Forum Guide to

PLANNING FOR, COLLECTING, AND MANAGING DATA ABOUT STUDENTS DISPLACED BY A CRISIS
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PLANNING FOR, COLLECTING,
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STUDENTS DISPLACED
BY A CRISIS
National Cooperative Education Statistics System

The National Center for Education Statistics (NCES) established the National Cooperative Education Statistics System (Cooperative System) to assist in producing and maintaining comparable and uniform information and data on early childhood, elementary, and secondary education. These data are intended to be useful for policymaking at the federal, state, and local levels.

The National Forum on Education Statistics (Forum) is an entity of the Cooperative System and, among its other activities, proposes principles of good practice to assist state and local education agencies in meeting this purpose. The Cooperative System and the Forum are supported in these endeavors by resources from NCES.

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September 2019
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This publication was prepared in part under Contract No. ED-IES-16-Q-0009 with Quality Information Partners, Inc. Mention of trade names, commercial products, or organizations does not imply endorsement by the U.S. government.

Suggested Citation

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Foreword

The National Forum on Education Statistics (Forum) is pleased to present the Forum Guide to Planning for, Collecting, and Managing Data About Students Displaced by a Crisis. The purpose of this resource is to provide timely and useful best practice information for collecting and managing data about students who have temporarily or permanently enrolled in another school or district because of a crisis. It includes lessons learned and provides recommendations for collecting and maintaining data about students who may move into or out of a school or district during and following a crisis.

This publication builds upon Crisis Data Management: A Forum Guide to Collecting and Managing Data about Displaced Students, published in 2010. It includes case studies and real-world examples; updates best practices related to collecting and managing education data before, during, and after a crisis based on the severe impacts of recent weather events and other crises; and addresses innovations in education data technology that have changed how education agencies collect, manage, and disseminate data.

This resource focuses on crisis data management, with a specific emphasis on data on displaced students, from the perspective of the education data community. It does not attempt to serve as a comprehensive disaster recovery planning tool, nor does it address all aspects of crisis response. Rather, it focuses on data management activities intended to minimize the impact of a crisis and help educational organizations quickly preserve or restore services to students following a crisis.

Objectives

This publication is intended to help state and local education agencies (SEAs and LEAs) collect and manage education data before, during, and after a crisis. It aims to

- focus on data management activities intended to minimize the impact of a crisis;
- help education organizations quickly preserve or restore education and services to students by making available accurate data; and
- identify best practices for collecting and maintaining data about students who may move into or out of an education agency during and after a crisis.

Audience

This publication is intended for SEA and LEA leadership and staff whose primary role is in information systems and education data. This audience includes sending agencies (i.e., states, districts, and schools) that experience a natural disaster or crisis and receiving agencies that enroll students who have been displaced by a crisis. This resource is also useful to stakeholders with an interest in crisis data management and data on displaced students, including federal agencies, state legislatures, office staff, disaster recovery and planning teams, parents, and members of the public.
In This Resource

- **Chapter 1** explains the importance of crisis data management, defines the terms “crisis” and “displaced student,” and raises key issues identified during past crises.
- **Chapter 2** recommends planning activities that should occur prior to a crisis, including the formation of a disaster recovery team, the assessment of existing data systems, the implementation of placeholders for data about displaced students, the maintenance of related data elements, the review of data collection frequency and timing, the consideration of associated data policies and procedures, and the facilitation of communication and training.
- **Chapter 3** reviews the crisis declaration and response planning process, underscores the importance of communication, and provides recommendations regarding the restoration and recovery of data systems and data on displaced students after a crisis, including systems assessment and data retrieval, collection, sharing, and exchange.
- **Chapter 4** describes effective data reporting and evaluation following a crisis, including ongoing data sharing, federal and state reporting, auditing expectations, accountability requirements, student progression and attainment, suspension or termination of temporary systems, and process evaluations.
- **Chapter 5** identifies several challenges specifically related to managing data about displaced students, including the implications of statewide student information systems (SISs), the timing of the crisis, the implementation of a displaced status indicator, the application of data codes, and the reconciliation and recertification of data.
- **Chapter 6** presents role-specific tip sheets for key education agency stakeholders and a suggested timeline.
- **Appendix A** provides a synopsis of relevant federal laws as they relate to privacy and homelessness and affect displaced students.
- **Appendix B** provides aggregate information on each state’s use of displaced student status indicators and crisis codes.
- **Appendix C** contains a checklist of tasks and activities to be undertaken before, during, and after a crisis.

National Forum on Education Statistics

The work of the National Forum on Education Statistics (Forum) is a key aspect of the National Cooperative Education Statistics System (Cooperative System). The Cooperative System was established to produce and maintain, with the cooperation of the states, comparable and uniform education information and data that are useful for policymaking at the federal, state, and local levels. To assist in meeting this goal, the National Center for Education Statistics (NCES) within the Institute of Education Sciences (IES)—a part of the U.S. Department of Education (ED)—established the Forum to improve the collection, reporting, and use of elementary and secondary education statistics. The Forum includes approximately 120 representatives from state and local education agencies, the federal government, and other organizations with an interest in education data. The Forum deals with issues in education data policy, sponsors innovations in data collection and reporting, and provides technical assistance to improve state and local data systems.
Development of Forum Products

Members of the Forum establish working groups to develop guides in data-related areas of interest to federal, state, and local education agencies. They are assisted in this work by NCES, but the content comes from the collective experience of working group members who review all products iteratively throughout the development process. After the working group completes the content and reviews a document a final time, publications are subject to examination by members of the Forum standing committee that sponsors the project. Finally, Forum members review and formally vote to approve all documents prior to publication. NCES provides final review and approval prior to online publication. The information and opinions published in Forum products do not necessarily represent the policies or views of ED, IES, or NCES. Readers may modify, customize, or reproduce any or all parts of this document.

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This online publication was developed through the National Cooperative Education Statistics System and funded by the National Center for Education Statistics (NCES) within the Institute of Education Sciences (IES)—a part of the U.S. Department of Education (ED). The Crisis Data Management Working Group of the National Forum on Education Statistics is responsible for the content.

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Acknowledgments

Members of the Crisis Data Management Working Group would like to thank everyone who reviewed or otherwise contributed to the development of the *Forum Guide to Planning for, Collecting, and Managing Data About Students Displaced by a Crisis*, including the following:

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Glossary of Common Terms

**Crisis:** A natural or man-made event that causes the disruption of school-level activities and the temporary or permanent displacement of students. This definition does not distinguish between natural disasters and other types of crises, such as acts of terrorism, as long as they temporarily or permanently disrupt educational activities. This definition does not include events that involve a single student or situations where a student is experiencing difficulties such as mental, emotional, or psychological distress.

**Data Steward:** An individual (or individuals) responsible for ensuring the quality of statistical information generated by an organization. Data stewards also generally assume responsibility for enhancing the information reporting process through staff development and by sharing data expertise with the various offices and programs that produce data and information in an organization.

**Disaster:** A sudden event causing often widespread and substantial damage, loss, distress, or destruction. See also *Federal Emergency Management Administration (FEMA)-Declared Disaster* and *Major Disaster*.

**Disaster Recovery:** The process, policies, procedures, and capabilities related to restoring or continuing critical business activities in an organization after a natural or man-made disaster. With respect to education agencies, it is the capacity of entities with sufficient capabilities necessary to assist schools affected by an event or emergency in restoring the learning environment; the physical environment; business operations; and the social, emotional, and behavioral health of the educational community. With respect to data, it is the process, policies, and procedures for preserving and regaining access to data—records, hardware, software—and communications.

**Disaster Recovery Planning:** A subset of a larger process known as continuity of operations planning (COOP) that focuses on the creation and validation of a practiced logistical plan for recovering and restoring interrupted critical functions following a disaster or extended disruption. With respect to data, it is the preparation for the resumption of applications, data, access, hardware, communications, networking, and other information technology infrastructure following a disaster.

**Disaster Recovery Team:** High-level agency staff responsible for minimizing the impact of a crisis and preserving or restoring educational services to students during and following a crisis.

**Displaced Student:** A student who was enrolled, or eligible for enrollment, but has temporarily or permanently enrolled in another school or district because of a crisis-related disruption in educational services. While this guide does not address situations where one individual student is displaced from their home or school, this broad definition could reasonably be made more specific by an education agency. States that experience a high number of natural disasters might wish to add, for example, a requirement that the crisis must be a FEMA-declared disaster.

**Displaced Student Status Indicator:** An indicator that flags a student who was enrolled, or eligible for enrollment, but has temporarily or permanently enrolled in another school or district because of a crisis. This indicator is usually associated with a specific crisis code in a student record.
Federal Emergency Management Administration (FEMA)- Declared Disaster: An event that FEMA has formally recognized as a disaster based on its predefined criteria. FEMA uses several factors to determine a disaster’s severity, magnitude, and impact. When FEMA reviews requests for major disaster assistance under the Stafford Act, it considers the following primary factors, as well as other relevant information, in making a recommendation to the President on whether supplemental disaster assistance is warranted:

- Public Assistance Program
  - Estimated cost of the assistance
  - Localized impacts
  - Insurance coverage in force
  - Hazard mitigation
  - Recent multiple disasters
  - Programs of other federal assistance

- Individual Assistance Program
  - Concentration of damages
  - Trauma
    - Large numbers of injuries and deaths
    - Large-scale disruption of normal community functions and services
    - Emergency needs such as extended or widespread loss of power or water
  - Special populations
  - Voluntary agency assistance
  - Insurance
  - Average amount of individual assistance by state

More information on FEMA is available through the web pages listed in the Reference List and Related Resources sections.

Homeless Children and Youths: The term homeless children and youths, as defined in the McKinney-Vento Act,

- means individuals who lack a fixed, regular, and adequate nighttime residence; and
- includes
  - children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;
  - children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
  - children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
  - migratory children who qualify as homeless because the children are living in circumstances described above.

More information on the McKinney-Vento Act is available through the web pages listed in the Reference List and Related Resources sections.
Homeschooling: The provision of compulsory education to children at home, typically by parents but sometimes by tutors, as an alternative to traditional public/nonpublic schooling in a formal setting. Homeschooling is a legal option for parents who wish to provide their children with a different learning environment than exists in traditional schools.

Major Disaster: As defined by the Stafford Act, any natural catastrophe (including any hurricane, tornado, storm, high water, wind-driven water, tidal wave, tsunami, earthquake, volcanic eruption, landslide, mudslide, snowstorm, or drought) or, regardless of cause, any fire, flood or explosion, in any part of the United States, which in the determination of the President causes damage of sufficient severity and magnitude to warrant major disaster assistance under this act to supplement the efforts and available resources of local, state governments and disaster relief organizations in alleviating the damage, loss, hardship, or suffering caused thereby. (FEMA 2016).

Nonpublic School: An institution that provides educational services and is primarily funded by nonpublic funds (e.g., tuition). The nonpublic school community includes private, religious, and independent schools, as well as home schools.

Outlying Areas: The United States Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.

Public Charter School: A school providing free public elementary and/or secondary education to eligible students under a specific charter granted by the state legislature or other authority, and designated by such authority to be a charter school.

Public School: A school controlled and operated by publicly elected or appointed officials and deriving its primary support from public funds.

Relocated Student: A student who has permanently relocated following a crisis and is no longer considered a displaced student.

Student Record: An education document or system maintained by the district in which a student is enrolled. Student records typically contain demographic data, school enrollment, grade assignments, promotions and retentions, grades, credits earned, participation in special programs, test scores, and other student information.

Temporary Data Exchange: An agreement of limited duration between two organizations that permits data sharing. Depending on the nature of the agreement, the receiving agency generally is expected to destroy or return the data at the end of a specified period of time.

United States: The 50 states, the District of Columbia, and the Commonwealth of Puerto Rico.
Acronyms Used in This Resource

ANSI: American National Standards Institute

CCD: Common Core of Data

CEDS: Common Education Data Standards

COOP: Continuity of Operations Planning

DHS: U.S. Department of Homeland Security

ED: U.S. Department of Education

EIA: Temporary Emergency Impact Aid for Displaced Students

FEMA: Federal Emergency Management Agency

FERPA: Family Educational Rights and Privacy Act

FIPS: Federal Information Processing Series

GETS: Government Emergency Telecommunications Service

GNIS: Geographic Names Information System

HIPAA: Health Insurance Portability and Accountability Act

HHS: U.S. Department of Health and Human Services

IEP: Individualized Education Program

IES: Institute of Education Sciences

LEA: Local Education Agency

MoU: Memoranda of Understanding

NCES: National Center for Education Statistics

POC: Point of Contact

SEA: State Education Agency

SIS: Student Information System

SPPO: Student Privacy Policy Office
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Chapter 1.

Introduction to Crisis Data Management

The Devastating Impact of Disasters

In 2017, the U.S. experienced 16 unique weather and climate disasters that each resulted in over $1 billion in losses—a new annual record. These billion-dollar disasters include three tropical cyclones, eight severe storms, two inland floods, a crop freeze, drought, and wildfires. The total cost of all weather and climate disasters in 2017 was approximately $306 billion. This was the costliest year for weather and climate disasters, at the time of this publication.


The 2017 California wildfire season was, at the time, the most destructive on record. According to the California Department of Forestry and Fire Protection (CAL FIRE), roughly 1.25 million acres of land were impacted by over 9,100 recorded wildfires (CAL FIRE 2019). On the worst day of the 2017 wildfire season, nearly 600 schools with approximately 260,000 total students were closed due to wildfires, hazardous smoke, and evacuations (Torlakson 2018a). The 2018 California wildfire season was even more widespread (CAL FIRE 2019) and included the Camp Fire in Butte County, California, which was the deadliest and most destructive wildfire in state history (Baldassari 2018). Fourteen schools were damaged or destroyed by the Camp Fire, and all 99 schools in Butte County were closed for more than 3 weeks (Torlakson 2018b). In the aftermath of the Camp Fire, 28,032 students in 87 schools in Butte County returned to their school of origin, 2,208 students in nine schools were housed at temporary school sites, and 1,520 students in grades 7–12 were provided independent study on a temporary basis (Torlakson 2018b).

Two of the costliest Atlantic hurricanes, Hurricanes Irma and Maria, hit the Caribbean islands in September 2017 and displaced thousands of families from the region. Hurricane Maria had a particularly severe impact on Puerto Rico, including its students and schools. School-age children between 5 to 17 years old missed an average of 78 days of school in the year after Maria struck, and more than five in six students with special needs experienced an interruption in special education services (Youth Development Institute of Puerto Rico 2018). Within one year of the hurricane, student enrollment in Puerto Rico’s public schools dropped by 12 percent, one in ten students with special needs had not yet received services, and nearly 25 percent of the island’s public schools were permanently closed at the end of the 2017-18 school year due to falling enrollment and financial concerns (Ujifusa 2018, Youth Development Institute of Puerto Rico 2018). The impact of Hurricane Maria was not limited to students who resided within the path of the hurricane. According to evacuee data collected by the Federal Emergency Management Agency (FEMA), Puerto Ricans who were displaced by the hurricane had settled in almost every state and major region in the United States (Hinojosa, Román, and Meléndez 2018).
Hurricanes Irma and Maria also hit the U.S. Virgin Islands (USVI), resulting in severe destruction that crippled the territory’s school infrastructure. The destruction greatly impacted the USVI school system and caused major delays in school openings, scheduling, and finding available space to accommodate students and teachers. One of the greatest challenges for the USVI school system was meeting the increased demand for student transcripts from students who relocated to schools throughout the United States. While the standard protocol was for each school to fulfill transcript requests, many schools lacked Internet access in the immediate aftermath of Hurricane Irma.

To assist with the cost of educating students displaced by Hurricanes Harvey, Irma, and Maria and the 2017 California wildfires, the U.S. Department of Education (ED) Temporary Emergency Impact Aid for Displaced Students Program awarded over $434 million to 27 state education agencies (SEAs) in the United States (including the outlying areas) (ED, Office of Elementary and Secondary Education, Office of Safe and Healthy Students 2018).

The Importance of Crisis Data Management

Floods, fires, epidemics, winter storms, chemical spills, and other crises can have a significant effect on communities, schools, and students. When a crisis shuts down a school facility or otherwise disrupts school-level activities, educators must be prepared to respond in a manner that quickly restores a safe and stable learning environment. These emergencies can happen anywhere and large-scale crises can affect schools and districts all over the country. During the 2017 hurricane season, the immediate demand for data about students displaced by Hurricanes Harvey, Irma, and Maria overwhelmed many school districts that had gained or lost students because of the hurricanes. These types of crises are frequent and their effects on school operations and management can be severe.

Effective crisis data management is critical to SEAs and local education agencies (LEAs). Education data need to be collected and managed in an appropriate and timely manner to facilitate a wide range of educational programs and services. Crisis data management helps ensure that students are accurately accounted for and promptly placed in an appropriate instructional program. In this age of data-driven decisionmaking, monitoring displaced students requires good planning, effective communications, and high-quality data. School leaders need accurate data to inform student placement, deliver appropriate services, adjust school management practices, allocate disaster-relief funding, and track student performance. Student data enable timely student transfers out of a school that has been impacted by a crisis and student enrollment into a new school. Thus, crisis data management is important for both sending and receiving states, districts, and schools.

What Is a Crisis?

In this resource, a crisis is defined as “a natural or man-made event that causes the disruption of school-level activities and the temporary or permanent displacement of students.” This definition does not distinguish between natural disasters and other types of crises, such as acts of violence or terrorism, as long as they temporarily or permanently disrupt educational activities. This definition does not include events that involve a single student or situations where a student is experiencing difficulties such as mental, emotional, or psychological distress. In addition to disrupting school-level activities, a crisis may also disturb routine data management operations.

While this resource defines a crisis in broader terms than FEMA’s definition of a major disaster, FEMA data highlight how frequently communities face crises in our nation. Figure 1 shows an average of 58 FEMA-declared disasters annually from January 1, 2000, through December 31, 2018.
FEMA (2018a) considers several factors when evaluating requests for major disasters to determine a disaster’s severity, magnitude, and impact.

