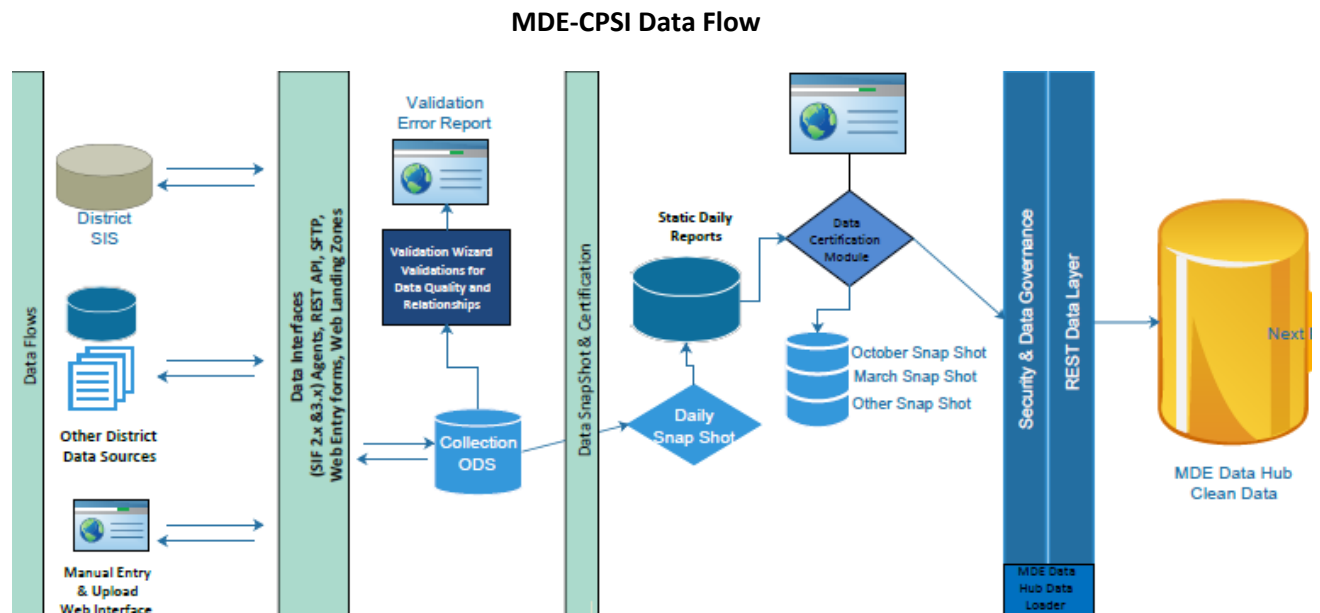
SIF Implementation Vendors	Ed-Fi License	SIF Cert	Location	High Level Estimate "ballpark" Cost	Notes
Visual Software Inc. (VisualSi)		ZIS 5.0 +	PA	Onsite Visit no charge review requirements Technical Implementation \$624,800 First year maintenance and support \$375,680, 2nd and third year \$251,120	MA, TIES and Infinite Campus work with Visual Software.
CPSI Ltd.	X	Partners are certified	Illinois	They also offer an onsite visit no charge to review requirements. First year implementation is discounted due to previous customer and is \$373,950. First year maintenance and support \$486,250, 2nd year \$486,250, 3rd year, \$491,050, 4th year \$496,100, 5th year \$501,400. CPSI Ltd sent two other quotes when the high maintenance costs were questioned. Other quote prices will be listed in the "Comparison of Alternatives" section.	Worked with OK. Worked on MN SIF pilot 2011/12. Started work with MA but they switched to Visual Software.

[See Appendix C – Implementation Vendor Contact Information](#)

SIF Hardware Requirements and Costs

When implementing SIF, the hardware configuration is similar to implementing Ed-Fi without Ed-Fi dashboards. Five servers are needed for every 200,000 students. SQL backend is used which MN.IT@MDE already maintains and supports.

Below is a configuration diagram from CPSI Ltd. This includes their validation tool that would require yearly license fees. Reference document “MDE-CPSI Data Flow with Hardware” for complete diagram.



Visual Software provided a spreadsheet to determine exact hardware needs for SIF Implementation. Below is a snip of the spreadsheet available to MDE if or when we need to determine hardware needs and software costs from Visual Software.

VSI Price Estimator for Minnesota Department of Education							
Environment	Product	Product Price/Core	Min Cores/Server	Number of Cores	Students / Core (est)	Enrollment	Assessment
Dev	ZIServer - Compact Edition (single server only)	500	2	4	10,000	X	X
	ZIServer - Standard Edition	2,000	2	0	15,000	X	X
	Veracity - Compact Edition (single server only)	3,750	2	8	8,000	X	X
	Veracity - Standard Edition	3,750	4	0	10,000	X	X
Staging	ZIServer - Standard Edition	2,000	2	16	15,000	X	X
	Veracity - Standard Edition	3,750	4	32	10,000	X	X
Production	ZIServer - Enterprise Edition	2,200	8	64	25,000	X	X
	Veracity - Enterprise Edition	3,125	8	96	20,000	X	X
<i>total</i>							
<i>Other Options</i>	Mimic Enterprise - Legacy agent for CSV files (Available Aug 2017)	3,125	8	16	20,000	X	X

MN.IT@MDE Costs

When SIF is fully implemented MDE in-house support costs would exist for infrastructure support. Goal would be for SIF vendors to work with MN.IT@MDE and transfer as much knowledge as possible to the team so minor customizations and support could be handled in-house. Internal costs for development and support will be lower for SIF because vendors charge yearly for software and SIF agents and that includes a support model for their software.

SIF Benefits

System Flexibility - Oklahoma is using SIF 2.x and when asked if it would be easy to add more fields for racial categories, they said in SIF race is a repeatable group, you can add as many as you want. They have 5 and can add more. Should be easy but they were not sure how many racial codes you can add.

Most program requirements would be met with SIF technology. When SIF fully implemented data collections will be **streamlined**, data will be **real time** and data submissions will be **automated**. Data will be stored in a data hub **centralizing** the data for better reporting. This is similar to benefits with Ed-Fi.

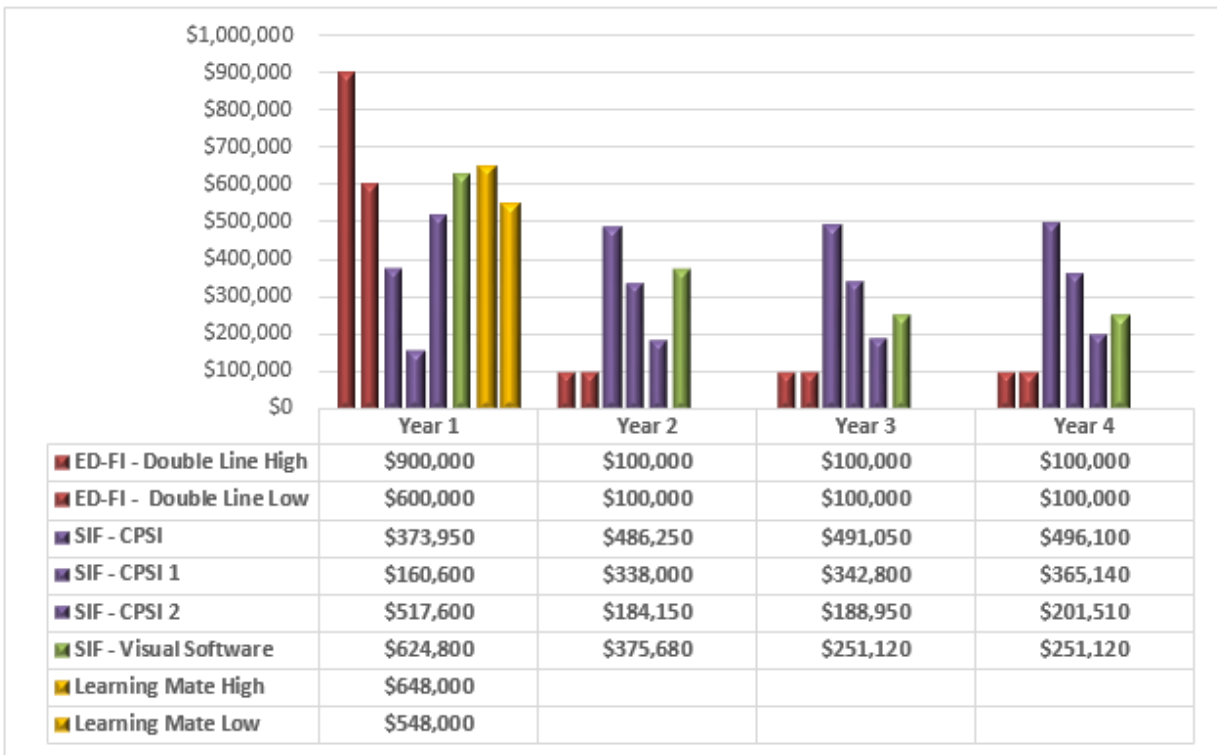
3.4 Comparison of Alternatives

3.4.1 Vendor Cost Estimates

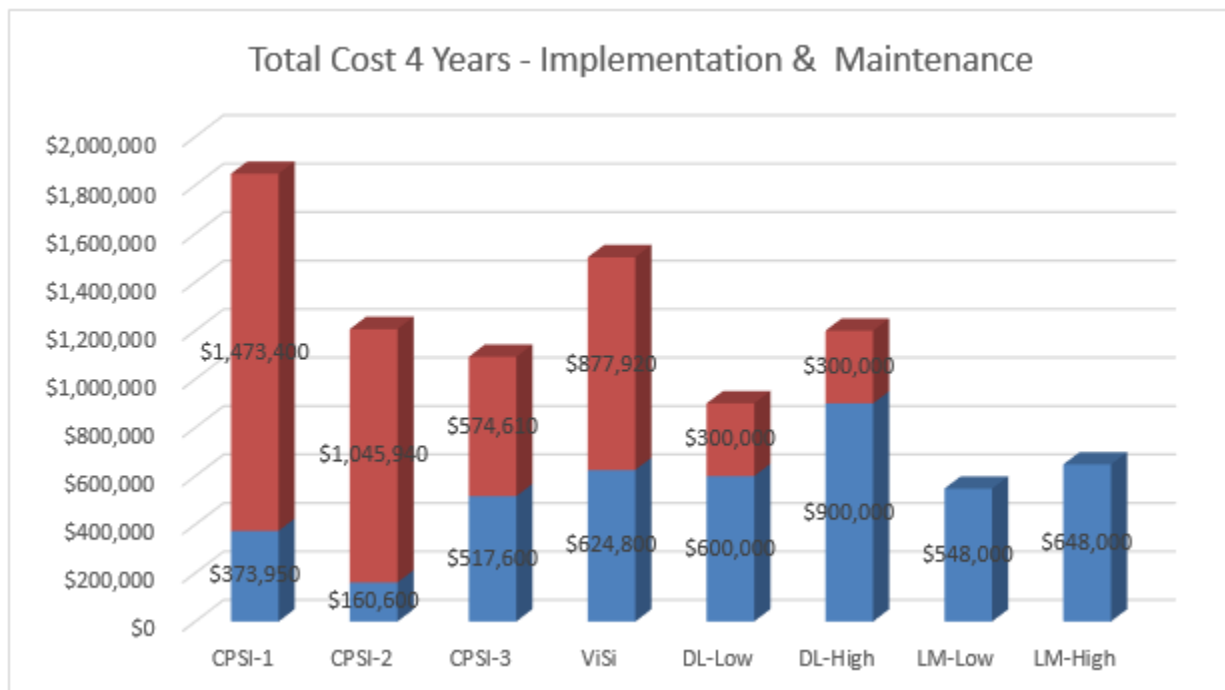
Vendor costs were detailed in “Benefits and Costs” under each alternative. In this section we analysis the cost differences between vendors. Note: Maintenance and support costs were requested from Learning Mate but were not received. Double Line and Learning Mate are Ed-Fi vendors. CPSI and Visual Software are SIF vendors. Visual Software gave us the most detailed and accurate quote of all vendors.

Here is a chart showing vendor estimates. Double Line gave us high and low estimates dependent on customizations and complexity. CPSI gave high, medium and low estimates depending on the use of their validation engine and subscription plans. Vendors sent implementation costs for full implementation of all Minnesota districts. For SIF estimates, Visual Software is the most realistic.

Vendor Implementation Costs and Three Years of Maintenance



This chart contains the same high level cost estimates but stacked columns to represent the total 4 year costs. Blue represents implementation costs and red are maintenance costs. Costs are based on estimates and subject to change when formal RFI or RFP is requested.



3.4.2 Comparison of Solutions

Web Services, Ed-Fi and SIF were rated on a technology pass/fail scale. Web Services failed because of inability to meet requirements. SIF failed due to high maintenance costs.

Web Services Technology - Fail

Criteria	Yes	No	Future
Cost Analysis	X		
Ability to meet Program Requirements		X	
Sustainability – maintenance costs	X		

Ed-Fi Technology - Pass

Criteria	Yes	No	Future
Cost Analysis	X		
Ability to meet Program Requirements	X		
Sustainability – maintenance costs	X		

SIF Technology - Fail

Criteria	Yes	No	Future
Cost Analysis		X	
Ability to meet Program Requirements	X		
Sustainability – maintenance costs		X	

Solutions were rated on a scale of 1 – 5. The decision criteria was taken from the list of program requirements. MN.IT@MDE Ed-Fi was an additional column added because if Ed-Fi is chosen, MN.IT@MDE has a development and infrastructure team that could learn and implement the Ed-Fi technology in-house.

Rating Scale is: 1 = Very Poor, 2 = Poor, 3 = Fair, 4 = Good, 5 = Very Good

Decision Criteria	Rating Scale	MN.IT@MDE In-House Web Services	Rating Scale	MN.IT@MDE In-House Ed-Fi	Rating Scale	Ed-Fi	Rating Scale	SIF 3.0
Reputation States and SIS Vendors	4	Good	5	Very Good	5	Very Good	2	Poor
Develop Data Collection	3	Fair	5	Very Good	5	Very Good	5	Very Good
Maturity of Solution	3	Fair	3	Fair	3	Fair	3	Fair
Cost Analysis	5	Very Good	4	Good	4	Good	1	Very Poor
Ability to meet Program Requirements	2	Poor	5	Very Good	5	Very Good	5	Very Good
Automate, replace manual file uploads	2	Good	5	Very Good	5	Very Good	5	Very Good
Streamline Data Collections	3	Fair	4	Good	4	Good	4	Good
Real Time Data Transfer	2	Poor	5	Very Good	5	Very Good	5	Very Good
Eliminate File Uploading	4	Good	4	Good	4	Good	4	Good
Centralize data	3	Fair	4	Good	4	Good	4	Good
Increase interoperability with other data systems for better reporting	3	Fair	5	Very Good	5	Very Good	5	Very Good
Sustainability – maintenance costs	4	Good	4	Good	4	Good	1	Very Poor
Resource Availability	3	Fair	2	Poor	4	Good	4	Good
Project Timeliness	5	Very Good	2	Poor	4	Good	4	Good
Long term solution	4	Good	5	Very Good	5	Very Good	5	Very Good
Hardware Requirements	5	Very Good	4	Good	4	Good	4	Good
System Expandable and Flexible	3	Fair	5	Very Good	5	Very Good	5	Very Good
Risk Level	5	Very Good	3	Fair	4	Good	3	Fair
TOTALS	65		74		79		69	

Conclusion after this rate comparison is that SIF will not be sustainable due to high maintenance costs. Ed-Fi outsourced had the highest score due to the fact that MN.IT@MDE in-house rates “Poor” for resource availability. Web Services does not meet all program requirements today but further analysis was done in a SWOT analysis to see if Web Services had enough strengths to evolve into meeting program requirements in the future. See SWOT analysis below.

3.4.3 SWOT Analysis

A SWOT analysis was completed for technology comparisons between Web Services and Ed-Fi technology. Strengths (benefits), weaknesses (low risk), opportunities and threats (high risk) were determined. See below chart for analysis.

Evolution versus Revolution

Evolution Web Services	Revolution Ed-Fi Technology
Strengths (Benefits) <ul style="list-style-type: none"> • In-house solution • Illinois will share code with MN and provide guidance • Allow existing file formats to stay the same • Some changes to existing collections but complete change will be avoided • May help standardize data collections • Automate - file uploading • Reusable – can be used for many collections • Costs will be lower than Ed-Fi 	Strengths (Benefits) <ul style="list-style-type: none"> • Provides free and open tools that integrate and streamline K12 data systems • Ed-Fi Alliance owns and issues licenses for Ed-Fi technology free of charge • Can be near real time • Forces Increased interoperability • Automate -Eliminate file and file uploading • Can determine parts of Ed-Fi solutions to use • Reusable - can be used for many collections
Weakness (Low to medium risk) <ul style="list-style-type: none"> • Does not force streamlining of data collection • File sent, validations occur, system comes back to data after validations – not real time • Does not force dismantling of silos 	Weakness (Low to medium risk) <ul style="list-style-type: none"> • Most likely vendor involvement • Could be costly depending on approach and customizations • Major change, will need to run parallel systems • Resistance to change from Districts • Maturity of solution launched and continued enhancements
Opportunity <ul style="list-style-type: none"> • This solution will evolve slowly so time can be taken to improve systems. 	Opportunity <ul style="list-style-type: none"> • Unlimited access to the Ed-Fi Data Standard and other components of the Ed-Fi Implementation Suite at no cost. ODS, API, dashboards, and tools. • Ed-Fi Alliance has a strong following and sharing solutions among states is strong.
Threat (High Risk) <ul style="list-style-type: none"> • Will not meet ALL program requirements in a timely manner 	Threat (High Risk) <ul style="list-style-type: none"> • Long term commitment and cost

For a solution to move forward and be considered viable for MDE they must meet business requirements. After thorough analysis of Web Services it does not meet requirements. Web Services does NOT allow for **streamlining** of data collections and **real time** data. Future potential of meeting those requirements would require a revolutionary approach and there is no way around that. Ed-Fi technology meets the most requirements of all solutions researched.

4. Impact Analysis

For a revolutionary approach such as Ed-Fi (SIF would be similar) there will be a noticeable impact. Currently data is manually submitted via a file upload. With Ed-Fi technology, data is submitted **automatically** and in **real time** and the physical file that data coordinators are used to working with is no longer there. Too often errors were corrected in the file itself and not the source. With Ed-Fi the error checks are fixed at the source before they can be submitted. This happens for every change, there will no longer be a need to send an entire MARSS file for one change. The data cannot be submitted unless it's correct which enforces ongoing data quality review. The Ed-Fi dashboard will show red marks for errors and users (teachers) can get overwhelmed when seeing all the errors but they are the additional eyes on the data, eyes that are more close to the data and can correct at the source. With training and support for data entry, errors will decrease. This is a significant change for data entry and data coordinators who work with data entry, data submissions and error corrections. Validation engines can be put in place to reduce errors and lessen the impact for correcting errors at the source.

Data stewards will be involved in their district implementation. Data stewards don't lose control but they find out that what they have been doing is transformational. When data is more accurate at the source, this allows data stewards to focus more on data quality, data reporting and other data related improvements. When automating data submissions, streamlining and centralizing data, users will spend less time on submitting data and more time on improved reporting which in turn will assist development of strategies that will strengthen academic programs and close achievement gaps for AAPI and English Learner subgroups.

There will be a change of culture if MDE goes with Ed-Fi technology. Strategy and implementation plans will need to be thought out carefully and planned to minimize impact. Patience is key to getting Ed-Fi implemented, it does not all work right away. Complexity of tying in systems takes times. Running parallel systems will need to be in place causing more work for some positions.

The need for an assessment data owner will be there. A Data Hub Administrator will be needed if MDE follows the path of the Michigan Data Hub which uses Ed-Fi technology.

Not all districts will or can be onboard with a new system right away. Big stick approach or mandating has been done in OK and AZ but this approach will not work in Minnesota. If MDE implements Ed-Fi they will need to assume that 100% onboarding will be a challenge and should plan for alternative file submissions to the state until 100% onboarding is achieved.

After Ed-Fi is fully implemented the impact on return on investments will be high. Ed-Fi is a relatively new technology (2011) so it is too soon to tell how accurate states mentioned in this study have been on their projected ROIs.

5. Recommendations and Conclusions

Results of this study have concluded that Ed-Fi technology outsourced is a viable solution to meet Program and IT requirements for data automation. Additional work to understand technical details and how this opportunity will meet long range goals for MDE is needed but out of scope for this study.

Ed-Fi technology outsourced should be considered for implementation and strategy consulting with the understanding that knowledge sharing would occur with the MN.IT@MDE team so future customizations, support and maintenance could be handled in-house.

Taking a revolutionary approach such as Ed-Fi technology will put MDE on the right path for improved data collections. This approach opens the door to automating collections such as MCCC and others. The future will hold many possibilities going down the path of Ed-Fi technology. As other states have mentioned, there is an Ed-Fi movement going on that MDE can take advantage of.

Appendixes

Appendix A – Acronym Guide

Acronym	Description
AAPI	Asian American Pacific Islander
ACS	American Community Survey
ACT	ACT, AP, IB, NWEAStandard Tests
AIF	Assessment Interoperability Framework (https://ceds.ed.gov/aif.aspx)
API	API stands for Application Programming Interface (API) and is roughly defined as: The allowance and processes to give programs access to connect and essentially, communicate with other programs. Their APIs are their languages. It's a software-to-software interface that allow for separate parties to talk to each other without any previous user knowledge or intervention. It runs the processes behind the scenes.
ARS	Assessment Reporting System
CEDS	Common Education Data Standards – set of most commonly used K-12 education data elements.
DAC	District Assessment Coordinator
Data Backpack	Bill introduced to share data. 2015 Bill did not pass.
D2 Grant	Absolute Priority 1 Disaggregating Data (D2) grant from the U.S. Department of Education's Office of English Language Acquisition, MDE
ECLDS	Early Childhood Longitudinal Data System
ECSF	Early Childhood Special Education
edFacts	EDFacts is a U. S. Department of Education initiative to put performance data at the center of policy, management and budget decisions for all K-12 educational programs. EDFacts centralizes performance data supplied by K-12 state education agencies (SEAs) with other data assets, such as financial grant information, within the Department to enable better analysis and use in policy development, planning and management.
Ed-Fi	Data standard and associated technical assets that serve as foundation for enabling interoperability among education data systems designed to improve student achievement and teacher satisfaction
EL	English Learner
ESEA	Elementary and Secondary Education Act
ESSA	Every Student Succeeds Act
GRR	Graduation Requirements Records
LEA	Local Education Agency – “School District” – Needed for testing and feedback
MARSS	Minnesota Automated Reporting Student System – School finance requires all student demographics to be submitted in MARSS. Mainframe system that handles 8 Billion in school aid annually. FYI Michigan calls their Admin Reviews MARS.
MARSS - ODS	Minnesota Automated Reporting Student System – Operational Data Store – proposed
MARSS - WES	Minnesota Automated Reporting Student System – Web Edit System - used today
MCCC	Minnesota Common Course Catalogue is a course classification and data collection system intended to provide info about courses that are taught by MN teachers and completed by MN students. (http://education.state.mn.us/MDE/dse/datasub/MCCC/)
MLDE	WICHE's Multistate Longitudinal Data Exchange (MLDE), funded by Bill & Melinda Gates Foundation, will build a system to exchange individual-level education and workforce data between at least 10 states. The effort will help state policymakers and researchers answer research questions about the development and mobility of human capital by linking education and employment outcomes across state lines.

Acronym	Description
NAEP	National Assessment of Educational Progress
P20W	Preschool, K-12, 13-20, Workforce
RMIC	Regional Management Information Centers
SaaS	Software as a Service
SEA	State Education Agencies
SIF	Schools Interoperability Framework
SIMS	Student Information Management System
SIS	Student Information System
SLDS	Statewide Longitudinal Data Systems - Systems funded by federal grant dollars intended to enhance the ability of States to efficiently and accurately manage, analyze, and use education data, including individual student records.
SLEDs	Statewide Longitudinal Education Data System
SLIFE	Students with Limited or Interrupted Formal Education
SLO	Student Level Observations
SME	Subject Matter Expert
SOA	Service Operations Architecture (Advisory) SOA effort at MI to use central point for data to come in, no matter what format it is and convert it and bring it into the system
SPPS	Saint Paul Public Schools
SSDC	Student Support Data Collection
Student PII	Student Parent-Implemented Intervention
TransAct	MDE provided tool. Helps to obtain translated federal forms local use
TRIG	Technology Readiness Infrastructure Grant – MI is involved with this grant for their MI Data hub
WICHE	Western Interstate Commission for Higher Education Consortium – Pilot Project involving Washington, Oregon, Hawaii, Idaho - working to share states data. Doing a pilot of SLEDs.
TestWES	MDE Test Web Edit System. Districts do activities in TestWES before statewide testing begins and after it ends.
UI	User Interface
XML	Extensible Mark-up Language
ZIS (SIF)	SIF - Logical grouping of software applications is called the SIF Zone. At the center of this ZONE is a software application called a Zone Integration Server (ZIS). This program serves as the central nervous system of the Zone that ties everything together.

