

CRISIS DATA MANAGEMENT:

A Forum Guide to Collecting and Managing
Data About Displaced Students



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 education and on 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 (the 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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February 2010

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FOREWORD

The Forum is pleased to present *Crisis Data Management: A Forum Guide to Collecting and Managing Data about Displaced Students*. One goal of the Forum is to improve the quality of education data gathered for use by policymakers and program decisionmakers. An approach to furthering this goal has been to pool the collective experiences of Forum members to produce “best practice” guides in areas of high interest to those who collect, maintain, and use data about elementary and secondary education. Effective crisis data management in state and local education agencies is one of these high interest areas.

Floods, fires, epidemics, ice storms, chemical spills, and other extreme events can have a substantial effect on communities, schools, and students. When a crisis shuts down a school building or otherwise disrupts the education system, 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, such as hurricane Katrina in 2005, can affect schools and districts all over the country.

In the aftermath of hurricanes Katrina and Rita, the immediate demand for data about displaced students overwhelmed many school districts that had gained or lost students because of the disasters. The scale of these crises and their effects on school operations and management were in many ways unprecedented. This guide reflects “lessons learned” by the education community and provides recommendations for collecting and maintaining data about students who may move in or out of an educational organization during and following a crisis. The document is not presented as a comprehensive disaster recovery planning tool, and it does not 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.

While this guide’s primary audience is Student Information Systems (SIS) data managers, many of the recommendations will also be useful to other staff members responsible for collecting, maintaining, and safeguarding data in education organizations. Members of the organization’s disaster recovery team should become familiar with this document as well.

In this Guide

- ⊙ **Chapter 1** defines the terms “crisis” and “displaced student,” and raises key issues that were 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, a review of the frequency and timing of data collections, and consideration of associated data policies and procedures.
- ⊙ **Chapter 3** provides guidance regarding the collection and dissemination of data about displaced students during a crisis, including the crisis declaration and subsequent data collection and exchange efforts.
- ⊙ **Chapter 4** describes effective data reporting and evaluation following a crisis, including ongoing data sharing, state and federal reporting, auditing expectations, suspension or termination of temporary systems, and process evaluations.

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- ⊙ **Chapter 5** identifies several challenges specifically related to managing data about displaced students, including the implications of statewide student information systems, the need for unique statewide student identifiers, the timing of the crisis, and the implementation of displacement status records.
 - ⊙ **Chapter 6** presents the document’s recommendations and suggested timeline in the form of a checklist of action items.
 - ⊙ **Appendix A** lists other related materials available from the National Forum on Education Statistics (the Forum) and the National Center for Education Statistics (NCES).
 - ⊙ **Appendix B** provides a synopsis of relevant federal laws as they relate to privacy and homelessness and affect displaced students.
 - ⊙ **Appendix C** is a glossary that defines terminology used in the document.
 - ⊙ **Appendix D** lists other resources related to crisis data management.

The National Cooperative Education Statistics System

The work of the National Forum on Education Statistics (the 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 educational 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 U.S. Department of Education, established the Forum to improve the collection, reporting, and use of elementary and secondary education statistics. 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 task forces to develop best-practice 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 the state- and school-district task force members who review the products iteratively throughout the development process. Documents prepared, reviewed, and approved by task force members undergo a formal public review. This consists of focus groups with representatives of the product’s intended audience, review sessions at relevant regional or national conferences, or technical reviews by acknowledged experts in the field. In addition, all draft documents are posted on the Forum website prior to publication so that any interested individuals or organizations can provide feedback. After the task force oversees the integration of public review comments and reviews the document a final time, publications are subject to examination by members of the Forum standing committee sponsoring the project. Finally, the entire Forum (approximately 120 members) reviews and formally votes to approve the document. NCES provides final review and approval prior to publication.



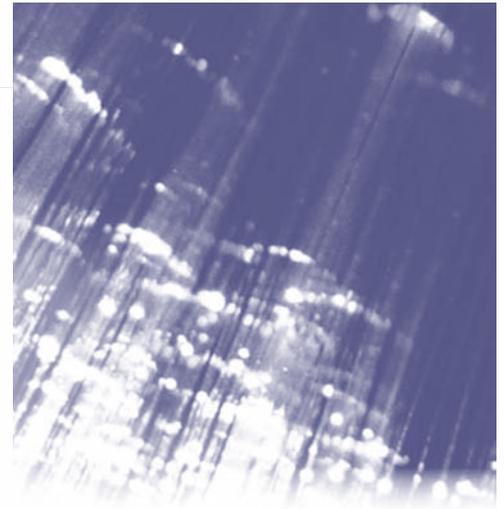
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Chapter 1

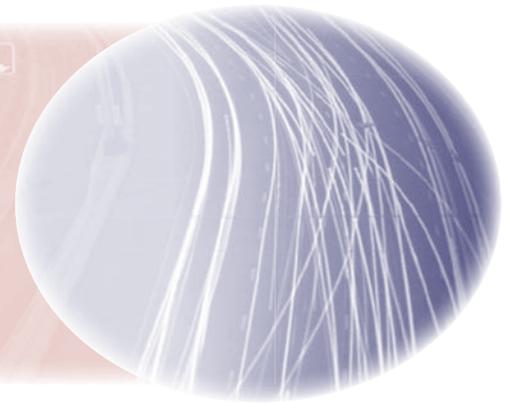
INTRODUCTION



The lasting implications of large-scale student displacement

The Southern Education Foundation (SEF) reports that “within two months following (Hurricane) Katrina, as many as 138,000 students were not in school” and 20–30,000 elementary and secondary students did not attend school at all in the 2005–06 school year.