The Public Assistance Program considers the following factors:

- Estimated cost of federal and nonfederal public assistance
- Impact of the disaster at the county and local government levels, as well as at the American Indian and Alaskan Native Tribal Government levels
- Amount of insurance coverage that is in force or should have been in force as required by law and regulation at the time of the disaster
- Extent to which mitigation measures contributed to the reduction of disaster damages
- Disaster history within the last twelve-month period
- Programs of other federal agencies

The Individual Assistance Program considers the following factors:

- Concentration of damage
- Degree of trauma to the community
- Impact of the disaster on special populations
- Capabilities of voluntary, faith, and community-based organizations
- Level of insurance coverage
- Total number of homes destroyed and damaged, as well as the accessibility and habitability of the dwellings and the community

Figure 2 shows that as of December 31, 2018, every state in the nation, as well as the extra-state jurisdictions, has been affected by at least one FEMA-declared disaster since the turn of the century.

For More Information . . .
- Visit https://www.fema.gov/media-library/assets/documents/111781 to learn more about the Public Assistance Program.
- Visit https://www.fema.gov/media-library/assets/documents/177489 to learn more about the Individual Assistance Program.
- Visit https://www.fema.gov/pdf/about/educational_facilities_factsheet.pdf to learn more about reimbursement eligibility for schools damaged or destroyed as a result of a Presidentially declared disaster.
Who Is a “Displaced” Student?

The displacement of students is often a specific characteristic or outcome of a crisis. For the purposes of crisis data management, a displaced student is defined as “a student who was enrolled, or eligible for enrollment, but has temporarily or permanently enrolled in another school or district because of a crisis-related disruption in educational services.” While this guide does not address situations where one individual student is displaced from home or school, this broad definition could reasonably be made more specific by an education agency. States that experience a high number of natural disasters that cause widespread and substantial damage, loss, distress, or destruction might wish to add, for example, a requirement that the crisis must be a FEMA-declared disaster.

Key Issues From Past Crises

The 2010 resource that this guide builds upon was derived from lessons learned during Hurricanes Katrina and Rita in 2005. While this resource reflects experience from a wide range of crises—including floods, hurricanes, volcanic activity, wildfires, and incidences of school violence—many of its recommendations are derived from lessons learned by education agencies affected by recent crises, including Hurricanes Harvey, Irma, and Maria in 2017 and Hurricanes Florence and Michael in 2018. The consequences of these natural disasters clearly transcended matters of education, but the ramifications for educational services were severe. In Florida alone, over 11,000 Puerto Rican evacuees enrolled in the state’s public elementary and secondary schools within the five months following Hurricane Maria (Hinojosa, Román, and Meléndez 2018).

School Crises Do Not Always Result in the Permanent Displacement of Students

On August 18, 2018, a fire destroyed part of Booker T. Washington Magnet High School’s campus in Montgomery, Alabama. In just a few short hours, the early morning fire destroyed the school’s cafeteria, counselor’s offices, and photo studio, as well as several classrooms. Classes for the school’s 411 students were canceled for the following week and resumed August 27, 2018, at a nearby building that was reopened to serve as a temporary school facility.


Crises come in many forms and scenarios, and some can displace families and students. A school or district may quickly lose some or all of its students, staff, buildings, and data after a devastating crisis, such as a fire or flood. In such a situation, another school or district might step in to help and, in some cases, gain newly displaced students quite suddenly.

Student displacement is often, but not always, associated with the availability of a school facility. Students who are prevented from attending school at their primary school facility or home campus may be able to share a school facility that is located on another campus. Students who are displaced by a natural disaster that does not directly impact the school facility, for example, may still be considered a displaced student. Furthermore, after a safety-related crisis, students and parents may be reticent to return to school once the school is reopened.

When reviewing the data management processes used to track displaced students, three key concerns arise.

- **Student displacement within a state:** Student movement within a state can be easier to monitor when a statewide student information system (SIS) is in place, statewide data standards have already been established, and displaced student indicator and crisis codes are used. States without a statewide SIS may face data-related
challenges but, as discussed in Chapter 5, states can plan ahead to ensure that they are prepared to collect data about displaced students when a crisis does occur. In many cases, districts within the same state are subject to the same statewide policies and requirements regarding graduation requirements, program eligibility and placement, and accountability measures, all of which ease the educational placement and delivery of services for displaced students.

- **Student displacement between states:** Student movement between states can be complicated by differences in state policies and data management procedures. Connecting students with their records is much more difficult and time consuming when displaced students cross state lines. Disparate procedures and state policies, including privacy protections, complicate data sharing. Varying state policies on grade placement, testing, promotion, and graduation requirements, amongst other issues, are also obstacles to student placement.

- **Sharing individual student data in a timely manner:** Delays in the transfer of education records after a crisis can impact enrollment and educational service eligibility decisions. After a major crisis, there are many questions regarding federal, state, and local rules and policies that govern the transfer of student data during an emergency. Crises that are massive in scale can have a significant impact on education operations, making it impossible for sending agencies to share student data with receiving agencies in a timely manner. As a result, new students may be enrolled in a receiving district without appropriate school records. Without incoming students’ official records, enrollment and educational service decisions made by the receiving agency are more likely to be incorrect. Placing students into an educational environment without access to education records can impose a burden on the receiving school and may be a detriment to the student. For example, children with special needs may not receive the services they require, and some students may not even be assigned to the correct grade level. Decisions regarding instructional services, food services, counseling, and other educational and social services will also be improved when receiving schools have access to student records.

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**Supporting Students in the Aftermath of a Crisis**

During the 2017-18 school year, Hurricane Maria displaced tens of thousands of students from Puerto Rico. Of the more than 1,000 displaced students who came to Connecticut, 192 enrolled in Meriden Public Schools, which has a large Puerto Rican population. Meriden welcomed these students and strived to meet their unique educational and social-emotional needs.

On October 1, 2017, Meriden Public Schools reported serving 7,873 students enrolled in 12 public schools. 51 percent of the student population was in the Hispanic/Latino racial/ethnic group, while the next largest student groups were the White group (30 percent) and the Black or African American group (12 percent). 74 percent of students qualified for free or reduced lunch, 20 percent were eligible for special education services, 15 percent were English learners, and 4 percent were enrolled in a bilingual program. Following Hurricane Maria, the number of students enrolled in a bilingual program increased greatly.

Toward the end of October 2017, the district’s single registration office created a separate spreadsheet to help identify and track displaced students. This data file was cleaned repeatedly to identify all displaced students and report data on displaced students to the state. As with any data entered manually, these data were subject to potential human
error. In certain cases, students who were displaced from Puerto Rico and registered in another school system before moving to Meriden were not immediately classified as displaced students. As a result, student information files needed to be analyzed to identify displaced students who enrolled in another LEA prior to entering Meriden Public Schools. Also, some displaced students enrolled in Meriden Public Schools, but due to personal family circumstances had to exit from Meriden and enroll in a different LEA.

In compliance with federal requirements, the Connecticut State Board of Education established four quarterly dates for LEAs to report displaced students at the student-record level, including special education and English learner status. Meriden Public Schools reported 32 students on October 10, 2017; 148 on December 8, 2017; 102 on February 9, 2018; and 130 on April 10, 2018. Students were included in the spreadsheet only if they were enrolled in Meriden Public Schools during one of the required reporting dates. 69 percent of these students spoke Spanish and required bilingual services. An additional 30 students who were displaced by the hurricane enrolled in and/or exited Meriden Public Schools, but were not enrolled on any of the four required reporting dates. In total, 192 unduplicated displaced students were identified.

Many student education records were destroyed during Hurricane Maria, and some students missed several months of school. Grade level placement was usually determined by the reported age of the student. Some students were unable to provide special education documentation upon enrollment beyond a parental report that a special education service had been provided in Puerto Rico, necessitating a referral to a Child Study Team for evaluation.

Although the displaced student population was only 2.4 percent of the total student population, many of the displaced students required bilingual services. By the middle of February, the two Meriden elementary schools with bilingual programs reported increases of 14 and 24 percent, respectively, in their bilingual student populations. This increase led to the hiring of new Spanish-speaking staff and the reorganization of some bilingual programs. In addition to the increased need for bilingual services, many displaced students needed unique educational services and supports as a result of their traumatic experiences during and following Hurricane Maria.

To prepare this case study, school psychologists, social workers, and teachers in schools with bilingual programs were interviewed about the trauma these students experienced and how these traumatic experiences impacted student behavior. Many displaced students faced barriers and challenges that impacted their academics and classroom behaviors. In addition to losing their homes in Puerto Rico, some students lost family members, relatives, pets, possessions and clothing, and their local schools. Some students and families who relocated to the district faced housing insecurity, while others qualified as homeless children and youths, as defined in the McKinney-Vento Act. Any student who qualified as a homeless child or youth was coded as homeless in the district SIS.

Meriden teachers were sympathetic and aimed to help students by demonstrating a safe, caring, and supportive classroom environment. One elementary school, for example, developed a presentation to help displaced students discuss and cope with their experiences. Teachers and school staff also helped students and their families beyond the classroom by organizing an event for displaced families to learn about community and school resources, organizing two clothing drives, and purchasing clothing and footwear for students with their own funds.

Of the 192 displaced students identified, 48.4 percent were still enrolled in Meriden Public Schools in the 2018-19 school year. During the 2017-18 and 2018-19 school years, Meriden’s displaced students participated as best they could in their daily school routines, including district assessments, surveys, and state-required testing. Some students are doing well academically, and many have adjusted well to school life. Based on the results of Meriden’s School Climate Survey for Students, 85 percent of the remaining displaced students have a “good” sense of belonging to school, which is nine percentage points higher than the total Meriden student population. Meriden educators will continue to monitor and address the unique educational and social-emotional needs of displaced students.
Chapter 2.

Before a Crisis: Planning for Data on Displaced Students

State and local education agencies (SEAs and LEAs) will be more prepared for a crisis if they have a disaster recovery plan. Disaster recovery plans focus primarily on the physical safety of people and resources—including data systems—but rarely place sufficient emphasis on data preservation. This chapter provides best practice information to help education agencies prepare for a crisis by developing and implementing plans, policies, and procedures for tracking displaced students and exchanging student data in a timely manner.

Establishing a Disaster Recovery Team

Disaster recovery is the process, policies, procedures, and capabilities related to restoring or continuing critical business activities in an organization after a natural or man-made disaster. With respect to education agencies, disaster recovery is the capacity of entities with sufficient capabilities necessary to assist schools affected by an event or emergency in recovering from the crisis, including restoring the learning environment; the physical environment; business operations; and the social, emotional, and behavioral health of the educational community (U.S. Department of Education, Readiness and Emergency Management for Schools Technical Assistance Center 2017). With respect to data, disaster recovery is the process, policies, and procedures for preserving and regaining access to data—including records, hardware, and software—and communications.

Disaster recovery planning is a component of continuity of operations planning (COOP), which focuses on the creation and validation of a practiced logistical plan for recovering and restoring interrupted critical functions following a disaster or extended disruption. Thus, an agency’s COOP plan often includes a disaster recovery plan that addresses various types of crises. A COOP plan identifies specific tasks and activities that will be completed before, during, and after a crisis and assigns those tasks to parties and individuals with primary and secondary responsibilities. Plans are typically aligned with state and local planning efforts and legislation. A process for regularly reviewing and assessing plans prior to the start of the school year provides the opportunity to update plans to reflect current agency operations and capabilities. Storing both paper and digital copies of plans can ensure their accessibility during a crisis. Digital documents can be easily updated and pushed out to users in response to a crisis, while paper documentation can be referenced even if electricity or Internet access is compromised.

Temporary or Permanent Closing Without Displacing Students

In early 2018, schools and districts in over a dozen states closed their doors for at least one day to help minimize the spread of the flu virus throughout the student population. Although these closures did not displace students, these events should be a component of crisis response planning to ensure the continuity of instructional services during pandemic influenza or infectious disease outbreak events.

Establishing a **disaster recovery team** to collaboratively plan and implement recovery activities in response to an actual emergency can prepare agencies to better respond to crises. Team members typically include high-level agency staff responsible for minimizing the impact of a crisis and preserving or restoring educational services to students during and following a crisis. Members may be selected for their expertise in safety and security, transportation, technology, homeless services, food service, special education, assessment, facilities, communication, federal programs, counseling and mental health, emergency systems, legal services, and finance and administration. Teams and their agencies will also benefit from strong contacts with other organizations that serve children or collect data about students (e.g., immunization and free lunch programs).

With respect to data, **disaster recovery planning** is the preparation for the resumption of applications, data, access, hardware, communications, networking, and other information technology (IT) infrastructure following a disaster. The protection and resumption of IT infrastructure and systems may be addressed in a COOP plan, disaster recovery plan, or stand-alone IT continuity plan. The Consortium for School Networking (CoSN) has developed an IT Crisis Preparedness Countdown checklist to help agencies take proactive action to ensure IT continuity before, during, and after a crisis (CoSN 2019).

Because data are a critical component of disaster recovery planning, it is essential that the disaster recovery team include data stewards from throughout an agency. **Data stewards** are responsible for ensuring the quality of statistical information generated by an organization (National Forum on Education Statistics 2004). They also generally assume responsibility for enhancing the information reporting process through staff development and by sharing data expertise with the various offices and programs that produce data and information in an organization. Depending on organization and size, some agencies may choose to establish a “data recovery team” as a subgroup of the disaster recovery team. Such a subgroup would include a student information system (SIS) manager, as well as data stewards from important program offices and departments. The goal of this subgroup would be to ensure that data needs are met during and following a crisis. Including data stewards in a disaster recovery team or forming a data recovery team can ensure that a disaster recovery plan addresses the provision of data needed for student instruction and services during and following a crisis.

After a disaster recovery team has developed a disaster recovery plan, planning exercises can help ensure that the plan is well understood and can be implemented effectively (U.S. Department of Education, Office of Elementary and Secondary Education, Office of Safe and Healthy Students 2013). These exercises can range from a tabletop exercise, during which small groups discuss and walk through a crisis scenario and the courses of action that are included in the plan, to a full-scale exercise, during which multiple agencies and community partners deploy all resources available to simulate a real-world crisis response. Planning teams can determine the frequency and scale of these exercises after considering the costs and benefits, as well as any state or local requirements. When appropriate and feasible, coordination with relevant agencies and community partners is helpful in assessing the effectiveness of plans.

Figure 3 outlines a planning process that agencies can use to structure their disaster recovery and continuity of
operations planning activities (U.S. Department of Education, Office of Elementary and Secondary Education, Office of Safe and Healthy Students 2013). This process can be used to develop a plan or periodically conduct an incremental or comprehensive review of an existing plan. Detailed information on each stage of the planning process illustrated in figure 3 is available in the U.S. Department of Education’s (ED) Guide for Developing High-Quality School Emergency Operations Plans (2013).

<table>
<thead>
<tr>
<th>Step 1: Form a Collaborative Planning Team</th>
<th>Step 2: Understand the Situation</th>
<th>Step 3: Determine Goals and Objectives</th>
<th>Step 4: Develop a Plan</th>
<th>Step 5: Prepare, Review, and Approve the Plan</th>
<th>Step 6: Implement and Maintain the Plan</th>
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<tr>
<td>Identify Core Planning Team</td>
<td>Identify Threats and Hazards</td>
<td>Develop Goals</td>
<td>Identify Courses of Action</td>
<td>Format the Plan</td>
<td>Train Stakeholders</td>
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<tr>
<td>Form a Common Framework</td>
<td>Assess Risk</td>
<td>Develop Objectives</td>
<td>Select Courses of Action</td>
<td>Write the Plan</td>
<td>Exercise the Plan</td>
</tr>
<tr>
<td>Define and Assign Roles and Responsibilities</td>
<td>Prioritize Threats and Hazards</td>
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<td></td>
<td>Review the Plan</td>
<td>Review, Revise, and Maintain the Plan</td>
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<tr>
<td>Determine a Regular Schedule of Meetings</td>
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<td>Approve and Share the Plan</td>
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Figure 3. Steps in the Planning Process

Assessing Existing Data Systems

Assessment of an agency’s existing data systems includes an analysis of operational schedules; an identification of which systems are most critical to serving displaced students, which have sensitive data, which are paper based, and which are automated; and a determination of the specific technology each system uses. As with a disaster recovery plan, a process to regularly review and assess existing data systems will determine whether an agency needs to update its existing systems. This information can also help staff consider whether the agency would benefit from the procurement or development of a new data system to support agency needs.

Changes and innovations in technology have influenced how agencies plan for and respond to crises. Any data collections that are only in paper format should be evaluated for automation or digitization. Data that are only stored in paper records by LEAs, such as grades, immunization records, and individual education plans, are not typically included in
state data collections. Ideally, any locally stored paper records will be scanned or digitized and also stored in a digital format. In the immediate aftermath of a crisis, access to digital records and cloud storage systems may be unavailable. Thus, retaining paper copies can be beneficial, even though they are more vulnerable to loss in a disaster. Cloud and web storage can ease remote data backups and updates prior to a crisis and facilitate data retrieval and sharing after a crisis. On-site backups may suffer irrevocable loss if a natural disaster destroys the facility in which the data system is housed, but automated data backups to the cloud and/or remote storage sites can help minimize the risk of data loss. Moving applications to the cloud prior to a crisis can protect against on-site losses due to a crisis and minimize delays in resuming routine operations following a crisis.

In preparation for an impending crisis, paper records need to be secured, and physical data systems may need to be taken offline or shut down completely. On-site technology preparation can minimize the damage caused by a crisis that results in power outages, power surges, flooding, or water damage. On-site preparation and protection might include unplugging all computer equipment, moving equipment away from windows, placing equipment on an elevated surface above ground level, and wrapping electronics in plastic tarps or waterproof materials. Communication with technology vendors prior to a crisis can also be useful when equipment are damaged or destroyed and need to be repaired or replaced after a crisis.