Appendix B – MDE and District Stakeholders

MN.IT@MDE Stakeholders	Title	Project Role	Contact Information	Notes
David Reeg	Supervisor Arch & Dev	Management Approval, SME MDE.IT	651-582-8474	Keeps track of project progress, SME MDE.IT, supervises contractor
Anne Sheridan	Project Manager	Assessments & Analytics PM, SLEDs, part of state finance	651-582-8721	
Dave Onsrud	SQL Programmer Architecture and Development	Student Enrollment & Assessments Data Subject Matter Expert	651-582-8626	Primary programmer with MARSS 1995, MARSS-WES 2008, Assessment data 1996
Joe Knudsen	Java Programming, IT Architecture & Development	TestWes & Assessments	651-582-8253	

MDE Stakeholders	Title	Project Role	Contact Information	Notes
Kevin McHenry	Assistant Commissioner for Data Governance	Executive Sponsor	651-582-8250	
Jennifer Dugan	Director of Research & Assessments, Statewide Testing	Program Champion	651-582-8654	
Gayra Ostgaard	Research Analyst	Grant Project Manager	651-582-8339	Will work closely with Marilyn Loehr (grant)
Kara Arzamendia	Supervisor of Data Analytics Group/SLEDs Coordinator	Program Management	651-582-8599	Reports to Jennifer Dugan Double Line has name
Tom Melcher	Director of School Finance	Program User	651-582-8828	Technically in charge of MARSS
Sharon Peck	Supervisor of MARSS (Minnesota Automated Reporting Student System) Student Data Collection	Program User	651-582-8811	Known as Data Management team internally to Tom's team
Leigh Schleicher	Supervisor Student Support Data Collection/SSDC (Title and other federal programs, SLIFE, Immigrant, etc.)	Program Management	651-582-8326	
Marilyn Loehr	MARSS Coordinator	Program User	651-582-8456	
Karen Millette	Data Steward MCCC	Program User	651-582-8632	

MN District Stakeholders	Name/Title	Project Role	Contact Information	Notes
Community of Peace	Bonnie S. Johnson / District Business Manager BonnieJ@cpa.charter.k12.mn.us Cara Quinn CaraQ@cpa.charter.k12.mn.us	Program User	651-280-4587	471 Magnolia Ave. E., St. Paul, MN 55130
SPPS	Stacey Gray Akyea / MARSS Coordinator Patti Michaud / Director	Program User		
Worthington	Pat Morphew / District Accounting Supervisor & MARSS Coordinator/Data	Program User	507-727-1102	

Appendix C – Implementation Vendor Contact Information

Implement Vendor Name	Contact Name/Title	Company Info/CEO	Notes
CPSI Ltd.	Michelle Elia / President michelle@cpsiltd.com Aziz Elia/ developer aelia@cpsiltd.com Ariana Bauer / Director of Sales ariana@cpsiltd.com	235 Southwoods Center Columbia, IL 62236 Phone: 800-659-8240 Fax: 618-281-8860 Email: sales@cpsiltd.com Web: cpsiltd.com	Worked with MDE in 2014 on SIF pilot. Founded 1990 – MA originally used CPSI but were issues and went with Visual Software.
Double Line Partners (DLP)	Bob Cook / Senior Account Executive bob.cook@doublelinepartners.com 815-451-8228 (cell) Matt Warden / Developer matt@doublelinepartners.com	Double Line Partners (http://www.doublelinepartners.com) Corporate Headquarters Austin, Texas Employee count 50+	DLP has extensive experience in the design and development of performance management systems – dashboards, scorecards and portals – that help teachers improve their students’ educational achievement. Nebraska, Arkansas, Tennessee, Colorado, Florida, Pennsylvania, Texas, Michigan, Delaware are some of the states they did projects in. (web) Double Line did not implement Ed-Fi at Arizona or Wisconsin. However they designed the certification process and certified their vendors to work with Ed-Fi. (BC)
Learning Mate	Joe Mattuch/Sales joe.mattuch@learningmate.com Ed Jung /Developer	Arizona	Provided staff augmentation for Arizona’s Ed-Fi implementation.
Visual Software Inc. (VisualSi)	Robert Hutchison President rchutch@visualsi.com (215) 493 8210 x114 (Office) (215) 272 5231 (Cell)	Visual Software (https://visualsi.com/) 532 Durham Rd. Newtown PA, 18940 Phone: +1 (215) 968-3000 Fax: +1 (215) 968-3001 (web)	Worked with MA and WAH. WAH was instrumental in the current Visual Software Inc. (VisualSi) support agreement negotiations which resulted in the guarantee that EOE or any school district receives a SIF Agent free of charge from the State vendor with a reduced support and configuration consulting rate. (web)
W. A. Holscher Consulting Inc. (WAH)	William A. Holscher Not Contacted Reference only	23 Digital Drive, Suite 201 Nashua, NH 03062 857-288-0636 WAHolscher@waholscher.com	Used to be MA SIF State Program Manager, Executive Office of Education. Now: WAH Inc. is an IT and mgmt. consulting co. specializing in performance improvement initiatives. WAH provided MA program and project mgmt. In conjunction with architectural and process improvements, including selecting the replacement State SIF Vendor, architecting IT infrastructure upgrades, establishing district on-boarding procedures and implementing a new MA SIF vendor certification pre-requisite requirement with a full set of associated policies, standards, procedures and supporting documentation. (web)
ESP solutions	Not Contacted Reference only		MA uses ESP Solutions to handle the transportation and validation process through the State Reporting Manager (SRM) software. (web)

Appendix D –SIS Vendor Contact Information

SIS Vendor Name	Contact Name/Title	Company Info/CEO	Notes
Aptium LLC (SchoolBrains)	William (Bill) Densberger / Vice President SchoolBrains	Massachusetts 845 Main Street Osterville, MA 02655	MA state referred to SchoolBrains. David R. mentioned this one. SchoolBrains SIF® Agent 2.7 Cell is 617-828-7100. Call any time with questions or to set up a meeting. It would be a pleasure to speak with you. Exchanged emails only.
Edupoint Synergy- SIS	Mike Grundy (KarenM) Rhiannon Schaeffer <i>Business Analyst</i> State reporting SME for Minnesota state reporting (KarenM) Phone: (480) 633-7500	Arizona, California 101 Pacifica, Suite 240 Irvine, CA 92618 p. 949.458.0900 1-888.EDUPOINT (888.338.7646) 1955 S Val Vista Drive, Ste. 200 Mesa, AZ 85204 p. 480.633.7500	Synergy Student Information System (SIS) provides all the data and process management functionality you expect from a world-class SIS. As part of the enterprise-level Synergy Education Platform, Synergy SIS helps your district do more, saving time and money while helping to improve educational outcomes. (web) Arizona mentioned Edupoint . (http://www.edupoint.com/Products/Student-Information-Management) Marilyn Loehr vendor suggestion, support largest districts. Approximately 65-75 districts.
Edupoint Synergy NW Region ONE	Mike Kunde – Region One Representative – knows product inside and out. Retiring soon. Blaine Location (Karen M) Mike Kunde mike@region1.k12.mn.us Ext. 107	Blaine, Moorhead, MN Edupoint Synergy NW Region ONE (http://www.region1.k12.mn.us/main/) Office is open: Mon - Thurs 8:00-4:30 Friday 8:00-4:00 CST (800) 450-2990 - (218) 236-2990 (218) 236-2368 - Fax 3031 17th Street S. , Moorhead MN 56560	NW Region ONE supports Synergy but is not part of Edupoint. They work with vendor.
Infinite Campus, Inc.	Tomma Pierce-Grzasko/Software Product Analyst (KarenM) Direct: 763.795.4167 Ann Nelson / manage state reporting for the districts Jon Berry/ Product Manager	Blaine, MN Infinite Campus, Inc. (https://www.infinitecampus.com/) Corporate Headquarters: 4321 109th Avenue NE Blaine, MN 55449 PHONE: (800) 850-2335 (651) 631-0000 EMAIL: sales@infinitecampus.com	For more than two decades trusted name in student information. 7.8M students, 45 states, 2K Districts. Marilyn Loehr vendor suggestion 2 nd largest Infinite Campus District addition has a total of 370,910 students in Minnesota June 2017.
Infinite Campus Inc.	Ashton Faires – State Education Agency Manager	Cell 480-294-3311 Arizona location	Ashton emailed MDE about their statewide system edition. Their statewide system “edition” is an off-the-shelf statewide data collection system.

SIS Vendor Name	Contact Name/Title	Company Info/CEO	Notes
JMC INC	Greg Gilman ext. 225 greg@jmcinc.com (KarenM) Bill McElmury, CEO JMC Inc. Development Sean McElmury President JMC Inc. Business side sean@jmcinc.com	Mailing Address PO Box 328 Lake City, MN 55041-0328 Phone: 800-524-8182 Phone: 651-345-4654 Fax: 651-345-2215	Greg G. doing work with Ed-Fi at WI. (KarenM) Marilyn Loehr vendor suggestion smallest. JMC INC. Website (http://www.jmcinc.com/)
PowerSchool	Kirk Sorenson (Karen M 1st) Corey Nelson (Karen M)		
Skyward, WI	School Management System Rachel Jones 800-236-7274 ext. 1510	2601 Skyward Drive Stevens Point WI 54482	SIS vendor (dr) Established 1980 ED-FI licensed vendor Skyward Website (https://www.skyward.com/)

Appendix E - State Contact Information

STATES /suggested	Contact Name/Title/(source)	Contact Info	Notes
*Arizona / (kg)	Mark Masterson / ADE Chief Information Officer, Chairman ADE Data Governance (conf) Lisa Blyler / Associate Superintendent (conf) Emily Carey / MBA Executive Business Manager Arizona Department of Education, IT	Mark.masterson@azed.gov Lisa.blyler@azed.gov Emily.Carey@azed.gov Office: 602-542-7111	CEDS and ED-FI –Edupoint Synergy SIS Different technology, they used competing framework EDFI instead of SIFS. (dr) Double Line Partners did not implement Ed-Fi at Arizona or Wisconsin. They designed the certification process and certified their vendors to work with Ed-Fi. (DL Bob Cook) Lisa is the contact we talked with. She has been at AZ for 5 ½ years and the project had started just before she got there. UPDATE May 2017 – Mark Masterson, ADE CIO, will leave the department beginning August 1, 2017. Mark spearheaded ADE’s transition to the new student data system.
Hawaii / MDE Assessments	Sandy Goya / Director Office of Curriculum, Instruction & Student Support Hawaii State Depart. of Education Andreas Wiegand Jan Fukada	Sandra_Goya/OIS/HIDOE@notes.k12.hi.us office: (808) 305-9610 cell: (808) 753-5525 Andreas_Wiegand/CIB/HIDOE@notes.k12.hi.us jan_fukada@notes.k12.hi.us	MDE Assessments would like to interview Hawaii because of their involvement with the D2 grant.
Idaho / (dr)	Todd King / IT Resource Manager (web) Chris Campbell, Chief Technology Officer (web) Andy Mehl (conf)	tking@sde.idaho.gov cacampbell@sde.idaho.gov andy.mehl@osbe.idaho.gov	In-House system, Part of WICHE Low budget completely IT project. Assumes business will be happy. Built automated sync source. We can have code for free but is high risk. Many things we don’t know. No automation, SIF based. (dr)
Illinois / (kg)	John Shake (kg,conf) Howard Hammel (kg) Alan Hinrichs /technical resource/(js)	JSHAKE@isbe.net hhammel@isbe.net AHINRICH@isbe.net	WebServices – in-house They have web services set up with many of their districts and vendor packages to collect data. (kg)
Iowa / (dr)	Roger Petersen / EdInsight - Data Warehouse (web) Jason Pontius (conference)	515-326-1020 roger.petersen@iowa.gov jpontius@iastate.edu	SIF, Doing automation SIF based. (dr) Iowa Department of Education Edinsight Data Warehouse Website (https://www.educateiowa.gov/data-reporting/edinsight-data-warehouse) Roger’s co-workers on the call margaret.hanson@iowa.gov rachel.kruse@iowa.gov

STATES /suggested	Contact Name/Title/(source)	Contact Info	Notes
*Massachusetts / (kg)	Melissa Marino / Data Collection supervisor (RC said best person to work with) Robert Curtin (conf) Robert O'Donnell (conf) Danielle Norton / Commonwealth SIF Program Manager Executive Office of Education (web)	mmarino@doe.mass.edu rcurtin@doe.mass.edu rodonnell@doe.mass.edu danielle.norton@doe.mass.edu 75 Pleasant Street Malden, MA 02148 (781) 338-6839 (P) (617) 894-7998 (C)	SIF, School Brains and ESP Solutions I (kg) also attended a session by Massachusetts at STATS-DC in 2014 about their SIF implementation and we had several follow up meetings at that time with their State SIF Program Manager. (kg) Note: Former contact in state now has own contracting company WAH. Massachusetts Department of Elementary and Secondary Education Information Services, Data Collection Website (http://www.doe.mass.edu/infoservices/data/)
Michigan / (DL)	Don Dailey/Michigan Data Hub Director (region lead) John Price/Sr. PM Div. of Accountability Services MI Dept. of Ed, (state lead)	don.dailey@kresa.org Kalamazoo RESA (269) 250-9264 PriceJ2@michigan.gov (517) 775-1275	CEDS and ED-Fi with Double Line Partners. Contacts and state suggested by Bob Cook from Double Line Partners.
Nebraska / (kg,DL)	Dean Folkers / Senior Administrator Data, Research, and Evaluation (kg, DL)	Nebraska Department of Education (402) 471-4740 dean.folkers@nebraska.gov	Double Line Partners customer Used Ed-Fi API to automate data collections from district. (kg)
*Oklahoma / (kg, dr)	Kyle Wang Leea Mote	Kyle.Wang@omes.ok.gov 405-521-2504 Leea.Mote@omes.ok.gov	Worked on 2012 MDE Pilot (dr) CPSI Ltd. Customer. Uses SIF for data collections and Ed-Fi for dashboards. Contact names provided by CPSI Ltd.
Washington / MDE assessments	Peter D Tamayo, CIO, IT Services, Office of Superintendent of Public Instruction (OSPI) Jenny Choi Program Supervisor Bilingual Education Office of Superintendent of Public Instruction	PO BOX 47200 Olympia, WA 98504 Office: 360.725.6134 Assistant: 360.725.4995 peter.tamayo@k12.wa.us Phone: (360) 725-4477 jenny.choi@k12.wa.us	State of Washington, Office of Superintendent of Public Instruction Website (http://www.k12.wa.us/) Working with the D2 grant.
South Carolina /	(kg)		
South Dakota /	(as)(kg)		Has statewide SIS
Georgia (kg)	Levette Williams	lewillia@doe.k12.ga.us (kg)	No statewide SIS (kg)
Delaware, (DL)			Delaware has taken over maintenance from DL. Bob Cook recommends if we need to talk with DL customer who cross trained with DL and does their own maintenance.

* Similar in districts as MN

Appendix F – State Survey Summary

State Survey Summary

March – May 2017

Methodology Overview: 10 States were interviewed using WebEx and email.

1. What technologies are you using today for your automated data collections?

(AZ) We have the CEDS and ED-FI model. Nine out of the 13 databases of that model have been adopted by AZ. ODS and API structures is what we use. 18 months to get certified and get ED-FI compliant. API goes directly to the database automatically and then data is pushed to us. We do not do a grab. The SIS that they use every day doesn't have to do go to different places. ONE STOP to enter all data. Before they had to submit every 20 days - submit a file, 2 weeks to a month to get back. Now they can send immediately and get back the next morning.

(HI) HIDOE has not yet completed the new modules for manual entry into our electronic Comprehensive Student Support System (eCSSS) database. Once the data entry module is complete, the data will migrate from eCSSS to our Longitudinal Database System (LDS) and be available "real time" (with about a 24 hour lag). **MDE Note:** The Infinite Campus website lists Hawaii DOE as a customer in 2015. Infinite Campus developed a SIS used by Hawaii districts and manages data for both districts and state departments of education in Hawaii.

(IA) We use SIF, we don't have any other automated technologies. SIS is School Interoperability Framework, it is a data model and has open transmission. Allows standardized data. We have 3 collections per year of k-12 statewide data. Enrollment data, participation, course info, and discipline info.

(ID) We have been collecting data for our Idaho System for Educational Excellence (ISEE) process since 2010. We use ESP Solutions to handle the transportation and validation process through the State Reporting Manager (SRM) software. Local Education Agencies (LEA) have to gain authorization and access to log in to SRM to upload data, validate and send data in to the Idaho State Department of Education (SDE). The process is not automated. At this time, we have 12 available files (349-ish fields) that are able to be uploaded to us at a minimum of 5-6 times a year (Oct, Nov, Mar, May, June, and Aug if summer alternative).

(IL) We designed a custom framework of our transmissions to and from districts in-house using web services. Within SIS a user can go in and generate a key. Developers had to create a user interface for users to create a key. That key identifies who they are and what system they want to talk to. Vendor creates the codes, districts provide key. Vendor charged \$500 to implement the web service. Small price to pay for time saved. Skyward is one vendor but we have around 30 vendors - some cloud based and some local.

(MA) SIF. We divide our collections into 4 main datasets. Three datasets out of the four have adopted SIF. SIMS, SCS (student course schedule) and school safety are there. EPIMS Education personnel management system working to integrate. EPIMS is in pilot year. They are using a subset today. Still working to integrate all of four datasets. About 3/4 of school districts are on board with SIFS. **MDE Note:** Infinite Campus said MA was using 2.7 SIFS.

(MI) Michigan CEPI (Center for Educational Performance and Information) application MSDS (Michigan Student Data System) is used to collect data using XML format. The schema is all laid out and districts generate the XML files. We use the ED-FI standards and build data hubs. The cockpit (management tool) system is used and that is code from the ED-FI alliance and is free. Some districts integrated with ED-FI, some not. For districts to be part of ED-FI must sign in and electronically sign data agreement for MI Data hub to host their data. Once that is done the system can auto provision a DB and ED-FI will build year, district and code. It has levels of security for different titles.

(NE) We received the 2012 SLDS grant and part of that grant we used to create a dashboard for teachers to get data in a real-time way using ED-FI standards. It started with the dashboard and combining data and then we started down the path implementing ED-FI. In the past 655,000 district hours were used sending data and 100 million dollars a year was spent to accomplish that feat of getting data and reporting to federal. Wanted to improve and make more real time so we started ADVISOR – name of our broader system which includes the dashboard, ODS, warehouse, and accountability data mart. Ed-Fi was built off of CEDS. CEDS is data standards and a large data dictionary and has everything from early childhood, to workforce, to K-12 they're trying to standardize. Ed-Fi takes most likely candidates of definitions and puts a fiscal data model together and how things integrate and connect. The API brings the data from source into the ODS.

1. What technologies are you using today for your automated data collections (continued)?

(OK) We are using SIF and built out Ed-Fi dashboards but they were never fully rolled out. That was an SDE leadership decision, after we had a leadership change after election. Ed-Fi is part of the reporting. We use SIF data that we collect from districts. We use SIF more. The Ed-Fi dashboard will hold the data from SIF. SIF is much more, it became our major data source for student information. The ED-Fi dashboards will pull data from SIF. SIF can do a lot more than feeding the Ed-Fi dashboard.

(WA) Our collection systems are custom developed applications based on the Microsoft development stack.

Technology Usage Summary

State Data Collection Solutions	AZ	HI	IA	ID	IL	MA	MI	NE	OK	WA
ED-FI	X						X	X	X	
SIF version 2.x			X			X			X	X
CEDS aligned (with variations)		X		X						X
Web Services					X					
In House				X	X					X

MDE Note: SIF 3.x has been released and is a significant change from 2.x

1a. Real Time Data Exchange?

(AZ) Near real time because we do daily aggregation/daily rules and they happen every night. Funny but users want REAL time (immediate) even though we had a big improvement from 20 days to overnight. In the past incentive was to not get certain things fixed until it mattered, now with real time data (overnight) people are seeing the errors and correcting them right away. The way we funded districts were on student counts from LAST year. Now we go to CURRENT year student counts for funding. That was impossible under the old system. Districts are encouraged to get things in the system correctly immediately.

(IA) Yes. SIF 2.4 is used for real time rostering report and for assessment delivery system for students. Assessment is a real time data interchange. What is your definition of real time? Enters in information and then immediately sends thru SIF and assessments – might be delayed a few seconds to a few minutes. Student IDs in SIF go out immediately.

(ID) None. This is with the understanding that automated means it does not involve LEA manual processing. Which ours requires manual processing. Data is approximately two weeks old by the time we receive it. It just gets older from there on.

(IL) Schools can use us real time but most don't. Districts upload their data and could be real time but it's not. For example Skyward sends files and picks up every 2 hours. Everything that comes in we need to edit and send back error reports. When we transmit data back and forth we track the log of the transmissions as well. Every file that comes in is processed (edit checks, loaded into table) - we then add two more fields - result code and result message. Sometimes will come back. There is always TWO WAY COMMUNICATION. When done uploading data and applying to DB sender gets messages.

(MA) SIF is a real time based. Exchange of data is real time. Data constantly flowing to us. We take snapshots for validation. Changes are received real time. When errors are all clear they can freeze their data set and send that for a particular data set. We do have real time student claiming. More work and stress for the data keepers, data coordinator. Before data stewards had to hunt down answers they didn't have and send files back and forth.

(MI) Yes. PowerSchool is largest SIS in MI. We enable a couple of plugin, ED-FI is set up, and we enable transaction status which enables data to stay real time in the data hub. **Note:** MI has 5 SIS in the state with one designated state solution.

1a. Real Time Data Exchange (continued)?

(NE) Yes. Right now 245 school districts in state. Range from 55,000 k-12 to 150 students in size. Majority less than a 1000. Tech support is limited. Capacity locally to have tech support, tools and resources is varied. Had to rely heavily on regional service units. Been fortunate to create relationship with SIS vendors and assessment vendors and have them build the API. Hyper critical. As they make changes to the system, if we (state) had to manage that for SIS option there would be no way we could sustain that. API based on standards. Took time for vendors to embrace but now they are coming on board when they see API standards.

(OK) In some instances this is as real time as you can get. For example one of the vendors claim that once a district person makes a change in their SIS they immediately send the SIF event message. Others keep theirs together and send them to us a couple times throughout the day in bulk. We also have a schedule that we do requests for the data. Most changes will come in real time.

(WA) No. For our core student data collection, the minimum district submission schedule is monthly. However, some districts submit daily updates.

2. What is working well with automated (or manual) data collection for your state?

(AZ) Independent 3rd parties did some monitoring/audit (WestEd and CELT) and they estimated that we are saving the state 40 million by improvements in data quality. Could be more. Every 1% we get better – any 1% error in data such as double counted or a rule was calculated incorrectly that we correct, we save 40 million.

MDE Note: See full report from WestED and CELTS [“The Quarterly Performance Review of the Arizona Education Learning and Accountability System \(AELAS\)”](#)

(HI) HIDOE has not yet completed the new modules for manual entry into our electronic Comprehensive Student Support System database. We anticipate that due to the limited amount and frequency of data entry, that it will be well received.

(IA) Iowa really likes SIF. Been a challenge to set up and deploy but now that it's up and running its great. The bigger problem is that we can't make big systemic changes. On SIF 2.4 currently. Would like to update to the most recent version. Our goal is to update to newer version.

(ID) Seems to be working well as cumulative. More LEA's are jumping on board. It reduces the need to resubmit former submissions with corrected data by allowing the data to be fixed in the next submission.

(IL) Process is working very well. Big on centralizing things (web service transmissions), helps make sure security is centralized. It has been an improvement from people writing in plugins. Creating ONE web service to be used for any application.

How would your system deal with adding additional racial and ethnic codes?

Everything in SIS is in a lookup table. SIS has its own plugin and identifies which plug in DLL needs to be used. The additional benefit we have is we can go and update this implementation once and it goes out to everyone.

Data elements document – you can see race and ethnicity codes from 2011 year. Start and End school year – you can't lose the history. Developers always look at that.

(MA) Two big things:

- Data quality, struggle at first, exercise in data scrubbing, looking at the source but NOW we see districts who have done it for a year and their data is ready to go year round. Data is clean which allows them to submit very early on in the window. Forcing data quality at the source is the number one benefit. Couple of school districts have said now that they have been integrated for a while they know they can rely on their SIS at any given time.

- Seeing more efficient submissions. Not getting submissions at the last minute. We are getting usable data faster and it's available for reporting quicker. In Oct 1st submission cycle sometimes we couldn't wrap up until September. Now a high percentage are done within the first two weeks of collection. The process is faster. Submitted certified – done within the first two weeks of the submission. That's if they take advantage of what SIF gives you. Real time always available and error reports available. If you stay on top of that and correct errors at source we can upload in 15 minutes and validate it and we're ready to go.

2. What is working well with automated (or manual) data collection for your state (continued)?

(MI) District Synchronization. 6 SIS vendors in the line - connection piece is working very well with the API integration. It is different because you don't see the data file with ED-FI. Verifying and validating is a challenge. Connection SIS Vendor page - guides available to vendors on details to send data.

(NE) Beauty in the standard. It allows for new data to be brought in whatever way we define that it comes in. **What about adding in extra fields for race and ethnicity?** Data that would be there for ethnicity you could extend out and build into the viable options thru the API into that data field. Allow core set of field and then extend them.

(OK) We have consistent business rules, we have been able to combine or eliminate the need for reporting things multiple times. We have been able to provide better matching up between systems, we rarely have any issues with the system itself, we have expanded the amount of data that we take in. Now we have student level data. Data is more accurate at the student level.

(WA) Our data governance and systems governance processes work well. We get buy-in from the districts and OSPI (Office of Superintendent of Public Instruction) program staff. OSPI is also transparent and inclusive regarding changes to our collections.

3. Have you been able to improve data quality?

(AZ) Yes

(HI) HIDOE anticipates being able to further disaggregate the data in such a way that improves the data quality usage, though we may also find additional areas for data quality improvement.

(IA) K-12 had history and good people who focused on data quality. Data quality wasn't a problem. Assessments, quality less of focus, looking at more real time data flow. State IDs have improved. No data quality problem today. Move to SIF was for Districts ease of use, saving time on their end was reason for SIF implementation. Fixing and cleaning state IDs, process improvement will lead to quality.

(ID) Slowly. Reducing frequency and quantity. Turns out if you only collect what is needed it allows the LEAs to focus on the important things.

(IL) Yes. We get more data. Just put in your local SIS and let vendor send up. Sometimes we have issues were users edit the text or csv file. Note: IL uses Web services. Some vendors charge \$500 to implement Web services. Skyward web services are built in for free. Web services is a benefit to vendors also. We go out and train school districts, also ask districts if they are asking for data twice so we can eliminate duplication. GOAL – not to ask for data twice. Want districts to help out the data hub administrators and find duplications. We had started building aggregate systems all over, now with Web services we can start to sunset those and eliminate spreadsheets.

(MA) Yes anecdotally. Districts have told us that. SIF prevents half data or orphaned data. Data dependencies are in place, referential data dependencies, and SIF demands those things to be in place. Legacy systems have to use offline tools, but SIF demands it is integrated in the SIS.

(MI) Too soon to tell. When districts first come on board they are finding mapping errors. **Note:** As of this interview MI was 14% ED-FI implementation completed.

(NE) Working with districts to determine how much we have improved. The 2017/18 will be last year of submitting old records and new (running parallel systems). After that we will have a true benchmark for measuring data quality improvement.

(OK) Yes. By being able to apply consist business rules we have been able to increase data quality and also de-duplicate the amount of data that is submitted. Data more accurate across the board. We have a data validation process, when we first get the data we send the record to the validation engine. We can post errors to an application that the district can login and see errors. We validate a lot of data elements / objects. Validate on business requirements.

(WA) Yes. Over time data quality has improved. However, as we introduce new data elements into the systems initial data quality is not as good.

4. Do you follow a master data management plan (CEDS / ED-FI, SIF as examples)?

(AZ) Yes, CEDS and ED-FI.

(HI) HIDOE's data warehouse follows CEDS.

(IA) Working with SIF. ED-FI wasn't around. Did explore using CEDS with data model. We had already established infrastructure for SIF so CEDS didn't make sense to move to.

(ID) I have been starting to morph some of our definitions to CEDS. Chris and I have been chatting about Ed-Fi but have not made solid decisions about moving that direction yet.

(IL) We looked closely at that about a year ago, CIO really wanted that. We had a 4 year SLDS grant and were thinking about folding ED-FI into that. That would have required changing data formats and more importantly the external districts would have to change. We have a mature system and would suffer for a few years while changing if we moved to ED-FI. We started to prepare for ED-FI but when architecture began it was going to cost more money and time than the money we had for the grant. Grant was for instructional support and we decided to focus on that.

(MA) SIF aligns closely with CEDS.

(MI) YES. Local control, districts control their own data. Data goes to the State Data Hubs and the State hosts district data. Owned by ISDs funded, by the state. ISD's are offered \$40.00 per hour for their tech staff for reimbursement. Would like a Data Hub Support Specialist at every ISD. 56 ISDs covers at least a county and sometimes 4. For our data plan, job title can determine access. We have MiLearn to access assessment data.