Source: Southern Education Foundation (2007). *Education after Katrina: Time for a New Federal Response*. Atlanta, GA.



On August 29, 2005, Hurricane Katrina made landfall in Louisiana and Mississippi. Approximately 700 schools were damaged or destroyed and over 370,000 students were displaced. According to the U.S. Department of Education, by late September, every state in the nation had received at least one displaced student and 12 states had received more than a thousand, with Texas and Louisiana enrolling over 45,000 (www.hurricanehelpforschools.gov/proginfo/index.html). The education community was unprepared to track such a large number of displaced students.

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.

What is a Crisis?

In this guide, a “crisis” is defined as “any natural or manmade event that causes the 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. In addition to disrupting school-level activities, a crisis may also disturb routine data management operations.

While this document defines a “crisis” in broader terms than the Federal Emergency Management Agency (FEMA) uses for “disasters,” FEMA data highlight how frequently communities face crises in our nation. According to its website, FEMA evaluates disasters based on the amount and type of damage, such as the number of homes destroyed or with major damage; the impact on the infrastructure of affected areas and facilities; threats to public health and safety; and interruptions to essential government services and functions (www.fema.gov/media/fact_sheets/declaration_process.shtm). Using these criteria, table 1 shows an average of 57 FEMA-declared disasters annually from 2003 through 2007.

Table 1. Number of declared disasters

Year	Number
2007	63
2006	52
2005	48
2004	68
2003	56

Source: U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA). (www.fema.gov/news/disaster_totals_annual.fema)

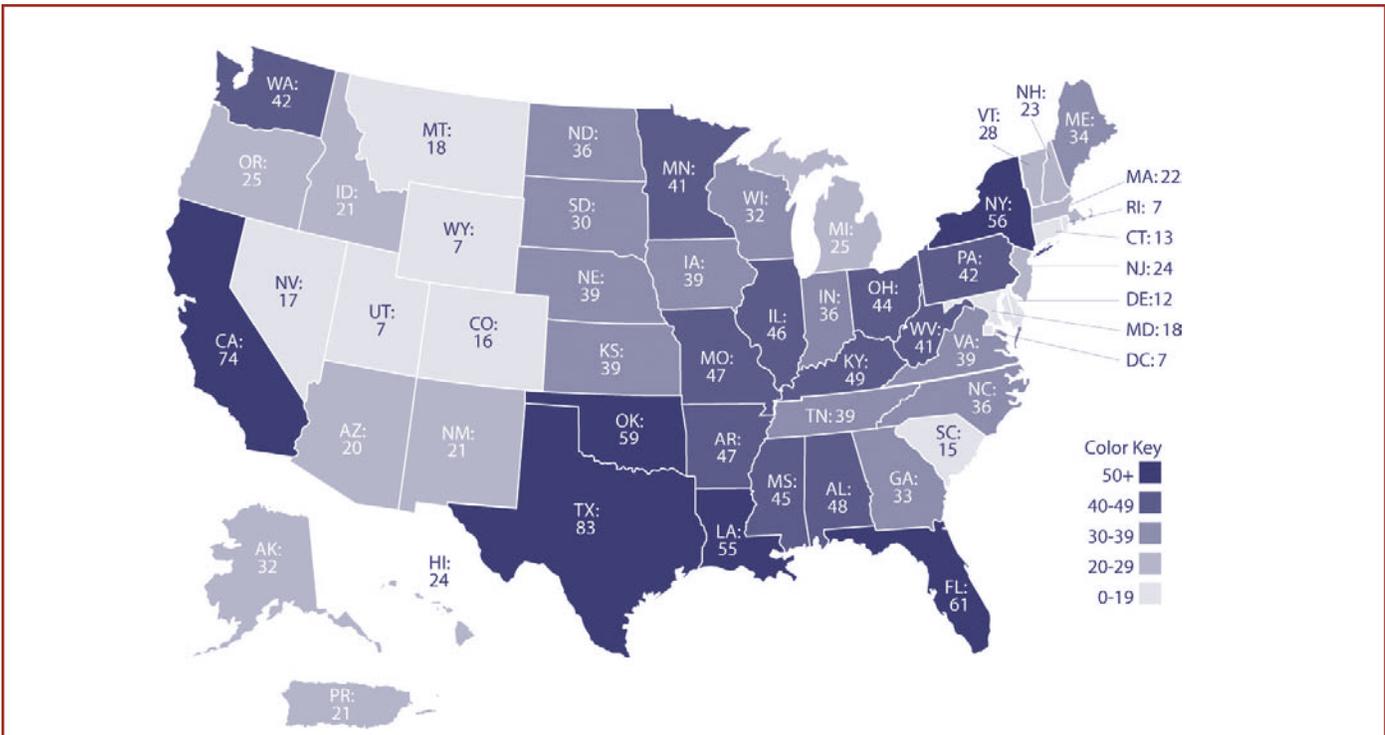


Figure 1. Number of FEMA-declared disasters: 1953–October 2008

Source: U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA). Retrieved October 2008 from http://www.fema.gov/news/disaster_totals_annual.fema.