Data systems that support parental access to student records, such as parent information portals and automated reports or student information packets, are useful for displaced families during and after a crisis. Agencies should note that certain education records, such as those pertaining to special education and Individualized Education Program (IEP) records, may not be connected to parent information portals given their sensitive nature. Maintaining the security and confidentiality of individual student data is a critical aspect of sound data practices. The Forum Guide to Education Data Privacy (2016) provides SEAs and LEAs with best practice information to use in assisting school staff in protecting the confidentiality of student data in instructional and administrative practices. Guidance and legally authoritative resources on protecting student privacy are available through ED’s Student Privacy Policy Office website: https://studentprivacy.ed.gov.

**Implementing Placeholders for Displaced Student Data Elements**

A data element is the most basic unit of specific information that can be defined, measured, and stored. In an SIS, data elements can convey information such as student names, addresses, test scores, and course enrollment. The Common Education Data Standards (CEDS) initiative (https://ceds.ed.gov/) is a voluntary common vocabulary, data model, and suite of implementation tools to help education stakeholders understand and use comparable education data throughout the early learning through postsecondary and workforce settings. CEDS provides several data elements that are applicable to crisis data management, including the following:
• **Displaced Student Status Indicator**—An indicator that flags a student who was enrolled, or eligible for enrollment, but has temporarily or permanently enrolled in another school or district because of a crisis. This indicator is usually associated with a specific crisis code in a student record.

• **Crisis Code**—A unique number or alphanumeric code used to identify a crisis. This code should be able to accommodate numerous crises within a single school year. It is associated with the displaced student status indicator to link a crisis to a student who was displaced or otherwise affected by the event. If the same code values are to be used over multiple years, it is important to have additional crisis-specific items (e.g., school year, date/time) in place to keep the events unique over time.

• **Additional Descriptive Information**—In addition to a code that identifies a crisis, an agency should consider including additional information to explain the event more fully. This type of data could prove useful for research purposes, federal accountability, and other data quality and organizational management issues. Furthermore, they could prove essential when multiple crises occur.
  - **Crisis Name**—The name of the crisis that caused the displacement of students.
  - **Crisis Start Date**—The year, month, and day on which the crisis affected the agency. This date may not be the same as the date on which the crisis occurred if evacuation orders are implemented in anticipation of a crisis.
  - **Crisis End Date**—The date on which the crisis ceased to affect the agency.
  - **Crisis Description**—A description of the crisis that caused the displacement of students.
  - **Crisis Type**—The type or category of crisis (e.g., chemical, earthquake, flood, wildfire).

FEMA has identified 15 different types of natural and man-made disasters (see figure 4).

<table>
<thead>
<tr>
<th>Biological Threat</th>
<th>Fire</th>
<th>Landslide</th>
<th>Volcano</th>
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<tbody>
<tr>
<td>Chemical Threat</td>
<td>Flood</td>
<td>Radiation and Nuclear</td>
<td>Wildfires</td>
</tr>
<tr>
<td>Drought</td>
<td>Heat</td>
<td>Tornado</td>
<td>Winter Storm</td>
</tr>
<tr>
<td>Earthquake</td>
<td>Hurricane</td>
<td>Tsunami</td>
<td></td>
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</tbody>
</table>


**Figure 4. FEMA Disaster Types**

Including an element that indicates a student’s status as a displaced student can be very helpful in a crisis. This element remains dormant until a crisis occurs and then, following the recommendations described below, it can be activated to identify and track displaced students during or following a disaster.
In addition to a displaced student status indicator, SISs should incorporate related crisis codes to provide a better understanding of each student’s status and needs. The elements listed in this section can be used to inform decisions and track students’ entry into or exit from an agency. Most SISs can easily accommodate data elements, which can provide invaluable benefits during and after a crisis.

Ideally, the addition of a displaced student status indicator will be instituted at the state level and incorporated into statewide and local data systems prior to a crisis. Proactively including this indicator in state and local data systems can encourage LEA support for the new indicator and its associated crisis data elements, improve data compatibility across districts throughout the state, and enable agencies to promptly begin tracking displaced students after a crisis. If a school district chooses to institute new data elements prior to receiving direction from the state, it should confirm that the new elements align with state data standards and requirements.

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**Tracking Displaced Students Using Statewide Crisis Codes**

In 2005, Hurricanes Katrina and Rita had a devastating impact on Louisiana and Texas. In the years following the hurricanes, these states have developed and implemented a statewide approach to tracking displaced students based on lessons learned. Each state’s advanced planning and implementation of crisis codes have proven useful for tracking displaced students during and after recent crises, including the Louisiana floods in August 2016 and Hurricane Harvey in August 2017.

**The Louisiana Experience**

Louisiana’s approach to tracking displaced students has evolved after the devastating impact of Hurricanes Katrina and Rita. In the wake of the hurricanes, the Louisiana Department of Education (LDOE) introduced a method for tracking displaced students within its statewide SIS and provided LEAs with collection guidelines. However, because routine collection schedules were insufficient, LEAs reported weekly counts of displaced student enrollments to the LDOE via a special web collection. In addition to helping track displaced student movement within the state, these data enabled the LDOE to report displaced student counts to the federal government on behalf of LEAs within the state that were applying for federal funding.

In the years following Hurricanes Katrina and Rita, Louisiana made several changes to its data practices to ensure that data would be collected and managed effectively during future crises. To understand the movement and needs of displaced students and deploy services and funding where needed, Louisiana implemented the collection of disaster entry and exit reasons, as well as disaster reasons for homelessness (if applicable). Louisiana uses five statewide codes to track the entry and exit of students who have been displaced by a natural disaster. For every student enrollment record submitted to the LDOE data systems, LEAs are required to provide a valid entry reason. For any enrollment exit, LEAs are also required to provide a valid exit reason.

- **Entry Code N1**: Disaster entry from public school within LA
- **Entry Code N2**: Disaster entry from nonpublic school within LA
- **Entry Code N3**: Disaster entry from out of state
- **Entry Code N4**: Disaster entry from within same district
- **Exit Code 37**: Disaster exit

The LDOE trains LEAs on how to use the state data codes and how to locate data for newly enrolled students, including students who have been displaced by a crisis within the state. The LDOE is also able to share data with LEAs that receive new students by providing LEAs with student data and records that were previously submitted to LDOE data systems. This
allows LEAs to quickly locate records for displaced students, as well as students who have disabilities, who have other special needs, and who qualify for free or reduced-price lunch.

For every data collection, LDOE implements a comprehensive data quality and communications outreach plan to ensure that all data are submitted on time and error free. As part of the data quality review process, data submitted during the current collection period are compared to prior periods during the school year and to the same period during the previous school year. Deviations from the expected values are flagged on data validation reports sent to LEAs. Deviations are also indicated on collection management reports so LDOE collection staff may follow up with the LEA data staff. There is also an escalation process in place for the LDOE to offer additional support and outreach to LEA staff if major data issues have not been addressed. If, for example, an issue has not been corrected 3 weeks before the deadline, LDOE staff will call the LEA; if the issue persists 2 weeks before the deadline, the LEA superintendent will receive an email. This formal process of escalating support and outreach helps ensure that data reporting deadlines are typically met.

Collecting disaster entry and exit data during recent crises was relatively effortless because the data codes and structures were already in place. The state previously considered adding new crisis data collections following the August 2016 Louisiana floods but determined that additional collections were not needed, given that LEA and LDOE staff did a thorough job running the existing collections. While no major changes have recently been implemented to the LDOE’s crisis data management practices, data are being monitored over time to determine whether future changes are needed.

The LDOE identified several best practices based on its experiences with crisis data management:

- **Collect sufficient data at all times.** Before a crisis occurs, agencies should ensure that they are collecting adequate information to follow the movement of students.
- **Ensure interoperability of data systems.** SEAs should design their state systems to share data between LEAs that experience a crisis and LEAs that receive displaced students.
- **Monitor data reports.** SEA monitoring of LEA data reports can help identify deviations and facilitate follow-up if needed. For both LEA and SEA staff, any data issues should be flagged early and often and escalated appropriately.
- **Support LEAs.** SEAs should set up regular supports, such as office hours and regional data training sites, to assist both sending and receiving LEAs.

**The Texas Experience**

Texas’s approach to tracking displaced students has evolved as the state has responded to, and learned from, previous crises and natural disasters. After Hurricanes Katrina and Rita in 2005-06, the Texas Education Agency (TEA) did not collect crisis code data. Instead, the TEA asked districts to maintain these data locally according to SEA specifications. Although having LEAs collect data satisfied many information requirements, it proved insufficient when student-level data were unavailable at the state level for federal auditors. Based on this experience, the TEA added a crisis data element to its state-level data system in the summer of 2008, which became extremely useful when Hurricane Ike made landfall in Galveston, Texas, on September 13, 2008.

Close to a decade after the TEA’s addition of a crisis data element, Hurricane Harvey made landfall in Texas on August 26, 2017. The TEA took several actions to help districts with data-related issues that occurred because of the hurricane, including requiring the use of crisis codes. The state already had a default crisis code (05) in place in its statewide data system, but shortly after the TEA activated this default code, it recognized the need for additional data to identify displaced and homeless students. This motivated the development and use of more granular crisis codes.

Three distinct crisis codes tracked students displaced by Hurricane Harvey, and a fourth crisis code tracked students affected by other hurricanes that season. Any student considered homeless (defined by the McKinney-Vento Homeless
Maintaining Data Elements

In addition to crisis codes and a displaced student status indicator, other data items may be necessary for federal and state reporting and accountability requirements. Maintaining these data elements, and ensuring their quality, is essential for collecting useful and actionable information about displaced students.

**Basic data elements from the student information system**

When enrolling a displaced student, the receiving district needs the same data it expects from any enrolling student, including student demographic information, student transcripts, and a list of services the student receives. These data help district administrators and staff assign students to the appropriate classes, programs, and services. In theory, most SISs are designed to easily retrieve this information; this is not always the case in practice, especially when new items are needed or the system is operating under extreme circumstances, as occurs during a crisis. After Hurricanes Harvey, Irma, and Maria and the 2017 California wildfires, for example, funding was available through the Temporary Emergency Impact Aid for Displaced Students to assist with the cost of educating displaced students. Receiving districts needed displaced student enrollment counts and separate counts of students who are reported as children with disabilities,
English learners who are not reported as children with disabilities, and all other displaced students to qualify for this aid (U.S. Department of Education 2018a).

**Basic data elements from other systems**

In addition to basic student data, users must be able to access data that are maintained in other systems; this includes data on school facilities, staff, security, transportation, programs, and services.

**Information for FEMA**

Historically, FEMA has declared a disaster and allocated federal funds to affected regions at the administrative level of the county. Therefore, state officials, FEMA, and other aid organizations may require the use of geographic codes when an agency applies for funds and assistance. The American National Standards Institute (ANSI) issues standardized numeric or alphabetic codes to ensure uniform identification of geographic entities through all federal government agencies (U.S. Census Bureau 2019). There are two types of codes: Federal Information Processing Series (FIPS) codes and Geographic Names Information System (GNIS) Identifiers. The U.S. Census Bureau also assigns and issues codes for a number of geographic entities for which FIPS or GNIS codes are not available, and sometimes in addition to FIPS and GNIS codes. In addition, the National Center for Education Statistics (NCES) has an online tool that allows users to obtain NCES IDs for school districts and schools, as well as district locale codes for all public schools and districts in the United States. The tool is available through NCES’s Common Core of Data (CCD) website: https://nces.ed.gov/ccd/schoolsearch/.

**Reviewing the Frequency and Timing of Data Collections**

In the immediate aftermath of a crisis, there is a strong demand for data about affected students and staff, including data on the withdrawal and enrollment of recently displaced students. Thus, timely data submissions are important to consider during crisis planning.

Decisions regarding when and how to schedule data collections are influenced by several factors, including accountability requirements, statutes and legislation, funding availability, system capabilities, and decisionmaker needs. While the timing of all data collections is important, data about displaced students are especially time sensitive given the immediate information needs for funding, accountability, and other decisionmaking. In a crisis, the flexibility to adjust collection schedules is critical. Sending and receiving agencies benefit from planning for ad-hoc data collections that may be necessary after a crisis, as well as data collections and survey periods that

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**Data Collection Timelines**

In the wake of the 2017 hurricane season, the Texas Education Agency (TEA) implemented a weekly data submission cycle to collect data on students displaced by Hurricanes Harvey, Irma, and Maria. Districts typically submit data to the TEA on an annual basis, but the need to collect data on displaced students motivated the TEA to establish a more frequent and systematic data collection schedule. The TEA enabled an option in its statewide longitudinal data system that allowed districts to submit data on a daily basis. In the six months following Hurricane Harvey, all LEAs that served an affected student submitted data on displaced students to the TEA every Friday. If the system had not allowed for this type of flexibility, Texas might have faced delays in collecting data on displaced students.
are scheduled to occur during a crisis. For example, when enrollment counts are collected by the state only a few times a year, additional ad-hoc collections may be needed to report accurate changes in enrollments following a crisis. System technology, such as automated data reports and backups, can be leveraged to support ad-hoc reporting in certain cases. SEAs may elect to assist LEAs with ad-hoc data collections in several ways, including facilitating communication between federal and local agencies, enabling data prereporting before a crisis, and providing prepopulation support during and after a crisis.

**Reviewing Data Policies and Procedures**

Team members with a strong working knowledge of current federal, state, and local data policies and procedures will invariably prove useful during post-crisis data collection and analysis. After a crisis, key personnel may not be available to answer questions and make policy decisions. When multiple team members are familiar with data policies and expectations, they can immediately step in to make decisions. Tracking policy and procedural decisions is also critical, as is a strategy for effectively communicating those decisions to leadership and staff.

**Federal policies and procedures**

The federal government has a wide range of programs, offices, regulations, and statutes that deal with crises, displaced students, and related issues such as data privacy, homelessness, and emergency aid. Agencies should proactively review and understand the implications of the following federal programs and legislation (a synopsis of relevant federal laws is available in appendix A):

- The Federal Emergency Management Agency (FEMA)
- The Family Educational Rights and Privacy Act (FERPA)
- The McKinney-Vento Homeless Education Assistance Improvements Act of 2001
- The Health Insurance Portability and Accountability Act (HIPAA)
- The U.S. Department of Education’s Temporary Emergency Impact Aid for Displaced Students (EIA)

**Eligibility Criteria for Federal Assistance**

FEMA’s Public Assistance (PA) grant program provides supplemental federal funds to assist communities responding to and recovering from major disasters or emergencies declared by the President. Funding may be applied to emergency work, which includes debris removal and damage prevention measures, or permanent work, which covers the restoration or replacement of property, including the recovery of files.

The *Public Assistance Program and Policy Guide* (FEMA 2018b) provides information on the PA program and its policies, administration, and implementation, including funding eligibility criteria and comprehensive policy used when evaluating applicant eligibility. The FEMA PA program has established the following criteria regarding eligible file recovery activities:

Eligible activities associated with the recovery of files include, but are not limited to:

- Recovery of damaged hard copies
- Stabilizing the damaged hard copies
- Sanitizing damaged hard copies
- Photocopying or scanning damaged hard copies to re-establish files
- Recovering data from water-damaged computer hard drives

Recovery of damaged hard copies includes labor and materials, such as bags, boxes, and containers. Stabilizing damaged hard copies includes freeze-drying. Photocopying or scanning includes labor and materials such as new folders and paper.

Not all activities are eligible. Examples of ineligible activities include:

- Establishing new information databases
- Manually entering data that were lost in damaged computers
- Scanning re-established hardcopy files into computers to create digital files
- Deciphering photocopies of damaged hard copies

Source: FEMA (2018b).
State and local policies and procedures

Considering how state and local policies and procedures may need to be adapted in response to a crisis will improve disaster recovery planning and help decisionmakers deal with these issues if the need arises. In addition to ensuring vital technical knowledge, precrisis engagement with staff within and across agencies will strengthen relationships and future crisis response efforts. The following topics are important to consider:

- Assessment schedules
- Average daily attendance/membership
- Class size
- Data exchange protocols
- Data policies and procedures
- Data retention
- Disaster recovery plans
- Graduation requirements
- Immunization waivers
- Instructional days (required and waived)
- Nonpublic schools
- Policy exceptions
- School improvement plans
- State accountability plans and modifications
- Textbook allocation
- Truancy
- Virtual education

Receiving districts may also wish to review their procedures and processes, particularly related to intake and enrollment, to assess their ability to accommodate displaced students. Given the wide variety of educational and social services available to students, receiving districts may need to adjust instructional services, transportation, food services, counseling, facilities, and other programs to support displaced students. Sending and receiving agencies may wish to develop policies and procedures for data reciprocity to support the timely exchange of data on displaced students during and after a crisis. In particular, receiving districts need access to up-to-date student transcripts to make timely and accurate placement and graduation decisions. Another important issue for sending agencies to consider is how students who were displaced will be reenrolled and whether they will still be considered displaced upon their return. As discussed in chapter 5, it can sometimes be difficult to determine when and for how long a student is considered displaced, particularly when a student who is displaced from their home due to a crisis remains in or returns to their original school.
Facilitating Communication and Providing Training

Maintaining lines of communication within an agency, between agencies, and with stakeholders is essential before, during, and after a crisis. SEAs and LEAs need to communicate with other education and government agencies on a wide range of data issues prior to, during, and following a crisis. Identifying and communicating with primary points of contact (POC) within an agency, including staff who will be responsible for providing data during a crisis, can support preparedness and response efforts. Leveraging professional networks and resources, such as those available through the National Forum on Education Statistics, can also be helpful. The development of a crisis communication plan can also be beneficial. This type of plan addresses how an agency and its staff will communicate with each other in situations where landline, cellular, and online/internet communication is compromised by a natural or man-made disaster. Capturing the emergency phone numbers and email addresses of all personnel that will remain accessible during a crisis can also be a helpful step during crisis communication planning. With this information, responsible parties within an agency can remain in communication even if a physical school, office, or site is evacuated or on lockdown.