(NE) Yes. Ed-Fi was built off of CEDS. CEDS is data standards and a large data dictionary. CEDS has everything from early childhood, to workforce, to K-12, they're trying to standardize. Ed-Fi takes most likely candidates of definitions and puts a fiscal data model together and how things integrate and connect.

(OR) Aligning with CEDS is still a work in progress. We are on SIF 2.0 and that does not align with CEDS. SIF 3.0 has tools that align with CEDS. During the SLDS project we had to create a lot of ETL (extract, transform, and load) to map the data from SIF to CEDS. Will take time and people to upgrade to SIF 3.0.

(WA) In our data management plan, we use CEDS when it makes sense to use it. Since most of our systems were created before CEDS, we are not 100% compliant. However, we are a big supporter of CEDS. We are taking the next step with CEDS and getting in the queue with Project Generate. We also have some SIF but it's not extensive.

5. What improvements would you like to make?

(AZ) DATA SIDE: Not even close to where we want to be. AZEDS is working well. Old system paid out 6 billion. We have upwards of 75 or more data collection systems that point to the old data system source. Student Detail big one. We have 9 ODS now that it can be part ofused to be ONE. Trying to collapse some of the duplicate data collections. That is our goal.

STATE AID Payments side – haven't even touched. Using 1999 technology to process those payments. We need to open that box and clean up what is in there. Data has been put in access databases, lots of manual input and people touching along the way. Pays charters and districts. Still need to extend the Ed-Fi API to add those applications.

(HI) HIDOE will be collecting additional data and improving disaggregation and reporting of student data over time.

(IA) There are some advantages to moving to new version of SIF. What version are you on of SIFS? 2.4 Now. 3.4 is most recent version. Our goal would be update to the newer version. Still room for internal processes to become more efficient, we could manage data more effectively. Would like to reduce the amount of rework which would allow us to expand the use our data. We are developing/working on that now.

(ID) Troublesome areas at this time are Mastery-Based Education, Chronic Absenteeism, and Web-Based Curriculum Programs.

5. What improvements would you like to make (continued)?

(IL) Downside, the token security and the web services are outdated, still secure but not up to date and user goes to SSL thru HTTP. Also, the key is a static key and we could update that to a newer token that gets refreshed which provides better security. The actual web service code we would like to update. SOAP protocol is what we use now but losing popularity. Microsoft still supporting SOAP implementation so it's not priority. Solution serves us very well but outdated and using static key that is tied to a single user for possibly years is a worry. Students move around, we collect data and can run a PDF that creates a student profile. It would be really nice to electronically send that to them, their systems ingest and they can use that student profile. That would be nice (past assessments).

(MA) Starting to think about other ways we can leverage SIF data that we are getting in besides the 4 data sets. Now that we've got ¾ of the data onto the platform, how can we use the data to benefit districts? In our data warehouse area they can look at canned reports on their data. Now thinking of ways to leverage it even more like reports for homeless and foster students – side collection is a smaller thing and we are thinking, can we use SIF data to feed that collection.

(MI) Automate more data uploads – want to automate a piece of the MSDS file short term – Districts push button then push over. Have a goal to address errors from Districts. Starting in October, due November.

(NE) Still accountability requirements, onboarding districts, working with vendors so it's double work. We have been asking for an investment from the state and we haven't gotten much together.

(OK) CEDS can accommodate more data and also if we are going to extend k -20 I think CEDS will be probably better than SIF or even 3.0. If we could move to 3.0 it would be a good thing but it is not just technical when updating. Our data automation process when we first started we didn't picture we would collect more data like attendance, we are collecting more and more data. If we knew we are going to process this many different data sets we should have had more powerful hardware. The processing power is low – need to do some hardware updates. MDE should think ahead and make sure you have enough resource and infrastructure for the data. Vendor relationships, have nine different SIS vendors that send us data through our SIF, we try to have a good relationship with the vendors so we can help districts from the entering of the data to the viewing at the state side, but it is very difficult when we do not know each of the individual systems. When a district changes SIS vendors there is not an easy way for us to keep the data consistent year over year.

(WA) Would like to work with edFacts. Improved reporting and data visualizations. Compliance with ESSA reporting requirements.

6. What was/is the cost to implement your current technical solutions?

(AZ) CEDS and ED-FI about 38 million. 42.4 million Appropriated for the project. 38 million spent on CEDS and ED-FI. We have dashboards that were rolled out. Vendor costs? \$400,000 first year and a couple hundred thousand the next year on Double Line Partners. We used them a little bit. The extension of API we did by staff augmentation. 70% people are contractors. We use staff augmentation. Pick the right people and pick person by person instead of giving the majority of the work to vendors. We did use vendors. 38 million 85% went to people we picked. Vast majority of money spent is people. They were happy, but a lot more work and challenging. **MDE note:** Learning Mate another vendor AZ works with.

(HI) Anticipated costs for the grant related to technical solutions will be \$277,000.00 over the course of the 5 years.

(IA) Didn't have the cost breakdown. It's difficult to say because there were a handful of grants involved. Larger strategic type of implementation goals and SIF were part of those goals. SLDS grants and SIF were part of it. Vendors? Lot of work by vendors with a lot of in-house people interacting. PEARSON was doing a lot of the work but have gotten out of the business that our contract was for. Ongoing pieces have vendor relationships and then some in-house also.

(ID) We have an ESP contract that I will need to let Chris weigh in on. Developer at ESP works 1x1 with Todd. Coding, puts in validation pieces, structures how files are made, removes and adds validations. In the back end gets data clean.

6. What was/is the cost to implement your current technical solutions (continued)?

(IL) Can't give you a hard line. Alan and I built the system and another developer did the token interface. Initial build – a couple of months. Along with working with other systems. Full time probably a month. Alan will be good resource for their code. Plugins are easy to create. Easy to integrate.

(MA) New SIF Development Costs run approximately \$800,000 per year for Project Management, Production Support, Business Analysis, Development, and Testing. This includes both state FTEs and contractors. We use Visual SI Zone Integration and Veracity Agent software to process our messages. Their licensing has historically been \$274,000 which was heavily discounted. Depending on our environment configurations, which are under review, our costs may exceed \$1,000,000 for licenses to support our DEV, QA, UAT and Production environments as deployed. We host our own applications, so there are ongoing server costs, licenses and backend support costs related to the program as well.

SIS Vendors? SIF project introduced this other process – which is the SIS vendors, which wasn't there before. Took us awhile to get into a groove. There's a chain of communication there. Business side and IT state side and IT SIS vendors and districts. It's almost like a square of chain of communication, 4 legs to the table. We all have to stay on the same page. We have eight SIS vendors, a few of those are very small in their share of districts. Some vendors have under 5 districts, 5 vendors have most of the districts. School Brains – good chunk of school district.

How do we get everyone in the loop? Collaboration with IT state, IT SIS Vendors. When districts have issues we have point people on either side and work together. Trying to avoid the blame game. Call vendor, no you call state. Learned a lesson there. We can't avoid it, we have to work closely with the vendor and Districts, schools and business side at the state. We genuinely thought it was the vendor side and the vendor thought it was the state side. We changed that concept up.

(MI) TRIG grant, state funded. Approximately 7 million in 4 years. State of MI stayed within budget. 6.2 million dollars over 2 years, \$300,000 additional spent. 1 million first year, spent under \$600,000 did what MN is doing now with feasibility study. Talked to other states. 1 million second year, 2 million third year, 2.2 million 4th year. Staffing was lean. Two PMs, Developer, Support Manager, and the District Support model consisted of 2.5 FTEs.

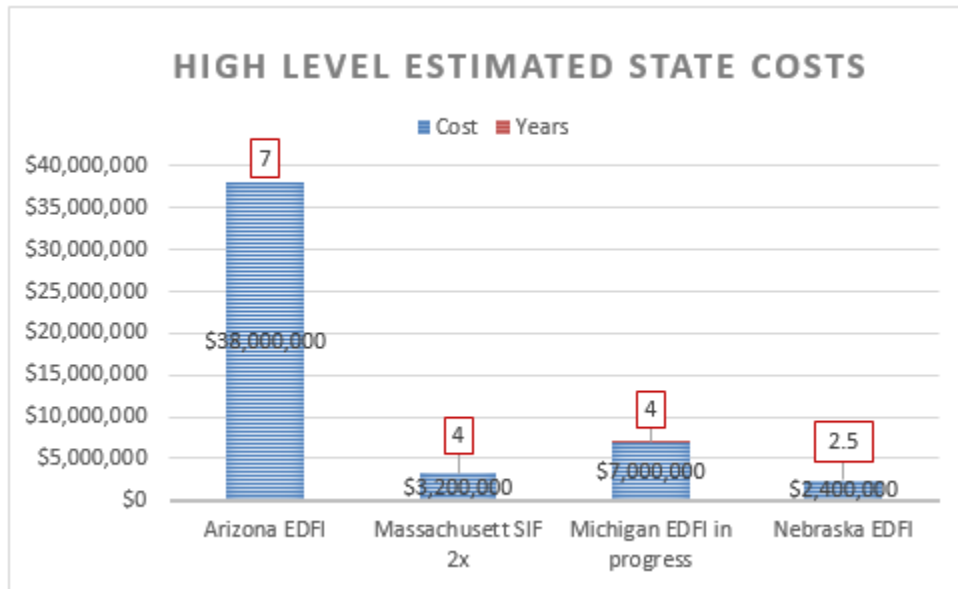
(NE) Need to do a better job of discerning costs for grant project. Grant funds used to help with implementation. No license fee or upgrade fees or customizations, now we have responsibility of implementers, you have to manage internally. Implementation included Advisor dashboard, ODS, augmenting support for vendors API to sandbox, new data warehouse and accountability data mart and stakeholder engagement. Over the 2 ½ years before we moved into scaling implementation we invested 2.4 million dollars which includes about 1 ½ year of implementation. Need a better job of detailing - we looked at it as one big push but other states might not have to invest in some of this. Like helping SIS vendors because today they have the API and won't need resources to do that work anymore. Most of this cost was contractors.

(OK) I was not here when it was originally implemented so I would I have to do some digging to get you that number. The initial implementation looks much different than it does today. We started with the State providing the SIF servers at the districts but that ultimately became too much to manage at a state level (we have 500+ school districts), later they determined that the districts would purchase that piece and connect to the state SIF infrastructure. **Note:** OK changed their implementation plan after they had initially rolled out.

(WA) The total costs are indeterminate because the work has been incremental since 2009.

See High Level Estimated State Cost Summary on next page.

Note: Arizona took 18 months to get certified and EDFI compliant and continues work on collapsing duplicate data systems. Massachusetts in 4th year with continued work on 4th dataset adoption to SIF. Michigan in 4th year with 14% districts onboard. Nebraska 2 ½ years with continued work onboarding districts.



7. How long did it take to implement solutions?

(AZ) Thought 6 months but took 18 months, once it was built, to implement because of certification with vendors and figuring out what the districts needed to be able to submit. It was a huge cultural change in how we submit data. Now we are good, we are going on our 7th year. 1st year to stabilize 1.2 million, down 50% of the time, catastrophic errors, next year million and change. We had trouble understanding the system we had. Hard coded rules were put in production with no documentation. We literally had to take apart the system to understand what we had before we could move forward with new technology. Then we started doing build, 14 million, own data dictionary, 15 APIs became available, then time starting count down.

(HI) HIDOE is still in the process of implementing solutions.

(IA) Grant was a 5 year grant. The grant that SIF was part of was extended one year so a total of 6 years. We used every one of those years and it was a long process and we had to keep existing systems up and running. Parallel systems ran for 3 years, did validation during that time.

(ID) Solutions are constantly being applied and challenges continue to grow over time. With the changing of education, funding and federal and state requirements, solutions will always be implemented. However the complications, time and cost associated with implementing these solutions aren't significantly huge. We reduced almost half of our data collection between school years, two years ago. And we're holding it down pretty good.

That's impressive to reduce half of your data collection between school years and holding it down. Are the program users okay with that? Yes. We do collect some data outside of the ISEE data collection via in-house SDE applications. One example is Migrant data. We collect through our Migrant Student Information System (MSIS) application. This is needed, as the Migrant data would require a lot of additional fields and validations. So it's often necessary to explore ways to reduce the burden on the LEA's, while helping increase the accuracy of the data by separating from the pot. Another application that we had to create, was our Staff Evaluation. Our board of education required some pretty intense elements at the last minute last year and it got dumped into the ISEE uploads without any business rules to back it. So there is no way to develop smart validations without business rules. Anyways, we were able to build an application that allows LEAs to report the data independent to the ISEE data collection. We can build the staff rosters using the data sent though ISEE and the districts then can assign the necessary data stewards to update the evaluations accordingly.

(IL) 1 FTE for a couple of months.

7. How long did it take to implement solutions (continued)?

(MA) SIF is in its fourth year of development and implementation. Student information and course information is in regular production use. We piloted the Safety and Discipline application last July – August which is now open to all SIF districts for use. The Teacher Information was successfully piloted during the October collection; the pilot will continue through the end of year collection. We expect to complete the development for all applications related to the collection and onboarding districts by the end of year 5. We plan to have all districts using SIF to certify collections by the end of year 6.

(MI) Took total of 4 years working on it to get it done. Goal is to get 100% districts onboard. In process of that now and 14% districts are implemented. June 2017 to end of year another 20%. January of 2018 hope to have another 20% onboard, June 2018 another 20%..... June 2019 90% districts onboard. It is NOT a state mandate to come onboard.

(NE) Over the 2 ½ years before we moved into scaling implementation we invested 2.4 million dollars which includes about 1 ½ year of implementation.

(OK) I would say the initial implementation was 12-18 months but honestly it is an evolving thing. We make changes to the data that is required every year, we update the business rules that are applied. We try to implement new tools to help the districts, etc. So it is never really completed... If that makes sense.

(WA) We are always making changes and implementing solutions. Nothing is static. The initial roll-out of our current student data collection system took 2+ years.

7a. What is your onboarding success?

(AZ) 100% of districts onboard. Mandated by the state. Continued work on collapsing duplicate data collections. That is our goal.

(HI) HIDOE is still in the development stages and it is too early to tell. HIDOE has the ability to monitor onboarding and will be studying the usage of ELL data over time, and as more tools become available.

(IA) 2/3 of district is working with SIF. Will need cooperation of student vendors. One of our main SIS vendor won't get on board with SIF. There is resistance. Assessment vendors are not interested in onboarding with SIF, so still use flat file or CSV. Have a well-established Iowa testing program and they are not interested in SIF. Long running relationship and no need to mess with what is working well. We still have the option of the CSV and flat file available. We have merged the two technologies. Lowered our standards, love to get them all on SIF would be fantastic. Would like to get back to vendors and reopen conversation.

(ID) MDE Note: Have not implemented new data automation.

(IL) We have 850 districts with about a 3rd using the web services to transmit data to us. GOAL is to get districts using web services 100%.

(MA) 50 or so districts need to get onboard.

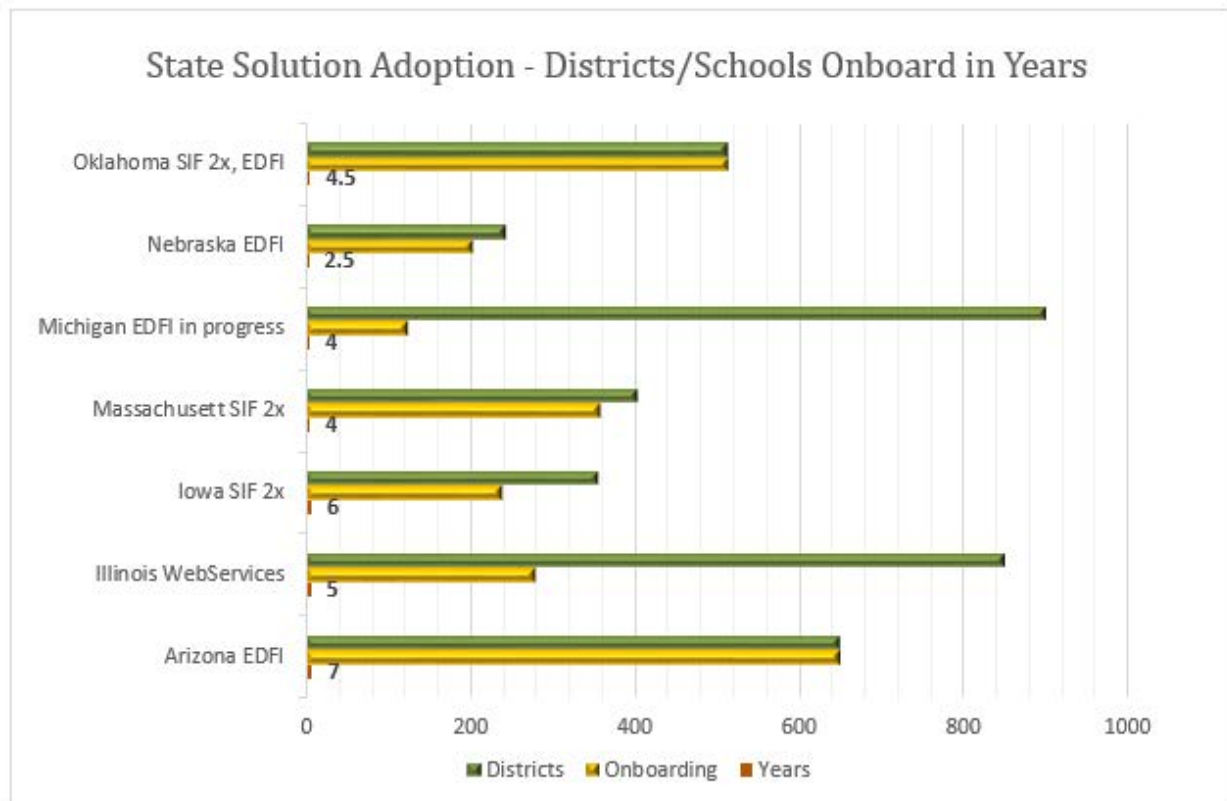
(MI) In process of implementation now. 14% complete as of this interview.

(NE) We have a stress point. 42 districts out of 245 have NOT moved FORWARD, contacting us or working with vendor. Small percentage. We are paying close attention to. Staff moral and willingness to keep an eye on end goal.

(OK) All 500+ districts are onboard. Have 30-40 charter schools that send their data via SIF. It was mandated by the State to comply with SIF to the State Department of Education. Thinking about technical schools career schools and getting them on board.

(WA) All of our applications are available to all WA school districts. However, we have a couple districts that struggle with submitting data. This is due to the lack of technologies in the smallest of small school districts in Washington.

See State Solution Adoption summary below



8. Do you have yearly maintenance costs for any solutions you are using? If yes, what are those costs?

(AZ) Ongoing issue. We have never received any money, not received anything for maintenance, so ongoing struggle. We figured we needed 3.65 million to maintain but got 0. We have to take money from the development bucket. Need to get better at letting legislature know we need more money for maintenance. Middle of April and still trying to get this worked out for maintenance. It has been a serious problem. **Update:** May of 2017 after this interview, the ADE CIO has gave notice and will leave his position at AZ citing lack of support to finish the AzEDS implementation.

(HI) Managing data tables and/or development beyond the grant scope would be covered in house. We are trying to also ensure that HIDOE staff will be able to maintain and support any changes required. The goal is to have ability to maintain data systems w/o additional external funding and using internal staff.

(IA) Don't know.

(ID) I will let Chris discuss this. MDE note: did not contact Chris.

(IL) Small part of FTE to support. If MDE were to go with the IL web services solution they would need a RESTful API developer.

(MA) The historic yearly maintenance cost for VSI was \$185,000 per year. Maintenance of our custom processing and development is included in the development costs.

(MI) Have 4 levels of support 1. ____ 2. ____ 3. Operational 4. Double Line programmers. We pay for a support bucket from Double Line. \$165 per hour and we buy in blocks of 100. Pretty reasonable. Some good programmers can be \$200 per hour.

8. Do you have yearly maintenance costs for any solutions you are using? If yes, what are those costs (continued)?

(NE) At end of grant created a contract for \$150,000 maintenance with Double Line. ½ of that was what we call level 4 support (programming level). Support goes from Districts to regions to states - issues such as flaws in software and other ½ was technical training or enhancements we did not foresee. Throughout the grant piece we spent time building our own expertise “co-development”. Unique approach, DL is supportive. NE wanted open source state so we would be able to share code with other states and manage it ourselves. Cost we save in license we put back in our own department.

(OK) Our current cost is a little over \$300,000.00 per year. It used to be much more but we cut out some of our unused pieces and licenses.

(WA) We receive \$1.8M from the state legislature to sustain our student data systems. We receive other state funds to sustain our finance and educator systems as well.

9. Lessons Learned?

(HI) Developing data systems take more time than expected, even when conservative estimates are made.

(OK) Have to have good communication with all the districts. The district can hire their own SIS and SIF vendors. You need to have good communication with individual districts and they should have good communication with their vendor. If issue district has to contact vendor and vendor will say state and state will say vendor. (Note: AZ said the same thing.) Save a lot of time and confusion and user frustration if good communication plan. Get district input. Even if you have a state law do user meetings to get their input, have yearly or twice per year user meetings to get their feedback about what is going well and what you need to work on.

(WA) Involve all stakeholders in all phases and be open and transparent. Identifying executive and program sponsorship are other key lessons learned.

REFERENCE: State Contacts in Student Data Disaggregation Surveys See [Appendix E - State Contact information](#)

Appendix G - Program User Survey Summary

Student Data Disaggregation - Program User Survey Summary

March – May 2017

Methodology Overview

Responses were gathered during 1x1 interviews with follow-up questions via email.

1. If you could improve your current data collection / analysis work / reporting processes with new technology or improvements to existing technology, what are the top 5 things you would hope a new system/new technology would include?

Data Transfer

(Assessments)

- Data transfer in real time. Example, who is enrolled where?

(Data Analytics)

- Real time data
- Timeliness

(Student Support Data Collection/SSDC)

- MARSS Oct 1 and end of year student count. Not final until December following year. Reports might get used that are not accurate. Needs improvement.

Data Collection

(Assessments)

- For capturing racial data would like an option that allows “not reported” instead of guessing or defaulting to “white” for racial code. If parent leaves blank the districts told to guess. It’s a sensitive matter. Most likely will increase in not reporting, guessing or white default.
- If we add more racial and ethnic fields, system needs to keep history.
- Race / Ethnicity and gender collections are sometimes a reporting issue when a child changes what race, ethnicity or gender they are between tests.
- Stop creating one off solutions. For student level information want to think long term.
- Today we get statewide assessment data from the vendors, Pearson or WIDA. In the future there could be capability of Infinite Campus giving us data.
- Streamline the PSEO data collection process.
- Design auto data submission. Where entities have to submit data to us it’d be nice to have something that allows us to collect data in a more automated way. Automation would be particularly useful in ADSIS. Today we get around 150 spreadsheets from 150 districts with all the errors and issues that this process engenders. It is time consuming and keeps more important work from getting done. Today, all student-level ADSIS data is kept in spreadsheets or in a local database on PC.

(Data Analytics)

- Link and connect databases, feed into one system
- Timeliness
- Cleaning up and centralizing
- No data governance, don’t have that, no one owns that. Who will own data collections?

(MARSS)

- MARSS has the race ethnic collection that started in 1980 and has American Indian aid and Integration eligibility. The State required legacy ethnic codes and a person would pick one out of the 5 choices. In 2009/10 Federal required collecting race/ethnic again which causes people to collect twice on race/ethnicity? Federal has 6 categories and you can pick one or multiple. Want to try and get integration. Try to get rid of the 1-5 from the state. Coordinate the federal report.

(Student Support Data Collection/SSDC)

- Would like clear data explanations for online fields for sure. Data explanation in manuals and on forms are all helpful.
- For 2nd, 3rd, or 4th Asian generations additional racial codes could be helpful in identifying achievement gaps. Those generations are less likely to list “Vietnamese” on a home language survey so the additional race/ethnic information will help. It would also give more information for reporting for EL and APPI. Note, however, that reporting must be done in a way that is not conducive to pitting one racial group against another.
- Improve, streamline data collection for Districts. Logging into 3 systems, MARSS, SSDC, TEST WES. Districts pay attention to MARSS because of the funding.
- Still using paper surveys for Homeless. Can we get into one of the electronic surveys?

Data Analysis and Reporting

(Assessments)

- Running reports - One source of truth (Jennifer)
- Data Dictionary and relational database diagrams for all systems would be very useful.
- At DHS employees have their own “sandbox” for data that they can easily access. It is data they use frequently. That would be nice to have.
- For DIRS it would be nice to have some data checks. (E.g. There’s data in DIRS for sexual assaults with no victims.)
- More flexibility when creating ad hoc reports and getting it out to people. There’s not a well-developed process for looking at data that doesn’t have a lot of funding.
- For Charters, it would be about getting our LEA and de-identified, individual-level, data reports into something they could access in Secure Reports or the like (this is more for authorizers). I’d like to see something similar for the High Quality Charter School Indicators (just the academic ones) as well. There’s lots of little odds ‘n ends that get done for charters. It’d be nice to see it more formalized.

(MARSS)

- More reports available to more people in the districts but yet secure. Example, give access to business manager /finance office role to certain reports. Have layered security. Currently District has one MARSS coordinator and that coordinator has access to all MARSS reports. This could be a bottleneck but we mandate that. Coordinators cannot share login credentials.
- Make reports more useable. We have an Alternative Program Specialist who gets the data and spends a lot of time formatting the report/data into what she can use. Can more reports be generated and be provided via Secure Reports to assist other program areas? Could save hours or her time.

2. In your current work process what is working well with today’s technology?

(Assessments)

- Easy to query.
- Large effort to clean up MARSS in 2011/12. Multiple student information, several ID’s for students in MARSS, got rid of duplicates. Don’t undo that cleanup effort.

(MARSS)

- MARSS edit and uploading files. There have been nice improvements done to this feature and we like the ability to download to excel.
- Working with the same programmer since the mid to late 90’s on the local edit. Working with Dave has been very nice. Other programmer for the mainframe side, Scott, has been here for the last 20 or so years’ we are very fortunate to have such good, consistent support.

(Student Support Data Collection/SSDC)

- Home language is already in MARSS and has traditionally served us well so it doesn’t matter about adding in additional race/ethnic codes.

3. Where are you seeing inaccuracies in data? Source or cause of errors, if any?

(Assessments)

- We're users of the data. We can only use what we have. The bigger problem is accurate collection. The data is reported to us by the districts so if there are errors this is where it usually comes from.
- There are data entry issues. E.g. same kid with same incident ID entered four times.
- We have a problem reporting 100 percent of students. We need to be able to implement secondary suppression. Automate secondary suppression, discount students less than 10.
- Different flags appear at different times (e.g. homeless starts over every year, EL status stays until something changes in record)
- Forms can't be submitted blank. If district doesn't select racial option it "defaults" to white. This will cause inaccuracies.

(Data Analytics)

- Other forms, other types of data, other pieces of info like PDFs, spreadsheets - clean up and centralize. Eliminate spreadsheets. Data comes in clunky. Program data is clunky, effort but we can't use it. Fill out application – same info is asked over and over. The one Plan one stop shop portal application got abandoned.

(MARSS)

- Data entry. People filling in the forms do not understand the consequences of inaccurate data. This has been long standing. Lack of family responses for income data that's used for compensatory revenue, for example.