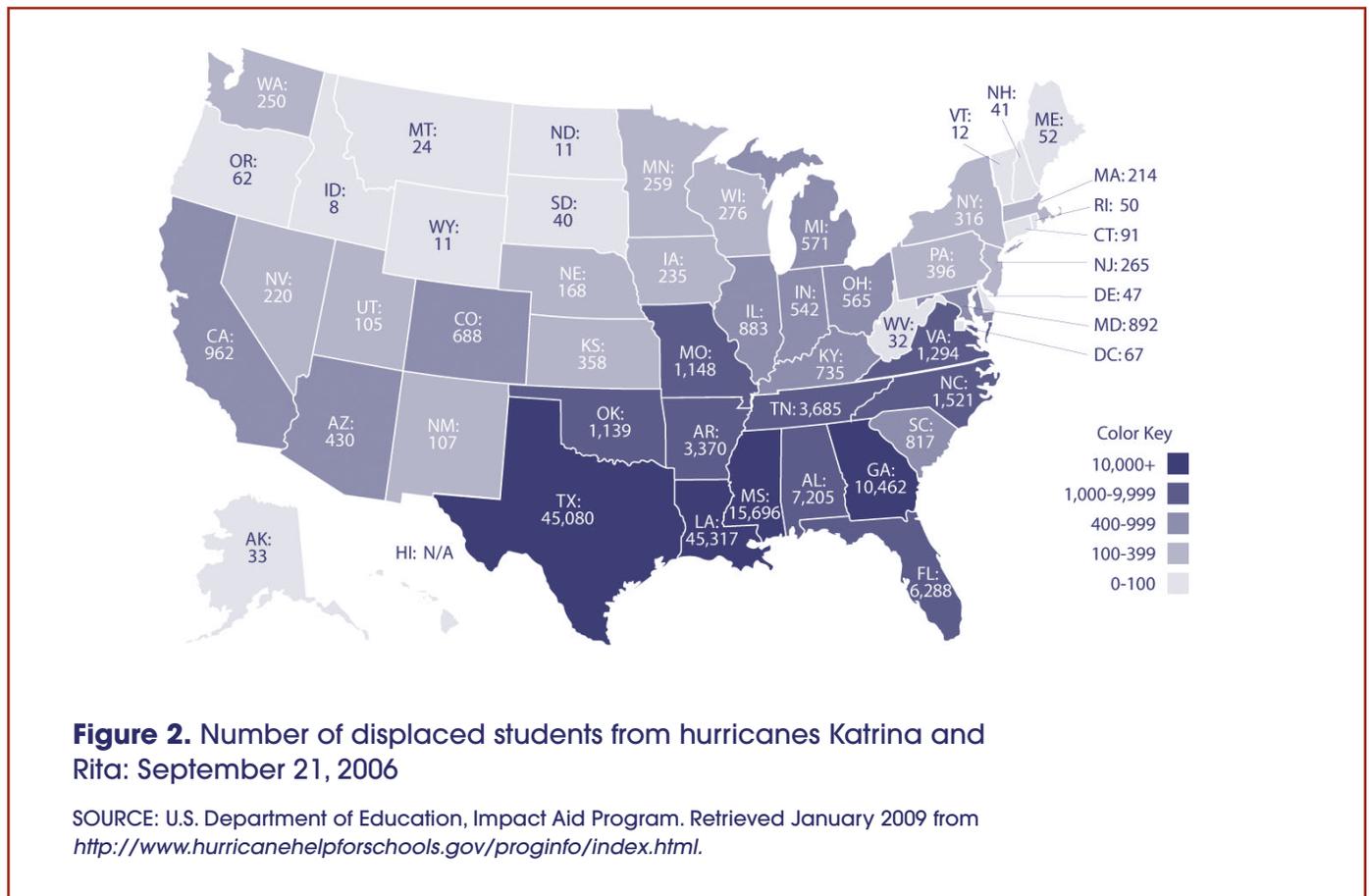
Figure 1 shows that in the past 50 years every state in the nation has been affected by at least one FEMA-declared disaster. A single, large-scale crisis such as Hurricane Katrina can affect the entire nation (see figure 2), and even geographically smaller crises can have a large impact. This guide is intended to help all education agencies prepare for data issues that arise from the displacement of students—regardless of the scale or nature of the crisis.

Who is a “Displaced” Student?

For the purposes of crisis data management, a “displaced” student is defined as “a student who was enrolled, or eligible for enrollment, but has enrolled in another place because of a crisis.” This broad definition could reasonably be made more specific by an education agency that might wish to add, for example, a requirement that the crisis must be a FEMA-declared disaster.

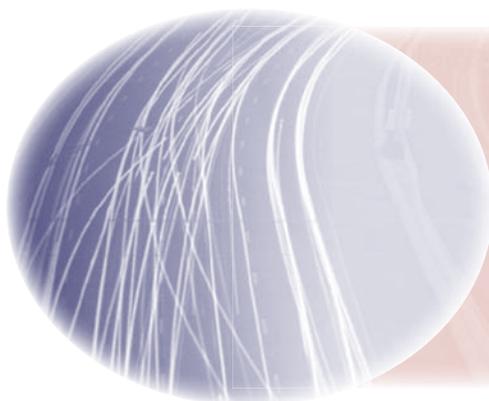
Temporary or permanent closing without displacing students

In early 2009, many schools and agencies closed their doors in an effort to help contain the spread of swine flu throughout the student population. Although these closings did not displace students, these types of events should be a component of disaster-response planning to ensure the loss of instructional services is minimized.



Key Issues From Past Crises

While this document reflects experience from a wide range of crises, the vast majority of its recommendations are derived from “lessons learned” by education institutions affected by hurricanes Katrina and Rita in August and September, 2005. The consequences of these disasters clearly transcended matters of education, but the ramifications for educational services were severe. In fact, these crises combined to cause the largest displacement of students in American history. In Louisiana alone, nearly 200,000 public elementary and secondary students were displaced—more than 26 percent of Louisiana’s prestorm enrollment.¹



Not all school crises are “national” tragedies

On December 10, 2007, Jones High School in Jones, Oklahoma was destroyed by fire during an ice storm that caused the fire hydrant’s water pressure to fade. The entire population of over 300 students in the rural community lost their school in one night.