Regular training provides agency staff, as well as key stakeholders and the broader community, with the information and preparation necessary to support effective crisis response efforts. Crisis response training may address a wide range of issues related to emergency planning, including how and when to implement crisis and displaced student data codes. In states with a statewide SIS, the SEA may be able to provide training and technical assistance to LEAs. In addition to training for agency staff, regular training for students and their families is an essential component of crisis preparedness. A study on school district crisis preparedness, response, and recovery plans (Kruger et al. 2018) found that nine in ten (89.6%) school districts provide resources or training on crisis preparedness to school teachers and staff, yet only three in five (59.5%) provide similar resources for students and less than one in five (17.6%) for students’ families. Offering training in partnership with local and regional agencies can help maximize resources and support broader participation in training activities.

Cooperative Crisis Response Training

The Hawaii Department of Education (HI DOE) has historically provided emergency readiness training for administrators, but not in conjunction with other state agencies. After the Kīlauea Volcano eruption and lava flows in 2018, the HI DOE’s Safety, Security, and Emergency Preparedness Branch suggested that administrators participate in annual in-person emergency readiness training sessions that involve all state agencies. Annual cross-agency training will support effective coordination between the HI DOE and other state agencies during future crises.
Recommendations for What to Do Before a Crisis:

- Include data managers on your agency’s disaster recovery team and, when possible, establish a data recovery team.

- Develop a disaster recovery plan and establish a process to regularly review and assess the plan. Disaster recovery teams are encouraged to produce these in multiple formats, including as digital documents that can be easily updated and pushed out to users.

- Automate all data systems and ensure that your systems are flexible enough to permit the creation of new applications and file formats.

- Be prepared to collect and/or report displaced student information to meet federal and state reporting requirements related to a declared crisis.

- Communicate with your SEA and LEA counterparts about data items and file formats before setting up any new elements or systems.

- Add a displaced student status indicator and associated crisis codes to your SIS.

- Review and maintain the basic student data items in your SIS.

- Be aware of existing federal resources and assistance that are available during and after a crisis.

- Be familiar with the frequency and timing of your agency’s current data collections. Be prepared to introduce additional data collections or collection cycles during a crisis.

- Review and understand current federal, state, and local data policies and procedures.
Chapter 3.

During a Crisis: Restoring Data Systems and Recovering Data on Displaced Students

This chapter will help education agencies respond more effectively to a crisis while it is occurring. Many of the recommendations included in this chapter assume that the agency has adhered to the recommendations in chapter 2 regarding adequate planning in advance of a crisis.

Developing a Response When a Crisis Is Declared

An assessment of the extent of a crisis will determine an agency’s response efforts. Once a crisis has been officially declared, the disaster recovery team can begin to determine the agency’s response, activate the disaster recovery plan, implement response activities, and clearly communicate plans to staff at all levels of the education system—the SEA, LEAs, and schools. Depending on the nature and scale of the event, some or all contingencies and responses may be triggered. During some crises, students may relocate to different states, districts, or schools. Data management and operations may be disrupted, including, in extreme situations, the loss of hardware that houses a critical data system—although good planning should ensure that adequate backups are available. Prioritizing essential business functions early on, particularly those that support students who have been temporarily or permanently displaced, can help focus crisis response efforts on critical data tasks.

Maintaining Communication

Communication with appropriate federal, state, and local agencies—including noneducation agencies, as appropriate—during and immediately following a crisis helps ensure that agencies appropriately coordinate their response efforts. Crises that compromise infrastructure can challenge this and other critical communication activities. Damage to electrical grids, telephone lines, internet cables, and cell phone towers take time to repair and rebuild after a natural disaster. All available methods of communication should be considered if regular telecommunication, internet, mail, and other services are interrupted during the disaster. Social media, mobile apps, and other alternative communication platforms may play a role during a crisis that impacts traditional communication channels. If the crisis warrants communication support, emergency communication tools and services are available to assist agencies during crises that impact communication channels. The Department of Homeland Security (DHS) Government Emergency Telecommunications Service (GETS) is one of several federal resources that facilitates communication during emergency or crisis situations. Additional information on federal emergency communication services and programs is available through DHS: [https://www.dhs.gov/topic/emergency-communications](https://www.dhs.gov/topic/emergency-communications).
Assessing Data Systems

Maintaining data during a crisis, as well as restoring an agency’s ability to collect data immediately following a crisis situation, remains a priority. For agencies directly affected by a crisis, locating or restoring existing student data will likely take precedence over all other data-related activities. Thus, the first data-related task will be to inventory data systems and determine whether any critical data have been lost or otherwise made inaccessible. Systems must be accessed through secure methods to limit unauthorized access to data. Monitoring data systems during a crisis can help staff determine whether data systems are working as they should be. Once the availability and security of data systems has been confirmed, agency staff can coordinate with crisis responders to assess whether students have been displaced. If so, local education agencies (LEAs) should begin to collect and share data to help identify these students. This exchange of data between agencies is necessary to minimize the interruption of educational services to displaced students. Related agencies, including federal, state, and local authorities, should follow their disaster recovery plans to facilitate and otherwise assist in these critical data activities.

Retrieving and restoring lost data

For organizations directly affected by a crisis, data and/or records may be lost temporarily or permanently. If an LEA or school loses both electronic and paper student records, records will need to be retrieved from an alternative source, such as an offsite cloud-based backup or a data warehouse. The LEA’s offsite backup should be the first source; however, if backup records are not immediately accessible, the state education agency (SEA) may have a data warehouse with some, if not all, of the data.

Relocating Paper Records During a Crisis

In May 2018, a charter school was relocated to another part of Hawaii Island due to the Kilauea Volcano eruption and lava flows. Due to the small size of the charter school, it was relatively easy to pack all paper files into records boxes and bring them to the school’s new location. When the school was destroyed by the lava flows in July 2018, the relocation of paper records and use of a student information system (SIS) ensured that no data were lost during the crisis.

Maintaining Communication During a Crisis

As one of the smallest states in the nation, Hawaii’s state agencies regularly meet with one another to engage in discussion and provide assistance when needed. The strong relationships between state agencies proved useful during the Kilauea Volcano eruption and lava flows in 2018. Representatives from several state agencies and departments, including the Department of Education, the Department of Health, and the Emergency Management Agency, worked with a wide range of federal agencies throughout the Kilauea crisis, including the Federal Emergency Management Agency, the Coast Guard, the National Guard, the U.S. Public Health Service, the National Oceanic and Atmospheric Administration, and the U.S. Geological Survey. The agencies met each morning at a designated time to provide updates on the crisis and discuss next steps.

Kilauea is located on Hawaii Island, one of Hawaii’s eight main islands. The island of Oahu is home to the state government and main agencies, and every island also has separate agency offices. The separate offices on each island maintain strong communication with the main office on Oahu, which helps ensure that the Oahu office is well aware of what occurs throughout the state. To help facilitate communication during the Kilauea crisis, a staff member from the Hawaii Department of Education’s Safety, Security, and Emergency Preparedness Branch was relocated from Oahu to Hawaii Island. Relocating this staff member to the site of the crisis helped the department maintain strong communication between its offices throughout the crisis.
Communicating guidance on the use of crisis indicators

Timely, accurate data on displaced students are critical during a crisis. After a crisis is declared, education authorities should initiate a collection of data on displaced students through a formal chain of communication between education agencies. For example, in a large-scale crisis, SEAs inform LEAs, which then advise schools to adjust enrollment collections and submit data with the agreed-upon displaced student status indicator. Relevant data elements and data collection timelines need to be communicated to agency leadership and staff. Data entry staff also need to be made aware of appropriate indicators, codes, and elements so they can follow procedures established during crisis planning and record information in the SIS appropriately. Accurate data are especially important during a crisis, so as always, urgency does not justify compromising data quality.

Sharing data

During a crisis, individual and aggregate data must be shared quickly between education agencies at the federal, state, and local levels to enable the placement of displaced students and allocation of crisis recovery resources and support. As students move, for example, their education records need to accompany them in a timely manner to ensure the delivery of educational services without delay. Similarly, as agencies request financial assistance to serve new students, counts of displaced students need to be reported and confirmed promptly if resources are to reach the schools and students that need them.

- **Individual student records:** These records typically contain demographic data, school enrollment, grade assignments, promotions and retentions, grades, credits earned, participation in special programs, test scores, and other student information maintained by the district in which a student is enrolled. Individual student data are essential to educational placement and must be exchanged in a timely and accurate manner to guarantee the continuation of educational services to displaced students. Web-based software applications designed to facilitate the exchange of electronic student records and transcripts, such as the Texas Education Agency’s Texas Records Exchange (TREx) system, can be greatly beneficial during and following a crisis. Because student records and transcripts are essential to a student’s educational placement, the ability to exchange this information quickly and accurately is of the utmost importance. While urgency is necessary, data users must respect and protect the confidentiality of education data, even during a crisis. Numerous laws, including the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g), have been enacted at the federal, state, and local levels to protect student information and data. Guidance and legally authoritative resources on protecting student privacy, including the appropriate disclosure of information when responding to health or safety emergencies, are available through the U.S. Department of Education (ED)’s Student Privacy Policy Office (SPPO) website: [https://studentprivacy.ed.gov](https://studentprivacy.ed.gov).

- **Aggregate data:** Official counts of students are necessary to ensure that decisionmaking is informed by accurate data. For data to be considered official, they must be collected from an authorized source, part of an authorized data collection, and submitted through an authorized system. To effectively manage educational, human, and financial resources, planning and oversight authorities may request aggregate counts of displaced students. As with other types of data, aggregate counts may be needed on a different timeframe during a crisis than at other times. During a crisis, staff may need to query and analyze aggregate data, including aggregate data on displaced students, in a variety of ways to support decisionmaking. Aggregate data on the number of students receiving counseling, food services, and social services can be particularly helpful for restoring student support services during and following a crisis.
FERPA and the Disclosure of Student Information Related to Emergencies and Disasters

In June 2010, ED’s Family Policy Compliance Office (FPCO) published a guidance document on FERPA and the disclosure of student information related to disasters and other health and safety emergencies. This non-regulatory guidance is intended to answer questions that have arisen about the sharing of personally identifiable information from students’ education records to outside parties when responding to emergencies, including natural or man-made disasters. The ED FPCO (2010, p. 1) summarizes the guidance as follows:

*FERPA prohibits a school from disclosing personally identifiable information from students’ education records without the consent of a parent or eligible student, unless an exception to FERPA’s general consent rule applies. In some emergency situations, schools may only need to disclose properly designated “directory information” on students that provide general contact information. In other scenarios, school officials may believe that a health or safety emergency exists and more specific information on students should be disclosed to appropriate parties. Understanding the options available under FERPA empowers school officials to act quickly and decisively when concerns arise. FERPA is not intended to be an obstacle in addressing emergencies and protecting the safety of students.*

The guidance document is available through ED’s SPPO website: [https://studentprivacy.ed.gov](https://studentprivacy.ed.gov).

Brokering data exchange

The increased demand for data that occurs when many students enter or exit a state or district in a short time may strain local resources and regular data-sharing processes. In this situation, a temporary application, database, or other alternative means of sharing records may be necessary. To be most effective, temporary data exchange technologies need to be developed and implemented quickly while ensuring that data are secure and student privacy is protected. SEAs may consider creating a temporary application or database to facilitate sharing student data with the LEAs and schools tasked with enrolling displaced students. Such a temporary database could also collect information about nonpublic students and schools. Recent developments in cloud and web storage could prove advantageous, particularly during a crisis that destroys on-site facilities. Cloud-based storage can help minimize the risk of data loss during a crisis and enhance the ability to retrieve and share data after a crisis, provided that damage to on-site infrastructure has not compromised access to the cloud.

Exchanges are agreements of limited duration between two organizations that permit data sharing. Depending on the nature of the agreement, the receiving agency is generally expected to destroy or return the data at the end of a specified period of time. Mechanisms such as virtual private networks, authenticated data encryption, and multi-factor user authentication can help improve the security and privacy of data exchanges. Of course, it is easier to control confidentiality and data quality issues in a hosted data system than in a temporary system. Secure data systems that provide basic information about displaced students can support proper placement and service delivery, but several questions must be addressed before embarking on these alternative means for sharing data:

- Where will the databases be stored?
- How will the data be secured?
- How will confidentiality be ensured?
- Will the agency be permitted to engage in a quick procurement process for immediate data services?
- Will software vendors support an abbreviated procurement process and changes in procedures?
File format is an important aspect of data exchange. Temporary data exchanges need to accommodate current or new file formats that may be required for new or temporary data collected or shared during a crisis. For example, if an agency collects enrollment data four times each year and a crisis occurs between collections, the agency may need current enrollment data and, therefore, decide to add a collection to the regular cycle. This data collection could use the same format and system as scheduled collections, or it could use a new format that facilitates more timely response and accommodates uncertainty in regular reporting methods.

**Temporary Databases**

After Hurricanes Irma and Maria in September 2017, many students were displaced from Puerto Rico and transferred to new schools off of the island. In response, the Puerto Rico Department of Education created a temporary database, the Student Record Exchange Platform (SRX), to facilitate the timely enrollment of displaced students. The SRX supports the exchange of official student records with other districts, including transcripts, Individualized Education Program (IEP) records, and other student information.


**Recommendations for What to Do During a Crisis:**

- Determine your agency’s response based on the nature and scale of the crisis, and clearly communicate data action plans to staff at all levels of the education system.
- Inventory all systems and determine whether any data have been lost or otherwise made inaccessible.
- Use a formal chain of communication between education agencies to initiate a collection of displaced student identifiers.
- Respect and protect the confidentiality of education data, even during a crisis.
- Be prepared to query and analyze aggregate data in a variety of ways to support decisionmaking.
- Determine the need for a temporary database to help share data on displaced students during a crisis.
Chapter 4.

After a Crisis: Reporting and Evaluating Data on Displaced Students

While identifying the time “before” a crisis is relatively straightforward, the transition from “during” to “after” a crisis is not always so clear. In this resource, “after” a crisis is defined as the time after most displaced students have enrolled in different schools. This period can vary from days to weeks or even months; it ends when there is no longer any reason to track the displaced students.

Ongoing Data Sharing

After displaced students have enrolled in their new schools, state and local education agencies (SEAs and LEAs) continue to have a responsibility to track them and report the data as a component of communicating about the impact of the crisis. This ongoing effort is necessary because the enrollment status of displaced students is subject to considerable fluctuation. A student who unexpectedly moves into temporary housing is likely to enroll and withdraw from several schools before settling into a more permanent living situation. Ongoing tracking of these students is vital to serving the child’s education needs and meeting federal and state reporting requirements.

Establishing reciprocal data sharing agreements can be mutually beneficial for sending and receiving agencies:

- Sending agencies that have experienced a crisis remain responsible for tracking and reporting student data, even after displaced students have enrolled in new schools. Ongoing tracking of these students is vital to serving the child’s education needs and meeting federal and state reporting requirements because the enrollment status of displaced students is subject to change.
- Receiving agencies need student records to enroll displaced students, but records transfers may be delayed or shared in an alternate format if the sending agency’s data systems were compromised by a crisis. Furthermore, certain records that are necessary for assigning students to programs and services, such as Individualized Education Program (IEP) or mental health records, may not be readily available to receiving agencies.

Introducing New Data Collections to Track Displaced Students

The New York State Education Department (NYSED) used several surveys to track students who were displaced by the 2017 hurricanes. Initially, LEAs submitted counts of displaced students through a weekly survey conducted by the NYSED Office of Bilingual Education and World Languages (OBEWL). During May and June 2018, the OBEWL survey was replaced by two short-term surveys conducted by the NYSED Office of Every Student Succeeds Act (ESSA)-Funded Programs to collect counts required for federal funding. When the Office of ESSA-Funded Programs’ survey was introduced, NYSED released a guidance memo that detailed the specific time frame that data would be accepted and how the counts would affect funding. The survey tool used by the Office of ESSA-Funded Programs leveraged an existing online platform used for other applications and data collections. User familiarity with this existing system ensured that data were collected in a consistent format in a short time period. The online platform required LEA superintendents to certify data accuracy prior to submission, thereby strengthening control over data collection.

NYSED also monitored the survey results to ensure that data were being reported. Following the conclusion of the Office of ESSA-Funded Programs’ survey, the OBEWL survey was reinstated in October 2018 and, as of March 2019, remains in effect.
Tracking Displaced Students and Facilitating Enrollment During and After a Crisis

**Scope:** This crisis data management project applies to how Florida state officials accommodated and tracked evacuees from Puerto Rico and the U.S. Virgin Islands displaced by Hurricanes Irma and Maria in September 2017.

**Description of the Issue**

- In September 2017, Hurricanes Irma, a category 5, and Maria, a category 4, wrought catastrophic damage upon the Caribbean—forcing many residents to flee to the mainland United States.
- Thousands of displaced students came to schools in Florida from Puerto Rico and the U.S. Virgin Islands.

**How the Florida Department of Education (FDOE) Addressed the Issue**

- The Governor issued an emergency order to help evacuees from Puerto Rico and the U.S. Virgin Islands displaced by the hurricanes.
- Florida state officials waived rules for hurricane evacuees so they could enroll in schools without immunization records, proof of residency, and transcripts.
- FDOE established emergency weekly procedures for collecting data on how the disaster impacted students. School district staff reported their arrival in Florida and departure from Puerto Rico, the Virgin Islands, and other territories. FDOE collected these data until March 2018.
- FDOE had existing codes to identify disaster affected students. However, an additional graduation code was established in order to identify the students who graduated based on the Puerto Rico graduation standards (Graduation Code WPR denotes a student who will graduate with a Puerto Rico high school diploma).