(Student Support Data Collection/SSDC)

- No child left behind – Pieced together things on top of MARSS to use for accountability, EL, status. Time consuming and inefficient – have had to build additional surveys and work-arounds to get needed info.

4. What are your thoughts on moving to new technology?

(Assessments)

- Can we have new technology? Is it in the budget?
- It would be nice to have more student level observation tables.
- Most Data Analytics needs to use the Federal 7 groups so we need to be consistent with this.
- Can we have "not reported" or "not provided"? What are our Federal Requirements?

(MARSS)

- In reference to adding race/ethnic codes; if we add another way of collecting race ethnic data, we will have three different ways of collecting the data and it won't tie together.
- Will data get run thru the same kind of edits? Will same kind of edits be applied? Currently have approximately 400 edits that MARSS files must pass. Charter schools have a hard time with edits. We ignore records with edit errors'; this can pose a problem for other users of the data.
- What data is appropriate to go into MARSS? Side systems better to serve smaller groups like preschool screening. ¾ of data does not apply to MARSS. What do we need for all kids? Should MARSS expand into areas like SLIFE which has 7 – 8000 students?
- Vendors in the past needed 18 month notice of any file format changes. We asked them recently that same question and none of them expressed any concern for allowing less time. These vendors are the software districts use for reporting and sending MARSS data. Vendors and Districts have a good relationship with each other and we don't want to upset that. Focus on the commonalities.
- Glad to hear that if a big change in technology, parallel systems would be in place. When MARSS went into production it was one cutover and that was it.
- Concerned about distribution of fund delays. They have a certain amount of staff and they don't want delays and want accurate reliable funds sent to schools.

(Student Support Data Collection/SSDC)

- Referring to the grant and its part in getting new technology/new processes; two parts to the D2 grant. First part is to get a good data system. Second part is to identify students and what do we do about that. Don't forget the intent of the D2 grant.

REFERENCE: Participants in Student Data Disaggregation Surveys See [Appendix B - MDE and District Stakeholders](#)

Appendix H - District Survey Summary

Student Data Disaggregation - District Survey Summary

March – May 2017

Methodology Overview

Responses were gathered during 1x1 interviews, onsite visit and follow-up questions via email.

District Responses

1. What is your process today for uploading and sending data to MDE?

District 1: MARSS – Extract – Select 16 schools. There is an A file (number of days, number of minutes) and a B file (student data). Depending on the number errors, it will let you upload the data or not (250 errors won't upload, but 97 errors on 50 students might not). I can update the data in ten minutes. Local Reports are updated at "real" time. Local reports are sent up to other districts in real time. Summary status isn't used a lot. In between when we run the report.... Verification only happens at certain times. At that point they'll produce a number of [statewide] reports we'll use. Some are similar to local reports, but not actual local reports.

District 2: We are a direct reporter to MDE. Our current enrollment is approximately 800 students PreK – 12. My role here is the one who does it all. MARSS and STARS reporting. As far as MARSS, we are a small district. Lots of resources available on the web site.

District 3: We've been with Infinite Campus since 1999. I believe they are certified for MCCC. No one knows if they follow CEDS data standards. File uploads Via Test WES. Data is extracted in a file format that is expected. MARSS is the gate keeper. Data is shared with REA – Research evaluation and assessments. We upload to collect all schools at once and send at once. Once a week we submit for all 83 schools and programs. We deal with about 150 errors a week. There are 72,000 records right now but will end up with 80,000 when done. Summer is included, but it would be June 16-17 and then June of 17 we'd start another year. We have this process down pat. Every time I submit it takes a full day to work through all the problems/errors. 100 overlaps, 150 errors every week. [There are three full time staff that do this.] DIRS submissions we pull out of Infinite Campus. Cleaning data is a good three weeks. Leary of 2nd submission, don't want to interfere with DIRS or MCCC happening.

2. What Vendors do you work with to accomplish this?

District 1: We have used Infinite campus since 2001. They follow the MARSS reporting certifications thru MDE. It maybe the best thing since sliced bread. Follow MARSS reporting certifications through MDE. The reports come out and are ready to go.

How is it working with Infinite Campus? Yes and no to responsiveness. We were one of the pilot districts and they were responsive, but now that they've expanded and offer to multiple states (TX and SD) we lost a few things we really liked, but also added some things we like. We have some workarounds. South Dakota is one state that has integrated their databases. They are all connected to central database.

MDE note: NW Region One said that SD uses one SIS vendor for entire state.

District 2: TIES for 18 – 20 years. Used JMC for a little while but not quite big enough for our needs (did not have a lot of options). Have moved to Synergy Edupoint this year. TIESS is the support for Edupoint Synergy. Not a TIESS member district. This is the first year using TIES and Edupoint Synergy. Can run reports and query and it seems to be working out really well. Teachers have a lot of access. It made a huge difference in time. Live data, I can upload to the state anytime and get data out. Other districts their data does not get submitted until the due date. I wish every district could direct input like Synergy. Direct reporting. Other districts and charter schools may not know they can call their region and get their data input immediately. JMC schools for example are small and might wait until due date.

District 3: Infinite campus which is the 2nd largest SIS vendor in State. They're located in Blaine, Minnesota.

3. If you could improve your current data submission processes (includes data submission, validation) with new technology or improvements to existing technology, what are the top 5 things you would hope a new system/new technology would include?

District 1: Go to what SD has: One integrated student database managed and connected at the state central level. Department of Ed has access to live data every minute of every day. In SD when a school goes into database they're working on a state repository not at the local level. I would like to eliminate uploading files.

District 2: We do not have any issues with the current processes. It's just me that does the MARSS data. I do appreciate that it is web based. I can login and submit from home. However, there is a delay in students who transfer schools and sometimes for students who are low on the list for the lottery that is required of Charter Schools. Records aren't always up to date between districts. I am satisfied with the process of uploading data from TIES/synergy to MDE MARSS WES, I like the process of uploading the data and reviewing local errors.

District 3: It would be easier if there was no file to submit, if it went to main collection right away. Electronic file transfer between the districts would be awesome, no files to deal with. We're too big so I ask people to contact the school our students came from. I send a notice of change... I just don't send the documents themselves when they request them. You can send data between any districts in MN using Infinite Campus. Real time reports, districts don't submit timely data and this is frustrating. A statewide system would help. Many districts don't submit on required period and certainly not more often, especially Charters. Some haven't submitted since January so I don't know if I'm looking at an old error... Having a statewide system would alleviate some of that. We need thorough training if we move to new technology or before people leave. Our district would never have an error-free MARSS submission if we never had to create a file to "submit" data as we do with the current process. Our data is live and fluid and has 6000 users. Any snapshot the state would take/pull would always contain errors. Real-time submitting would be nearly IMPOSSIBLE for a district of our size. We really need the opportunity to freeze data, fix errors, and then submit at a time of our choosing. That is why I believe a state-wide system will not fill all the needs people are looking for. I have a feeling you would hear that same complaint from many other districts, regardless of size.

4. In your current work process what is working well with current technology?

District 1: Links, moving local to state. No need for improvement. Except no file uploads.

District 2: We appreciate that all MDE submissions are web based and can leave and come back to it. Multiple Modules for different audiences: For example, our teachers have access to TIES and can do cross lists and attendance from their classroom. We were doing paper up until about 3 years ago.

District 3: Oh YES! Test WES is working well. Has helpful errors. Test Wes knows what they are doing. We have had Test WES for 5 or 6 years. There's a few reports I'd love to see changed a little bit. Errors I know what they are and how to clean them. [The MARSS Coordinator] has been here so long and knows what she is doing. Someone less experienced... to step in and have someone do what she does [would be difficult]... the state has not provided us training. I learned from previous person who had been here for around 40 years. We worked together for a year. There was no state training and lack of training material. They provided knowledge and guidance. Charters will call with questions and I love helping them out. If [the current MARSS Coordinator] were to leave someone else would have a very difficult time with file uploads.

5. Where are you seeing inaccuracies in data? Source or cause of errors, if any?

District 1: A lot of it making assumptions, lack of understanding because of the language issues for what we're asking for. Birth certificate can be an issue. Given political atmosphere around immigrants and everything else. Sometimes it does have a chilling impact on people. Parents working with translators – then you find out they don't even know their native language that well. New families, centralized registration. Three Spanish translators available. 45% of population Hispanic. You can get reasonable good answers. Seeing data entry errors from: Lack of understanding... or saying "Yes" but they don't understand the data flow and how that will affect

District 2: Report availability: For example, this report is not available at this time so I have to follow up to clean up data. It doesn't affect me for the time lines. We share a lot of the MARSS reports. Some go to our Synergy people. Some go to the executive director, food service, compensatory revenue...

District 3: Typical errors : High mobility of students incorrect start and end code, wrong state id, date overlaps, majority of errors are those three errors due to high mobility of students.

6. What are your thoughts on moving to new technology?

District 1: A central database is the goal at the top of the mountain. How we get there is going to take baby steps. If you just say we're doing it, you're going to have a revolt. I would take people at the bottom of the mountain and walk them up the mountain. The move will include time and money...

Would there be data ownership complaints? Not as long as districts can still control their data it's just that MDE can pull real time data for their reports and wouldn't need to wait for fall or yearend reporting cycle. We don't want to have to wait. I would be supportive of the move to one centralized system. MDE needs to bring information down to their level and have them walk up with me. If we're going to get buy in from districts through legislatures we need to lay the groundwork... We need more quick response... How do we do that? Integrate more MARSS cycles.

If we got SIF or standard format, it wouldn't matter what front end (infinite campus), if it's in appropriate format I don't have to worry. The actual raw data...

CEDS, if you are going to do that, what data does the state need versus the district? State isn't concerned with who is the household? Who are the parents? Where do they live? Emergency contacts? Enrollment and Dems are what MARSS are, the other tabs are local. MARSS does not collect emergency contacts. Can a centralized DB at the state level keep track of all this?

District 2: If moving to new technology means more live data that would be positive. That would be wonderful to have data go from Edupoint automatically to MDE. One less step between Synergy and MDE.

How much time do you spend getting data over to the state? Not very much time. If your extract is clear then you save your A file then B file, get error report. 10 minutes tops to send data up to state. If we have any changes for assessments, we are in there all the time and that's just basic data entry. Running two systems parallel for student information. File maker – potential students.

District 3: Anticipate resistance: YES! Infinite Campus would have resistance if moved to a new version. REA - statistics – writing reports ... We have three people working in IT who write reports. We constantly are providing stats, numbers, projectors... Changing all of our report data would take so long. Training and support would be critical.

We have had discussions about SIF. Data definitions would need to be the same to meet SIF compliancy.

Using PeopleSoft for financials and that is an Oracle based system. What else can we do? Oracle HR, Our PeopleSoft Oracle programmer is retiring. He does Carl Perkins, ECFE, etc. He's wonderful and retiring in a year. Who will take over?

There are something like 22 submissions due to the state in varied formats. The data hinges on MARSS. If there was a system that could be automated that would be good. Sometimes it's difficult to find what the errors are. A lot of investigation is needed [to find the source]. Across submissions there are different formats and it makes it very difficult... A positive of state system could get real time reports where I'm not waiting on someone for submitting. I think it would help us be cleaner and more on time which is tied to our funding. However, it will be a huge lift to enter and collect the data...

You need to think about how could it be timely...? MARSS first and then the second one to reduce the errors in the second file. More like what you see with MCCC. DIRS cleaning is a good 3 weeks and then we get feedback... We wouldn't want the second submission to prevent DIRS or MCCC from happening.

How to collect data/Support needed

District 1: Race is entered in numeric format currently should open up to Alphanumeric. Maybe it is, but we only use 0-9. Exclude I and O. But now you're up to 30-32 different values that could be in that field without expanding your data. Give us expanded data but not expand the data structure.

"Not reported" for racial field is good option. Given sensitivity of culture... yes something could be race not reported. To identify student's race/ethnicity currently: Determination

- Parent Identified
- Self
- Observer based on name, verbal
- unknown

Adding in additional racial fields will create work. We would need to go back and resurvey 330 students will take some time... need to explain politely, work thru what is there. Don't see a problem collecting.

We have not started collecting information. We're waiting for forms in Worthington to reach out to people. Won't be able to call them all. Is there going to be a state form? Pilot project trying to determine/identify ethnic groups... Can you help us by providing a form?

MDE needs to provide the districts a carrot! Why do they want to do the extra work to switch over to a new system? How is it going to be a benefit? Pull student records and student grades rather than us asking them for all of the information? It saves both work from going out and asking and then also sending the information. You can show the new system, pull student grade from other district, maybe we can get that ourselves. Show them how you can save time.

District 3: The field [race/ethnicity] should have an option for not reported indicating the family has chosen not to do it. A short term solution wouldn't be terrible, but who is going to check for those errors? There are errors that aren't errors... We default to white... They're saying Hispanic isn't a race, but that's not the way it shakes out. If we have one additional submission that would not be too bad. Ethnic category by EL status. Race Ethnic fields only needed at final end of year. It would be a good time to build in standards. Lots of communication will be needed. What data is at the State versus District level? For reporting the state level is never the same as what we report internally. Some students are not in state reports. There's just a lot of nuances and things would need to line up.

Real time data: present in different ways, nice comparison reports.

Better data collecting: Example free and reduced lunch. Parents are not feeling the pressure from state to fill out the form with their income. There's no consequences if they don't so free and reduced have dropped from 76% to 69% and that is not accurate. We need to communicate benefits to parents. It's the same with using wrong dates.

There are unintended consequences, but it's still important to respect family's privacy. How else will the state use this data? Things are very personal.

REFERENCE: Participants in Student Data Disaggregation Surveys See [Appendix B – MDE and District Stakeholders](#)



Attachment 2: Compiled Notes from October 2, 2017 Stakeholder Meeting

Community Feedback Session - Large Group Report Out Notes

1. Forms: Expiration data (*All forms*)
2. "Chinese, except Taiwanese" (*Data collection form*)
3. Should this be by origin, birthplace, and/or nationality? Add to directions (*Data collection form*)
4. Will the data be used to evaluate students differently? (*FAQ*)
5. What will be the impact to children's future (e.g., college enrollment)? (*FAQ*)
6. Clearly state what are federal vs. state requirements (Highlight what is mandatory and optional) (*All forms*)
7. "Choose not to disclose" needs to be an option (*Data collection form*)
8. Confidentiality (*All forms*)
9. How will local schools use the data? (*FAQ*)
10. Add signature and date for parents (*Data collection form*)
11. Articulate how data can be used to help schools improve (*All forms*)
12. Population changes (*FAQ?*)

Data Collection Form

Pluses/Positives: What is working well? What do you like about the form?

- No feedback provided.

Wishes/Concerns: What is problematic? What don't you like about the form? Questions? Suggestions?

- In the description paragraph, indicate *confidential –not used for any other purposes.
- Make clear that the sentence, “However, without the information,” is a federal requirement.
- “If yes” questions make clear are optional.
- “Colombian” is still masking other groups.
- “Spanish-American” is Hispanic? Why?
- A better option is “Do not wish to pick/indicate.”
- Work with the language, and if it is a country or ethnicity, “race/ethnicity/heritage.”
- Terminology heritage defined.
- Label Questions as “1” and “1a” and provide direction on what is required by federal law and what is optional based on this.
- Make an option for NOT selecting.
- “Do not disclose” under every subgroup and maybe make this the first option.
- Second or third generation should be “based” on ethnicity.
- “heritage” groups/categories
- WWII camps and history is a concern.
- The current national context must be monitored
- Note that federal requirement district can fill in, but state they can not
- “Except for Taiwanese” Must be looked into. It is political and country based.
- Is it possible to move “Is the student white” to the first question?
- Is the secondary group “optional”?/It should be optional
- Not let district select for pre-k. Lack of knowledge.
- Chinese except Taiwanese
- Is it country of origin or ethnicity or language? These are mixed on the form.
- Understand why MDE is asking for this?
- Ask student further. Subgroup should be optional
- Why doesn't white have a subgroup? No group within white group?
- Asia – East, Southeast for East, etc.
- Will be crosschecked by? FRP + subgroups
- Mixed subgroups how to identify
- People identify as “American”
- People may feel embarrassed or “boxed” by choosing one group
- Creates conflicts between groups by creating groups
- Also look at why not reporting? Include more data other than ethnicity
- Want kids to be just like other kids
- How are we going to use this? What will be done?
- Combine subgroups

Parent Letter Form

Pluses/Positives: What is working well? What do you like about the form?

- No feedback provided.

Wishes/Concerns: What is problematic? What don't you like about the form?

Questions? Suggestions?

- The districts are required to report, BUT parents do not have to disclose
- Distinction between federal and state
- The entire form is optional for parents but not for the district
- If choose "not indicate," update to "not other" in this form
- Optional
- Optional
- Employee
- Why – motive – state law – lead
- Easier to read – more memo style
- First sentence "targeted programs" specific footnote
- Third paragraph, second sentence, should read "If you choose not to indicate any of the more 'specific examples'" instead of "'more detailed selections'"
- Third paragraph, third sentence, should be clear about what are federal and state requirements.
- Optional state requirement
- Blank
- Other

FAQ Form

Pluses/Positives: What is working well? What do you like about the form?

- No feedback provided.

Wishes/Concerns: What is problematic? What don't you like about the form? Questions? Suggestions?

- What is FERPA?
- Not reported – is mandatory?
- Students identify themselves
- Reason collected not here
- Students not self-identify in elementary school, maybe later grades older stronger as Americans – less self-identify
- Some Communities stronger to identify
- How will it be used on FAQ
- Why no goal? How will this help us help schools improve?
- Under “Is every student asked to answer these questions?” the motive is not clear. Change language to “Is every family asked to provide this information?”
- Under “How will this information be collected?” Add to give all “families” (not students) the opportunity to more...
- Define terms (e.g. heritage)
- Is every student asked... clarify state and federal requirements
- Q1 required by fed and Q1 by state
- Clarify optional and required portions from parents vs. districts and why
- Data will not be tied to teacher performance
- How will it be used?
- Reporting is in groups (group level) NOT individuals (individual level) and stress this
- I don't want schools to ask my kids.
- Clarify the purpose of the data (Targeting programming in Florida; it was used to create a benchmark and this is NOT how it should be used.)
- Give direction to school districts for what they should and shouldn't use the data for (Don't use it as punishment)
- Change language from “Is every student parent asked to answer these questions?” to “Is every parent asked to provide this data on their student?” Be clearer
- Ethnicity is not causing the issue. Collecting this information is allowing to help identify potential issues
- “What if families/students do not report the new racial ethnic categories?” Be clear what the new categories are. They are not the federal codes.
- Add “education” to department after second bullet under “How will this information be used at the state level?”
- Under “How will this information NOT be used?” Add “How be sure have access to data (and who won't); Not used outside of K12; Somehow address that this will not impact college entrance
- Add “Why not more groups for white group and Native Hawaiian Pacific Islander?”

**Attachment 3: Minnesota Local Chinese American Community
Feedbacks to the Minnesota Department of Education Data
Disaggregation Documents**

October 31st, 2017

Table of Contents

Minnesota Local Chinese American Community Feedbacks to the Minnesota Department of Education Data Disaggregation Documents	1
Letter to Minnesota Department of Education	3
Appendix A: Redlined Minnesota Department of Education documents to provide more accurate legal requirements by the law	8
• Sample Parent Letter for Districts	9
• Racial and Ethnic Demographic Designation Form	11
• Frequently Asked Questions	15
Appendix B: A summary of concerns expressed by parents who attended the community feedback session.....	17
• Education – Testimony by Yongling, PhD in Ed, Minneapolis, a mother of two elementary kids..	17
• Protection of privacy data - Testimony by Gary, Woodbury, a father of one elementary boy	18
• Testimony by Wei, Plymouth, a father of two elementary kids	19
• Testimony by Ling, Rosemount, a mother with two elementary boys.....	20
• Testimony by Sifang, Prior Lake, a mother of two teenage boys	21
• Testimony by Zoe, Lakeland, a twenty-eight year Minnesotan with three kids.....	22
• Testimony by Lindsey.....	25
• Testimony by Chuck, Woodbury, a father of a college girl.....	26
• Testimony by Jeff, a twenty-years Minnesotan with two boys at Eden Prairie public schools.....	26
Appendix C: Online Petition to Stop the Discriminatory Data Disaggregation.....	28
• Petition letter	29
• Numbers of signature collected as of October 31 st , 2017	31
• List of signatures collected as of October 24, 20107	32
Appendix D: Local Minnesota Chinese American media reports	33
• MN Chinese News, October 07, 2017	34
• China Tribune, October 12, 2017	41
• MN Times, October 20, 2017	43

Letter to Minnesota Department of Education

Dr. Gayra Ostgaard
Results Measurement Specialist
Minnesota Department of Education
1500 Highway 36 West, Roseville, MN 55113

October 31st, 2017

Re: Minnesota local Chinese American community feedbacks to the Minnesota Department of Education data disaggregation documents

Dear Dr. Ostgaard,

Please accept our sincere appreciation to you for your efforts in organizing a great feedback session at the Minnesota Department of Education (MDE) on October 2nd, 2017. This session provided our community members a great opportunity to voice their concerns and thoughts to you and your colleagues at MDE. Many thanks for your warm welcome, extreme patience, diligent work, sincere professionalism, and continuous encouragement during the three-hour discussion with members from various minority communities!

As briefed during that feedback session, MDE plans to roll out three documents, including a "Sample Parent Letter for Districts", a "Racial and Ethnic Demographic Designation Form", and a document titled as "Frequently Asked Questions", to all Minnesota public schools to collect racial and ethnic disaggregation data beyond the current federal requirements. The purpose of these documents is that, in addition to the student categories identified under the most recently reauthorized federal Elementary and Secondary Education Act (ESEA) that Minnesota public school districts are already collecting, MDE will require all Minnesota public schools to collect more detailed subcategories student data set by the 2017 Minnesota Statutes 2017, 120B.35, subdivision 3.

In addition to the feedbacks provided by the local Chinese American community members who attended the feedback meeting, we later engaged more members from the Chinese American communities in Minnesota to review the above-mentioned documents and voice their concerns if there is any.

To our knowledge, the broad Chinese American community in Minnesota has been deeply upset by these MDE documents.

1. It seems that in these documents, MDE misrepresented to Minnesota parents, if not lies on purpose, that the collection of these additional detailed and sensitive disaggregated data under MN 120B.35 Clause Subd.3. (a) (2) is required at both federal and state level. However, the federal governments do NOT require detailed subcategories of each race and ethnicity.

- a. A very necessary disclosure to all parents about the optional nature of providing these additional detailed disaggregated data provided by the law in the “Racial and Ethnic Demographic Designation Form” is not included at all. The 120B.35 Clause Subd.3. (h) clearly states that “The school district **must** inform parents and guardians that ***volunteering information on student categories of not required by the most recent reauthorization of the Elementary and Secondary Education Act is optional***”. However, none of the documents provided by MDE indicates that disclosure of additional racial data is optional.
 - b. The document of “Frequently Asked Questions” by stating “This information will be reported to the federal government by compiling the categories into the federally collected racial/ethnic categories as illustrated on the data collection form for all federal reporting” fails to provide an important clarification that only seven racial and ethnic data in the most recent reauthorization of the ESEA is required to report to the federal government, NOT additional detailed disaggregated data collected by MN 120B.35.
 - c. The use of observation identification for both seven categories required by the federal and the additional detailed disaggregated data required by the MN state is also misrepresented in these documents. For example, “Frequently Asked Questions” states that “If families/students do not fill out the form, districts are required to make a determination based on the best information they have for financial and reporting reasons and to submit the information to MDE”. Also, the “Sample Parent Letter for Districts” states that “an employee of the school district is required to provide the information for your student using the best information they have available”. However, the observer identification is actually ONLY allowed for seven federal categories in the most recent reauthorization of the ESEA. NO observer identification has been allowed for additional subcategories listed in the 2017 Minnesota Statutes 120B.35. Moreover, it is practically impossible to accurately distinguish among Asian minorities based on observation.
 - d. The signature of guardians or parents is missing on the MDE data collection form to confirm a consent from parents to disclose sensitive data about minors.
2. MDE fails to provide necessary options for parents who are unwilling to disclose additional detailed disaggregated data to ensure any provided data “**will not violate the privacy of students or their families, parents, or guardians**” under 120B.35 Clause Subd.3. (h).
 3. Regarding the very sensitive information and privacy nature of these data, MDE cannot demonstrate to parents how the Department is able to comply with the current federal and state law to ensure a validated security platform to protect the additional detailed disaggregated data collected by all Minnesota school districts and MDE.

Furthermore, parents from the Chinese American community in Minnesota have been outraged by some underlining messages that these MDE documents will be delivering to all kids and parents in all Minnesota public school districts. Such disturbing messages include:

1. Racial discrimination and racial registry of minority Americans at Minnesota public schools are justifiable;
2. The stereo-type of minority Americans as “foreigners” will be perpetuated in Minnesota;
3. American communities shall be more divided instead of being more united and integrated;

To help you and your colleagues at MDE understand our perspectives and serious thoughts and concerns regarding the implementation of such racial data disaggregation, we included in this letter the following materials collected from our local Chinese American community for your reference.

1. Redlined MDE documents to provide more accurate legal requirements by the law;
2. A summary of concerns expressed by parents who attended the community feedback session;
3. A copy of petition with 850+ signatures from local Chinese American community members;

To follow up, we would sincerely appreciate further updates and continuous dialogues/follow-ups with the MDE regarding this matter and related documents.

1. We hereby request to be updated on any newer version of the MDE forms for a further review with our Chinese American community so to make sure mutual agreed languages and clauses to be adopted before their launching to the rollout sites in 2018;
2. We hereby request to be included as a concerned community in the hearing with Minnesota legislative committees having jurisdiction over kindergarten through grade 12 education policy and finance, in which MDE is anticipated to deliver a report by February 1, 2018.

Again, thank you very much for this great opportunity allowing us to voice our deep concerns! We understand you have been working on a task that is tough and challenging. Our community is more than willing to provide any further help and contribute to the development of these MDE documents. Looking forward to hearing from you very soon!

Warmest regards,

Ling Li, [651-248-0872](tel:651-248-0872), liling99@gmail.com
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Sharlene Dai, [517-285-1366](tel:517-285-1366), sharlenedai@gmail.com
and friends from the local Chinese American community

Appendix A: Redlined Minnesota Department of Education documents to provide more accurate legal requirements by the law

- Sample Parent Letter for Districts

District Letterhead

Sample Parent Letter for Districts

Dear Parent or Guardian:

In an effort to assist Minnesota districts in providing targeted programs and services to help all students succeed, districts are required by law to collect more detailed student racial and ethnic identity information based on Minnesota's largest racial and ethnic groups. Every year, Minnesota school districts are required to report student data, compiled by racial and ethnic identity categories, to the Minnesota Department of Education. These categories are set by the U.S. Department of Education and by Minnesota Rule, and were revised in 2017 by the Minnesota State Legislature to allow individuals to identify themselves with greater specificity.