Source: Olivarez 2007. Jones High School Destroyed By Fire. *NewsOK.com*. Retrieved June 11, 2008.

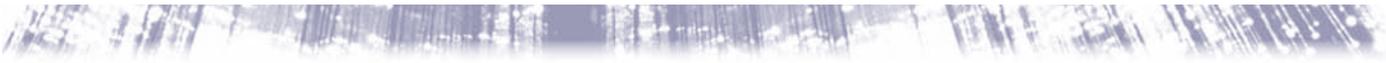
Crises come in many forms and scenarios, and some can displace families and students. For example, a school or district may quickly lose some or all of its students, staff, buildings, and data after a devastating fire or flood. In such a situation, another school or district might step in to help and, in some cases, gain newly displaced students quite suddenly. When reviewing the data management processes used to track students in this type of situation, three key concerns arise.

- ◎ **Student displacement within a state:** When a student moves within a state, a statewide information system can be very helpful for school reassignment. Transfers within a state should be easier to monitor than movement between states, especially when statewide data standards have already been established. The most useful data standard for tracking students is a unique student identifier,

LESSONS LEARNED: THE INABILITY TO OBTAIN STUDENT RECORDS UPON ENROLLMENT

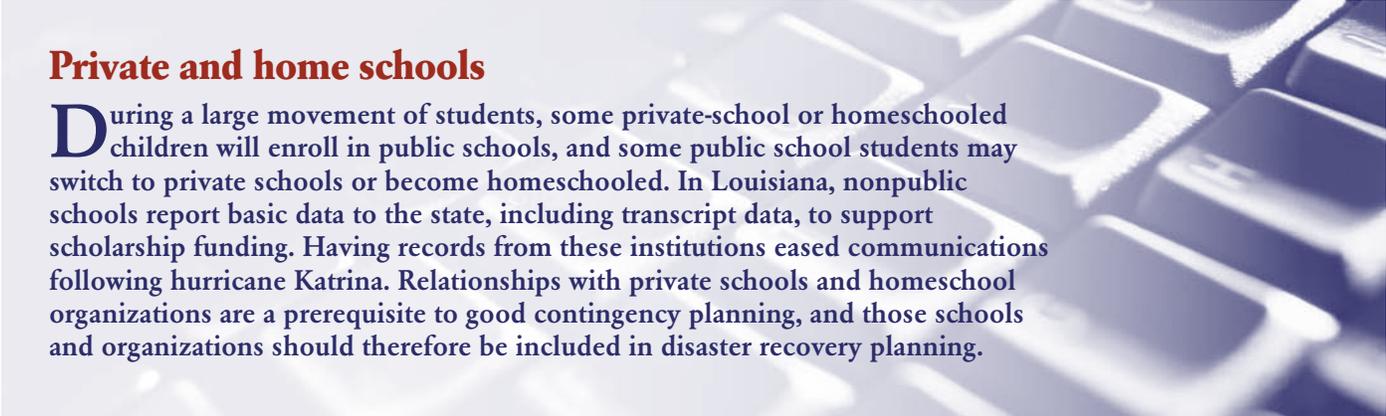
Customary enrollment methods and processes were not functional following hurricanes Katrina and Rita. As students moved, districts could not obtain basic student information such as credits earned and services needed. As a result, some parents were able to enroll their children in incorrect grades for reasons such as keeping siblings together, grade advancement, early graduation, and even athletic eligibility.

¹Rand/Gulf States Policy Institute. 2006. *Student Displacement in Louisiana after the Hurricanes of 2005: Experiences of Public Schools and Their Students*.



which streamlines the process of providing districts with placement information on new students. In many cases, districts within the same state are subject to the same policies governing credits needed for graduation, grade placement, program eligibility, and accountability measures, all of which make educational placement and the delivery of services for displaced students much easier.

- ⊙ **Student displacement between states:** Quickly connecting students with their records is much more difficult when displaced students cross state lines. Disparate procedures and state policies, including issues of privacy, complicate data sharing. For example, because student identifiers are usually unique only within a single state, linking between states requires developing sophisticated matching algorithms and other labor-intensive tasks. Varying state policies on grade placement, testing, promotion, and graduation requirements are all obstacles to student placement.
- ⊙ **Sharing individual student data in a timely manner:** After hurricanes Katrina and Rita, there was considerable confusion about federal, state, and local rules and policies governing the transfer of student data during an emergency. Because of the massive scale of the two crises, data did not accompany students in a timely manner. Many new students were permitted to enroll in districts without appropriate school records. Without incoming students' official records, enrollment and educational service decisions were often incorrect. Indeed, placing students into an educational environment without access to educational records imposes a significant burden on the receiving school and may be a substantial 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 grades.



Private and home schools

During a large movement of students, some private-school or homeschooled children will enroll in public schools, and some public school students may switch to private schools or become homeschooled. In Louisiana, nonpublic schools report basic data to the state, including transcript data, to support scholarship funding. Having records from these institutions eased communications following hurricane Katrina. Relationships with private schools and homeschool organizations are a prerequisite to good contingency planning, and those schools and organizations should therefore be included in disaster recovery planning.



CHAPTER 2

BEFORE A CRISIS: PLANNING FOR DISPLACED STUDENT DATA

State education agencies (SEAs) and Local Education Agencies (LEAs) may consider themselves prepared for a crisis because they have a disaster recovery plan; however, most of these plans focus primarily on the physical safety of people and data systems. While protecting health and safety is undoubtedly the most important task in any emergency situation, few disaster recovery plans place sufficient emphasis on preserving data. This chapter provides guidance to help education organizations prepare for such a crisis by developing and implementing policies for tracking displaced students and exchanging student data in a timely manner.