**Collaboration**

- FDOE received a transcript sample from the Puerto Rico Department of Education (PRDE) team that was provided in Spanish. Through FDOE internal coordination, the transcript sample was translated into English. After reviewing the translated sample, FDOE compiled and provided some follow-up questions to the PRDE in order to get a better understanding of the student record exchange (SRX) system.
- The SRX system was created by the PRDE in order to facilitate the secure transfer of students’ transcripts and diploma information for Puerto Rico public school attendees. The SRX allowed users the ability to search for transcripts and course information.
- Florida was one of the first states to utilize the system and was integral in assisting with the review and navigation of the PRDE SRX system through continued usage and experiences with the local districts. This collaboration allowed the PRDE an opportunity to receive the feedback needed to enhance the system.
- Multiple screens and functionality were refined and added by the PRDE team in order to help users within Florida LEAs and the FDOE.
- FDOE worked with school districts in Florida to capture the number of students who enrolled in Florida schools each week from Puerto Rico and the U.S. Virgin Islands.
- FDOE used the data reported by Florida LEAs in collaboration with the Florida Department of Health to ensure that these students received required immunization.
- FDOE used the data reported by Florida LEAs to aid the PRDE with transferring credit hours for 11th- and 12th-grade students towards their high school diplomas.
- FDOE worked with the Florida Legislature to keep them abreast of the number of students arriving in Florida from Puerto Rico and the U.S. Virgin Islands.

**Challenges**

- As part of the FDOE data collection process, districts were requested to provide aggregated information via spreadsheets about the disaster impacted students entering each district. The form had to be manually completed, and there were inconsistencies in the submission formats provided by the districts.
- School districts submitted data after the deadline or in some cases were completely unresponsive.
Numerous laws, including the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g), have been enacted at the federal, state, and local levels to protect student information and data. A synopsis of relevant federal laws is included in appendix A. Guidance and legally authoritative resources on protecting student privacy, including the appropriate disclosure of information when responding to health or safety emergencies, are available through the U.S. Department of Education (ED) Student Privacy Policy Office (SPPO) website: https://studentprivacy.ed.gov. The SPPO has developed numerous resources, including online training modules, videos, webinars, and frequently asked questions to help states, districts, and schools protect the privacy of student data.
Federal and State Reporting

Depending on the magnitude of the crisis, tracking a high number of displaced students for funding and accountability purposes will likely have long-term ramifications on data systems and policies. In particular, longitudinal data systems are vulnerable to disruption when an agency quickly or unexpectedly sees large student population changes due to enrollment or withdrawal. Accurate counts of students, including displaced students, can ensure that sending and receiving agencies receive the appropriate amount of funding.

Funding

In fiscal year 2018, ED’s Temporary Emergency Impact Aid for Displaced Students (EIA) program awarded over 434 million dollars to 27 SEAs in the United States (including the outlying areas) to assist with the cost of educating students displaced by Hurricanes Harvey, Irma, and Maria and the 2017 California wildfires (ED, Office of Elementary and Secondary Education, Office of Safe and Healthy Students 2018).
Education agencies that receive and spend federal funds are obligated to report data and contribute to required federal data collections. When a large geographic area is affected by a crisis, new data may be needed to allocate federal aid, relief funds, and other financial assistance. During these situations, federal agencies typically work directly with affected counties to identify or request needed data; this process is more complicated when school districts are not aligned with county boundaries. In certain cases, the SEA can communicate with the federal agency on behalf of its districts to reduce the local burden. Effective collaboration between an SEA and a state’s LEAs can help ensure that data reporting deadlines are met and agencies remain eligible for federal funding. In the aftermath of Hurricane Harvey, for example, the TEA worked with many Texas LEAs to ensure that data were submitted to the SEA on time to meet federal reporting timelines.

**Auditing**

When accepting federal emergency funds, agencies should anticipate audits of data submitted to verify funding eligibility. Auditors review data for discrepancies and errors, such as duplicate counts of students, confirmation of displaced student status (i.e., an originating school in the area affected by the crisis), and potential fraud. Detailed information about entry and withdrawal dates is critical to ensure that redundant requests for funding the same student are not sought or received. Audit burden can be lessened when high-quality, detailed data are maintained in a format that accommodates reasonable audit requirements.

**Core data tracking**

Following a crisis, routinely reported student data items are generally still required from schools and agencies to meet regular federal and state reporting needs. Clearly, large changes in student populations, such as those seen when many students are displaced, may substantially alter the statistical data normally reported by an agency. Explaining crisis-related extenuating circumstances, such as large changes in student enrollment and program participation, in footnotes is appropriate in published data reports. Agencies should also account for major changes resulting from a crisis, such as school closures or reorganizations, since those changes can impact federal data collections and the allocation of federal funds.

**Accountability concerns**

A large movement of students into or out of an agency can influence accountability data. Data from an agency that has been through a crisis should undergo reconciliation prior to use for accountability purposes. Under some circumstances, accountability requirements related to test scores, student progress, graduation rates, and subgroup membership may be modified or waived to account for the movement of displaced students. If accountability requirements are waived
or changed, they must be communicated to parents in a timely manner. States and districts that have experienced a crisis or enrolled students displaced by a crisis may qualify for available exemptions and waivers from federal and state accountability requirements. Agencies that receive a waiver must be prepared to act after a crisis to ensure that they meet accountability requirements when the waiver ends. SEAs that grant waivers to LEAs have a responsibility to both hold LEAs accountable for meeting requirements, including those related to data collections, and support LEAs in ensuring that requirements are met.

### Federal Requirements for Grantees and Program Participants

On September 20, 2018, ED sent a letter with non-regulatory guidance to all chief state school officers regarding recent federally declared disasters. This non-regulatory guidance provides SEAs, LEAs, and other ED grantees and program participants with information on available waivers and other potential forms of relief and intends to “help Department grantees and program participants restore teaching and learning environments and resume services following Federally declared disasters that impact the 2018–2019 academic school year” (ED 2018b, p. 2). Specifically, the guidance

- addresses flexibility on reporting deadlines, timelines for grant-funded activities, and maintenance of fiscal effort or matching requirements, where applicable;
- proposes potential alternatives and strategies for providing program services after disruption;
- suggests methods for ensuring the continuity of services and communication with program participants; and
- covers a variety of topics specific to various program areas.

The letter and guidance are available through ED’s Hurricane Help web page: [https://www.ed.gov/hurricane](https://www.ed.gov/hurricane).

### Supporting Student Progression and Attainment

State and local policies for awarding high school diplomas vary considerably. Thus, a student who is on track to graduate on time might move to another state because of a crisis and, under the new state’s diploma requirements, no longer be considered on track to graduate. Receiving agencies may also need to develop policies and provide programs to accommodate and support high-school juniors and seniors who are not on track to graduate on time due to their displacement from another state. Education agencies that receive a large number of students who have been displaced from another state can develop a formal process with the sending state to award displaced students a diploma from their sending state, provided that the displaced student meets the sending state’s degree requirements. In the wake of Hurricanes Irma and Maria in September 2017, the New York State Education Department and the Florida Department of Education established a formal process with the Puerto Rico Department of Education (PRDE) that allowed students who had been displaced from Puerto Rico to earn a diploma from the PRDE. The use of a common course classification system, such as the School Courses for the Exchange of Data (SCED) Classification System can help sending and receiving agencies compare course information, maintain longitudinal data about students’ coursework, and efficiently exchange course-taking records.
Discontinuing Temporary Systems

After a crisis is over and students have been permanently placed in new school districts, or have returned to their original district, decisions must be made about archiving or destroying temporary datasets and data systems. This is especially important when temporary systems contain personally identifiable student data or other data that might be considered confidential or sensitive in nature. States have different legal requirements for records retention and disposition that will govern decisions regarding temporary datasets. Data sharing agreements that were made with other districts and states during the crisis will also influence the organization’s archival or destruction responsibilities.

Evaluating Response Activities

When a crisis is over, an agency will benefit from a formal evaluation of the adequacy and effectiveness of its disaster recovery plan. All aspects of the data response efforts, including data systems and staff, data elements, and data collection and reporting, should be considered as part of this evaluation. Some of the major evaluation questions asked might include the following:

- Were the data response planning activities adequate for the crisis?
- What additional planning activities might have been helpful?
- Did data systems and staff perform all of their necessary functions?
- Which staff and leadership positions were responsible for completing specific data activities and tasks? Did staff and leadership have adequate authority to successfully complete their specific roles, duties, and responsibilities during the crisis?
- Did the displaced student status indicator and crisis data elements accomplish their purpose?
- Should new data elements be developed for future crises? If so, what elements?
- Did financial systems and policies help or hinder the data response?
- Did external auditing reveal any shortcomings in the system?
- How effective were communications between agencies, both within and outside of the state?
- Were data collection and reporting timelines met?
- What steps were taken to ensure data quality, including nonduplication of student data counts?
- Was the confidentiality of all student data protected?
- Are there any long-term consequences to data reports that need to be addressed or explained, such as uncharacteristic changes in enrollments because of displaced student exit and entry?
- What changes to the disaster recovery plan should be implemented immediately, and what changes should occur after the next data system upgrade?
- What other lessons can be learned from the crisis and response?
**Recommendations for What to Do After a Crisis:**

- Be prepared for the ongoing tracking of displaced students following a crisis, including the high likelihood of multiple enrollments and withdrawals.

- Apply for applicable exemptions and waivers. If granted, develop a plan to meet requirements when the terms of the exemption or waiver end.

- Footnote reports and other published data when there are marked changes that may be a result of student displacement rather than normal measures of progress and participation.

- Formulate a plan to archive or destroy temporary data systems based on usage agreements, records retention policies, confidentiality expectations, and other data-lifecycle considerations.
Chapter 5.
Data Challenges

Many obstacles hinder the collection of high-quality information about displaced students. This chapter details several data-related challenges that may be encountered before, during, and after a crisis.

**When a Statewide Student Information System (SIS) Has Not Been Established**

The type of student data collection system a state has will directly affect the statewide implementation of a displaced student status indicator and crisis data elements and, ultimately, the statewide collection of crisis data. Each crisis is different; thus, the data collection process, including the technology to support collections, needs to be flexible to adapt to the unique circumstances of each crisis. Many states have a statewide SIS that allows districts to either directly use or connect to a state-run individual student data collection system. Under most crisis scenarios, states with a statewide SIS will be able to respond to the need for crisis data more promptly than states that only collect aggregate data reported by local education agencies (LEAs). A statewide SIS enables the state education agency (SEA) to modify data elements at the state level, make those elements available to all LEAs, and then collect detailed crisis information and data on displaced students from LEAs as soon as data entry begins. Data quality is also improved by the ability to have centralized cross-district checks and feedback verification reports for the districts. SEAs with a statewide SIS also have the capability to report certified data to the federal government on behalf of their districts, which can decrease LEA data burden.

States that do not have a statewide SIS nevertheless have a system that allows LEAs to share individual student data with the state at various collection times during a school year. In this case, statewide data collection changes require LEAs to work with their SIS vendors to modify each LEA data system, which can be difficult to accomplish in a timely fashion if student-level crisis data elements are not in place prior to a crisis declaration. By planning ahead, these SEAs could ensure that they are prepared to collect data when a crisis does occur by adding student-level crisis data elements to the statewide data collection, thereby requiring LEAs to work with their SIS vendors to include such elements. Infrequent collection timelines could also prove detrimental when immediate decisionmaking is required at the state level, particularly if financial and budgetary decisions at the state level are dependent on the quality and timeliness of LEA data. States that rely only on statewide aggregate data collections may lack the flexibility they will need during a crisis, but SEAs can design their systems in a way that provides needed flexibility. The Texas Education Agency’s data system, for example, allows for near real-time granular data to be submitted by LEAs.

**When a Crisis Occurs During the School Year**

While there is never an opportune time for a crisis, the time at which a crisis occurs often influences response efforts. Crises that occur at the very beginning of a school year, such as when Hurricane Harvey made landfall at peak intensity on August 26, 2017, can do more than delay certain districts and schools from opening at the start of the scheduled school year. Crises that occur at the start of the school year could also complicate data collections that are necessary for
a range of critical administrative and funding decisions. At the
other end of the school calendar, a crisis in the spring
during state assessments or graduation testing would
introduce a host of different data issues—for example,
LEAs might be unable to confirm whether a student has
earned the credits necessary for graduation.

Crisis that occurs during data collection periods, testing
dates, and other data-critical times can have long-term
impacts on data quality. The timing of a crisis can also
affect data collection schedules, especially for systems still
using aggregate collections. Disaster recovery plans ought
to account for when a crisis occurs, as a crisis that occurs
at the start of the school year requires a different response
than a crisis that occurs during summer break. Therefore,
a disaster recovery team should not only plan for multiple
types of crises but also for the full extent of scenarios
with respect to timing. Receiving agencies also need to be
prepared to accommodate students who were displaced by major disasters that occur beyond their locality. Instructional
services, transportation, food services, counseling, facilities, and other student services will likely be impacted by the
enrollment of displaced students.

When a “Displaced” Student Becomes a “Relocated” Student

It can sometimes be difficult to determine whether a student is displaced or not and, by extension, when a displaced
student had permanently relocated following a crisis and tracking is no longer necessary. Students who are displaced
by a crisis are more likely to move multiple times and may not permanently relocate in a new location until the head of
household secures employment. Thus, each time a student changes schools, it becomes increasingly more difficult for
agencies to track student movement. Clear communication between sending and receiving agencies—including receiving
agencies where a student has enrolled temporarily—is essential for accurate and continued tracking of students who are
displaced by a crisis.

In preparation for the tracking of students who exit or enroll in an agency due to a crisis, a disaster recovery team should
work with authorities at the state and/or local levels to determine how long the displaced student status indicator will be
used and to whom it will be assigned; how many times, for how long, and during what time frame it will be assigned to a
student’s record; and what data must be maintained for funding or accountability purposes. Some of the major questions
regarding the effective management and use of a displaced student status indicator include the following:

- At what point following a crisis does a temporarily displaced student become a permanently relocated student?
- How will the indicator be used to track different types of displacement, such as students who are
displaced from their homes but remain enrolled and continue to attend the same school?
- How many times (i.e., for how many different moves) can the indicator be used?
- What information is needed about students already enrolled in school who are forced into an alternative

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Displaced Students at the Beginning of the School Year

Hurricane Harvey made landfall in Texas on August 26, 2017. The hurricane coincided with the start of the new school year for many Texas school districts, which sometimes made it difficult to determine the reason for new student enrollment. The Irving Independent School District implemented a new enrollment procedure to help determine whether new students were enrolling in school due to a hurricane-related displacement. A counselor interviewed each new enrollee to identify whether the enrollee was a displaced student prior to enrollment. The district adopted this procedure to help ensure that students received appropriate services and staff had the information necessary to apply the correct crisis codes.

setting because of the influx of displaced students? Should they be flagged as displaced students?
- Do funding or accountability needs require maintaining data on displaced students for a specific amount of time? If so, how long should the indicator be included in student records once students are no longer displaced?

In certain situations, students and their families may feel uncomfortable being identified as displaced or homeless, given the stigma that is sometimes attached to being labeled as such, particularly for a long time. To account for students and families who do not self-identify as displaced, a receiving school can incorporate into its intake and enrollment procedures the collection of information necessary to determine whether a student has been displaced due to a crisis. Receiving agencies that provide services to displaced students who qualify for McKinney-Vento services can facilitate the continued provision of services by communicating this information to the next agency that the student enrolls in.

When Data Elements and Codes Need to Be Applied

After a crisis, it is often difficult to determine whether a displaced student has dropped out of school, has transferred to a new school, or has not yet enrolled in a new school and is eligible to return. Information on a displaced student’s status is necessary for the accurate application of exit codes. Tracking the movement of displaced students is also more difficult when a displaced student status indicator is not in place prior to a crisis. Situations where a displaced student has relocated several times before returning to the sending district can further complicate the correct application of a displaced student status indicator.

Accounting for Every Student: A Taxonomy for Standard Student Exit Codes
https://nces.ed.gov/forum/pub_2006804.asp

This best practice resource presents an exhaustive and mutually exclusive exit code taxonomy that accounts, at any single point in time, for all students enrolled (or previously enrolled) in a school or district. It is based on exit code systems in use in education agencies across the nation and a thorough review of existing literature on the subject.

Forum Guide to Collecting and Using Attendance Data
https://nces.ed.gov/forum/pub_2017007.asp

This resource is designed to help state and local education agency staff improve their attendance data practices. It offers best practice suggestions and real-life examples, a set of voluntary attendance codes, and tip sheets for a wide range of education agency staff who work with attendance data.

Reconciling Data After a Crisis

Hurricane Florence caused severe and widespread damage throughout the Carolinas in September 2018. In North Carolina, 52 of the state’s 100 counties were included in the Federal Emergency Management Agency (FEMA) Major Disaster Declaration (4393-DR). 52 percent of all North Carolina regular school districts, enrolling 51.7 percent of the state’s 1.43 million students, were located in the 52 counties designated in the FEMA disaster declaration.

The widespread impact of the hurricane posed challenges for school districts and charter schools, including reporting enrollment and attendance data to the North Carolina Department of Public Instruction (NCDPI). These data are collected by NCDPI after each of the nine school months of the year and are used by several departments within and outside of
NCDPI. Furthermore, state funding is reliant on student membership data reported during the first two months of the school year, making data timeliness and accuracy all the more critical.

In the wake of the hurricane, 312 schools, enrolling over 171,000 students, missed 10 or more school days; of these, some schools missed as many as 39 school days. As a result, data from districts within the FEMA disaster declaration area were out of sync with data from districts that were not impacted by the hurricane. Thus, the monthly reporting due dates were delayed up to 8 weeks for school districts that missed instructional days due to the hurricane. To reconcile these differences in reporting due dates, NCDPI collected, compiled, and posted data for districts not affected by the hurricane, then updated and posted the final data after all districts and charter schools reported their enrollment and attendance data.