Our district has been asked to collect this information for the 2018-19 school year, and, as a result of the new legislation, you are asked to update your child's data even if you have previously reported this information. Starting with the 2019-20 school year, all schools in Minnesota will collect student racial and ethnic identity information using these updated categories. Including

(a) Federal required categories: The seven student categories ((1)Hispanic/Latino of any race, and, for individuals who are non-Hispanic/Latino only, (2) American Indian or Alaska Native, (3) Asian, (4) Black or African American, (5) Native Hawaiian or Other Pacific Islander, (6) White, and (7) Two or more races) identified under the federal Elementary and Secondary Education Act, as most recently reauthorized;

(b) Optional categories (seven of the most populous Asian and Pacific Islander groups, three of the most populous Native groups, seven of the most populous Hispanic/Latino groups, and five of the most populous Black and African Heritage groups as determined by the total Minnesota population based on the most recent American Community Survey) identified under the 2017 Minnesota Statutes 120B.35;

To update your child's information, please complete the enclosed form and return it to [LOCATION] by [DATE]. Note: if you choose not to indicate any of the more detailed selections, each federal group allows an "Other" category to be selected. Federal and state reporting requirements do not allow school districts to leave this information blank for students. As a result, if we do not receive this form from you, an employee of the school district is required to provide the information for your student using the best information they have available ONLY for the seven federal required student categories identified under the federal Elementary and Secondary Education Act, BUT NOT for the optional categories.

Please contact [EMPLOYEE] if you would like to check the information currently on file for your child, but please also complete and return the enclosed form. For more information about the reporting categories, please contact [NAME] at [PHONE NUMBER].

Sincerely,

Commented [SD1]: According to the 2017 Minnesota Statutes 120B.35, the school district must inform parents and guardians that volunteering information on student categories (the category (b) listed above) of not required by the most recent reauthorization of the Elementary and Secondary Education Act is optional and will not violate the privacy of students or their families, parents, or guardians.

[SUPERINTENDENT NAME]

- Racial and Ethnic Demographic Designation Form

7/12/2017

Racial and Ethnic Demographic Designation Form

Student's First Name _____ Student's Middle Name/Initial _____
 Student's Last Name _____ Student's Date of Birth _____
 Student's District/School _____

Please respond to the questions below based on the race/ethnic category(ies) with which this student associates and return the completed form to his or her school of enrollment. Providing this information is optional and refusal to respond will not impact enrollment in the school. However, without the information, school staff will need to assign the student to a category for state reporting purposes based on the best information they have available. The school is required to request this information to comply with Minnesota Statutes passed during the 2017 legislative session. As a result, if we do not receive this form from you, an employee of the school district is required to provide the information for your student using the best information they have available ONLY for the seven federal required student categories identified under the federal Elementary and Secondary Education Act ((1)Hispanic/Latino of any race; and, for individuals who are non-Hispanic/Latino only, (2) American Indian or Alaska Native, (3) Asian, (4) Black or African American, (5) Native Hawaiian or Other Pacific Islander, (6) White, and (7) Two or more races) , but not the optional volunteering information.

Please respond to all the questions below.

Q1. Is the student Hispanic/Latino?

- ☐ Yes
- ☐ No
- ☐ Decline to disclose

Optional volunteering information: If yes, please select one or more of the following groups/categories. You may select more than one group.

- ☐ Colombian
- ☐ Ecuadorian
- ☐ Guatemalan
- ☐ Mexican
- ☐ Puerto Rican
- ☐ Salvadoran
- ☐ Spaniard/Spanish/Spanish-American
- ☐ Other Hispanic/Latino
- ☐ Decline to disclose

Commented [SD1]: Add "optional volunteering information" under each category not required by Elementary and Secondary Education Act
 -According to the 2017 Minnesota Statutes 120B.35, "the school district must inform parents and guardians that volunteering information on student categories of not required by the most recent reauthorization of the Elementary and Secondary Education Act is optional and will not violate the privacy of students or their families, parents, or guardians."

Commented [SD2]: In general, a choice of "Decline to disclose" is added under each of the federal categories.

-According to Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education 2007, "As a general matter, while educational institutions and other recipients are required to comply with this guidance, individuals are not required to self-identify their race or ethnicity. If respondents do not provide information about their race or ethnicity, educational institutions and other recipients should ensure that respondents have refused to self-identify rather than simply overlooked the questions."

[DATE]. **Note:** if you choose not to indicate any of allows an "Other" category to be selected. Federal districts to leave this information blank for student

Commented [SD3]: Add "Decline to disclose" to make it clear that each category not required by Elementary and Secondary Education Act is optional.
 -According to the 2017 Minnesota Statutes 120B.35, "the school district must inform parents and guardians that volunteering information on student categories of not required by the most recent reauthorization of the Elementary and Secondary Education Act is optional and will not violate the privacy of students or their families, parents, or guardians."

Q2. Is the student American Indian?

☐ Yes

☐ No

☐ [Decline to disclose](#)

Optional volunteering information: If yes, please select one or more of the following groups/categories. You may select more than one group.

☐ Cherokee

☐ Chippewa/Ojibwe

☐ Sioux/Dakota

☐ Other American Indian

☐ [Decline to disclose](#)

Q3. Is the student Native Hawaiian/Pacific Islander?

☐ Yes

☐ No

☐ [Decline to disclose](#)

Q4. Is the student Asian?

☐ Yes

☐ No

☐ [Decline to disclose](#)

Optional volunteering information: If yes, please select one or more of the following groups/categories. You may select more than one group.

☐ Asian Indian

☐ Burmese

☐ Chinese, except Taiwanese

☐ Filipino

☐ Hmong

☐ Karen

☐ Korean

☐ Vietnamese

☐ Other Asian

☐ Decline to disclose

Q5. Is the student black?

☐ Yes

☐ No

☐ Decline to disclose

Optional volunteering information: If yes, please select one or more of the following groups/categories. You may select more than one group.

☐ African-American

☐ Cameroonian

☐ Ethiopian-Oromo

☐ Ethiopian-Other

☐ Kenyan

☐ Liberian

☐ Nigerian

☐ Somali

☐ Other Black

☐ Decline to disclose

Q6. Is the student white?

☐ Yes

☐ No

☐ Decline to disclose

Q7. Is the student two or more races?

☐ Yes

☐ No

☐ Decline to disclose

Commented [SD4]: Add the seventh category according to the federal categorization

Parent/Guardian

Name(s):

Relationship to Student:

Commented [SD5]: Add parent signature and date information

Parent/Guardian

Signature: _____ Date

- Frequently Asked Questions

Frequently Asked Questions

Why is this information being collected?

In 2017, the Minnesota State Legislature required districts to collect more detailed student data of the seven race and ethnicity categories set by the U.S. Department of Education for specific groups. Minnesota Statutes ~~2016~~2017, 120B.35, subdivision 3 can be found here: https://www.revisor.mn.gov/bills/text.php?session=ls90&number=HF2&session_number=1&session_year=2017&version=list

According to the 2017 Minnesota Statutes 120B.35 Clause Subd.3. (h), the school district must inform parents and guardians that volunteering information on student categories of not required by the most recent reauthorization of the Elementary and Secondary Education Act is optional and will not violate the privacy of students or their families, parents, or guardians.

Is every student asked to answer these questions?

Yes. Every student in Minnesota attending grades K-12 is being asked to answer these questions. The racial/ethnic information being collected is more descriptive for many groups than what has previously been collected. This change allows individuals to more specifically identify themselves if they so choose.

How will this information be collected?

To give all students the opportunity to more specifically identify themselves, districts are encouraged to send the data collection form and parent letter home with every student.

When will this information be collected?

Partner Districts: The initial collection of the more detailed information will be first deployed in five partner districts: Community of Peace, Minnetonka, Schoolcraft, St. Paul and Worthington. These partner districts will likely send the data collection form home in the fall/winter of 2017-18 school year with enrollment forms for the 2018-19 school year. The six partner districts will report to the department this detailed student race and ethnicity information beginning with the 2018-19 school year.

Commented [SD1]: Five or six partner districts?

Statewide: Based on lessons learned with the six partners, all other districts will likely send the data collection form home in the fall/winter of 2018-19 school year with enrollment forms for the 2019-20 school year. All districts will then report this detailed student race and ethnicity information to the department beginning with the 2019-20 school year. 2

This information will be collected every five years from the date of statewide implementation for all districts including the six initial partner districts. It will be collected again in school year 2024-25.

What if families/students have already identified using the previous categories?

If families/students have already provided this information using previous forms, they are being asked to re-submit the form. This is because the Minnesota Department of Education is streamlining and centralizing its data collection systems. Previously reported racial/ethnic categories will not be carried

over to the streamlined data collection system because previously reported information could differ across systems.

What if families/students do not report the new racial and ethnic categories?

If families/students do not fill out the form, districts are required to make a determination on categories required by the most recent reauthorization of the Elementary and Secondary Education Act based on the best information they have for financial and reporting reasons and to submit the information to MDE.

The volunteering information on student categories of not required by the most recent reauthorization of the Elementary and Secondary Education Act (for example, seven of the most populous Asian and Pacific Islander groups, three of the most populous Native groups, seven of the most populous Hispanic/Latino groups, and five of the most populous Black and African Heritage groups as determined by the total Minnesota population based on the most recent American Community Survey and identified under the 2017 Minnesota Statutes 120B.35) is optional and will not violate the privacy of students or their families, parents, or guardians.

How will this information be used at the state level?

- ☐ This information will only be used for state data collection and reporting purposes.
- ☐ In accordance with state legislation, the department will collect and report this information for assessment and graduation data.
- ☐ Individual student records are protected by the Federal Education Records and Privacy Act (FERPA).

How will this information be reported to the federal government?

Only categories of required by the most recent reauthorization of the Elementary and Secondary Education Act. This information will be reported to the federal government by compiling the categories into the federally collected racial/ethnic categories as illustrated on the data collection form for all federal reporting.

How will this information NOT be used?

- ☐ This information will not be tied to immigration status at the state or federal level and will not be checked elsewhere.
- ☐ This information will not impact whether or not your student can attend school.
- ☐ This information, while collected for individual students, will only be reported for a group of students. The reports provided by the department are required to protect students' identity and the group of students must be large enough as to not be able to identify a student.

Appendix B: A summary of concerns expressed by parents who attended the community feedback session

- Education – Testimony by Yongling, PhD in Ed, Minneapolis, a mother of two elementary kids

I am here today to share my experience and opinion on the policy and implementation of data disaggregation. I come from a bilingual, biracial and bicultural family and my children are raised with both of their Chinese heritage and their American identity. The diversity of this nation is what makes us strong and united, and I fully believe that the identity politics, as manifested in the practice of separating, rather than uniting people, will not only divide us, but make us weaker, as a community and as a nation.

I am trained as an educator and have a doctorate in educational policy and administration from the University of Minnesota. I currently work at the University of Minnesota's Confucius Institute, where the core mission is to promote Chinese language and culture. I have taken many courses during my graduate studies and still keep myself abreast of the current educational trends. I would like to cite an international study to inform and discuss with you, what are the factors that MATTERS in improving our education and education system.

TIMSS (Trends in International Mathematics and Science Study) is an international assessment of math and science at 4th and 8th grades that has been conducted every four years since 1995. The most recent one, TIMSS 2015 is the 6th assessment in the series monitoring 20 years of trends in educational achievement, together with comprehensive data on students' context for learning math and science. In 2015, 57 countries and 7 benchmarking entities (regional jurisdictions of countries such as states or provinces) participated in TIMSS. In total, more than 580,000 students participated in TIMSS 2015. TIMSS has a standardized average score of 500. The top two countries/benchmarking entities are Singapore and Hong Kong with average students scores of 618 and 615 respectively, and United States' average score is 539.

Educators examined a variety of school-based factors that are associated with students' success, such as school climate, teacher preparation, school composition, and TIMSS also included a chapter on the home environment support and its correlation with students' success in math and science. As the study results indicated (results can be found at:

<http://timss2015.org/wp-content/uploads/filebase/full%20pdfs/T15-International-Results-in-Mathematics-Grade-4.pdf>, chapter 4 is on home environment support), for 4th graders, students has successes in math and science are: those whose parents reported more home resources for learning, whose parents often spending time with them early literacy and numeracy, and those who attended more years of preschool. However, there was no mention of any specific ethnic groups that may result in differentiated math and science achievement.

As policy makers, we take interventions to help improve the education for our children on the factors that we can make a change. We can help parents with more resources of learning at home, we can encourage parents to send their children to attend more years of preschool.

However, we can NOT change who we are, what our racial and ethnic belonging. Therefore, I really do not see any practical implication for which obtaining more information on detailed, specific ethnic composition, I do not see how and why it will benefit our children, and our school.

I also want to point out that the so-called disaggregation is not scientific. For example, it separates people of Chinese background to Mainland Chinese, Taiwanese, Cantonese, etc. I do not see any reasonable rationale in this categorization except for politics. In education, we collect basic data on students such as home language (i.e., whether they speak English at home), whether they receive free or reduced lunch at school, or their individual education plan (IEP, or 504, for special education). Mainland Chinese and Taiwanese people both speak Mandarin! Why separate the two groups? IT DOES NOT MAKE ANY SENSE!

As a tax payer, I have the right to input where and how the tax dollars should be spent. Spending tax dollars on disaggregated data is not only expensive, but also extremely ineffective. I do not see any practical implications, and MDE does not have a good answer either. As Senator Eric Pratt has said, this is a terribly mismanaged process. Therefore, I strongly oppose to the implementation of collecting data on sub-ethnic groups. Let's work together to see how we can fix this problem and put us back on the right track.

- [Protection of privacy data - Testimony by Gary, Woodbury, a father of one elementary boy](#)

Sub-group Education Rights and Privacy

In this article, we propose to protect sub-group education records privacy by limiting the usage and access of disaggregated data.

Definition:

Sub-group refers to people share a similarity in one or multiple categories of disaggregated data. For example, students and families from B country, who are English learners and have free lunch at school.

In 120B.31 subdivision 4, the first six categories can be used to estimate students and families' immigration status, income, ancestor's origin (for mixed blood esp.), ethnicity and etc. The seventh category is open to collect and use more information which is not disallowed to be the status of refugee or even eye color.

Why do we need protect sub-group privacy?

Sub-group information belongs to personally identifiable data and privacy, such as ethnicity and language at home.

When sub-group data analysis was made on a large statistic scale, such as state wide, it can't be used to identify individuals, e.g. a population survey. However, in 120B.35, education record and disaggregated data by school and by grade are required to be analyzed, reported and published. This will easily generate a situation of that there are only a few students in one grade belongs to a sub-group, while a single student can be highlighted and profiled in one class, or a single or two families can be profiled in a neighborhood.

The privacy is not only for the students, is also about all the families inside the sub-group. Adults could be profiled by their children's education record disclosure too.

FERPA (Family Education Rights and Privacy Act) protects family and student education record and personally (or family) identifiable information. The sub-group data could identify a small number of people in their class, school or neighborhood, which should also be protected.

Potential abuse of sub-group data

Disaggregated data, including raw data, and reports, will contain community, geographic, income, genetic, educational information and their annual changes, which is invaluable to commercial data agencies, anthropology researchers, and esp. investors.

For example the highly detailed data can be used in regional consumer analysis with kids' grades (age), ethnicity, free lunch, education records, etc. No agencies ever can provide the detail data like disaggregated data sets can do, regarding sampling coverage, geographic location and timeline.

Improper management of data accessing could lead to leakage and commercial exchange of the data.

Improper or intentional perform of 120B.31 subdivision 4 (7) could generate unimaginable business values.

Code of data usage and access

In order to protect sub-group people, esp. vulnerable minority sub-groups, all disaggregated data should be limited in their usage and access.

- ✧ Strictly limit the data in the usage of K-12 educational improvement ONLY.
- ✧ Develop Sub-group Education Rights and Privacy Act similarly to FERPA. Legally prevent data leakage and abusing.
- ✧ Set a code of data analysis, clearly define what type of analysis is allowed to the data. The analysis which could disclose sub-group identifiable information should NOT be allowed.
- ✧ Audit the data usage and access annually.
- ✧ School districts have to meet the requirement before disaggregated data collecting and reporting.

- **Testimony by Wei, Plymouth, a father of two elementary kids**

I would like to share some of thoughts with MDE officials and legislators and expressed my deep concerns over data disaggregation. Specifically, I would give an example that just happened to me this weekend. When I was helping my daughter polishing her short speech for the 4th grade student council election, I asked my daughter if she want to highlight her Asian/Chinese identity. To my surprise, she refused and was very upset. I asked her to reconsider it which only met with more upset. At end my 9-year old said she doesn't want to be singled out, she just want to be the same with the rest of the kids while her class is majoritively white. I would like to ask educators and legislators to pay extra attention to our minority kids who might have strong refusal to repetitive and detailed identification at school as this could hurt them while they were young and have identification issue. They may also feel being bullied and face other type of racial stereotype jokes which in turn hurt their social life at

schools. Subsequently, I would ask legislators and educators to deplore in-depth research on the psychological impact to minority kids before data disaggregation goes in place, since every kid is DIFFERENT. Good intention cannot be justified when a group of kids is unfairly treated, no matter how small the group is. I would warn that the negative influence to such minority kids might be permanent and irreversible. Last but not least, even if the disaggregation form filling is optional or they could choose OTHER on the form, the harmful effect to kids might still be done by the process itself.

- [Testimony by Ling, Rosemount, a mother with two elementary boys](#)

I would like to share my personal experience with the educators and legislators in the room. The first two meant to point out that children are vulnerable to the data disaggregation bill and the third one shows how impossible to make the decision of an Asian American's subcategorization by the "best knowledge".

1. About 2.5 years ago, we moved to MN from IA, since my sons play hockey. Back then, my older one was 10. He was known by a lot of kids on the first day of school, since he was the only 5th grader who went to middle school for math. One day at recess, another kid went to say Hi to him, and said "Hi, Andrew, I know you are new to our school. Where are you from?" Andrew replied with a smile "I'm from Iowa." That kid paused for a second, and asked again "I mean, where are you REALLY from?" Andrew replied with another smile "I see what you mean.", he said, "I look different, I speak a different language at home. But, I am an American, just like you." Andrew is confident, and proud of his Chinese heritage. He has always been interested in Chinese culture and history. I can't image what would be his response if he were a more sensitive about his racial identity.

2. This story happened to my younger one last year when he was in Kindergarten. One child in his class pulled the corner of his eyes in front of Alex, and claimed that "Alex is NOT an American!" Alex was so confused and upset that he didn't even tell the teacher what happened to him. He did talk to us about this after school. I had a very serious conversation with the teacher. If the data disaggregation bill is fully implemented in all school districts, more damage will be done to Chinese American children. This bill will no doubt give the "go" signal to some people to specifically call names of Chinese American children. They will feel singled out, excluded, isolated at school.

3. This happened to me on the first of my first work. One of my co-workers asked me "are you a Korean or a Japanese?" After we talked a little bit, it turned out that my co-worker is also a Chinese. So, people of our own "race" couldn't tell our ethnicity without talking to each other, how can school district make the decision of an Asian American's "race"? What would be their "best knowledge"?

- Testimony by Sifang, Prior Lake, a mother of two teenage boys

First, I would like to express our gratitude to this country and Minnesota on behalf of our Chinese community. We are also very thankful for having the opportunity to voice our concerns on the data disaggregation.

As an immigrant from mainland China, I came to Minnesota in the fall of 1993. I have lived here ever since. I love Minnesota and call this place my hometown. I am proud and honored to be an American. I am personally very grateful for the opportunities the United States of America and Minnesota have given me and my family.

I moved to Savage in 1999 because I loved the countryside feeling and the beautiful scenery. When I just moved there, I was a little nervous and worried. Soon I found out my neighbors are very wonderful people. They intentionally included my family in many of their activities so that we did not feel left out. We had summer bonfire and Christmas parties together. My kids played with theirs kids in our cul-de-sac and everybody's back yard together. When I was sick in 2006, my neighbors made meals for my family and took cares of my sons.

Both of my sons were born here in Minnesota. When they started school, there were the only Chinese in their grades. The school staff welcomed us with their smiles and open arms. We have made a lot more friends through school programs and activities. The teachers and staff have influenced them very positively. Our sons' friends got them excited about Cub Scout. Both of them continued to be active in Boy Scouts. Again we met great people through scouts. My sons have achieved Eagle Scout rank.

I am so thankful that my neighbors, school staff, friends, Boy Scout parents and volunteers all treated us not just as Chinese, but more importantly as AMERICANS, as members of the community. They helped us integrated into this great country, AMERICA.

There were a few times that things did not go as well. One time my older son came home feeling troubled when I asked how his day was. He mentioned that some students called him "China Boy". So I sit down with him and we had a talk. I told him it is true that he is a china boy. But he was born here and he is a true AMERICAN. I told him how grateful I am to this country. I encouraged him to work hard, treat people like he wants to be treated, contribute positively to our community and our country. In the end he should become a great AMERICAN citizen. Our most important identity is AMERICAN.

From my personal experience, I don't think libeling immigrants and our decedent specific minority races and ethnic groups helps us integrating into the AMERICAN society. Actually it promotes racial tension between different races and between different ethnic groups. The collecting and reporting of disaggregated data can make the racial and ethnical tension even worse.

I hope all races and ethnic groups can be integrated into the AMERICAN society as one people. I hope AMERICA continues to be united with AMERICAN spirit. Especially at the current time of serious racial conflict, unity is very important to our country's future.

I have voted for Senator Eric Pratt during the past many years. I have supported him when he first ran for Prior Lake school district board member, then the state representative and after

that the senator of district 55. I trust him because we have similar values. I will continue to rely on him and the people on this board to make sound decisions on the data disaggregation.

Let us all work together to promote the unity among different races and ethnic groups! Let's stop collecting and reporting disaggregated data!

- [Testimony by Zoe, Lakeland, a twenty-eight year Minnesotan with three kids](#)

Data disaggregation, who wins, who loses, and what shall we do?

On October 2 despite the pouring rain more than 60 parents from the Chinese community showed up for the MDE stakeholders feedback session regarding the implementation of the new data disaggregation law. Around 800 Chinese community members in Minnesota have already signed the petition against this law within the past two weeks.

The data disaggregation bill was initiated by Coalition of Asian American Leaders (CAAL, consisting mainly Hmong leadership) with the intention of identifying achievement gaps between ethnic subcategories. While the intention was good, the bill was not well informed to all minority communities during the legislative session earlier this year, and many community members affected by this law are still not aware of the law (such as the Indian and Korean communities), and that has caused quite a few unexpected consequences.

The parents from the Chinese community are deeply concerned about being separately identified as Chinese due to a long history of discrimination against Chinese immigrants. This law will create a Chinese Minnesotan Registry from childhood even the children are born and raised in Minnesota. The Chinese community fears that their future generations of children would be forever labeled as Chinese and be perceived as perpetual aliens. The Chinese Community also has the fear for potential data abuse to support discriminatory policies against certain ethnicities for education and employment purposes. If this law continues to exist, then it should be paired by laws like the California Proposition 209 and Michigan Civil Rights Initiative, that prohibit discrimination and **preferential treatment** based on race, ethnicity, national origin, etc. Please see the text of those laws here:

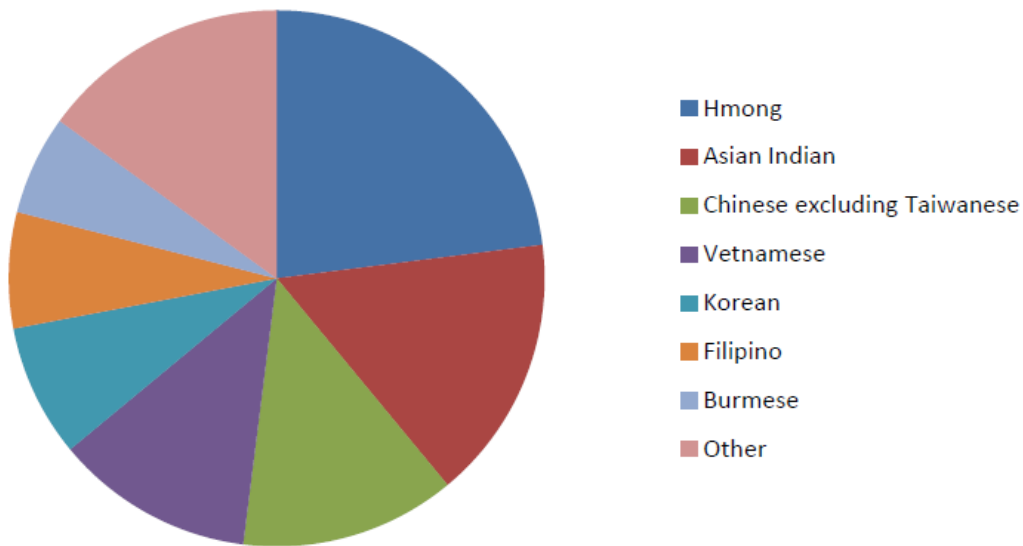
(https://en.wikipedia.org/wiki/Michigan_Civil_Rights_Initiative#Text_of_the_Amendment)

(https://en.wikipedia.org/wiki/California_Proposition_209#Text)

This law tries to address educational gaps, however, the ethnicity is barely a dividing line or the cause for the educational achievement gaps. There are low academic performers in every race and ethnicity. Under the “All Kids Count” every child should be helped despite race and ethnicity. If the MDE allocates funding to help one ethnicity only, then the rest of children of different races and ethnicities would not be able to share the benefits of those dollars at all.