Access to the Disaster Recovery Plan

Louisiana staff were asked to store a copy of their agency's Disaster Recovery Plan in the trunks of their cars so that no matter where they were during a crisis, they would have their copy with them. Such a practice is also useful when facilities close after work hours and staff do not have an opportunity to go back to their offices to retrieve their files during an emergency.

Evaluating the Disaster Recovery Team

Most disaster recovery experts advocate the creation of a disaster recovery team that will plan and implement recovery activities in response to an actual emergency situation. Team members typically include key staff responsible for minimizing the impact of a crisis and ensuring that educational services to students are not interrupted. 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. Agencies should also have strong contacts with organizations outside of education that serve children or collect data about students (e.g., immunization and free lunch programs).

Because data are a critical component of disaster recovery planning, data stewards from throughout an agency should be represented on the disaster recovery team. In fact, depending on organization and size, some agencies may choose to establish a “data team”

Recommendation: Ensure that data managers are represented on your agency's disaster recovery team and, when possible, that a “data subgroup” is established.



Recommendation:

All data systems should be automated. Ensure that automated data systems are flexible enough to permit the creation of new applications and file formats.

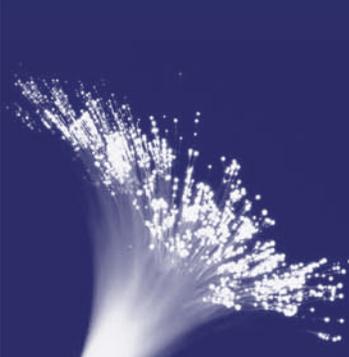
as a subgroup of the disaster recovery team. Such a group usually includes a student information system manager, as well as data stewards from important program offices and departments. The goal of this subgroup would be to ensure that data needs are met during and following a crisis.

Assessing Existing Data Systems

Any good disaster recovery plan will be based on an assessment of the agency's existing data systems. This includes analysis of the operational schedule for all data systems, as well as identifying which systems are most critical to serving displaced students, which have sensitive data, which are paper-based, and which are automated. The assessment should also determine the specific technology each system uses. Any data collections still in paper format should be evaluated for automation as paper collections are much more vulnerable to loss in a disaster.

Maintaining the security and confidentiality of individual student data is a critical aspect of sound student data systems. The National Forum on Education Statistics has developed several best practice guides for preserving the confidentiality of student data; see appendix A for a detailed description of these resources.

LESSONS LEARNED: MOVING FROM PAPER TO ELECTRONIC RECORDS



In Louisiana, many Individual Education Plans (IEPs) were maintained in paper form and destroyed during hurricane Katrina. The lack of official IEPs posed significant placement challenges for schools and districts that received these special education students. Louisiana has since implemented a web-based system that school districts use to electronically store IEPs on state-operated servers. Access to all IEPs is now readily available to districts receiving special education students who transfer within Louisiana. In the event of another large-scale crisis, this state-housed system could be used to share data with entities outside the state as well.

Implementing Placeholders for Displaced Student Data Elements

A data element is the lowest level of information (i.e., a single piece of data that gets stored). In a student record system, data elements can convey information such as student names, addresses, test scores, and course enrollment. Including an item that identifies a child's status as a "displaced student" can be very helpful in a crisis situation. 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. The items below were developed for students entering an education agency; however, they can also be used to inform decisions and track students exiting an agency.

Ideally, the addition of a "displaced student" identifier will be instituted at the state level because it will improve data compatibility across districts throughout the state. If a school district chooses to institute this new data element prior to receiving direction

from the state, it should confirm SEA data requirements to ensure alignment with state standards.

In addition to a displaced student identifier, data systems should incorporate a related crisis event table to provide a better understanding of the student's status and needs (see below). Most data systems can accommodate these items fairly simply, yet the benefits of having the supporting elements can be invaluable, as described in greater detail in chapters 3 and 4.

Displaced student indicator: This indicator has a field length of at least two characters and corresponds to a crisis code in the Crisis Event Table (see below). It typically resides with the student record and can be used as a flag for a multitude of purposes—federal funds, exceptions to accountability rules, etc. From an operational perspective, the indicator either defaults to 00 or is set to a null value until it is triggered by a crisis affecting a student. Depending upon the enrollment circumstances of any given student, this indicator could be used by both the exiting and receiving school districts. Students affected by more than one crisis in a school year could have more than one indicator. (The following section, “Tracking Displaced Students During Hurricanes Katrina and Rita,” illustrates how displaced student indicators were used in different states.)

Crisis event table: A crisis event table identifies and describes a crisis that may or may not cause the displacement of students. It would exist as a structured table with placeholders (e.g., 00) that are populated with values as crises occur. Such a table could include the following data:

- a. **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 identifier in order 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 enough crisis-specific items (e.g., school year, date/time) to keep the events unique over time.
- b. **ADDITIONAL DESCRIPTIVE INFORMATION:** In addition to a code that identifies a crisis, an agency should consider including enough additional information to more fully explain the event. This type of documentation could prove useful for research purposes, federal accountability, and other data quality and organizational management issues. Examples include
 - i. **CRISIS NAME:** The name of the crisis that caused the displacement of students (e.g., Hurricane Rita).
 - ii. **CRISIS TYPE:** The type or category of crisis. For example, FEMA declares disasters in 17 categories (see figure 3).
 - iii. **CRISIS START DATE:** The date on which the crisis affected the agency, which may not be the same as the date the crisis occurred. For example, a hurricane might be expected to reach land on Wednesday but the crisis start-date would be Monday if that is when evacuation orders are implemented.
 - iv. **CRISIS DESCRIPTOR(S):** Additional information about the crisis not included above.