The state passed several pieces of legislation to accommodate hurricane-related school closures and their subsequent impact on the data reported:

- North Carolina funds school districts based on a budgeted average daily membership (ADM), with adjustments made based on the highest actual ADM of the first two school months. Hurricane Florence made landfall in the first month of the school year and subsequent student displacements resulted in an abnormally low ADM for certain schools. To ensure that funding was not hindered by abnormally low ADM, legislation (NC S.L. 2018-136) was passed to adjust funding based on the highest actual ADM in the first four months of the school year.

- North Carolina law requires that school calendars must have a minimum of 185 instructional days or 1,025 instructional hours, but some school districts missed up to 39 instructional days as a result of the hurricane. In response, legislation (NC S.L. 2018-135) was passed to waive up to 20 instructional days. This legislation also allowed state funds to be used to compensate school personnel in the affected area for days that were not made up in the school calendar. It also appropriated $6.5 million to districts for school nutrition employee compensation due to the loss of school lunch receipts.

- School principal salaries are set by legislation (NC S.L. 2018-5, S.B. 99 § 8.2) and directly affected by the first two months of their school’s ADM. This legislation was amended (NC S.L. 2018-145, S.B. 469 § 22) so that principals were held harmless for abnormally low ADM due to Hurricane Florence. This legislation applied only to principals whose schools were located in the FEMA disaster declaration area and were closed at least 10 school days in the months following the hurricane.

Student accounting data from the 2018-19 school year, including 2018-19 ADM, will also impact future state budget decisions:

- The total state funded K-12 education budget is approximately $10.2 billion, with ADM data serving as the backbone of the budget. The state prepares the budgeted ADM based on the higher of the current year ADM and the projected future ADM by districts, which uses the first two school months of the school year as the basis for projections. The base data of school districts within the FEMA disaster declaration area was affected by student displacements, resulting in a risk of under-projecting needs in developing the biennium budget for 2019-21. Modifications to the model were necessary to account for the hurricane’s effect on ADM.

- State transportation funds are generated by districts using the most efficient transportation routes. As a result of Hurricane Florence, students were displaced and roads were flooded or closed, which led to school buses being rerouted to less efficient routes. The transportation funding model will need to be adjusted to ensure that district funding is not impacted by student displacements and infrastructure barriers that are beyond the district’s control.

NCDPI staff incorporated new functions in the NC Student Information System (SIS) to flag and track students displaced by hurricanes Florence and Michael. These two new programs in all SIS instances are entitled “Hurricane Florence Displacement” and “Hurricane Michael Displacement,” respectively. Schools assign the appropriate program to displaced students when a student transfers between schools in the same district, between schools in different districts in the state, or from outside of to within the state.
When Data Have Been Impacted by a Crisis

Agencies that have experienced a crisis often face many challenges that can impact data quality. The resumption of routine agency operations, including data-related activities, could be delayed when a crisis has displaced teachers and staff. Accessing, exchanging, and reporting data can be difficult after a crisis, particularly when critical infrastructure, such as electricity, internet, and cell phone service, has been compromised. In situations where data back-ups in a different physical location are the only available source of data, they may be inaccessible if the impacted area is offline. In states where student data and records are saved at the LEA level and transferred, but not stored, by the SEA, SEAs may be unable to fulfill education records requests while the LEA is offline. Agencies that have experienced a crisis need to determine when and how to check data quality, reconcile incomplete and missing data, and recertify data after a crisis.
Strengthening Data Ethics, Quality, and Use in Education Agencies

There are many resources to aid SEAs and LEAs in improving data ethics, quality, and use in their agencies, including the following:

Forum Curriculum for Improving Education Data: A Resource for Local Education Agencies
https://nces.ed.gov/forum/pub_2007808.asp

This curriculum supports efforts to improve the quality of education data by serving as training materials for K-12 school and district staff. It provides lesson plans, instructional handouts, and related resources, and presents concepts necessary to help schools develop a culture for improving data quality.

Forum Guide to Building a Culture of Quality Data: A School & District Resource
https://nces.ed.gov/forum/pub_2005801.asp

This resource was developed to help schools and school districts improve the quality of data they collect and to provide processes for developing a “Culture of Quality Data” by focusing on data entry—getting things right at the source. This resource shows how quality data can be achieved in a school or district through the collaborative efforts of all staff.

Forum Guide to Data Ethics
http://nces.ed.gov/forum/pub_2010801.asp

While laws set the legal parameters that govern data use, ethics establish fundamental principles of “right and wrong” that are critical to the appropriate management and use of education data in the technology age. This guide reflects the experience and judgment of seasoned data managers; while there is no mandate to follow these principles, it is hoped that the contents will prove a useful reference to others in their work.

Improving Education Data: Online Courses
https://nces.ed.gov/forum/dataqualitycourse/dataquality.asp

These online courses are meant to help local LEA staff improve the quality of their data. They are based on the Forum Curriculum for Improving Education Data. The first course, Improving Education Data Part 1—Creating a Foundation, introduces concepts related to creating a culture of quality data. The second course, Improving Education Data Part 2—Coordinating Data Quality, looks at information related to the responsibilities of data coordinators/stewards and at how to plan LEA-level data quality.

Toolkit for a Workshop on Building a Culture of Data Use

This field-tested workshop toolkit guides facilitators through a set of structured activities to develop an understanding of how to foster a culture of data use in districts and schools. The conceptual framework draws on five research-based elements known to support an effective culture of data use. Supporting materials—a facilitator guide and agenda, a slide deck, and participant handouts—provide workshop facilitators with all the necessary materials to lead this process in their own setting.
Chapter 6.

Crisis Data Management Tip Sheets for Stakeholders

The immediate demand for data about displaced students can overwhelm many education agencies that gain or lose students who have been displaced by a crisis. This resource provides recommendations for developing and maintaining data about students moving into or out of an agency because of a crisis. These recommendations are not a comprehensive disaster recovery planning tool. Rather, they are lists of data system planning activities intended to limit the impact of a crisis and preserve or restore educational services to students following a crisis. This chapter includes tip sheets for state and local education agencies (SEAs and LEAs) that identify critical data activities and actions that occur before, during, and after a crisis. Certain activities are applicable to both SEAs and LEAs; therefore, there is duplication between the two tip sheets. Additional details about these planning and response activities are available in chapters 2 through 5.

Tip sheets for the following stakeholder groups are included in this chapter:

- SEA staff and leadership
- LEA staff and leadership
Tip Sheet for SEA Staff and Leadership

Collaboration with agency colleagues, LEAs, and other relevant stakeholder groups (such as federal agencies, legislatures, and disaster recovery and planning teams) should occur before, during, and after a crisis.

Before a Crisis

- Have a regularly reviewed continuity of operations plan.
- Include data managers on your agency’s disaster recovery team and, when possible, establish a data recovery team.
- Have an up-to-date technology plan, test data systems, and back up data.
- Ensure that users will be able to access related data in other systems.
- Automate all data systems.
- Identify relevant statutes that may impact the collection, management, and sharing of data on displaced students.
- Review and understand current federal, state, and local data policies and procedures.
- Create procedures for memoranda of understanding (MoU) and data reciprocity/sharing agreements.
- Implement a statewide displaced student status indicator and crisis codes before they are needed in a crisis.
- Be prepared to collect displaced student information from LEAs to meet federal and state reporting requirements related to a declared crisis.
- Be prepared to introduce additional data collections or collection cycles during a crisis.
- Communicate with your LEA counterparts about data items and file formats before setting up any new elements or systems.
- For SEAs with a statewide student information system (SIS),
  - verify that your SIS is flexible enough to permit the creation of new applications and file formats;
  - add a displaced student status indicator and associated crisis codes to your SIS; and
  - review and maintain the basic student data items in your SIS.
- Train staff and have a designated backup person for all assigned tasks.
- Be aware of existing federal resources and assistance that are available during and after a crisis.
- Leverage professional networks and resources, such as those available through the National Forum on Education Statistics (Forum), the Statewide Longitudinal Data Systems (SLDS) Grant Program, the Regional Educational Laboratory (REL) Program, the Comprehensive Centers Program, and the Council of Chief State School Officers (CCSSO).
- Proactively address issues that might challenge your agency, including a statewide SIS, the timing of crises, displacement status, data codes, and data quality.

Forum Membership

SEA staff and leaders are encouraged to leverage members of the Forum, including their state’s SEA and LEA representatives. The contact information for current Forum members can be accessed via the membership rosters listed on the website (http://nces.ed.gov/forum):

- SEA/LEA Representatives: https://nces.ed.gov/forum/member_state.asp
- Government Agency Representatives: https://nces.ed.gov/forum/member_agency.asp
**During a Crisis**

- Determine your agency’s response based on the nature and scale of the crisis.
- Use emergency communication tools to communicate with all disaster recovery team members.
- Maintain communication with agency leaders and staff and your state’s LEAs.
- Include dates and publication numbers on announcements, press releases, and memoranda to help staff, leadership, and stakeholders refer to the latest information.
- Clearly communicate data action plans to staff at all levels of the education system.
- Inventory all systems and determine whether any data have been lost or otherwise made inaccessible.
- Use a formal chain of communication between education agencies to initiate a collection of displaced student identifiers.
- Respect and protect the confidentiality of education data, even during a crisis.
- Be prepared to query and analyze aggregate data in a variety of ways to support decisionmaking.
- Consider using a temporary database to help share data on displaced students during a crisis.

**After a Crisis**

- Maintain communication with agency leaders and staff and your state’s LEAs.
- Transfer data and records in a timely and secure manner.
- Be prepared for the ongoing tracking of displaced students following a crisis, including the high likelihood of multiple enrollments and withdrawals.
- Review all systems to assess which data reports will be impacted by the crisis.
- Remember to footnote reports and other published data when there are marked changes that may be a result of student displacement rather than normal measures of progress and participation.
- Consider the possibility of stepping in as the fiscal agent for LEAs when requesting Emergency Impact Aid and other federal support.
- Ensure that SEA exceptions and waivers are correctly applied to the LEA.
- Support the provision of alternative learning options for displaced students, such as virtual education or independent study.
- Formulate a plan to archive or destroy temporary data systems based on usage agreements, confidentiality expectations, and other data-lifecycle considerations.
- Collect an evaluation report from each subgroup of your agency and collate the information.
- Evaluate the effectiveness of your agency’s disaster recovery plan.
Tip Sheet for LEA Staff and Leadership

Collaboration with agency colleagues, the SEA, and other relevant stakeholder groups (such as federal agencies, legislatures, and disaster recovery and planning teams) should occur before, during, and after a crisis.

Before a Crisis

- Have a regularly reviewed continuity of operations plan.
- Include data managers on your agency’s disaster recovery team and, when possible, establish a data recovery team.
- Have an up-to-date technology plan, test data systems, and back up data.
- Ensure that users will be able to access related data in other systems.
- Digitize information and records to enable access on smartphones and digital devices.
- Automate all data systems.
- Enable parental access to their student’s information in your agency’s student’s information portal.
- Review and understand current federal, state, and local data policies and procedures.
- Understand federal, state, and local laws that may impact data sharing and reciprocity, particularly laws related to student privacy.
- Create procedures for memoranda of understanding (MoU) and data reciprocity/sharing agreements.
- Understand how to use your state’s displaced student status indicator and crisis codes before they are needed in a crisis.
- Be prepared to collect and report displaced student information to the SEA to meet federal and state reporting requirements related to a declared crisis.
- Communicate with your SEA counterpart about data items and file formats before setting up any new elements or systems.
- For LEAs without a statewide student information system (SIS),
  - verify that your SIS is flexible enough to permit the creation of new applications and file formats;
  - add a displaced student status indicator and associated crisis codes to your SIS; and
  - review and maintain the basic student data items in your SIS.
- Be familiar with the frequency and timing of your SEA’s current data collections.
- Assess infrastructure capacity and intake protocol.
- Develop a process for identifying displaced students as they enroll during a crisis to ensure that data are collected.
- Identify and develop a plan to collect and provide data that are necessary to coordinate services that should be provided to displaced students.
- Train staff and have a designated backup person for all assigned tasks.
- Be aware of existing federal resources and assistance that are available during and after a crisis.

Forum Membership

LEA staff and leaders are encouraged to leverage members of the Forum, including their state’s SEA and LEA representatives. The contact information for current Forum members can be accessed via the membership rosters listed on the website (http://nces.ed.gov/forum):

- SEA/LEA Representatives: https://nces.ed.gov/forum/member_state.asp
- Government Agency Representatives: https://nces.ed.gov/forum/member_agency.asp
• Leverage professional networks and resources, such as those available through the National Forum on Education Statistics, the Statewide Longitudinal Data Systems (SLDS) Grant Program, the Regional Educational Laboratory (REL) Program, the Comprehensive Centers Program, and the Council of Chief State School Officers (CCSSO).
• Proactively address issues that might challenge your agency, including not having a statewide SIS, the timing of crises, displacement status, data codes, and data quality.

**During a Crisis**

• Determine your agency’s response based on the nature and scale of the crisis.
• Use emergency communication tools to communicate with all disaster recovery team members.
• Maintain communication with agency leaders and staff, your SEA, and parents.
• Include dates and publications numbers on announcements, press releases, and memoranda to help staff, leadership, and stakeholders refer to the latest information.
• Clearly communicate data action plans to staff at all levels of the education system.
• Inventory all systems and determine whether any data have been lost or otherwise made inaccessible.
• Monitor and comply with directives regarding reporting data on displaced students to your SEA.
• Respect and protect the confidentiality of education data, even during a crisis.
• Be prepared to query and analyze aggregate data in a variety of ways to support decisionmaking.
• **Receiving LEAs**:
  □ Implement procedures for identifying displaced students as they enroll to ensure that data are collected.
  □ Provide data to support the provision of applicable services to displaced students (e.g., McKinney-Vento services and the National School Lunch Program).

**After a Crisis**

• Maintain communication with agency leaders and staff, your SEA, and parents.
• Transfer data and records in a timely and secure manner.
• Be prepared for the ongoing tracking of displaced students following a crisis, including the high likelihood of multiple enrollments and withdrawals.
• Maintain historical displaced student enrollment data in your SIS.
• Remember to footnote reports and other published data when there are marked changes that may be a result of student displacement rather than normal measures of progress and participation.
• Ensure that SEA exceptions and waivers are correctly applied to the LEA.
• Support the provision of alternative learning options for displaced students, such as virtual education or independent study.
• Collect an evaluation report from each subgroup of your agency and collate the information.
• Evaluate the effectiveness of your agency’s disaster recovery plan.
Crisis Data Management Timeline

Table 1 presents the major planning and response components described in this resource. Additional details about these planning and response activities can be found in chapters 2-4.

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<th>Before a Crisis</th>
<th>During a Crisis</th>
<th>After a Crisis</th>
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<td>Assess data systems</td>
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<td>Review data collection schedules</td>
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<td>Implement displaced student data placeholders</td>
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<td>Maintain data elements</td>
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<td>Develop a response</td>
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<td>Retrieve and restore lost data</td>
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<td>Initiate use of crisis data codes</td>
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<td>Share and exchange data</td>
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<td>Report data to federal and state agencies</td>
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<td>Discontinue temporary systems</td>
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<td>Communicate with states, districts, and schools</td>
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Table 1. Crisis Data Management Timeline
Conclusion

Crises, in some form or another, will continue to disrupt the lives of students, schools, education agencies, and communities. Educators have always been committed to providing high-quality educational services to all students. This resource provides actionable information to support the development and maintenance of timely, accurate data about displaced students moving into or out of an education agency. The ability to track displaced students efficiently and accurately allows an education agency to continue this commitment to providing quality educational services during and after a crisis. It is hoped that crisis management planning undertaken by education data administrators and staff will lead to additional questions, ideas, and actions that can benefit us all during future crises.

The scale and severity of crises—including the impact of crises on schools and students—continue to evolve. Several issues relevant to crisis data management are beyond the scope of this resource, such as the role of virtual education in ensuring learning continuity for displaced students. Schools and districts that have experienced a crisis may be able to provide students with instructional resources and support, such as those described in Recommendations to Ensure the Continuity of Learning for Schools (K-12) During Extended Student Absence or School Dismissals (U.S. Department of Education 2010). Learning continuity is an important issue that deserves consideration, but is beyond the immediate focus of this resource. Similarly, tracking other types of education data beyond data on displaced students, such as facility and finance data, is an important issue for planners to consider, but outside of the scope of this resource.

It is likely that education agencies will need to consider and address many crisis-related issues that are beyond the immediate focus of this resource. Thus, these issues warrant further consideration and discussion. Ongoing issues include the following:

- The usefulness of other types of education data during and after a crisis.
- The displacement of teachers and staff and the impact of this on an education agency’s response efforts.
- The impact that permanent re-enrollment in a receiving agency can have on a sending agency that has experienced a crisis.
- The role of distance, online, and other educational resources in ensuring learning continuity for displaced students.
- The appropriate use of alternative communication methods during and after a crisis.
- Events that involve a single student (who may or may not be a displaced student).
- Situations that do not disrupt school-level activities or displace students temporarily or permanently, including
  - situations where a student is experiencing difficulties such as mental, emotional, or physiological distress.
  - situations in which the main source of student information is compromised (e.g., due to a data breach, corruption, or loss).
Appendix A: Understanding Relevant Federal Laws

This appendix provides an overview of five important federal laws that affect displaced students. All information was obtained from the cited websites. Many states and localities have adopted similar laws, regulations, and policies. Agencies should proactively review and understand the implications of all applicable federal, state, and local legislation.

Family Educational Rights and Privacy Act

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g) is a federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education (ED).

FERPA gives parents certain rights with respect to their children’s education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are known as “eligible students.”