The Hmong American Partnership (a non profit organization) has recently received \$875,000 grant from the MDE to help the Southeastern Asian children to improve educational outcomes, even without the data evidence from this newly passed law. One would doubt if this law is really necessary when certain ethnicity has already been able to make the case to receive public funding from the MDE. Please see the \$875K Grant news here: (<http://www.hmong.org/hap-receives-875000-from-mde-to-operate-a-community-learning-center-to-improve-educational-outcomes-for-underserved-students/>)

Asian Pacific Minnesotans (source: CAPM)

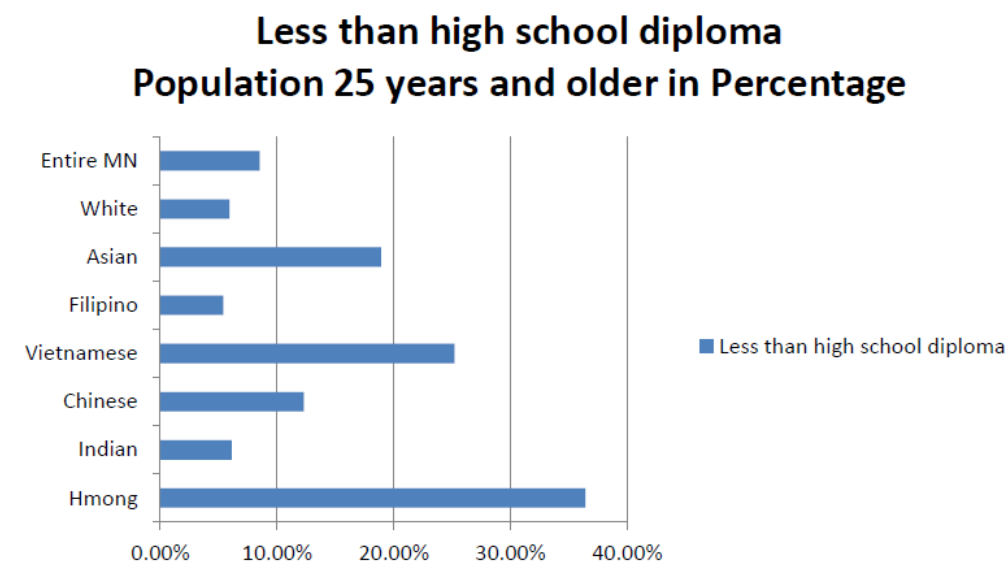
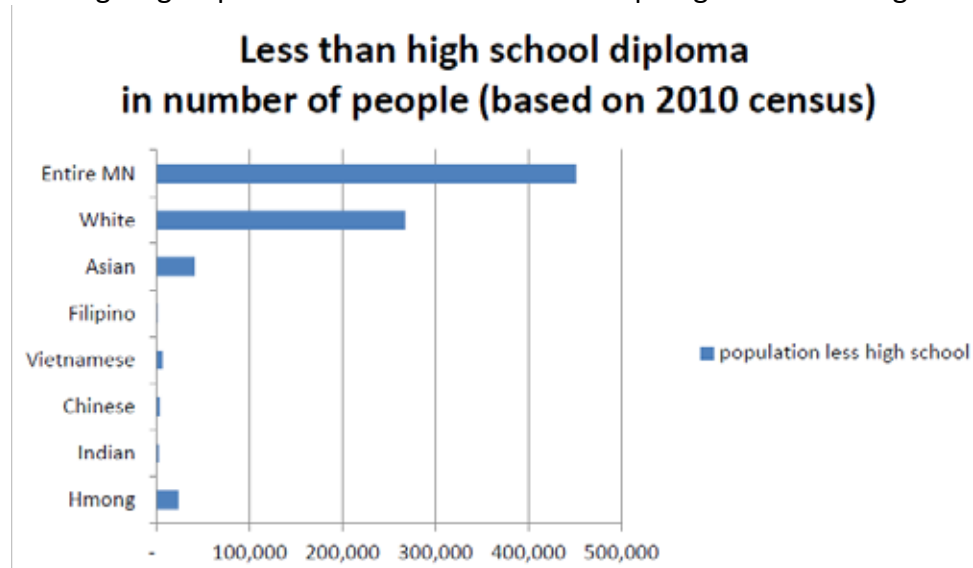


With the changing faces of the modern American society, there are more and more people from mixed race background. The traditional categories of race are gradually going out of date. Trying to define people's ethnicity is even more challenging and it opens up a can of worms. In fact, in the MDE survey form, the ethnicity categories are frequently mixed and/or confused with country of origin, such as the category "Chinese except Taiwanese". While Chinese is an ethnicity, Taiwanese are Chinese from Taiwan. How about Chinese from Singapore or Chinese born in Minnesota? All are Chinese by ethnicity, but from different parts of the world. Then why does it single out Chinese except Taiwanese?

The categories under the current law only separate seven largest categories in Asian population. Since the majority people in the Indian, Chinese, Korean and Filipino population in Minnesota are doing relatively well in terms of education attainment level, the small percentage of under-achievers in those communities would not be able to benefit from this law. The other category includes all other smaller groups and they are too small to be counted separately, therefore, none of them would benefit from this law either. The only Asian categories that could benefit from this law would be Hmong and Burmese/Karen, regardless whether they are high achievers or under achievers. The benefit to Vietnamese is uncertain at this point.

Although the percentage of educational attainment shows one picture, the number of people chart paints a quite different picture of educational attainment. (Please see the chart below.) Although there is a higher percentage of Hmong population over 25 years old not having high school diploma, there are many more white Minnesotans not having a high school diploma statewide (by applying the above percentages to the 2010 census population data). By the way, now more than half of Hmong are second generation young people under 25 years old, and their high school graduation rate is much higher than those over 25 years old. If MDE grants \$875,000 exclusively to the Hmong community, what happens to more than a quarter million white people who also need help to graduate from high school? This law is bad deal for Indians, Chinese, Koreans, Filipinos, Japanese, and worse of all, to the vast majority of Minnesota

population: the whites. MDE has now \$875K less funding for all the rest of Minnesota kids. The All Kids Count should count **every child**, White, Black, Hispanic and Asian. Unfortunately, this law is not counting all kids, in fact, this law neglects the vast majority of the Minnesota kids and the largest group -- the white kids who need help to graduate the high school.



The minority population concentrates in the Twin Cities Metro area. In the vast land of Minnesota many schools do not have statistically significant number of minority ethnicities to report. However, under the mandatory reporting requirement of this law, all those schools must report students' ethnicity without (1) extra funding or (2) expertise in identifying various ethnicities. Not only it is an administrative burden to school staff, but it seriously impairs the data accuracy if students are identified to wrong ethnicity categories.

The current MDE student database already has much more detailed student categories by language spoken at home – not necessarily coincide with ethnicity categories. Those data could well be used to identify poor performing students.

In conclusion, data disaggregation by ethnicity is not scientific; instead, it is misleading, and defeats the purpose of All Kids Count by neglecting the white kids and others, and will inevitably result in discrimination based on ethnicity in education and potentially in employment in Minnesota.

Suggestions:

1. Since this law neglects so many white students (the majority population) under the All Kids Count, it should really be repealed.
2. Since the vast majority land of Minnesota does not have many minority students, the schools should be allowed to opt out of this reporting responsibility. School reporting should be made optional, not mandatory.
3. If this law continues in Minnesota, it should be paired by laws like California Proposition 209 and Michigan Civil Rights Initiative, to prevent potential misuse of ethnicity data, and prohibit discrimination and preferential treatment based on race, ethnicity, country of origin, etc.
4. Since this society is evolving rapidly, situation may change over time. This law should be reviewed once every five years to check the applicability to the society of that time.

- [Testimony by Lindsey](#)

Good morning, everyone. Thank you for giving me the opportunity, and on behalf of Chinese parents, to express our concerns of the Disaggregated Data collection.

Thomas Jefferson said: "All men are created equal. "

This is one of the American values that draw people from all over the world, no matter their color, religion, culture and education background, to come to this land and work hard on their American dream.

We love America deeply and believe firmly this is the best place to raise our children. Our children are born as American, like all other American kids. They are together, to contribute to American future.

Compare equality of outcome and equality of opportunity, we choose the latter. We always tell our children, try your best to study at young age and deposit your happiness for future. Hard work will reward you with more happiness when you grow up. They believe in us.

If a person was granted better education, later, better job, just because where he is from, who his parents are, or what his race is, we call it unfair.

God helps those who help themselves.

The disaggregated Data collection tries to separate children, magnify their parent identity and pass on the message that biological feature matters. Identity is first. Children would be frustrated that the ancestry is more important than self-motivation, and therefore, they are not created equal!

Is Thomas Jefferson wrong? Please help us to clarify, please help children to clarify, that all men are created equal.

- [Testimony by Chuck, Woodbury, a father of a college girl](#)

I would like to share and present my research on the “Disaggregated Data Collection And Educational Attainment Gaps” with the educators and legislators.

- Disaggregated data collection will split united communities in the State
- Disaggregated data collection is another form of discrimination
- Disaggregated data collection is not scientific
- Disaggregated data collection project would be financially high cost
- The solutions for promoting education development should be tested before being implemented at state and national level (1)
- Disaggregated Data collection project lacks the needed protections to student data privacy
- Disaggregated data collection will not solve the issue of educational attainment gaps among sub ethnic groups
- Race is not one of the factors impacting student’s learning and performance

We call for the State Legislature’s immediate attention to these issues we are raising from this so called disaggregated data collection bill/project. We call for new legislative initiatives to repeal or amend the related legislations.

- [Testimony by Jeff, a twenty-years Minnesotan with two boys at Eden Prairie public schools](#)

Thanks so much for making yourself available for listening to our voices and concerns regarding this data disaggregation legislation! The representatives from our Chinese communities here at this meeting have already made really good points about this act as both parents and experts in their fields. I now just want to relate our discussions today to some important history of this country.

Chinese, as an ethnic group, had been under serious discrimination in this country’s history. Back in 1882, US passed the **Chinese Exclusion Act of 1882**, which was the first significant law restricting one ethnic group immigration into the United States. The act was passed by the U.S. Congress and signed by President Chester A. Arthur. It suspended Chinese immigration for ten years and declared the Chinese as ineligible for naturalization. The act was then renewed in 1892 for another ten years, and in 1902 Chinese immigration was made permanently illegal until Congress finally repealed it in 1943 when China became a strong ally fighting with US in WWII. When this act was enforced, the registration of every Chinese resident in the U.S. was required to avoid legal action resulting in deportation.

Let’s take another look at the history. Jewish and Irish immigrants were very much discriminated in this country in the past. These groups and communities have fought strongly against such discriminations in education, employment and other areas. And today, these ethnic groups are all included under the White category and treated as Americans, without labeling them as Jewish or Irish any more.

However, by looking at the history, I feel the racial data disaggregation in this new act is moving our society backward to create more division and discrimination in this country.

With the memory of being targeted for racial discrimination in the history, we, Chinese immigrants, have been striving to avoid being labeled as Chinese on us and our younger generations. Our kids and our grand kids are born Americans like many other American kids, and they should feel safe and confident to pursue their education, their career and their dreams in this country like every other American. This racial disaggregation legislation would place a permanent racial label on every minority kid, creating basis for potential discrimination in education and employment. We refuse our kids being label as such, as “foreigners”.

To save our kids and other minority kids from the fear of discrimination, to give them the comfort and confidence to pursue their dreams equally as other American kids, I strongly urge the legislators in Minnesota to consider a new Act to protect our kids’ privacy of racial data. One’s race and ethnicity should not be something to be used to harm you in life nor help you in life. Such data shall not be collected and shall not be ever used in education and employment considerations.

Thanks so much for listening!

Appendix C: Online Petition to Stop the Discriminatory Data Disaggregation

- [Petition letter](#)

October 5, 2017

From: the Chinese communities in Minnesota

To: The Honorable Minnesota State Legislators

Re:

Petition to Stop the Discriminatory Data Disaggregation

The Honorable Representatives and Senators,

We, Chinese communities, representing one of the strongest voices from the minority communities in the State of Minnesota, petition to immediately stop the discriminatory data disaggregation, namely the legislative requirement to collect student data by detailed race and ethnicity categories for specific groups.

Under 2017 Minnesota Statutes **120B.31 SYSTEM ACCOUNTABILITY AND STATISTICAL ADJUSTMENTS** and **120B.35 STUDENT ACADEMIC ACHIEVEMENT AND GROWTH**, , Minnesota Department of Education now requires collecting and reporting of disaggregated data from all Minnesota public schools, which include *seven of the most populous Asian and Pacific Islander groups* (including Chinese), *three of the most populous Native groups*, *seven of the most populous Hispanic/Latino groups*, and *five of the most populous Black and African Heritage groups as determined by the total Minnesota population based on the most recent American Community Survey* in addition to the *student categories identified under the federal Elementary and Secondary Education Act, as most recently reauthorized*.

The collection of these detailed disaggregated data (in addition to the federal requirements on seven categories of aggregated racial and ethnic data) will result in a de facto exhaustive Asian American registry as every Asian American's educational performance would be linked to their ethnicity. Leaving the white students all alone, the new statutes seriously undermine the fundamental rights of Asian Americans and other minorities to be treated equally as white students. It has made the entire Chinese community dread the potentially disastrous consequences when such data are abused to support discriminatory policies in many aspects of our society.

Furthermore, such Statutes would create and enforce the stereo-type that Asian Americans are perpetual foreigners. Even if a kid is born in the U.S. and has never set foot in Asia, he or she would be perpetually labeled by his/her ancestor's country of origin. In our Chinese community, there have been real cases that kids became really upset when being singled out and labeled with such ethnical tags. We are deeply concerned that hate or bullying remarks like "go back to your country!" may become justifiable under this discriminatory law.

The sponsors and supporters of this legislation have claimed it is intended to address disparities among the Asian ethnic groups. However, focusing on ethnicity is the wrong as well as overly simplified approach to a complex issue that is caused and more effectively tracked, by socioeconomic factors such as income level, education and motivation of learning as well as by the factor of language spoken at home, etc.

Such new Statutes that promote race and ethnicity data disaggregation would intentionally or unintentionally, gravely threaten the civil liberties of all Americans and seriously divide communities. Therefore, we call for your immediate attention to the voices from us as well as other minority communities in the state against such a policy. We call for new legislative initiatives to repeal or amend the related legislations in order to avoid the hurtful discriminations that our kids are going to suffer from such laws.

While the Minnesota Department of Education is trying to develop guidelines for implementing these legislative requirements, we hereby request that:

- 1) Students and parents shall be clearly provided the option of not disclosing the student's detailed race and ethnicity information beyond the student categories identified under the federal Elementary and Secondary Education Act (as most recently reauthorized) according to the **2017 Minnesota Statutes 120B.31 SYSTEM ACCOUNTABILITY AND STATISTICAL ADJUSTMENTS** Subd. 3. Clause (h) *A school district must inform parents and guardians that volunteering information on student categories not required by the most recent reauthorization of the Elementary and Secondary Education Act is optional and will not violate the privacy of students or their families, parents, or guardians;*
- 2) The Minnesota Department of Education and all the school districts shall make the best efforts to respect the privacy of such information on each student and develop clearly guidance and monitoring procedures on how such information can be used under the applicable law.

I, the undersigned, do hereby state that I make the above petition.

Date	Print Name	Signature	Contact (Email or Phone)	City	Zip code

- Numbers of signature collected as of October 31st, 2017

2017-10-07 Petition to Stop the Discriminatory Data Disaggregatio

QUESTIONS

RESPONSES 870

870 responses

SUMMARY

INDIVIDUAL

Accepting responses

1 of 870

Responses cannot be edited

Petition to Stop the Discriminatory Data Disaggregation

October 5, 2017

From: the Chinese communities in Minnesota
To: The Honorable Minnesota State Legislators

Re:
Petition to Stop the Discriminatory Data Disaggregation

The Honorable Representatives and Senators,
We, Chinese communities, representing one of the strongest voices from the minority communities in the State of Minnesota, petition to immediately stop the discriminatory data disaggregation, namely the legislative requirement to collect student data by detailed race and ethnicity categories for specific groups.
Under 2017 Minnesota Statutes 120B.31 SYSTEM ACCOUNTABILITY AND STATISTICAL ADJUSTMENTS and 120B.35 STUDENT ACADEMIC ACHIEVEMENT AND GROWTH, which were originated from the Bill SF 2597 and Bill HF3042, Minnesota Department of Education now requires the collecting and reporting of disaggregated data from all Minnesota public schools, which include seven of the most populous Asian and Pacific Islander groups (including Chinese), three of the most populous Native groups, seven of the most populous Hispanic/Latino

- List of signatures collected as of October 24, 20107

Appendix D: Local Minnesota Chinese American media reports

- MN Chinese News, October 07, 2017

【明州报道】明州华人抗击明州教育部种族细分会议报道

2017-10-07 明州华人世界



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由明州教育部组织的细分学生种族报表社区反馈研讨会于10月2日晚在明州教育部会议中心召开。

Hispanic/Latino	American Indian	Native Hawaiian/Pacific Islander	Asian	Black	White
Chicano	Cherokee		Asian Indian	African American	
Chicana	Chippewa/Ojibwa (Anishinabe/Ojibwa)		Burmese	Cameroonian	
Guatemalan	Hawaiian		Chinese, except Taiwanese	Ethiopian-Ghana	
Mexican	Other Tribal Affiliated		Filipino	Ethiopian-Other	
Porto Rican			Indonesian	Ghanaian	
Salvadoran			Korean	Libyan	
Taiwanese*			Laotian	Nigerian	
Other Hispanic/Latino			Other Asian	Sudanese	
				Other Black	

本次会议由明州教育部调研与评估主任Jennifer Dugan，政府关系代主任Kate Lynne Snyder及效果评估专员Gayra Ostgaard主持。

明州部分亚裔组织在2016成功游说一些明州众议员和明州参议员（11位民主党和1位共和党）提出种族细分法案而且获得通过，并于今年五月由明州州长Mark Dayton签署法案，正式纳入明州法律，批准在明州公立学校对小学中学学生收集种族细分（白人除外）数据。本次会议是根据明州法律要求，明州教育部专门就在各个学区执行种族细分的信息采集工作来征求意见。明州教育部计划从明年年初起在5个试点学区（St. Paul, Minnetonka, Worthington, Schoolcraft和Community of Peace）开始收集各个族裔（白人除外）的细分数据，然后明年秋季在明州所有学区全面展开收集工作。本次会议内容包括讨论明州教育部为推动收集如此详细的种族细分（白人除外）而准备数据分类表格，给家长的沟通信息和常见问题等议程。

获得此信息之后，大约有50多位富有正义感和关切华人后代利益的热心华人冒着瓢泼大雨，从大双城地区的各地专门赶到到会参加。他们其中有在校学生的父母，有子女长大成人的家长，还有跟随家长前来的小朋友。会议开始前，10多个与会华人轮流在会议厅外面的人行道上举牌抗议，标语牌上写着“NO DIS-AGGREGATION! NO DISCRIMINATION!”，“WE ARE ALL AMERICANS”和“DATA DISAGGREGATION = RACIAL DISCRIMINATION”等口号，向走进教育部会场的人们展示。

这次杯葛和抗击明州教育部细分会议由来自明州华人社区的部分热心华人自发组织。大家发扬草根精神，事先进行了沟通，分享资料，制定了反击的方法策略；决定了在会议中掌握主动，相互支持，主次分明地提问质疑；坚持据理反驳违宪及不合理的条款。组织者还归纳出几个最核心的要害问题，其中包括：明州教育部推出的表格是否推行种族歧视？是否按照法律提供足够的信息给大家提供选择？如何保护学生隐私？教育部如何制定政策确保学区不滥用数据等等。会议中，各位华人家长争相举手提问，强烈地表达了我们华人社区对这个明显带有种族歧视的法案和表格的困惑和愤怒。在后来的分组讨论中，大家更进一步提出了具体的改进意见。

我们华人参加会议的热情和现场质疑令明州教育部的与会官员感到了极大惊讶和震撼。面对我们提出的许多尖锐问题，这些官员并不能当场给出确定的答复。此

次我们明州华人参与会议的人数如此之多，提出的问题如此尖锐，分析表达得如此准确恰当，也使得在场参加会议的几个推动种族细分的组织和族裔代表感到无比惊诧。他们坦言他们第一次直接认识到了来自明州华人社区的强大力量。

这么多的热心华人勇于站出来参与此次明州反细分活动，明确地表达明州华人反对细分的立场和诉求，此一行动使与会的华人都深深感到只要我们华人积极地行动起来，为华人的核心利益和子孙后代的利益而团结一致，通过合理合法的途径，表达我们的诉求，用实际行动争取扭转对华人不利的法规条款，我们的各种地位必将为之改善。

今后我们华人争取正当权益的路还任重道远。目前，明州已经通过了法律要求在教育上进行种族细分，我们华人一定尽最大努力改变这个对华人不公平的法律。在与明州的立法机构和人员进行沟通的同时，我们会继续和明州教育部门交涉，尽量从维护华裔利益的角度来修改和完善相关施行文件，尽力减少明州细分法案对华人孩子们的心灵伤害。

我们呼吁所有的华人积极投入我们争取华人的各项正当权益活动中，加入我们壮大力量，拧成一股绳，同心协力地坚持我们华人公平公正合理的诉求，直至取得令人满意的结果。希望这一切将为我们的子孙后代在美国有尊严地生活打下良好的基础。



http://mp.weixin.qq.com/s/Tb64IvHZAKW0-kJG2j_fZg

11/7/2017





(明州华人反对种族细分行动组供稿)



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- [China Tribune, October 12, 2017](#)

由明州教育部组织的细分学生种族报表社区反馈研讨会于10月2日晚在明州教育部会议中心召开



本次会议由明州教育部研究与评估主任 Jennifer Diagne、政府关系主任 Kate Lynne Snyder 及社区评估专员 Gwyn O'Connell 主持。

明州部分亚裔组织在2016成功游说一些明州众议员和明州参议员(11位共和党人和1位民主党人)提出种族细分法案并获通过。并于今年五月由明州州长 Mark Dayton 签署法案,正式纳入明州法律。他曾在明州公立学校对小学中学学生收集种族细分(白人除外)数据。本次会议是根据明州法律要求,明州教育部专门就在各个学区执行种族细分的信息采集工作征求意见。明州教育部计划从明年年初开始在5个试点学区(School, Minneapolis, Washington, Schokorah 和 Community of Peace)开始收集各个族裔(白人除外)的细分数据,然后明年秋季在明州所有学区全面展开收集工作。本次会议内容包括讨论明州教育部为收集如此详细的种族细分(白人除外)而准备的数据分类表格,向家长的沟通信和意见问题等议题。

获得信息之后,大约有50多位富有正义感和关

华人后代利益的热心华人志愿者代表出面,从大联盟地区的各地专门赶来参加会议。他们其中有在校学生的父母,有子女长大成人后的家长,还有跟家长同来的小朋友。会议开始前,10多个与会华人聚集在会议厅外面的人行道上手举抗议,标语牌上写着“NO DISAGGREGATION NO DISCRIMINATION”,“WE ARE ALL AMERICANS”和“DATA DISAGGREGATION = RACIAL DISCRIMINATION”等口号,向走进教育部会场的人们展示。

这次样稿和倡议明州教育部细分会议由来自明州华人社区的部分热心华人自发组织。大家发扬草根精神,事先进行了沟通,分享资料,制定了反法的方法策略;决定了在会议中掌握主动,相互支持,主动分门地提问质疑;坚持原则反对违法及不合理的条款。组织者们还归纳出几十个核心的重要问题,其中包括:明州教育部推出的表格是否推行种族歧视?是否按照法律提供足够的信息给大家提供选择?如何保护学生隐私?教育部如何制定政策确保学区不滥用数据等等。会议中,

各位华人家长争相举手提问,强烈地表达了我们对这个明显带有种族歧视的法案和表格的困惑和愤怒。在将来的分组讨论中,大家更将进一步提出了具体的改进意见。

我们华人参加会议的热情和现场质询令明州教育部的与会官员感到了极大惊讶和震撼。面对我们提出的许多尖锐问题,这些官员并不能当场给出确定的答复。此次我们明州华人参加会议的人数如此之多,提出的问题如此尖锐,分析表达得如此准确恰当,也使得在参加本次会议的几个亚裔种族细分组织成员代表感到无比惊讶。他们坦言他们第一次直接认识到了来自明州华人社区的强大力量。

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美國法律學博士,明州最高法院與聯邦地區法院執照律師和顧問,曾任明州政府律師和審判監督官,精通各種法律事務,熱忱為社區華人服務。



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- [MN Times, October 20, 2017](#)

明州華人團體積極參政 關心細分學生種族問題

■明州華人反對種族細分行動提供稿



由明州教育局頒發的細分學生種族表被社區反種族研討會於10月2日晚在明州教育局中心召開。

本週會議由明州教育局與評估主任 Jennifer Dugan、政府關係主任 Katie Lynne Snyder 及社區評估員 Gayle Ostgaard 主持。

明州部分亞裔組織在2016成功游說一些明州眾議員和明州參議員(11位民主黨和7位共和黨)提出種族細分法案而且獲得通過, 於今年五月由明州州長 Mark Dayton 簽署法案, 正式納入明州法律, 批准在明州公立學校對中小學學生收集種族細分(白人除外)數據。本週會議是根據明州法律要求, 明州教育局專門就在各個



學校執行種族細分的信息收集工作來征求意见。明州教育局計劃在明年年初起在5個試點學區(St. Paul, Minneapolis, Worthington, Schoolcraft 和 Community of Peace)開始收集各個族裔(白人除外)的細分數據, 然後明年秋季在明州所有學區全面展開收集工作。本週會議內容包括討論明州教育局為收集如此詳細的種族細分(白人除外)而準備數據表格, 給家長的溝通和意見問題等。

獲得此信息後, 大約有50多位富有正義感和關切華人利益和熱心華人團體代表, 從大連地

區的各地專門趕來參加。他們其中有在校學生的父母, 有子女長大成人後的家長, 還有跟隨家長前來的小朋友。會議開始前, 10多個與會華人輪流在會議室外面的人行道上手持抗議, 抗議牌上寫著

“NO DISAGGREGATION! NO DISCRIMINATION!”