Recommendation: SEAs should be prepared to collect displaced student information from LEAs to meet state and federal reporting requirements related to a declared crisis.

Recommendation: SEAs and LEAs need to communicate about data items and file formats before setting up any new elements or systems.

Recommendation: Agencies should add a displaced student indicator and associated crisis event table to its data system.

Figure 3. FEMA disaster categories

Chemical	Nuclear power
Dam failure	Plant emergency
Earthquake	Terrorism
Fire or wildfire	Thunderstorm
Flood	Tornado
Hazardous material	Tsunami
Heat	Volcano
Hurricane	Wildfire
Landslide	Winter storm

Source: <http://www.fema.gov/hazard/types.shtml>

Tracking displaced students during hurricanes Katrina and Rita

Louisiana, Mississippi, and Texas were all significantly affected by hurricanes Katrina and Rita. Yet, because of differences in the design and operation of their student data systems, the three states had a different approach to tracking displaced students during and after the crisis.

THE LOUISIANA EXPERIENCE

- ⊙ The Louisiana SEA immediately introduced a method for tracking displaced students within its statewide student information system (SIS), and provided LEAs with collection guidelines. However, because routine collection schedules were insufficient, weekly counts of displaced student enrollments were reported by the LEAs to the SEA via a special web collection.
- ⊙ Early communications with federal agencies indicated that the displaced student population was very mobile and, therefore, that impact-aid funding should be distributed to the school(s) of post-Katrina enrollment during the 2005–06 school year. To help allocate funds appropriately, several snapshot funding (“as of”) dates were established. Because the information was available at the state level, the Louisiana SEA was able to report displaced student counts to the federal government on behalf of LEAs seeking to receive Impact Aid funding.
- ⊙ Because an enrollment record in the Louisiana student information system contained the school code, entry date, entry reason, exit date, and exit reason, the SEA decided to also collect a crisis code. To operationalize this modification, SIS managers added values to existing exit- and entrance-code tables for each crisis. Thus, students who moved multiple times because of more than one crisis could be identified independently for each crisis. However, in order to establish unduplicated counts of displaced students when analyzing longitudinal data, a query of all enrollment records was necessary to determine a student’s displacement status for the entire school year.



THE MISSISSIPPI EXPERIENCE

- ⊙ The Mississippi SEA immediately introduced a method for tracking displaced students within its statewide SIS and provided LEAs with collection guidelines. These guidelines were communicated via e-mail and by means of a newly created Mississippi Hurricane Katrina Recovery website. One example of the type of information shared this way was the immediate addition of a new field to the Mississippi SIS “Request Transfer Screen,” called <Katrina Transfer>.
 - ⊙ The SEA was concerned about its existing processes for transferring and releasing students, so it established three ways to enter a transfer depending on the origin and destination of transferring students:
 - **In-state students transferring from one Mississippi district to another Mississippi district**

The normal process of transferring students within the state using the Mississippi SIS (MSIS) was temporarily disrupted due to the destruction of facilities and lack of power following the crisis. As soon as the system was operational, SEA staff processed the transfer and release of records for each district within the state.
 - **Transfers of students moving into Mississippi from Louisiana**

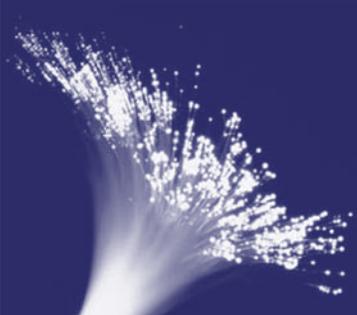
Mississippi created a subsystem in its MSIS that consisted of one screen and three reports focused solely on students entering Mississippi schools from Louisiana. This subsystem was linked to a database sent by the Louisiana SEA to facilitate the enrollment of its students who had been displaced by the crisis.
 - **Mississippi students transferring to another state**

Many Mississippi students were displaced by the crisis and enrolled in schools in other states. To facilitate their enrollment, Mississippi worked with the other states to institute emergency enrollment procedures, as authorized under the McKinney–Vento Homeless Assistance Act. In cases where all school records had been lost or destroyed, the SEA helped receiving states and school districts to recreate the information based on data in the MSIS database.
 - ⊙ Mississippi believed it had established an effective method of tracking displaced students, regardless of whether they were originally “in state” or “out of state.” However, some students did not stay in the enrolling district very long and enrollment counts had to be conducted frequently to minimize the risk of duplicate counting.
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THE TEXAS EXPERIENCE

- ⊙ The Texas SEA did not collect crisis code data for hurricanes Katrina and Rita in 2005–06 but, rather, asked districts to maintain these data locally according to SEA specifications. Independent of these data, counts of displaced students by district were conducted on a weekly basis by regional office staff and reported to the state.
- ⊙ Although having local districts collect data satisfied many information requirements, it proved insufficient when the federal government conducted an audit of the number of students served, and student-level data were unavailable at the state level. This became an important issue because each district in Texas was audited, and federal auditors were forced to identify duplicate student counts from locally provided spreadsheets.
- ⊙ Following hurricanes Katrina and Rita, data maintained at the LEA level identified students who were involved in one, both, or neither hurricane. Codes implemented were: 00 = not displaced by either hurricane Katrina or Rita, 01 = displaced by hurricane Katrina, 02 = displaced by hurricane Rita, 03 = displaced by hurricane Katrina and by hurricane Rita.