- Parents or eligible students have the right to inspect and review the student’s education records maintained by the school. Schools are not required to provide copies of records unless, for reasons such as great distance, it is impossible for parents or eligible students to review the records. Schools may charge a fee for copies.
- Parents or eligible students have the right to request that a school correct records which they believe to be inaccurate or misleading. If the school decides not to amend the record, the parent or eligible student then has the right to a formal hearing. After the hearing, if the school still decides not to amend the record, the parent or eligible student has the right to place a statement with the record setting forth his or her view about the contested information.
- Generally, schools must have written permission from the parent or eligible student in order to release any information from a student’s education record. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.31):
  - school officials with legitimate educational interest;
  - other schools to which a student is transferring;
  - specified officials for audit or evaluation purposes;
  - appropriate parties in connection with financial aid to a student;
  - organizations conducting certain studies for or on behalf of the school;
  - accrediting organizations;
  - to comply with a judicial order or lawfully issued subpoena;
  - appropriate officials in cases of health and safety emergencies; and
  - state and local authorities, within a juvenile justice system, pursuant to specific state law.

Schools may disclose, without consent, “directory” information such as a student’s name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, schools must tell parents and eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the school not disclose directory information about them. Schools must notify parents and eligible students annually of their rights under FERPA. The actual means of notification (special letter, inclusion in a parent-teacher association [PTA] bulletin, student handbook, or newspaper article) is left to the discretion of each school.
McKinney-Vento Homeless Education Assistance Improvements Act of 2001

The McKinney-Vento Act (P.L. 107-110) is designed to address the challenges that homeless children and youths have faced in enrolling, attending, and succeeding in school. Under the McKinney-Vento Act, state education agencies (SEAs) must ensure that each homeless child and youth has equal access to the same free, appropriate public education, including a public preschool education, as other children and youths. Homeless children and youths must have access to the educational and related services that they need to enable them to meet the same challenging state academic standards to which all students are held. In addition, homeless students may not be separated from the mainstream school environment. SEAs and local education agencies (LEAs) are required to review and undertake steps to revise laws, regulations, practices, or policies that may act as barriers to the identification, enrollment, attendance, or success in school of homeless children and youths.

The McKinney-Vento Act strongly emphasizes the importance of school stability for homeless children and youths. Changing schools multiple times significantly impedes a student’s academic and social growth. The research on highly mobile students, including homeless students, indicates that a student can lose academic progress with each school change. Highly mobile students have also been found to have lower test scores and worse overall academic performance than peers who do not change schools frequently. Therefore, the McKinney-Vento Act calls for LEAs to maintain students in their school of origin to promote school stability and greater educational outcomes overall, unless it is not in the student’s best interest.

The following is the policy of the Congress:

(1) Each state educational agency shall ensure that each child of a homeless individual and each homeless youth has equal access to the same free, appropriate public education, including a public preschool education, as provided to other children and youths.

(2) In any state where compulsory residency requirements or other requirements, in laws, regulations, practices, or policies, may act as a barrier to the identification of, or the enrollment, attendance, or success in school of, homeless children and youths, the state educational agency and local educational agencies in the state will review and undertake steps to revise such laws, regulations, practices, or policies to ensure that homeless children and youths are afforded the same free, appropriate public education as provided to other children and youths.

(3) Homelessness is not sufficient reason to separate students from the mainstream school environment.

(4) Homeless children and youths should have access to the education and other services that such children and youths need to ensure that such children and youths have an opportunity to meet the same challenging state academic standards to which all students are held.
The term “homeless children and youths”—

(A) means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 11302(a)(1) of this title); and

(B) includes—

(i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;

(ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section 11302(a)(2)(C) 1 of this title);

(iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and

(iv) migratory children (as such term is defined in section 6399 of title 20) who qualify as homeless for the purposes of this part because the children are living in circumstances described in clauses (i) through (iii).

For More Information . . .

• Visit https://ed.gov/policy/elsec/leg/esea02/pg116.html to learn more about the McKinney-Vento Act.

• Visit https://www2.ed.gov/programs/homeless/index.html to learn more about education for homeless children and youths grants for state and local activities.

• Visit https://nche.ed.gov/disaster-preparation-and-response/ to learn more about how the McKinney-Vento Act applies to and can assist displaced students and their families.


Health Insurance Portability and Accountability Act

Congress enacted the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Public Law 104-191, to, among other things, improve the efficiency and effectiveness of the health care system through the establishment of national standards and requirements for electronic health care transactions and to protect the privacy and security of individually identifiable health information. Collectively, these are known as HIPAA’s Administrative Simplification provisions, and the U.S. Department of Health and Human Services (HHS) has issued a suite of rules, including a privacy rule, to implement these provisions. Entities subject to the HIPAA Administrative Simplification Rules (see 45 CFR Parts 160, 162, and 164), known as “covered entities,” are health plans, health care clearinghouses, and health care providers that transmit health information in electronic form in connection with covered transactions. See 45 CFR § 160.103. “Health care providers” include institutional providers of health or medical services, such as hospitals, as well as noninstitutional providers, such as physicians, dentists, and other practitioners, along with any other person or organization that furnishes, bills, or is paid for health care in the normal course of business. Covered transactions are those for which HHS has adopted a standard, such as health care claims submitted to a health plan. See 45 CFR § 160.103 (definitions of “health care provider” and “transaction”) and 45 CFR Part 162, Subparts K–R.
The HIPAA Privacy Rule requires covered entities to protect individuals’ health records and other identifiable health information by requiring appropriate safeguards to protect privacy, and setting limits and conditions on the uses and disclosures that may be made of such information without patient authorization. The rule also gives patients’ rights over their health information, including rights to examine and obtain a copy of their health records, and to request corrections.


The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) was signed into law on November 23, 1988; it amended the Disaster Relief Act of 1974 (P.L. 93-288). The Stafford Act constitutes the statutory authority for most Federal disaster response activities especially as they pertain to the Federal Emergency Management Agency (FEMA) and FEMA programs.

The Stafford Act intends to provide an orderly and continuing means of assistance by the federal government to state and local governments in carrying out their responsibilities to alleviate the suffering and damage which result from disasters, specifically by

(1) revising and broadening the scope of existing disaster relief programs;
(2) encouraging the development of comprehensive disaster preparedness and assistance plans, programs, capabilities, and organizations by the States and by local governments;
(3) achieving greater coordination and responsiveness of disaster preparedness and relief programs;
(4) encouraging individuals, states, and local governments to protect themselves by obtaining insurance coverage to supplement or replace governmental assistance;
(5) encouraging hazard mitigation measures to reduce losses from disasters, including development of land use and construction regulations; and
(6) providing federal assistance programs for both public and private losses sustained in disasters.

On October 5, 2018, the president signed the Disaster Recovery Reform Act of 2018 into law as part of the Federal Aviation Administration Reauthorization Act of 2018. These reforms acknowledge the shared responsibility of disaster response and recovery, aim to reduce the complexity of FEMA, and build the nation’s capacity for the next catastrophic event. The law amends the Stafford Act and contains more than 50 provisions that require FEMA policy or regulation changes for full implementation.

For More Information . . .

- Visit https://www.hhs.gov/hipaa/index.html to learn more about HIPAA.
- Visit https://studentprivacy.ed.gov/resources/joint-guidance-application-ferpa-and-hipaa-student-health-records to learn more about the relationship between FERPA and HIPAA and how these two laws apply to student records.
The Temporary Emergency Impact Aid for Displaced Students (EIA) program provides funds to assist with the cost of educating public and nonpublic students displaced by a major disaster or emergency. Under the EIA program, ED awards grants to eligible SEAs to enable them to make emergency impact aid payments to eligible LEAs and eligible Bureau of Indian Education-funded schools to assist with the cost of educating displaced students who are served by those agencies and schools or who attend eligible nonpublic schools located in the areas served by those agencies. Under the 2019 EIA program, ED will award grants to eligible applicants for costs incurred during the 2018-2019 school year as a result of educating public and non-public school students displaced by Hurricanes Florence and Michael, Typhoon Mangkhut, Super Typhoon Yutu, and wildfires, earthquakes, and volcanic eruptions occurring in calendar year 2018 and tornadoes and floods occurring in calendar year 2019 in those areas for which a major disaster or emergency is declared under section 401 or 501 of the Robert T. Stafford Disaster Relief and Emergency Act (42 U.S.C. 5170 and 5190). The EIA program is authorized in Division B, Subdivision 1, Title VIII of P.L. 116-20 “Additional Supplemental Appropriations for Disaster Relief Act of 2019.” Current information on the EIA program is available on the ED website at https://www2.ed.gov/programs/eia/index.html.

For More Information . . .


ED’s Temporary Emergency Impact Aid for Displaced Students

- Visit https://www2.ed.gov/programs/eia/index.html to learn more about the EIA program.
- Visit https://www2.ed.gov/programs/eia/faq.html for answers to frequently asked questions about the EIA program.
- Visit https://www.ed.gov/hurricane to learn more about the continuation of critical services to students, families, and educators and the restoration of the learning environment after a hurricane.
Appendix B: Select List of Displaced Student Status Indicators and Crisis Codes

Several states have developed data elements to help track displaced students and record crisis information. Table 2 presents a select list of displaced student status indicators and crisis codes that are used by states. While this list includes elements that are used during and following a crisis that displaces students, it does not include a comprehensive list of all possible data elements that could be used to track displaced students and record crisis information, nor does it include data elements that collect required data for federal collections on homeless education programs. The information is not exhaustive, and there may be additional examples not presented in this table. State and local education agencies (SEAs and LEAs) may find this list useful as they refine their existing student information systems to capture data related to displaced students and crisis situations.

<table>
<thead>
<tr>
<th>State</th>
<th>Data Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arkansas</td>
<td><strong>Resident:</strong> The code designating whether the student’s legal residence is within the geographic area served by the district as follows:</td>
</tr>
<tr>
<td></td>
<td>R = Residence is within the district’s area</td>
</tr>
<tr>
<td></td>
<td>C = Residence is outside the district’s area</td>
</tr>
<tr>
<td></td>
<td>E = Irma Evacuee Student (resident)</td>
</tr>
<tr>
<td></td>
<td>H = Harvey Evacuee Student (resident)</td>
</tr>
<tr>
<td></td>
<td>S = Residence is outside the state of Arkansas</td>
</tr>
<tr>
<td></td>
<td>K = Katrina Evacuee Student (resident)</td>
</tr>
<tr>
<td></td>
<td>Q = Rita Evacuee Student (resident)</td>
</tr>
<tr>
<td></td>
<td>U = Maria Evacuee Student (resident)</td>
</tr>
<tr>
<td></td>
<td>1 = Resident Home School Student No ADM</td>
</tr>
<tr>
<td></td>
<td>2 = Resident Home School Student WITH ADM</td>
</tr>
<tr>
<td></td>
<td>4 = Resident Home/Private School Student Act 173 with ADM</td>
</tr>
<tr>
<td></td>
<td>5 = Home School Virtual Environment</td>
</tr>
<tr>
<td></td>
<td>7 = Florence Evacuee Student (resident)</td>
</tr>
<tr>
<td></td>
<td>8 = Michael Evacuee Student (resident)</td>
</tr>
<tr>
<td></td>
<td><strong>Displaced District:</strong> The name of the district that the evacuee student attended prior to coming into the state.</td>
</tr>
<tr>
<td></td>
<td><strong>Displaced District State:</strong> The state in which the Displaced District is located.</td>
</tr>
<tr>
<td>State</td>
<td>Data Definition</td>
</tr>
<tr>
<td>---------</td>
<td>----------------</td>
</tr>
</tbody>
</table>
| Florida | **Disaster Affected Student:** Indicator of whether the student moved to this school district or changed schools within the district this school year due to a disaster such as a hurricane or earthquake.  
  B = Yes, this student moved to this district this school year from outside of Florida due to the Gulf of Mexico Deepwater Horizon oil spill incident.  
  E = Yes, this student moved to this district this school year due to an earthquake.  
  Q = Yes, this student changed schools within this district this school year due to an earthquake.  
  W = Yes, this student changed schools within this district this school year due to a hurricane.  
  Y = Yes, this student moved to this district this school year due to a hurricane.  
  Z = No, this student did not move to this district and did not change schools within this district this school year due to a disaster.  

**Homelessness Cause:** Code students who are or were homeless using the following causes of homelessness codes for the student and/or the student’s family or guardian.  
  D = Man-made Disaster (Major)  
  E = Natural Disaster - Earthquake  
  F = Natural Disaster-Flooding  
  H = Natural Disaster-Hurricane  
  M = Mortgage Foreclosure- homeless family loses own home due to foreclosure  
  N = Natural Disaster-Other  
  O = Other – i.e., lack of affordable housing, long-term poverty, unemployment or underemployment, lack of affordable health care, mental illness, domestic violence, forced eviction, etc.  
  S = Natural Disaster-Tropical Storm  
  T = Natural Disaster-Tornado  
  U = Unknown  
  W = Natural Disaster-Wildfire or Fire  

Code students who are not and have not been homeless this school year using the following code.  
  Z = No, student is not homeless and has not been homeless this school year.  

| Louisiana | **Disaster Entry and Exit Reasons:**  
  Entry Code N1 = Disaster entry from public school within LA  
  Entry Code N2 = Disaster entry from nonpublic school within LA  
  Entry Code N3 = Disaster entry from out of state  
  Entry Code N4 = Disaster entry from within same district  
  Exit Code 37 = Disaster exit
### State Aid Category: Classification for aid eligibility from the state.

<table>
<thead>
<tr>
<th>State Aid Category</th>
<th>Data Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>Regular resident enrolled in their district.</td>
</tr>
<tr>
<td>1</td>
<td>Enrollment Options/Open Enrollment</td>
</tr>
<tr>
<td>10</td>
<td>Joint Powers Cooperatives for Special Education and/or Secondary Vocational Programs</td>
</tr>
<tr>
<td>11</td>
<td>Parent Initiated Agreements Between School Boards</td>
</tr>
<tr>
<td>12</td>
<td>Grandfather Clause/40 Acre Law/Previous Enrollment</td>
</tr>
<tr>
<td>13</td>
<td>State Board Approved Exception</td>
</tr>
<tr>
<td>14</td>
<td>Enrollment in Another State</td>
</tr>
<tr>
<td>15</td>
<td>Non-Minnesota resident, tuition paid by entity in another state or country</td>
</tr>
<tr>
<td>16</td>
<td>Shared Time Aid is paid to the resident district</td>
</tr>
<tr>
<td>17</td>
<td>Shared Time Aid paid to the serving district.</td>
</tr>
<tr>
<td>18</td>
<td>Shared Time - Parent/guardian pays tuition</td>
</tr>
<tr>
<td>19</td>
<td>Tuition Agreement with Resident District</td>
</tr>
<tr>
<td>2</td>
<td>A Foreign Exchange Student</td>
</tr>
<tr>
<td>20</td>
<td>Tuition Agreement with Parent/Guardian</td>
</tr>
<tr>
<td>21</td>
<td>Ineligible Nonresident Student</td>
</tr>
<tr>
<td>22</td>
<td>Student Residents</td>
</tr>
<tr>
<td>24</td>
<td>Early Graduate</td>
</tr>
<tr>
<td>25</td>
<td>Adult students age 21 or older who meet the GI criteria.</td>
</tr>
<tr>
<td>26</td>
<td>Private High School Graduation Incentives</td>
</tr>
<tr>
<td>27</td>
<td>Temporary Placement for Nonhandicapped Students for Care and Treatment</td>
</tr>
<tr>
<td>28</td>
<td>Resident student attending a nonpublic school through either an IEP IFSP IIIP or for care and treatment.</td>
</tr>
<tr>
<td>29</td>
<td>Resident Voluntary Pre-Kindergarten students who are ineligible for funding</td>
</tr>
<tr>
<td>3</td>
<td>Graduation Incentives</td>
</tr>
<tr>
<td>4</td>
<td>Enrollment Choice for 11th and 12th Grade Students</td>
</tr>
<tr>
<td>41</td>
<td>Screening by school district used for Early Childhood Screening</td>
</tr>
<tr>
<td>42</td>
<td>Child and Teen Checkup EPSDT</td>
</tr>
<tr>
<td>43</td>
<td>Headstart</td>
</tr>
<tr>
<td>44</td>
<td>Private Provider</td>
</tr>
<tr>
<td>45</td>
<td>Conscientious Objector</td>
</tr>
<tr>
<td>46</td>
<td>Extended School year</td>
</tr>
<tr>
<td>5</td>
<td>Interdistrict Cooperative Agreement</td>
</tr>
<tr>
<td>51</td>
<td>South Dakota enrolled in MN</td>
</tr>
<tr>
<td>52</td>
<td>Minnesota enrolled in SD</td>
</tr>
<tr>
<td>6</td>
<td>Secondary Cooperative Facilities</td>
</tr>
<tr>
<td>7</td>
<td>Homeless</td>
</tr>
<tr>
<td>8</td>
<td>Students who transfer to the charter school via student/parental choice.</td>
</tr>
<tr>
<td>9</td>
<td>Summer membership hours</td>
</tr>
<tr>
<td>97</td>
<td>Displacement due to natural disaster. Active in 2018 for students displaced by Hurricane Harvey.</td>
</tr>
<tr>
<td>98</td>
<td>Summer Graduate or Dropout</td>
</tr>
</tbody>
</table>

### Special Programs for Displaced Students:

- Hurricane Florence Displacement
- Hurricane Michael Displacement
<table>
<thead>
<tr>
<th>State</th>
<th>Data Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Texas</td>
<td><strong>Crisis Code:</strong></td>
</tr>
<tr>
<td></td>
<td>00 = Student Was Not Affected By A Health Or Weather Related Crisis</td>
</tr>
<tr>
<td></td>
<td>05A = This code identifies students who had to change LEAs either because their home campus was damaged or they had to move to another LEA because their home was impacted.</td>
</tr>
<tr>
<td></td>
<td>05B = This code identifies students who had to change campuses either because their home campus was damaged or they had to move to another campus attendance zone within the same LEA because their home was impacted.</td>
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<tr>
<td></td>
<td>05C = This code should be used to identify students who became homeless per the McKinney-Vento definition by Hurricane Harvey, but have not had to change campuses.</td>
</tr>
<tr>
<td></td>
<td>07 = Reserved For Future Health Or Weather Related Crisis</td>
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<td></td>
<td>08 = Reserved For Future Health Or Weather Related Crisis</td>
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<td></td>
<td>09 = Reserved For Future Health Or Weather Related Crisis</td>
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<td>10 = Reserved For Future Health Or Weather Related Crisis</td>
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<td>11 = Reserved For Future Health Or Weather Related Crisis</td>
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<td>12 = Reserved For Future Health Or Weather Related Crisis</td>
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<td>26 = Reserved For Future Health Or Weather Related Crisis</td>
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<td>27 = Reserved For Future Health Or Weather Related Crisis</td>
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<td>28 = Reserved For Future Health Or Weather Related Crisis</td>
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<tr>
<td></td>
<td>29 = Reserved For Future Health Or Weather Related Crisis</td>
</tr>
<tr>
<td></td>
<td>30 = Reserved For Future Health Or Weather Related Crisis</td>
</tr>
</tbody>
</table>

Table 2. Select List of Displaced Student Status Indicators and Crisis Codes
Appendix C: Checklist of Crisis Data Management Tasks and Activities

There are many operational tasks necessary to effectively plan for and respond to crises that cause the disruption of school-level activities and may temporarily or permanently displace students. The following list of activities can assist state and local education agencies (SEAs and LEAs) as they create a new or improve an existing disaster recovery plan. Additional details about these planning and response activities can be found in chapters 2-4. This list is not exhaustive or prescriptive, and agencies should modify the tasks and activities in this process to best meet their needs.