“WE ARE ALL AMERICANS” 和

“DATA DISAGGREGATION = RACIAL DISCRIMINATION”

等口號, 向進進教育局的人們表示。

這次抗議和抗由明州教育局分會分會由明州華人社區的部分熱心華人自發組織。大家發揚果敢精神, 事先進行了溝通, 分享資料, 制定了反種族細分策略; 決定在會議中掌握主動, 相互支持, 並分別向地廳廳長、副廳長和副廳長表達不合理的條款。組織者們還列出幾個最核心的要點問題, 其中包括: 明州教育局提出的表格是否推行種族歧視? 是否按照法律提供足夠的信息給大家提供選擇? 如何保護學生隱私? 教育如何制定政策確保學區不濫用數據等。會議中, 各位華人家長爭相舉手提問, 熱烈地表達了我們華人社區對這個明顯帶有種族歧視的法案和表格的憤怒和憤慨。在最後的分組討論中, 大家更進一步提出了具體的改進意見。

我們華人參加會議的熱情和積極態度令明州教育局的官員感到極大驚訝和震撼。面對我們提出的許多問題, 這些官員並不能當場給出確定的答復。此次我們明州華人參與會議的人數如此之多, 提出的問題如此尖銳, 分析表達得如此確切, 也使得在場參加會議的幾個推動種族細分的組織和與會代表感到無比挫敗。他們坦言他們第一次直接认识到了來自明州華人社區的強大力量。

這么多的熱心華人勇於站出來參與此次明州反種族細分活動, 明確地表達明州華人反對種族細分的立場和訴求, 此一行為與會的華人都深深感到只要我們華人積極地行動起來, 為華人的核心利益和子孫後代的利益與團結一致, 通過合理合法的途徑, 表達我們的訴求, 用實際行動爭取種族對華人不利的不合理條款, 我們的各種地位必將為之改善。

今後我們華人爭取正當權益的路還任重道遠。目前, 明州已經通過了法律要求在教育上進行種族細分, 我們華人一定盡最大努力改變這個對華人不公平的法律。在與明州的立法機構和人員進行溝通的同時, 我們會繼續和明州教育局交涉, 盡量從維護華裔利益的角度來修改和完善相關施行文件, 減少對明州細分法案對華人孩子們的傷害。

我們呼籲所有的華人和僑胞加入我們爭取華人的各項正當權益活動中, 加入我們壯大力量, 形成一股繩, 同心協力地堅持我們華人公平公正合理的訴求, 直到取得令人滿意的結果。希望這一切將為我們的子孫後代在美國有尊嚴地生活打下良好的基礎。

他立志為弱者抱不平

華裔王善忠 (Shen Wang) 在明尼蘇達州州長戴頓 (Mark Dayton) 任下, 今年9月15日當選為第七司法區 (7th Judicial District) 首位亞裔法官, 年僅40歲的主審官, 其專業與司法服務經驗, 尤其受到戴頓讚賞。鮮為人知的是, 專業領域備受敬重的他, 卻曾是露宿公園的遊民。王善忠說, 流落街頭曾令人情冷暖與社會不公, 他立志為弱者打抱不平。

王善忠6日接受華文媒體採訪時表示, 他的「多元經驗」與他的成長背景有關。王善忠的父親是由山東到美國的華僑, 母親則是韓國人。四歲時父母離異, 王善忠因此跟著爸爸到台灣住了多年, 九歲時他又隨父親到美國開餐館。

18歲時, 他因為與爸爸發生衝突, 憤而离家出走。王善忠回憶, 一開始他沒有地方住, 公園就成了他的「居所」。他盡管很辛苦, 但他告訴自己不能失敗, 要活下去。王善忠說, 最難熬的時刻是「對未來失去希望」, 所以他不願想太多, 把時間都拿去打工, 開始存了一點錢, 他租下地下室作為居所。才終於稍微安定下來。

因處境艱難, 他盡可能地與社會不公, 因此也激發他為弱者打抱不平的決心。這樣的日子過了兩年後, 他接受芝加哥姑姑的資助, 進入芝加哥州立大學攻讀政治學, 畢業後又到明尼蘇達大學完成法律學位。

取得學位後, 他當律師檢查13年,「檢察官的工作就是追求正義, 而比起那些案, 他訴他奴隸 (sex trafficking) 等相關案件, 更有成就感」。王善忠解釋, 將承人這平穩之生涯, 死者也無法復生, 但如果能協助性侵犯受害者, 不僅可以將受害者

帶回, 還能讓受害者重新生活。

王善忠認為, 正義與法律與情。他說, 法官對同一案件的判決可能不同, 因此身為法官, 品格與觀點很重要。王善忠從過去起訴犯罪的經驗, 到之後擔任法官, 對他分辦對錯幫助很大。而他也過去因苦悶, 也讓他富有同情心, 願意給犯人機會改過。

在美國長大的王善忠, 青少年時期也曾經歷身份認同問題, 他的心得是「學會做自己, 負責任, 不為別人而活, 不要在乎他人批評, 保持內心平靜」。他還提到, 自己的人生哲學是「你要怎麼對待你, 你就怎麼對待人」, 如果大家都這樣做, 社會問題會少很多。

已有兩女的王善忠, 是個愛家的好男人。他談到



太太快樂, 人生就幸福。王善忠開心的說, 太太是韓裔是台灣人, 當年結婚時介紹認識, 幾次相處他很快知道她就是與他建立幸福家庭的人。蔡佩軒目前在芝加哥 (St. Cloud) 的中文沉浸式學校教書, 她利用是全家最喜歡的休閒活動。

來源: 世界日報

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Edina 診所:

6545 France Avenue S, Suite 290, 周一、二、四、五、六、日: 8:00-5:00

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Attachment 4: Compiled Notes from December 13, 2017 Stakeholder Meeting

Community Feedback Session - Large Group Report Out Notes

1. Put together FAQ for American Indian population
2. Impact funding/Multi-racial
3. Can the default be American Indian?
4. On the form itself, make it clear people are being asked to answer all of the questions
5. Include the tribes in Minnesota
6. How will this impact funding?
7. How will this impact WBWF reporting?
8. Can question 2 be question 1 on the data collection form?
9. Question 2 and 2a ask federal first whereas state is self-identification
10. When all districts do this, the impact will be huge
11. Data won't accurately be reflected
12. Six hundred students identified as American Indian or Alaska Native vs 300 in the public data doesn't reflect the reality. What about SPED and Discipline data?

Data Collection Form

Pluses/Positives: What is working well? What do you like about the form?

- Color
- Likes “this student associates”

Wishes/Concerns: What is problematic? What don’t you like about the form?

Questions? Suggestions?

- There was a discussion of including tribes (Ho Chunk, Mahnommen) versus the three Census categories.
- This information will be difficult to collect from parents. Few parents will return this form.
- Schools will need to work to inform parents of how to identify, particularly if they want to be reported as solely Native American.
- Preserving the legacy count is important.
- All of these definitions are complicated. There should be better options for kids.
- Central and South American tribes do not have federal recognition from the United States government. Their concerns are different from North American tribes. North American tribes have treaty rights.
- How will this impact World’s Best Workforce?
- There is a scarcity of resources at schools. Will this lead to moving resources away from certain students?
- The arrows are unclear. They imply that you stop when you answer a question yes (“If no, then proceed to question x. . .” implies that you stop if yes).
- Native American classification and Federal Funding tied to Accountability.
- Federal codes went into law 2008.
- MARSS Reporting 2011.
- Paragraph 2, front page, question 2a is required for state Indian Education Funding Purposes.
- Color
- American Indian presented first – alphabetically
- Concerned over the length of the whole form; and literacy level of parents (parents busy – will they read it?)
- Find form confusing; not clear that if you say “yes” to #1 that you should be answering the rest of the questions (to identify the multiracial families/students)
- Concerns over implications for funding for American Indian students
- What does “community recognition” mean and who does the recognizing?
- Lumping North and South American together.
- 39,000 student forms all at once?
- Difference affiliation and community recognition
- Asking kids to hide who they are.
- Deny a part of themselves while creating a welcoming environment
- Confusing them
- I don’t want to be a f’n number.
- The law changes every year
- How do you target to “other tribal affiliation”
- “profiling” at school?
- Making kids choose sides of the family
- Skew the data (600 in program and MARSS shows 300)
- What is the difference between tribal affiliation or community recognition?

- You're asking kids to hide who they are.
- Law will/could change for the next 3–5 years; the more detailed groups may be tied to other data.
- How do you target services for people who mark "other"?
- Why aren't there more detailed groups under White or Native Hawaiian/Pacific Islander?
- How do we not lose students with two or more races?
- Can there be a citizenship question vs. affiliation or community recognition?
- How will this impact the 506 forms?
- Does every form have to match? Will this impact every form?
- Reporting won't be accurate.
- Clarifications needed on federal and state definitions
- Add federal funding implications to form
- Concern how this form impacts 506 forms
- Concern about the federal multi race selections leading to less funding
- Would like a similar default as Hispanic and to lead form with AI
- Need to use data for intervention
- Include Write-in option for Tribes not listed
- Link to 506 form if selecting yes

Parent Letter Form

Pluses/Positives: What is working well? What do you like about the form?

- Targeted programs can be ideal, but...
- *Data driven decision making* = This will make the data inaccurate

Wishes/Concerns: What is problematic? What don't you like about the form?

Questions? Suggestions?

- In the first paragraph, "providing targeted programs and services to help all students succeed" implies that you would treat students differently based on their ethnicity.
- At end of 1st paragraph, include the default district practice (somebody makes a guess, default to white, use the old enrollment data, etc.?)
- Use the letter as a vehicle to share with American Indian parents that declining to respond may have fiscal implications/students may not be identified as American Indian
- Different definitions of American Indian/Alaska Native
- 506 forms
- How much funding will be taken away?
- Funding for portions of students served based on the definition
- Targeted services will require more money
- How will students decide if parents are different races
- CPS/fostered/adoptive
- Data driven decision making = *This will make the data inaccurate*

FAQ Form

Pluses/Positives: What is working well? What do you like about the form?

- Like having a FAQ document to share with parents.

Wishes/Concerns: What is problematic? What don't you like about the form?

Questions? Suggestions?

- If the intent is targeted?
- Middle Eastern – those students have very different needs, just like American Indian/Alaska Native
- How do we expect our students to NOT GET LOST in the two or more races?
- Why would you give wrong public data?
- *Overarching comment: test sites seem very urban and very white. Schoolcraft is K-8 so no grad rates there
- Also concerns over length of document—very busy and literacy level of parents
- Can families go back and update their answers if they are worried about their responses?
- Highlight/bold what districts do if parents decline
- Clarify that at least one response is tied to state funding
- What is “community affiliation”?
- Prefer “USA” vs. “North America” (don't want to include Canada/First Nations)
- Concerns over reporting American Indian and another group. The default should be they are American Indian.
- Use the same guidance that is used for Hispanic/Latino; if any indication of American Indian, the student is considered American Indian.
- District fill in: Add best practice steps to aid in district
 - Sibling
 - Community groups
 - Indian Aid
 - Title 507 form
- Too many words
- Won't be used by parents
- Too high of a reading level for parents
- Would like a FAQ for American Indian Families
- Won't get too much feedback from pilot sites due to lower populations in those districts

Attachment 5: List of Groups for Outreach

3M

African Economic Development Solutions

African American Leadership Forum

African Immigrant Services

AGA Medical

American Israel Public Affairs Committee (AIPAC)

American Indian Opportunities Industrialization Center (OIC)

Anne Sullivan Community Center

Bois Forte Band of Chippewa

Bois Forte Tribal Government

Bright Horizons

BroadCom Corporation

Coalition of Asian American Leaders

Comcast

Council for Minnesotans of African Heritage

Council on Asian Pacific Minnesotans

Daugherty Business Solutions

Detroit Lakes Native American Education and Programs

DuPont

Ed Allies

Eden Prairie Chinese Association

Entegris

Ewald Consulting

Fond du Lac Band of Lake Superior Chippewa

Frogtown Neighborhood Association

Generation Next

Grand Portage Band of Lake Superior Chippewa

Grand Portage Reservation Tribal Council

Handke Family Center

Hennepin County Medical Center

Hispanic Advocacy and Community Empowerment through Research

Hmong American Partnership

Indian Education Program Plan (MDE)

Iowa State University

Isaiah Minnesota (MN)

Karen Organization of Minnesota

Leech Lake Band of Ojibwe

Lower Sioux Indian Community

Macalester College

Medtronic

Metropolitan State University

Minnesota Intercollegiate Athletic Conference (MIAC) - Urban Indian Advisory Board

Minnesota Indian Affairs Council (MIAC) Board of Directors

Minnesota Indian Education Association (MIEA) Board of Directors

Mille Lacs Band of Ojibwe
Minnesota Alliance With Youth
Minnesota Cambodian Communities Council
Minnesota Children's Defense Fund
Minnesota Chinese Association for Science and Technology
Minnesota Council on Latino Affairs
Minnesota Education Equity Partnership
Minnesota Humanities Center
Minnesota Indian Affairs Council (MIAC)
Minnesota International Chinese School (MICS)
Minnesota Minority Education Partnership
Minnesota Parent Teacher Association (PTA)
Minnesota State Colleges and Universities
Minnesota State Council on Asian Pacific Minnesotans
Minnesota Urban League
Native American College Fair
Neighborhood Development Center
Oromo Chamber of Commerce
Parents of African American Student Advisory Council (PAASAC at St. Paul Public Schools)
Prairie Island Indian Community
Prime Therapeutics
R & D Systems
Red Lake Nation
Regions Hospital
Restorative Therapies Group
Reviving the Islamic Sisterhood of Empowerment
Rong Yang CPA PC
Saint Paul Indian Education Department
Seagate Technology
Securian Financial Group
Serve Minnesota
Shakopee Mdewakanton Sioux Community
Siemens Energy
Somali American Parent Association (SAPA)
Southeast Asia Resource Control Center
St. Jude Medical
St. Cloud State
St. Cloud National Association for the Advancement of Colored People (NAACP)
St. Kate's
Students for Education Reform
TCF Bank
Tribal Nations Education Committee
University of Minnesota
University Of Northwestern St Paul
Upper Sioux Community
US Bank
Valspar
Veritas Technologies LLC
White Earth Nation

List of Districts for Outreach

Anoka Hennepin Schools
Augsburg Fairview Academy
Bagley School District
Bemidji Area Schools
Bloomington Public Schools
Brainerd Public Schools
Burnsville-Eagan-Savage School District
Carlton Public Schools
Cedar Mountain Schools District
Centennial Schools
Columbia Heights Public Schools
Community of Peace Academy
Elk River-Otsego-Rogers-Zimmerman School District
Elk River Public Schools - American Indian Education
Farmington School District
Forest Lake School District
Hastings
Hopkins
Inver Grove Heights Community Schools
Jefferson Community School
Lakeville Public Schools
Minneapolis Public Schools
Minneapolis Public Schools - Indian Education Department
Minnetonka Schools
Morris Area Schools
Mounds View Public Schools
North St. Paul-Maplewood Oakdale
Osseo Public Schools
Richfield Public Schools
Robbinsdale Area Schools
Rochester Public Schools
Rosemount-Apple Valley-Eagan Public School
Roseville Area Schools
Shakopee
South St Paul Public Schools
South Washington County Schools
St. Cloud Area Schools
St. Francis
St. Louis County District
White Bear Lake Area Schools
Worthington School District

Attachment 6: Racial and Ethnic Demographic Designation Form (Draft)

Student's First Name _____ Student's Middle Name/Initial _____

Student's Last Name _____ Student's Date of Birth _____

Student's District/School _____

Parent Name _____ Date _____

Parent Signature _____

Please respond to the questions below based on the race/ethnic category(ies) with which this student associates and return the completed form to his or her school of enrollment. Providing this information is optional and refusal to respond will not impact enrollment in the school.

Federal law requires school staff to complete Questions 2, 3, 4, 5, 6, and 7 based on the best information they have available. Question 1 is required for state funding purposes and school staff are required to complete this question based on the best information they have available. It is recommended that a district will collect for all students the required information by using one of the following procedures in the following order:

- A. parent or guardian identification;
- B. age-appropriate student self-identification, when parent or guardian identification is not an option;
- C. if parent, guardian, or student self-identification methods are not possible, sight counts administered by the principal or designee, pursuant to written guidelines developed by the district.

School staff are not required to assign students to the more detailed ethnic groups listed in questions 2a., 3a., 4a., or 5a. however the school is required to request the information in order to comply with Minnesota Statutes passed during the 2017 legislative session.

The purpose of collecting each group, how the information will be used and not used, and how the more detailed groups were identified can be found on the accompanying FAQ Document.

Please respond to all the questions below.

Q1. Does the student identify as American Indian or Alaska Native as defined by the state of Minnesota? The state of Minnesota definition includes persons having origins in any of the original peoples of North America and maintain cultural identification through tribal affiliation or community recognition. ***This question is needed to calculate state aid/funding.***

- ☐ Yes
- ☐ No

Q2. Is the student American Indian or Alaska Native as defined by the federal government? The federal definition includes persons having origins in any of the original peoples of North and South America (including Central America), and who maintains a tribal affiliation or community attachment. (Federal Register, Vol. 72, No. 202/Friday, October 19 2007/Notices/59274)

- ☐ Yes

2a. *If yes, please select one or more of the following groups/categories. You may select more than one group. (Optional)*

- | | |
|--|--|
| <input type="radio"/> Anishinaabe/Ojibwe | <input type="radio"/> Other American Indian Tribal Affiliation |
| <input type="radio"/> Cherokee | <input type="radio"/> Decline to indicate |
| <input type="radio"/> Dakota/Lakota | <input type="radio"/> Unknown origin |

- ☐ No (If no, please move on to question 3.)

Q3. Is the student Asian as defined by the federal government? The federal definition includes persons 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. (Federal Register, Vol. 72, No. 202/Friday, October 19 2007/Notices/59274)

- ☐ Yes

3a. *If yes, please select one or more of the following groups/categories. You may select more than one group. (Optional)*

- | | |
|------------------------------------|---|
| <input type="radio"/> Asian Indian | <input type="radio"/> Korean |
| <input type="radio"/> Burmese | <input type="radio"/> Vietnamese |
| <input type="radio"/> Chinese | <input type="radio"/> Other Asian |
| <input type="radio"/> Filipino | <input type="radio"/> Decline to indicate |
| <input type="radio"/> Hmong | <input type="radio"/> Unknown origin |
| <input type="radio"/> Karen | |

- ☐ No (If no, please move on to question 4.)

Q4. Is the student Black or African American as defined by the federal government? The federal definition includes persons having origins in any of the Black racial groups of Africa. (Federal Register, Vol. 72, No. 202/Friday, October 19 2007/Notices/59274)

☐ Yes

4a. *If yes, please select one or more of the following groups/categories. You may select more than one group. (Optional)*

- | | |
|--|---|
| <input type="radio"/> African-American | <input type="radio"/> Somali |
| <input type="radio"/> Ethiopian-Oromo | <input type="radio"/> Other Black |
| <input type="radio"/> Ethiopian-Other | <input type="radio"/> Decline to indicate |
| <input type="radio"/> Liberian | <input type="radio"/> Unknown origin |
| <input type="radio"/> Nigerian | |

☐ No (If no, please move on to question 5.)

Q5. Is the student Hispanic/Latino as defined by the federal government? The federal definition includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race. (Federal Register, Vol. 72, No. 202/Friday, October 19 2007/Notices/59274)

☐ Yes

5a. *If yes, please select one or more of the following groups/categories. You may select more than one group. (Optional)*

- | | |
|------------------------------------|---|
| <input type="radio"/> Colombian | <input type="radio"/> Salvadoran |
| <input type="radio"/> Ecuadorian | <input type="radio"/> Spaniard/Spanish/Spanish-American |
| <input type="radio"/> Guatemalan | <input type="radio"/> Other Hispanic/Latino |
| <input type="radio"/> Mexican | <input type="radio"/> Decline to indicate |
| <input type="radio"/> Puerto Rican | <input type="radio"/> Unknown origin |

☐ No (If no, please move on to question 6.)

Q6. Is the student Native Hawaiian or Other Pacific Islander as defined by the federal government? The federal definition includes persons having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands. (Federal Register, Vol. 72, No. 202/Friday, October 19 2007/Notices/59274)

☐ Yes (If yes, please move on to question 7.)

☐ No (If no, please move on to question 7.)

Q7. Is the student White as defined by the federal government? The federal definition includes persons having origins in any of the original peoples of Europe, the Middles East, or North Africa. (Federal Register, Vol. 72, No. 202/Friday, October 19 2007/Notices/59274)

☐ Yes

☐ No

Attachment 7: District Parent Letter (Draft)

Sample Parent Letter for Districts

1-16-2018

Dear Parent or Guardian:

In an effort to assist Minnesota districts in providing targeted programs and services to help all students succeed, districts are required by law to request more detailed student ancestry or ethnic origin information based on Minnesota's largest groups beyond what has been collected at the federal level since 2008. Providing the more detailed information is optional and refusal to respond will not impact enrollment in the school.

Our district has been asked to collect this information for the 2018-19 school year. As a result of the new legislation, you are asked to report your child's data. Starting with the 2019-20 school year, all schools in Minnesota will collect this information using these updated categories. It is likely you will be asked to fill out a revised form next year as well. The Minnesota Department of Education will continue to incorporate feedback from the public into this form.

To report your child's information, please complete the enclosed form and return it to [LOCATION] by [DATE]. Note: You may choose to not indicate any of the more detailed selections by marking the "decline to indicate" option(s). You may also choose to mark an "other" option if you do not see your group represented. School staff are not required to assign students to these detailed groups.

Please complete and return the enclosed form. For more information about the reporting categories, please contact [NAME] at [PHONE NUMBER].

Sincerely,

[SUPERINTENDENT NAME]

Attachment 8: Frequently Asked Questions (Draft)

1-16-2018

Why is this information being collected?

In 2017, the Minnesota State Legislature required districts and charters to collect more detailed student data on the seven race and ethnicity categories set by the U.S. Department of Education for specific groups. For more information, refer to [Minnesota Statutes 2017, 120B.35, subdivision 3](https://www.revisor.mn.gov/statutes/?id=120B.35) (<https://www.revisor.mn.gov/statutes/?id=120B.35>).

The goal of collecting more detailed ancestry or ethnic origin information is to better understand and identify educational needs of all students in Minnesota. The more detailed groups were identified by the Minnesota State Demographer based on the [U.S. Census Bureau's classification/coding system](https://www.census.gov/topics/population/race/about.html) (<https://www.census.gov/topics/population/race/about.html>). Data for all groups represented come from the American Community Survey in either the 1-year or 5-year rolling average dataset. For more information, refer to the [American Community Survey](https://www.census.gov/programs-surveys/acs/) page (<https://www.census.gov/programs-surveys/acs/>).

When will this information be collected?

2017-2018: The initial collection of more detailed ancestry or ethnic information will first be deployed in five partner districts: Community of Peace Academy, Minnetonka Public Schools, Schoolcraft Learning Community, St. Paul Public Schools, and Worthington Public Schools. These partner districts will likely send the data collection form home in the fall/winter of the 2017-18 school year in conjunction with enrollment forms for the 2018-19 school year. The five partner districts will report this detailed student ancestry or ethnic origin information to the Minnesota Department of Education (MDE) in the beginning of the 2018-19 school year.

2018-2019: Based on lessons learned with the five partner districts, all other districts and charters will likely send an expanded version of the data collection form home in the fall/winter of the 2018-19 school year with enrollment forms for the 2019-20 school year. All districts will then report this detailed student ancestry or ethnic origin information to the department during the 2019-20 school year.

This information will be reviewed and updated every five years from the date of statewide implementation for all districts, including the five initial partner districts beginning in school year 2024-25.

Is every family asked to answer these questions?

Yes. For the 2018-2019 school year, every family with a student in one of the partner districts attending grades K-12 is being asked to answer these questions. You may also be asked to fill out a revised form next year, as the department will continue to incorporate feedback from the public into this form.

Students are asked in question 1 to indicate if they identify as American Indian or Alaska Native as defined by the state of Minnesota. This is defined as persons having origins in any of the original peoples of North American and maintain cultural identification through tribal affiliation or community recognition. This question is needed to calculate state aid.

Six federal race/ethnicity codes appear as the “Yes/No” questions on the form and include questions 2, 3, 4, 5, 6, and 7. The federal data collection of race/ethnic data requires a two part question. Question five asks if the student is Hispanic/Latino. The federal government considers Hispanic/Latino to be an ethnicity. The remaining questions (2, 3, 4, 6, and 7) require at least one of the following be selected: American Indian, Asian, Black or African American, Native Hawaiian/Pacific Islander, or White. The federal government considers these groups to be races.

Families do not have to select one of these categories, but if they do not, districts are required by federal law to identify and report this information for students based on the best information they have available. It is recommended that a district will collect for all students the required information by using one of the following procedures in the following order:

- A. parent or guardian identification;
- B. age-appropriate student self-identification, when parent or guardian identification is not an option;
- C. if parent, guardian, or student self-identification methods are not possible, sight counts administered by the principal or designee, pursuant to written guidelines developed by the district.

This information is not tied to state funding. If a family selects Hispanic or Latino, a student is reported as Hispanic or Latino to the federal level. For example, if a student is indicated as Hispanic or Latino and White, they would be reported as Hispanic or Latino in the accountability system. If a family selects more than one of the following: American Indian, Asian, Black or African American, Native Hawaiian/Pacific Islander, or White the student is reported to the federal level as “two or more races.” For example, if a student is indicated as both American Indian or Alaska Native and White, they would be reported as “two or more races” in the accountability system. This group is often referred to as the seventh federal race/ethnicity code and does not explicitly appear on the form.

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

Minnesota (MN) more detailed ancestry/ethnicity codes: These categories include questions 2a, 3a, 4a, and 5a but their collection is not a federal requirement. This information is being collected because Minnesota Statutes 2017, 120B.35, subdivision 3 as discussed above in the “Why is this information being collected?” section.

- Anishinaabe/Ojibwe; Cherokee; Dakota/Lakota; Other American Indian Tribal Affiliation
- Colombian; Ecuadorian; Guatemalan; Mexican; Puerto Rican; Salvadoran; Spaniard/Spanish/Spanish-American; Other Hispanic/Latino
- Native Hawaiian or Other Pacific Islander
- Asian Indian; Burmese; Chinese; Filipino; Hmong; Karen; Korean; Vietnamese; Other Asian
- African-American; Ethiopian-Oromo; Ethiopian-Other; Liberian; Nigerian; Somali; Other Black

What if families do not complete this form?

If families do not fill out the form, districts are required to make a determination on the federal race/ethnicity questions based on the best information they have and to submit the information to the Minnesota Department of Education (MDE). Districts are not required to make a determination on the more detailed ancestry/ethnicity codes.

Why are some groups given the option of having more detailed groups, but others are not?

The more detailed groups are dictated by [Minnesota Statutes 2017, 120B.35, subdivision 3](https://www.revisor.mn.gov/statutes/?id=120B.35) (<https://www.revisor.mn.gov/statutes/?id=120B.35>).

Under this legislation, “Native Hawaiian or Other Pacific Islander” and “White” are not given the option of reporting more detailed groups. Under state data practices law, [Minnesota Statutes Section 13.05, subd. 3](https://www.revisor.mn.gov/statutes/?id=13.05) (<https://www.revisor.mn.gov/statutes/?id=13.05>), MDE is also required to limit use and sharing of private data only to what is necessary to administer and manage authorized programs or mandated by the federal government.

How will this information be collected?

To give all families the opportunity to more specifically identify themselves, districts are encouraged to send the data collection form and parent letter home with every student.

What if families have already identified using the previous categories?

If families have already provided this information using previous forms, they are being asked to re-submit the form. This is because the Minnesota Department of Education is streamlining and centralizing its data collection systems. Previously reported racial/ethnic categories will not be carried over to the streamlined data collection system because previously reported information could differ across systems.

How will this information be used at the state level?

- The more detailed racial/ethnic information will be used for state data collection and reporting purposes.
- In accordance with state legislation, the Minnesota Department of Education reports this information at the group level for assessment and graduation data for the first year. Future reporting may include group level information for growth indicators, preparation for postsecondary academic and career opportunities, school safety, and students' engagement and connection at school.
- A student's racial/ethnic information will also be combined with that student's special education status, English learner status, gender, and other demographic information. Future reports are likely to provide group reports that allow for multiple combinations or selections of this information. For example, a comparison of graduation rates for Chinese male non-English learners to Somali female English learners.
- Reporting will be suppressed for any group smaller than 10 students, including results where the remainder of the student body is smaller than 10 students.
- Individual student records are protected by the Family Education Records and Privacy Act (FERPA). FERPA provides guidance around how schools share student information. For more information, refer to the [FERPA](https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html) page (<https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>).

Will this information be reported to the federal government?

Only federally required race/ethnicity information from questions one through six (American Indian or Alaska Native; Asian; Black or African American; Hispanic/Latino; Native Hawaiian or Pacific Islander; White) will be report to the federal government. The more detailed ethnic information will not be reported to the federal government.

How will this information NOT be used?

- This information will not be reported at the individual student level.
- This information will not be tied to immigration status at the state or federal level and will not be checked elsewhere.
- This information will not impact whether or not your student can attend school.
- While the information is collected for individual students, it will only be reported for groups of students. The reports provided by the department are required to protect every student's identity, and the group of students must be large enough so that no individual student can be identified.
- This information will not be tied to teacher performance or evaluation.
- This information will not impact college entrance.

Who will have access to this information at the local level?

This form and the information it contains will be entered into data systems by someone with proper data access and training at the administrative office of your student's school. School personnel responsible for facilitating completion of and collecting the data forms, may also view the completed form as it is transported to the administrative office.

Attachment 9: The Minnesota Case for Disaggregated Data

In the land of 10,000 lakes, we are certainly capable of seeing and rationalizing the Asian American community as the “model minority” – with everyone in the group being above average. This term, originally coined to describe earlier immigrant communities who achieved great success, such as the Japanese and Chinese, has become the lens through which many Americans, including our policy makers, view particular communities and justify public policy decisions. As policy making becomes increasingly data driven, it is imperative that Minnesota does not fall into the trap of using data as Mark Twain used to say, “damn lies and statistics.”