LESSONS LEARNED: OPERATIONALIZING A DISPLACED STUDENT INDICATOR



The design of an agency's data system has a large impact on the design of the displaced student indicator. Most systems have student data stored in different record types or levels. For example, a "complete" student data record may actually be a combination of records—enrollment, program, food service, transportation—linked by a common identifier. Such a system may place different limitations on the design of a displaced student indicator than a system with a single, stand-alone file for each student. Choices about the placement and hierarchy of a crisis code can, therefore, have a significant impact on query, storage, and print functions.

Revising the Texas solution: After its experience with hurricanes Katrina and Rita, Texas decided to add a crisis data element to its state-level student information system. The timeline for implementing this modification became more urgent in the summer of 2008 with the landfall of hurricane Dolly on the Texas coast. In an emergency meeting of the Data Governance Committee, LEAs agreed to immediately add a crisis element to the statewide student identification record for the 2008–09 school year, which proved to be a wise decision when hurricane Ike made landfall in Galveston, Texas, on September 13, 2008.

- ⊙ The Texas Education Agency now collects a crisis code at the student-record level. This approach was chosen because the student ID accompanies all student level data submissions, which allows displaced students to be identified on reports of enrollment, attendance (the state's funding measure), graduates and dropouts, and extended school year services.
- ⊙ When hurricane Ike caused the evacuation of the Texas Coast on September 13, 2008, a new code table was sent to districts. Because of this change, any state or federal audits of students displaced by the crisis could be managed at the state level, which is a more efficient model for both the auditors and the school districts.
- ⊙ When creating a code table for a crisis element, planners should avoid repeating previously used crisis codes because historical and/or longitudinal data often are included in data requests, and using the same codes repeatedly could complicate analysis.

Maintaining Data Elements

Basic data elements at the student, staff, class, school, LEA, IEU, and SEA levels can be found in the *NCES Handbooks Online*, available from NCES at <http://www.nces.ed.gov/programs/handbook>.

In addition to the crisis event table and displaced student indicator, other data items may be necessary to improve federal and state reporting and accountability assessments. Maintaining these data elements, and ensuring their quality, is essential for collecting useful and actionable information about displaced students.

Basic items 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 and a list of services the student receives. In theory, most student information systems 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 Katrina and Rita, for example, Impact Aid funding was available for displaced special education students, but in order to qualify for this aid, receiving districts needed information about each displaced child's special education status. Without these basic data elements and data management capabilities, these funds were hard to obtain.

Basic items from other systems. In addition to basic student data, users must be able to access related data maintained in other systems; this includes, for example, information from facilities, security, transportation, programs and services, and staff data systems.

County information for FEMA. Historically, FEMA declares a disaster and allocates federal funds to affected regions at the administrative level of the county. Therefore, when an agency receives students from a FEMA-declared disaster area, state officials and FEMA will likely request data from the displaced student's home county. Administrative staff should be able to assign and record a Federal Information Processing Standards (FIPS) County Code based on address information from the exiting school or district.

In some cases, the SEA may have the FIPS code information needed by the LEAs. Similarly, the federal government maintains national school and district databases that include county FIPS codes for every school in the country.

The National Center for Education Statistics has an online tool that allows users to obtain FIPS County Codes for all public schools and districts in the United States, available at: <http://nces.ed.gov/ccd/districtsearch/index.asp>.

Recommendation: Review and maintain your basic student data items in your SIS.

The Forum produces documents that highlight data standardization and basic data elements (See appendix A for a list of these documents).

Recommendation: Incorporate existing resources, including FIPS codes and other available national databases.

Reviewing the Frequency and Timing of Data Collections

Data collection timelines

The Mississippi Statewide Information System was designed to accept the prescribed monthly submission as well as optional daily submissions from districts, which provides a mechanism for adding data collection windows as needed during a crisis. If the system hadn't allowed for this type of flexibility and had limited attendance reports to the originally scheduled 10th day of each month, Mississippi would have been unable to accurately report fall enrollment at the beginning of the school year, which fell shortly after hurricane Katrina.

Recommendation:

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.

While the timing of all data collections is important, data about displaced students are especially time sensitive given the immediate information need for funding, accountability, and other decisionmaking. In a crisis, the flexibility to adjust collection schedules is critical. For example, when enrollment counts are only collected by the state a few times a year, additional ad-hoc collections may be needed to report accurate changes in enrollments following a crisis.

Reviewing Data Policies and Procedures

A strong working knowledge of current federal, state, and local policies will invariably prove useful during data collection and analysis following a crisis. After a disaster, 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. Having a method for tracking policy and procedural decisions is also critical, as is a strategy for effectively communicating the decisions. Some types of data policies and procedures with which team members should be familiar include

- ⊙ **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 initiatives.
 - The Family Educational Rights and Privacy Act (FERPA)
 - The McKinney-Vento Act
 - The Federal Emergency Management Agency (FEMA)
 - The Impact Aid Program
- ⊙ **State and local policies and procedures:** Many state and local policies and procedures may need to be adapted in response to a crisis. Assimilating state and local guidance related to the following topics 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

A detailed description of relevant federal laws can be found in appendix B.