Before a Crisis
- Establish a disaster recovery team
- Assess existing data systems
- Review federal, state, and local data policies and procedures
- Review the frequency and timing of data collections
- Implement placeholders for displaced student data elements
- Maintain data elements, including basic data elements from the student information system, basic data elements from other systems, and information for the Federal Emergency Management Agency (FEMA)
- Maintain communication between states, districts, and schools
- Provide training

During a Crisis
- Declare a crisis
- Develop a response
- Maintain communication between states, districts, and schools
- Assess existing data systems
- Retrieve and restore lost data
- Communicate guidance and initiate the use of crisis indicators
- Share data and broker data exchange

After a Crisis
- Maintain communication between states, districts, and schools
- Continue ongoing data sharing
- Report data to federal and state agencies
- Support student progression and attainment
- Discontinue temporary data systems
- Evaluate crisis response activities
Reference List


Related Resources

Additional Resources

Common Education Data Standards (CEDS)
https://ceds.ed.gov/
The CEDS initiative is a voluntary common vocabulary, data model, and suite of implementation tools to help education stakeholders understand and use comparable education data throughout the early learning through postsecondary and workforce settings.

Disaster Preparation and Response
The National Center for Homeless Education (NCHE) operates the U.S. Department of Education’s (ED) technical assistance center for the federal Education for Homeless Children and Youths (EHCY) Program. This NCHE web page includes information and links to related resources on providing displaced students with educational programs and social services, helping students cope with natural disasters and crises, and planning for and responding to crises.

Disaster Recovery Reform Act of 2018
https://www.fema.gov/disaster-recovery-reform-act-2018
This Federal Emergency Management Agency (FEMA) web page provides an overview of more than 50 provisions in the Disaster Recovery Reform Act of 2018 that require FEMA policy or regulation changes for full implementation. It includes each provision and the status of FEMA’s implementation as there are updates.

EHCY Grants for State and Local Activities
https://www2.ed.gov/programs/homeless/index.html
This ED web page includes information on the McKinney-Vento EHCY Program, including program purpose; grant eligibility and applicant information; awards and performance; funding status; legislation, regulations, and guidance; related resources; and contact information.

Emergency Communications
https://www.dhs.gov/topic/emergency-communications
This U.S. Department of Homeland Security (DHS) web page includes information and resources on emergency communications, including several programs and services provided by DHS and other federal agencies to support emergency communications.

Family Educational Rights and Privacy Act (FERPA)
This ED web page includes information and links to related resources on FERPA, including frequently asked questions; information for parents and students, K-12 school officials, and postsecondary school officials; the Protection of Pupil Rights Amendment; and guidance and notices.
Guide to Collecting & Reporting Federal Data: EHCY Program
This NCHE publication serves as a resource for managing the collection and submission of high-quality data that meet federal requirements. It includes a list of all the information school districts and states are required to report, a table to help liaisons and state coordinators assess data quality, sample comments states can submit with data, and information to help plan for future collections. While primarily designed to meet the needs of State Coordinators for Homeless Education and EDfacts Coordinators, local liaisons may also find the Guide helpful in completing data reports required by their SEAs.

Health Insurance Portability and Accountability Act (HIPAA) - Health Information Privacy
https://www.hhs.gov/hipaa/index.html
This U.S. Department of Health and Human Services (HHS) web page includes guidance and information about the HIPAA Privacy Rule, including what information is protected and how health information is used and disclosed.

Homeless Education
This ED web page includes the text of the McKinney-Vento Homeless Education Assistance Improvements Act of 2001.

Hurricane Help
https://www.ed.gov/hurricane
Originally created by ED in response to Hurricane Harvey in 2017, this set of web pages provides information related to Hurricanes Harvey, Irma, and Maria in 2017 and Hurricanes Florence and Michael in 2018, as well general hurricane information, links to federal resources, and lists of resources specifically related to education.

Individual Assistance Program and Policy Guide
https://www.fema.gov/media-library/assets/documents/177489
This FEMA guide consolidates policy statements for all Individual Assistance programs, including the Individuals and Households Program, the Mass Care and Emergency Assistance programs, and the Community Services programs. The guide is intended to provide a comprehensive policy resource for state, local, territorial, and tribal governments, nongovernmental partners, and other entities that assist disaster survivors with post-disaster recovery. It applies to any disaster declared on or after March 1, 2019.

Joint Guidance on the Application of FERPA and HIPAA to Student Health Records
This joint guidance from ED and HHS is intended to explain the relationship between FERPA and HIPAA and how these two laws apply to records maintained on students.
Protecting Student Privacy
https://studentprivacy.ed.gov/
The ED Student Privacy Policy Office is responsible for the administration and enforcement of federal laws relating to the privacy of students’ education records, and for the provision of technical assistance on student privacy issues for the broader education community. This website includes guidance and legally authoritative documentation, best-practice information, training materials, and other resources on student privacy issues, including the privacy of students’ education records.

Public Assistance Program and Educational Facilities Fact Sheet
https://www.fema.gov/pdf/about/educational_facilities_factsheet.pdf
FEMA and ED worked together to develop this fact sheet in an effort to better address Frequently Asked Questions (FAQs) as they relate to reimbursement eligibility for schools damaged or destroyed as a result of a presidentially declared disaster.

Search for Public Schools
https://nces.ed.gov/ccd/schoolsearch/
This online tool from the National Center for Education Statistics (NCES) allows users to obtain NCES IDs for districts and schools, as well as district locale codes and statistical area information for all public schools and districts in the United States.

Robert T. Stafford Disaster Relief and Emergency Assistance Act (P.L. 93-288, Amended)
This ED web page includes the text of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), which constitutes the statutory authority for most federal disaster response activities, especially as they pertain to FEMA and its programs.

Temporary Emergency Impact Aid for Displaced Students (EIA)
https://www2.ed.gov/programs/eia/index.html
This ED web page includes information on the EIA program, including program purpose; grant eligibility and applicant information; awards and performance; funding status; legislation, regulations, and guidance; related resources; and contact information.

Toolkit for a Workshop on Building a Culture of Data Use
This field-tested workshop toolkit guides facilitators through a set of structured activities to develop an understanding of how to foster a culture of data use in districts and schools. The conceptual framework draws on five research-based elements known to support an effective culture of data use. Supporting materials—a facilitator guide and agenda, a slide deck, and participant handouts—provide workshop facilitators with all the materials needed to lead this process in their own setting.
Case Studies and Real-World Examples

Hawaii Department of Education

Kīlauea Eruption Update

Emergencies
http://www.hawaiipublicschools.org/BeyondTheClassroom/SafeSchools/Emergencies/Pages/home.aspx

New York State Education Department

Recent Natural Disasters and Displaced Families: Resources & Guidance for School Districts, Families, and Community Organizations
http://www.nysed.gov/bilingual-ed/
recent-natural-disasters-and-displaced-families-resources-guidance-school-districts

North Carolina Department of Public Instruction

Data & Reports
http://www.ncpublicschools.org/fbs/resources/data/

North Carolina General Assembly
https://www.ncleg.gov/

Texas Education Agency

Hurricane Harvey Resources
https://tea.texas.gov/About_TEA/Other_Services/Weather_and_Disaster/Hurricane_Harvey_Resources/

Hurricane Harvey Help
https://tea.texas.gov/harveyhelp/

Hurricane Harvey Parent Resources
https://tea.texas.gov/About_TEA/Other_Services/Weather_and_Disaster/Hurricane_Harvey_PARENT_Resources/
National Forum on Education Statistics Resources

**Accounting for Every Student: A Taxonomy for Standard Student Exit Codes (2006)**
https://nces.ed.gov/forum/pub_2006804.asp
This best practice resource presents an exhaustive and mutually exclusive exit code taxonomy that accounts, at any single point in time, for all students enrolled (or previously enrolled) in a school or district. It is based on exit code systems in use in education agencies across the nation and a thorough review of existing literature on the subject.

**Forum Curriculum for Improving Education Data: A Resource for Local Education Agencies (2007)**
https://nces.ed.gov/forum/pub_2007808.asp
This curriculum supports efforts to improve the quality of education data by serving as training materials for K-12 school and district staff. It provides lesson plans, instructional handouts, and related resources, and presents concepts necessary to help schools develop a culture for improving data quality.

https://nces.ed.gov/forum/pub_2015158.asp
This resource provides “encyclopedia-type” entries for eight plausible alternative measures of socioeconomic status (SES) and, as such, will help readers better understand the implications of collecting and interpreting a range of SES-related data in education agencies.

https://nces.ed.gov/forum/pub_2005801.asp
This resource was developed to help schools and school districts improve the quality of data they collect and to provide processes for developing a “Culture of Quality Data” by focusing on data entry—getting things right at the source. This resource shows how quality data can be achieved in a school or district through the collaborative efforts of all staff.

**Forum Guide to Collecting and Using Attendance Data (2018)**
https://nces.ed.gov/forum/pub_2017007.asp
This resource is designed to help state and local education agency staff (SEA and LEA) improve their attendance data practices. It offers best practice suggestions and real-life examples, a set of voluntary attendance codes, and tip sheets for a wide range of education agency staff who work with attendance data.
Forum Guide to Core Finance Data Elements (2007)
https://nces.ed.gov/forum/pub_2007801.asp
This resource provides an overview of key finance data terms. It also covers the two NCES public school finance surveys: the state-level National Public Education Financial Survey and the School District Finance Survey (or F-33).

https://nces.ed.gov/forum/pub_2017017.asp
This resource is intended to identify some of the overarching benefits and challenges involved in data disaggregation; recommend appropriate practices for disaggregating racial/ethnic data in districts and states; and describe real-world examples of large and small education agencies disaggregating racial/ethnic data successfully.

https://nces.ed.gov/forum/pub_2015157.asp
This resource outlines the data needs and helpful analytics for five use cases (individual learning plans, educator support systems, postsecondary feedback loops, accountability systems, and career technical and education programs) that support SEA and LEA college and career ready initiatives.

https://nces.ed.gov/forum/pub_2011806.asp
This resource focuses on the use of crime, violence, and discipline data to improve school safety. It presents strategies for implementing an incident database; recommends a body of data elements, definitions, and code lists useful for collecting accurate and comparable data; and offers suggestions for the effective presentation and reporting of data.

Forum Guide to Data Ethics (2010)
http://nces.ed.gov/forum/pub_2010801.asp
While laws set the legal parameters that govern data use, ethics establish fundamental principles of “right and wrong” that are critical to the appropriate management and use of education data in the technology age. This guide reflects the experience and judgment of seasoned data managers; while there is no mandate to follow these principles, it is hoped that the contents will prove a useful reference to others in their work.

https://nces.ed.gov/forum/pub_2017016.asp
This resource recommends data visualization practices that will help education agencies communicate data meaning in visual formats that are accessible, accurate, and actionable for a wide range of education stakeholders. Although this resource is designed for staff in education agencies, many of the visualization principles apply to other fields as well.
https://nces.ed.gov/forum/pub_2006807.asp
This resource was developed to remedy the lack of reliable, objective information available to the education community about decision support systems. It is intended to help readers better understand what decision support systems are, how they are configured, how they operate, and how they might be developed and implemented in an education setting.

Forum Guide to Education Data Privacy (2016)
https://nces.ed.gov/forum/pub_2016096.asp
This resource provides SEAs and LEAs with best practice information to use in assisting school staff in protecting the confidentiality of student data in instructional and administrative practices. SEAs and LEAs may also find the guide useful in developing privacy programs and related professional development programs.

Forum Guide to Education Indicators (2005)
https://nces.ed.gov/forum/pub_2005802.asp
This resource provides encyclopedia-type entries for 44 commonly used education indicators. Each indicator entry contains a definition, recommended uses, usage caveats and cautions, related policy questions, data element components, a formula, commonly reported subgroups, and display suggestions.

Forum Guide to Elementary/Secondary Virtual Education Data (2016)
https://nces.ed.gov/forum/pub_2016095.asp
This resource provides information on the impact of virtual education on established data elements and methods of data collection and addresses the scope of changes, the rapid pace of new technology development, and the proliferation of resources in virtual education.

Forum Guide to Ensuring Equal Access to Education Websites (2011)
https://nces.ed.gov/forum/pub_2011807.asp
This resource guides education institutions in improving the accessibility of websites and other electronic information technology, and in complying with accessibility standards and laws. It is intended to raise awareness in nontechnical audiences and suggest best practices for complying with Section 508 goals at an operational level in schools, school districts, and SEAs.

https://nces.ed.gov/forum/pub_2018156.asp
This resource is designed to help SEAs and LEAs plan, design, build, use, and improve their facility information systems. It includes a review of why school facilities data matter and recommends a five-step process that an education agency can undertake to develop a robust facility information system around goals, objectives, and indicators.
https://nces.ed.gov/forum/pub_2009805.asp
This resource offers best practice concepts, definitions, implementation strategies, and templates/tools for an audience of data, technology, and program staff in SEAs and LEAs. It is hoped that this resource will improve this audience’s awareness and understanding of metadata and, subsequently, the quality of the data in the systems they maintain.

Forum Guide to Personalized Learning Data
https://nces.ed.gov/forum/pub_2019160.asp
This new resource will help education agencies as they consider whether and how to expand their use of personalized learning. It includes an overview of the topic, best practices on collecting and using data for personalized learning, and case studies from districts and states that have implemented personalized learning.

https://nces.ed.gov/forum/pub_2014802.asp
SCED is a voluntary, common classification system for prior-to-secondary and secondary school courses. This resource includes an overview of the SCED structure and descriptions of the SCED Framework elements, recommended attributes, and information for new and existing users on best practices for implementing and expanding their use of SCED.

https://nces.ed.gov/forum/pub_2014801.asp
This resource recommends a set of core practices, operations, and templates that can be adopted and adapted by LEAs as they consider how to respond to requests for both new and existing data about the education enterprise.

https://nces.ed.gov/forum/pub_2012809.asp
This resource recommends a set of core practices, operations, and templates that can be adopted and adapted by SEAs as they consider how to respond to requests for data about the education enterprise, including data maintained in longitudinal data systems.

Forum Guide to Taking Action with Education Data (2013)
https://nces.ed.gov/forum/pub_2013801.asp
This resource provides practical information about the knowledge, skills, and abilities needed to identify, access, interpret, and use data to improve instruction in classrooms and the operation of schools, LEAs, and SEAs.
https://nces.ed.gov/forum/pub_2013802.asp
This resource is intended as a guide to the skillful and appropriate use of education data. It introduces the teacher-student data link (TSDL) and provides information on TSDL components, use cases, and strategies for overcoming implementation challenges.

Forum Guide to Technology Management in Education
https://nces.ed.gov/forum/tec_intro.asp
This resource is designed to assist education agency staff with understanding and applying best practices for selecting and implementing technology to support teaching and learning in the classroom. It addresses the widespread use and integration of technology in modern education systems and focuses on technology governance and planning, technology implementation, integration, maintenance, support, training, privacy, security, and evaluation.

Improving Education Data (Online Courses, 2013)
https://nces.ed.gov/forum/dataqualitycourse/dataquality.asp
These online courses are meant to help local LEA staff improve the quality of their data. They are based on the Forum Curriculum for Improving Education Data. The first course, Improving Education Data Part 1—Creating a Foundation, introduces concepts related to creating a culture of quality data. The second course, Improving Education Data Part 2—Coordinating Data Quality, looks at information related to the responsibilities of data coordinators/stewards and how to plan LEA-level data quality.

https://nces.ed.gov/forum/pub_2008802.asp
This best-practice resource was developed to assist SEAs and LEAs in their implementation of the new federal race and ethnicity categories—thereby reducing redundant efforts within and across states, improving data comparability, and minimizing reporting burden. It serves as a toolkit from which users may select and adopt strategies that will help them quickly begin the process of implementation in their agencies.

Traveling Through Time: The Forum Guide to Longitudinal Data Systems (Series)
The Traveling Through Time series is intended to help SEAs and LEAs meet the many challenges involved in developing robust systems, populating them with quality data, and using this new information to improve the education system. The series introduces important topics, offers best practices, and directs the reader to additional resources related to longitudinal data system (LDS) planning, development, management, and use.