Nationally, the “model minority” conversation has been driven by the extraordinary successes of the Japanese and Chinese Americans, Korean Americans, and Asian Indians. These groups, highly educated, native born, financially successful, and with personal, family, business wealth, and a high percentage of home ownership are the backbone of the model minority myth. Their success skews the averages up. Minnesota’s Asian Pacific stories, however, are different. There is significant diversity within Minnesota’s Asian Pacific community, but these differences within the community often aren’t reflected in our data.

The Asian Pacific Minnesotan community is descended from more than forty nationalities and is arguably the most diverse community in the state. Minnesotans of Hmong, Vietnamese, Lao, Cambodian, Bhutanese, and Karen heritage make Minnesota’s Asian Pacific community different from those in any other state – ours is majority refugee experienced community. This majority brings a completely different experience and story to the table. Minnesota is home to the largest Karen community outside of Burma and the second largest Hmong community in the nation. These refugee experienced communities do not have generations of family wealth and stability, a tradition of higher education, homeownership, and established support networks. Many are experiencing formal education for the first time with its structural and institutional barriers and challenges. Their realities include facts such as:

- 47% of Cambodian Minnesotans identify as Limited English Proficient (LEP)
- 72% of Vietnamese Minnesotans have less than a bachelor’s degree
- 27% of Hmong Minnesotan families with children live in poverty
- 18% of Burmese (Karen) own their homes

Our policies have to reflect these multiple realities, not just echo the convenient model minority myth.

Seeing the stark contrast between population statistics and community realities, in 2012 the Council on Asian Pacific Minnesotans (“the Council”) issued an education assessment report titled “Facts, Not Myth.” The Council disaggregated the Minnesota Comprehensive Assessment (MCA) data by language spoken at home, ethnicity, income level, English proficiency, and mobility. Through this analysis, the Council provided new and concrete understandings about the academic performance of Asian Pacific students in Minnesota. The findings from the disaggregated data directly counter the widely held misconception that all Asian Pacific students were performing at levels well above other minority students and only slightly below White students and thus, were not in need of additional and targeted support.

In reality, our refugee-experienced, low-income, English learning, and highly mobile Asian Pacific students experience significant educational disparities, and in some cases, have lower proficiency rates than other racial groups. These vulnerable sub groups within the community are lost in current statistical measures and have yet to be properly considered in our policy making decisions. Contrary to the model minority stereotype, disaggregated data from the Council's 2012 report give us the following results:

- 50.3% and 40% of refugee experienced Asian Pacific students were proficient in reading and math, respectively.
- Less than 17% of Burmese (mostly Karen) students were proficient in reading or math, the lowest of any ethnic or racial student group.
- Less than 59% and 40% of Lao, Hmong, and Cambodian students were proficient in reading and math, respectively.

These numbers confirm what researchers, community members, and educational professionals have long recognized: the reporting of aggregated data for Asian Pacific students is misleading and masks educational disparities experienced within the Asian Pacific Minnesotan community. These stakeholders and others believe that in order for our state and nation to effectively address the root causes of disparities, we must collect and disseminate disaggregated data. Without this paradigm shift, the disparities Asian Pacific Minnesotans disproportionately experience will continue to be covered up by misleading information, making it difficult to allocate attention, resources, and support for those who need it most.

Every one of our children should have above average chances of achieving their dreams. We can increase the chances that they will succeed by letting go of our long-held assumptions about our cultural communities and collecting data we currently do not have. Let us celebrate the great successes of the few leading groups, but not be lulled into a false sense of understanding that all of our Asian Pacific communities are thriving. When Minnesota standardizes the collection and dissemination of disaggregated data, we position ourselves to make decisions that lift up all Minnesotans. In doing so, we move some of our most vulnerable communities from being misidentified as model minorities to being understood, and meaningfully considered in policy discussions regarding the many disparities crises facing Minnesota.



Attachment 10: Coalition of Asian American Leaders Letter

January 16, 2018

Dr. Brenda Cassellius
Commissioner of Education
Minnesota Department of Education (MDE)

Dear Commissioner Cassellius:

The passage of the All Kids Count Act in 2016 was historic and made Minnesota among a few states in the nation to require its education agency to disaggregate student data. Our communities are anxious to see that it is implemented as intended. There are profound resource implications to communities who have needs which have gone unnoticed. Collecting disaggregated data and reporting it is an affirmation of the needs of those communities, and moves us towards ensuring that their children will receive the kinds of responsive support they need.

Thank you for your leadership in moving the All Kids Count Act into implementation. We and a number of organizations representing diverse racial communities and education policy groups have and continue to support the All Kids Count Act because we understand that having better data is good for families and good for education leaders who must decide what to do with the limited resources they have to ensure every child has a great education. So, on behalf of those organizations and countless parents and community leaders, we want to share that we still firmly support the All Kids Count Act.

Having better data to understand successes and disparities along lines of race and ethnicity, English language ability, foster care status, military family status, gender, low-income status, and disability means we will all do better for our kids. Specifically, for Asian Minnesotans ensuring their inclusion in equity discussions means having the ability to see and understand more nuanced data; when they are lumped into the aggregate category of Asians, their community's disparities become hidden. Unfortunately, neither the U.S. nor the Minnesota Department of Education require data collection beyond the aggregate label of "Asian" therefore, data for specific ethnic communities is not available across the state or at the majority of school districts where there are large Asian American populations.

For African Minnesotans, being grouped together in the category of black misses the intersectionality between race and ethnicity. When ethnicity is being considered along with race, it is easier to direct specific resources needed to treat disparities that target ethnic groups within a race. Furthermore, it is essential to consider the black English Learner community of students that are being neglected because of the lack of disaggregated data in the aggregated label of "Black or African-American". These students have specific needs that their African-American counterparts may not, such as having to learn and speak English along with their native languages. Also, when students who identify as Black/African American are not given a subgroup option within this race question, it makes identification of recent immigrant groups from Somalia, Liberia, Ethiopia and other African countries within this broad racial group more challenging. Consequently,

proxies such as language or other indicators are used to identify unique cultural groups and immigrant populations.

Minnesotans of Southeast Asian, Hmong, Latino and Somali descent comprise some of the state's youngest population and are among some of the fastest growing communities in the state and in the country. For example, since 2000, Asian Minnesotans have grown by 76% in Minnesota to a population of 256,000. Furthermore, 60% of Minnesota's Asian population are Southeast Asian Americans who are refugees or descendants of refugees. This is unlike any other state's Asian population where Southeast Asians are a much smaller proportion of the population. **Southeast Asian students along with other students of color and Indigenous students often face significant educational challenges resulting in low enrollment in rigorous courses and high numbers of students unprepared for college, work and life after graduation.** While we've been able to collect anecdotal stories and have some information because of existing data, implementing data disaggregation will only help everyone better understand achievement and needs of students in all communities.

We firmly support data disaggregation because it will help us and education leaders better understand who makes up the diverse racial and ethnic groups here in Minnesota, what unique needs exist, and what community assets may be uplifted to solve education challenges. It's always been about how we support every student to succeed regardless of income, ethnicity, immigration and language, but we can't do that unless we have better disaggregated data.

Sincerely,

Jeffrey Hassan, Executive Director
African American Leadership Forum (AALF)



Abdullah Kiatamba, Executive Director
African Immigrant Services (AIS)



Linda Her, Director
Asian American Organizing Project (AAOP)



Ange Hwang, Executive Director
Asian Media Access



Lyda Morgan, Executive Director
Minnesota Cambodian Communities Council



Ekta Prakash, Executive Director
CAPI USA



Lee Pao Xiong, Director
Center for Hmong Studies, Concordia University St. Paul



Bo Thao-Urabe, Network & Executive Director
Coalition of Asian American Leaders (CAAL)



Michelle J. Walker, Executive Director
Generation Next



Bao Vang, CEO
Hmong American Partnership



Txong Pao Xiong, Executive Director
Hmong Cultural Center (HCC)



Eh Tah Khu & Alexis Walstad, Co-Executive Directors
Karen Organization of Minnesota (KOM)



Sunny Chanthanouvong, Executive Director
Lao Assistance Center of Minnesota (LAC)



José González, Executive Director
LatinoLEAD



Chanida Phaengdara-Potter, Director
The SEAD Project (Southeast Asian Diaspora)



Raj Chaudhary, Chief Operating Officer
SEWA-AIFW (Asian Indian Family Wellness)



Kelly Drummer, President and CEO
Tiwahe Foundation





2800 University Ave SE | Suite 200
Minneapolis, MN 55414

January 16, 2018

Dr. Brenda Cassellius
Commissioner of Education
Minnesota Department of Education (MDE)
1500 Highway 36 West
Roseville, MN 55113

Dear Commissioner Cassellius;

As you know, we are eager to see Minnesota move forward with a strong policy around student data disaggregation. When used well, data can be incredibly powerful. Whether it's policymakers trying to understand what works for specific student groups, and should therefore be replicated, or parents seeking to engage in deep conversations about their local schools, having access to accurate, nuanced information is important.

The All Kids Count Act is an important step toward ensuring more useful data that recognizes our currently invisible student populations. We are writing today to highlight what we see as the key issues to watch as the Minnesota Department of Education moves forward with implementation of the law.

- 1) Providing Clarity on Federal vs. State Requirements. Federal law requires all states capture and report student data by race (white, black, American Indian, Native Hawaiian/Pacific Islander, Asian, and mixed race), ethnicity (Hispanic/Latino), and several other categories such as gender, free and reduced lunch status, foster care status, English learner status, disability, military family status, etc. When this information is not provided by guardians, districts have policies on how to report the data to the federal government such as requiring educators make their best guess or defaulting to a specific category like white or not in a military family.

At the same time, Minnesota law empowers guardians to choose the more specific racial or ethnic categories that best describe their children's identities, or to leave this information blank as they see fit. Should a guardian choose not to complete this information, neither the federal government nor the state require districts to provide the information.

As the Minnesota Department of Education works with schools across the state, the distinction between what is required under federal law and what the state requests from

families is essential. MDE should provide clear notices to districts explaining that subcategories are optional, and must not be completed by educators if parents opt out of providing the information.

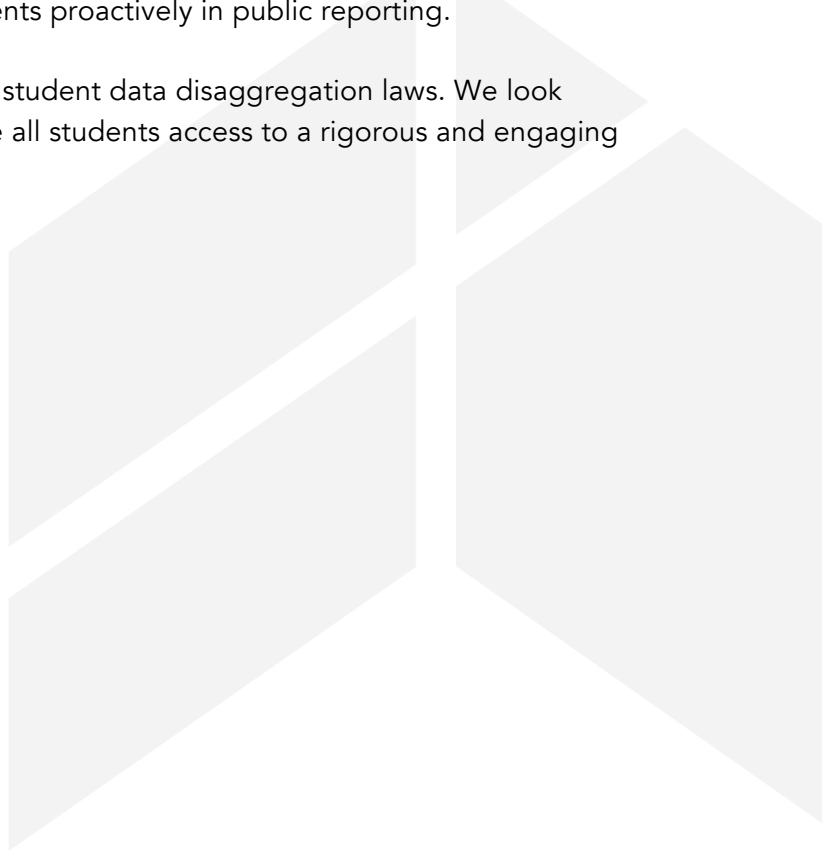
- 2) Disaggregating Across Multiple Indicators. It is important that the state work to disaggregate student data in areas beyond proficiency and graduation rates. Dismissal data, indicators used for federal accountability such as chronic absenteeism, and other student data sets should be disaggregated further and presented to the public.
- 3) Public Reporting. MDE should work to make disaggregated data as accessible as possible. Rather than creating another resource or report, MDE should ensure that users of existing tools and reports, including the state report card/forthcoming data dashboard, have easy access to disaggregated data.
- 4) Access to Cross-Tabulated Data. The All Kids Count Act requires cross-tabulation of major identities. We suggest that MDE provide public information on our most populous intersectional identities such as 2,000 or more students in the state. For example, MDE should include groups such as African-American students with disabilities or low-income white students proactively in public reporting.

Thank you again for your work to implement student data disaggregation laws. We look forward to working with you as we guarantee all students access to a rigorous and engaging education.

Sincerely,

A handwritten signature in black ink that reads "Daniel Sellers". The signature is fluid and cursive, with the first name "Daniel" and last name "Sellers" clearly distinguishable.

Daniel Sellers





Minnesota Indian Affairs Council

RESOLUTION 12012017_04

WHEREAS, the Minnesota Indian Affairs Council Membership consists of representatives of the eleven federally-recognized Indian Tribes located within the State of Minnesota, members of the legislature, commissioners from the state departments, and

WHEREAS, the Minnesota Indian Affairs Council is a liaison between the state and local units of government in the delivery of services to the American Indians in the State of Minnesota, and

WHEREAS, American Indian/Alaska Native populations are often identified by the various federal and state agencies as a minority and the smallest ethnic group in the United States; and

WHEREAS, steps have been taken by American Indian/Alaska Native leadership to educate federal and state agencies about the unique role of tribes and to promote Indian self-determination on a government-to-government basis and to be consulted on issues significant to Indian Country; and

WHEREAS, American Indian/Alaska Native students, families, and staff in the public Pre K-12 systems are impacted by the student registration and identification processes, which use a variety of the federal and state registration forms and program eligibility criteria for specific purposes; i.e. title VI of the Every Student Succeeds Act, Indian Education 506, Johnson O'Malley Certificate of Indian Blood, Impact Aid, Minnesota Indian Education formula aid, Minnesota Automated Reporting Student System (MARSS), self-identification, Achievement and Integration aid, and an array of other forms for services; and

WHEREAS, American Indian/Alaska Native people are citizens of, or descendants of citizens of sovereign nations, and possess a unique political status that is not racial or ethnic in nature; and

WHEREAS, the Minnesota Department of Education has historically utilized a definition of American Indian students defined as “persons having origins in any of the original peoples of North America and maintain a cultural identification through tribal affiliation or community recognition”; and

WHEREAS, the newly reauthorized federal education law, the Every Student Succeeds Act (ESSA) mandates that the Minnesota Department of Education now utilize the U.S. Department of Education definition of American Indian student for certain program eligibility and achievement data reporting, which identifies American Indian students as “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”; and

WHEREAS, Minnesota Statutes 120B.35 also mandates that the Minnesota Department of Education further disaggregate American Indian/Alaska Native students into “three of the most populous Native Groups” according to the most recent version of the American Community Survey; and

WHEREAS, the mandated use of these definitions and conflicting student identification procedures undermine the status of American Indian/Alaska Native students as citizens of, or descendants of citizens of sovereign Tribal Nations first, further confuses families and students, and contributes to misidentification, underrepresentation, complicated program and funding eligibility determinations, and inaccurate reporting of achievement, attendance, dropout, and graduation data for American Indian/Alaska Native students in Minnesota; and

WHEREAS, the 2007 U.S. Department of Education guidance on racial and ethnic data allows states to create racial or ethnic subcategories if the state finds a distinction valuable; and

WHEREAS, the Minnesota Indian Affairs Council finds it valuable to identify all American Indian/Alaska Native students accurately, and shall support the development of a priority political designation of “American Indian/Alaska Native”

that is intentionally incorporated into student identification forms and processes if such students and families elect to identify themselves specifically as American Indian/Alaska Native;

THEREFORE LET IT BE RESOLVED, that the Minnesota Indian Affairs Council urges the Minnesota Department of Education to determine a way to continue utilizing the historical state definition of American Indian student and not the current federal definition, not only to more accurately count and identify American Indian/Alaska Native students, but also to determine eligibility for all state and federal programs and funding qualification purposes; and

BE IT FURTHER RESOLVED, that the Minnesota Indian Affairs Council urges the Minnesota Department of Education establish a procedure to ensure all American Indian/Alaska Native students are identified as American Indian/Alaska Native first, including those that may be identified or categorized as multi-racial, “two or more races”, or those that may be ethnically identified as Hispanic/Latino, and;

BE IT FINALLY RESOLVED, that the Minnesota Indian Affairs Council requests that the Minnesota Department of Education work in conjunction with Minnesota’s Tribal Nations to urge federal agencies to adopt necessary changes to the student definitions to more accurately capture and report achievement and graduation data.

CERTIFICATION: We do hereby certify that the foregoing resolution was duly presented and acted upon by a vote of ____For, ____Against,____Silent at Regular Meeting of the Minnesota Indian Affairs Council, a quorum present, held on December 1, 2017 at Shakopee, Minnesota.

Robert L. Larsen, Chairman
Minnesota Indian Affairs Council

Norman Deschampe, Secretary / Treasurer
Minnesota Indian Affairs Council



Attachment 13: Minnesota Indian Affairs Council Letter

**161 St. Anthony Ave, Suite 919
Saint Paul, MN 55103**

January 17, 2018

Kevin McHenry
Assistant Commissioner
Minnesota Department of Education
1500 Highway 36 W.
Roseville, MN 55113

Dear Mr. McHenry,

We want to thank you and the many staff members at the Minnesota Department of Education (MDE) for organizing and facilitating multiple community feedback sessions related to the new legislative requirement to further disaggregate student identification data for race and ethnicity. These feedback sessions provided a space for American Indian education professionals, parents, community members, tribal education directors, administrators, and youth to voice their concerns regarding the implementation of this new process.

The Minnesota Indian Affairs Council (MIAC) understands that we live in a data-driven society, and realizes that it's very difficult to make public policy decisions without accurate and timely data. We also recognize the numerous benefits to further disaggregating race and ethnicity data, including the ability highlight unmet needs, and to more appropriately target resources to those communities that may need additional supports to address achievement disparities. Unfortunately for American Indian students, families, and tribal nations in Minnesota, there is no benefit to disaggregation as the law is currently written. In fact, it is the position of MIAC that this process further marginalizes American Indian students, families, and tribal nations.

The current legislation and related forms disregard entire tribal nations, tribes, and communities, and certainly does not capture the diversity of tribal nations here in Minnesota. Since Minnesota Statutes 120B.35 mandates that data be disaggregated for the "three most populous Native groups" identified from the most recent American Community Survey, MIAC is curious how additional resources will be targeted to Dakota students, Ojibwe students, or Cherokee students, should they be identified as a student group requiring additional support? Minnesota is home to eleven separate, distinct, sovereign tribal nations, and students representing over 60 tribal nations attend public schools throughout Minnesota. Further dividing American Indian students into a few select tribal subcategories will not yield any meaningful data that can be drawn upon to improve student achievement and graduation rates.

This is nothing new in the field of American Indian education. American Indian students, families, and staff in the public PK-12 systems are disproportionately impacted by the numerous student registration and identification processes, which use a variety of federal and state registration forms and program eligibility criteria for specific

purposes; i.e. Title VI (Indian Education) of the Every Student Succeeds Act (ESSA), Indian Education ED 506 form, Johnson O'Malley Certificate of Indian Blood, Title VII (Impact Aid) of ESSA, Minnesota Indian Education formula aid, Achievement and Integration aid, self-identification, and an array of other forms for services. Adding yet another identification process that in many ways conflicts with the identification processes listed above, has high potential to confuse and frustrate parents, and could further contribute to misidentification and underrepresentation of American Indian students. Conflicting student identification processes could also impact funding eligibility, which is based solely on student counts.

MIAC has been following this issue closely, and recently passed two resolutions which include recommendations to improve American Indian student identification at both the state and federal level. For purposes of implementation of the state data disaggregation law, MIAC recommends the following:

1. Incorporate an American Indian citizenship question on the Data Collection Form – The justification for this is that American Indian people are citizens of, or descendants of citizens of sovereign nations, and possess a unique political status that is not racial or ethnic in nature. The current question undermines the status of American Indian students as citizens of, or descendants of citizens of sovereign Tribal nations first. Much like the Hispanic/Latino question captures unique ethnicity, a citizenship question would accurately capture and count ALL American Indian students, including those that may be identified or categorized as American Indian alone, “two or more races” (multi-racial), or those that may also be ethnically identified as Hispanic/Latino.
2. Incorporate an equitable option on the Data Collection form to collect data for all 567 federally-recognized tribes in the nation – There are currently 567 federally-recognized tribes that all occupy uniquely different geographic locations, speak and write different Native languages, and practice unique cultural traditions and ceremonies. MDE and independent school districts in Minnesota have the responsibility under state and federal law to meet the unique culturally-related and academic needs of American Indian students. Collecting accurate, comprehensive, disaggregated data on all tribal nations and communities means that providers and policymakers can better meet their needs, native languages can be revitalized and preserved, and tribal nations will have accurate data to help inform their own policy and program decisions.
3. At a minimum, disaggregate data for the eleven separate sovereign tribal nations here in Minnesota. Specific tribal nation-level student data has been a priority of tribal nations and elected tribal leaders in Minnesota for a long time. In addition, tribal education departments are uniquely equipped with additional support resources, and can be a partner in helping to meet the needs of American Indian students, but they need accurate data that reflects their own specific nation in order to do so.

The Minnesota Indian Affairs Council appreciates the opportunity to provide feedback on this issue, and looks forward to working with MDE and with the legislature to create a process that is appropriate and meaningful for American Indian students and tribal nations in Minnesota.

Sincerely,

Dennis W. Olson

Executive Director



Bois Forte

TRIBAL GOVERNMENT

Attachment 14: Bois Forte Band
Resolution No. 61-2018

RESOLUTION NO. 61-2018

- WHEREAS,** the Bois Forte Band of the Minnesota Chippewa Tribe is a federally recognized Indian Tribe organized under the Indian Reorganization Act of 1934 and operating under the Revised Constitution and Bylaws of the Minnesota Chippewa Tribe; and
- WHEREAS,** the lawful governing body of the Band is the Bois Forte Reservation Tribal Council and it is authorized to operate programs and to provide services that promote the health, education and general well-being of the Band and its members; and
- WHEREAS,** the Minnesota Department of Education is under a statutory mandate that is part of the Every Student Succeeds Act (ESSA) to use a federal definition of "American Indian student" for certain program eligibility and achievement data and that definition includes students who identify their origins as being "original peoples of North and South America (including central America); and
- WHEREAS,** in addition, Minnesota law (Minn. Stat. 120B.35) mandates that the Minnesota Department of Education further disaggregate data on students who identify as American Indian/Alaska Native into the three most populous Native groups in the state according to another survey source; and
- WHEREAS,** the Bois Forte Tribal Reservation Tribal Council agrees with the Minnesota Indian Affairs Council Resolution No. 12012017_04 which, among other things, calls on the Minnesota Department of Education to use the definition of American Indian student that includes "persons having origins in any of the original peoples of North America and maintain a cultural identification through tribal affiliation or community recognition"; and
- WHEREAS,** the Bois Forte Reservation Tribal Council is concerned that the use of confusing and conflicting definitions of American Indian student has the potential to misidentify some students who should, in fact, be counted for programs and funding intended for the education of American Indian students; and

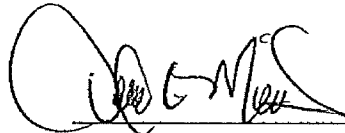
NOW THEREFORE BE IT RESOLVED that the Bois Forte Reservation Tribal Council hereby calls on the state government to consult with the Bois Forte Reservation Tribal Council and other tribal governments to find ways, including modification of the disaggregation mandate of Minn. Stat. 120B.35, to identify Indian students and avoid circumstances in which data is gathered and used to push Indian students to the margins of the state and national educational systems.

CERTIFICATION

We do hereby certify that the foregoing resolution was duly presented and enacted upon by a vote of 4 for, 0 against, 0 abstaining, at a special meeting of the Bois Forte Tribal Council, a quorum being present, held on January 17, 2018 at Nett Lake, Minnesota.



Cathy Chavers
Chairwoman



David C. Morrison, Sr.
Secretary-Treasurer



INDEPENDENT SCHOOL DISTRICT NO. 707

Nett Lake School

James Varichak, Superintendent/Principal



Brandon Benner, Chairman
Jane Villebrun, Treasurer
Beverly Steel, Director

13090 Westley Drive
Nett Lake, Minnesota 55772
(218) 757-3102
FAX (218) 757-3330
www.nettlakeschool.org

Marilyn Geshick, Vice Chairman
Karlene Chosa, Clerk
Tara Geshick, Director

January 24, 2018

Dr. Brenda Cassellius
Commissioner, Department of Education
1500 Highway 36 West
Roseville, MN 55113

Dear Commissioner,

As the American Indian Parent Advisory committee/Local Indian Education Committee/JOM Committee for Independent School District 707 located in Nett Lake and within the boundaries of the Bois Forte Reservation, it is our delegated duty to be the voice for all American Indian students and families the fall under the school districts jurisdiction.

This letter is to serve as documentation of our concern that the Minnesota Department of Education is under a statutory mandate that is part of the Every Student Succeeds Act (ESSA) to use a federal definition of "American Indian student" for certain program eligibility and achievement data and that definition includes students who identify their origins as being "original peoples of North and South America (including central America). In addition, Minnesota law (Minn. Stat. 120B.35) mandates that the Minnesota Department of Education further disaggregate data on students who identify as American Indian/Alaska Native into the three most populous Native groups in the state according to another survey source.

The American Indian Parent Advisory committee/Local Indian Education Committee/JOM Committee of ISD 707 does hereby agree with the Bois Forte Tribal Council Resolution 61-2018, as well as the Minnesota Indian Affairs Council Resolution No. 12012017_04 which, among other things, calls on the Minnesota Department of Education to use the definition of American Indian student that includes "persons having origins in any of the original peoples of North America and maintain a cultural identification through tribal affiliation or community recognition". In addition, it is our concern that the use of confusing and conflicting definitions of American Indian student has the potential to misidentify some students who should, in fact, be counted for programs and funding intended for the education of American Indian students.

Therefore, the American Indian Parent Advisory committee/Local Indian Education Committee/JOM Committee of ISD 707 hereby calls on the state government for Tribal Consultation to find ways, including modification of the disaggregation mandate of Minn. Stat. 120B.35, to identify Indian students and avoid circumstances in which data is gathered and used to push Indian students to the margins of the state and national educational systems.

Respectfully,

Simona Benner
Chairwoman