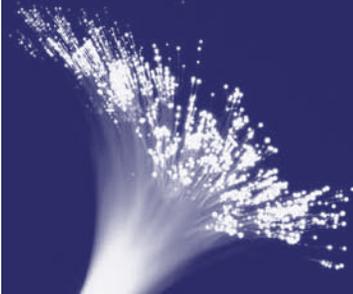
within and across agencies will strengthen relationships and future disaster recovery responses. The following types of issues should be considered:

- Assessment schedules
- Average daily attendance/membership
- Class size
- Data retention
- Disaster recovery plans
- Full-time equivalent
- Graduation requirements
- Immunization waivers
- Instructional days (required and waived)
- Nonpublic institutions
- Policy exceptions
- State accountability plans and modifications
- Data policies and procedures
- Textbook allocation
- Truancy

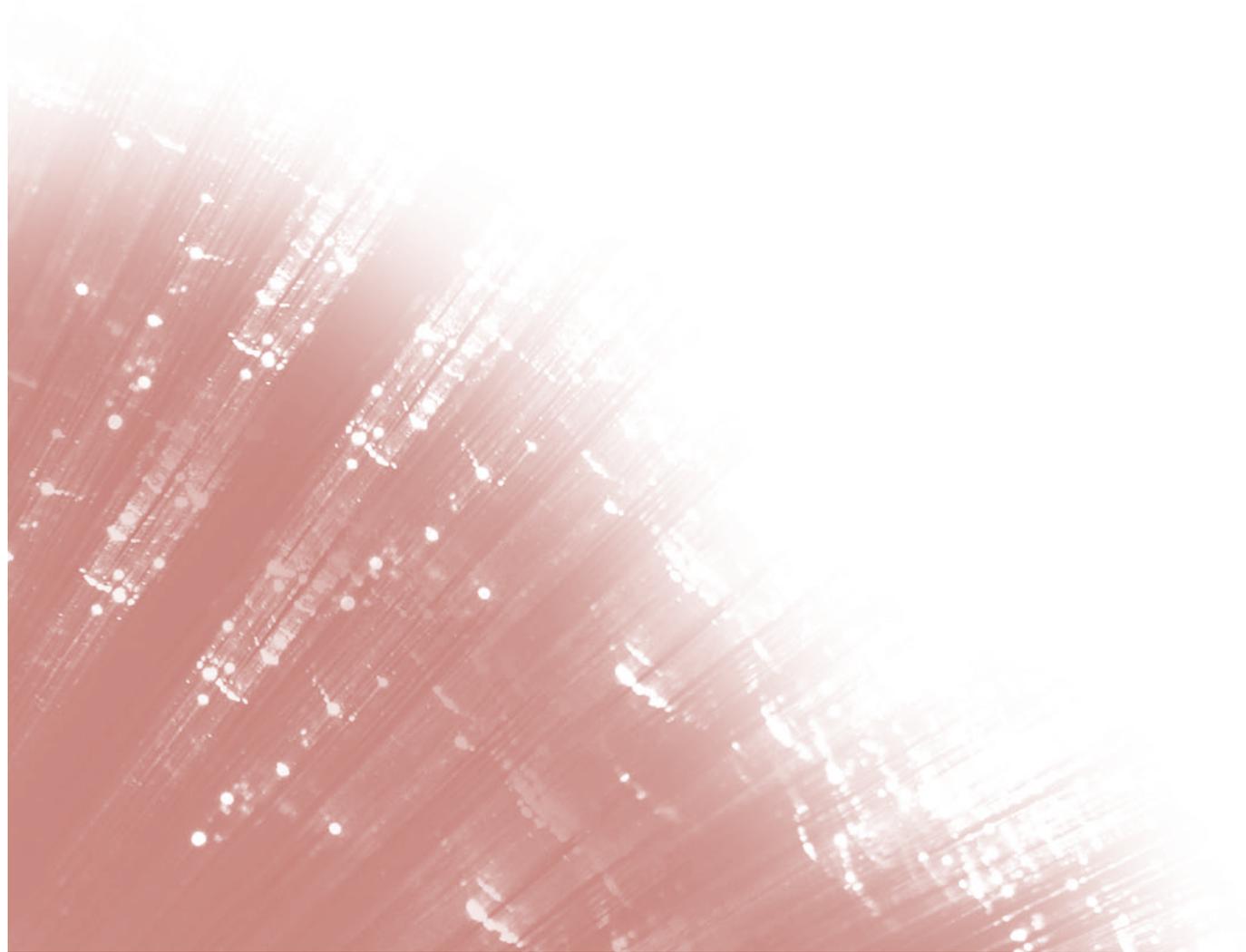
Recommendation:
Agencies should review and understand current federal, state, and local data policies and procedures.



LESSONS LEARNED: STATE ACCOUNTABILITY EXCEPTIONS



After the movement of students from Louisiana to Texas that followed hurricanes Katrina and Rita, the Texas Education Agency modified state and federal accountability to accommodate the large influx of displaced students. This was accomplished by implementing additional demographic boxes on the assessment answer sheets.



Chapter 3

DURING A CRISIS: COLLECTING AND DISSEMINATING DATA ABOUT DISPLACED STUDENTS

This chapter will help education agencies respond more effectively to a crisis while it is occurring. Many of these recommendations assume the organization has adhered to the guidance in chapter 2 regarding adequate planning in advance of the event.

Crisis Declaration

Once a crisis has been declared officially, the disaster recovery plan is activated and the team begins to implement response activities. Depending on the nature and scale of the event, some or all contingencies and responses may be triggered. In some crises, students may relocate to different schools, districts, or states. 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. Communication with appropriate federal and state agencies should also occur during the initial response when circumstances warrant such action.

Data System Assessment

For agencies directly affected by a crisis, locating or restoring existing student data will likely precede all other data-related activities. As such, the first task will be to inventory data systems and determine whether any critical data have been lost or otherwise made inaccessible. Once the availability and security of data systems has been confirmed, responders should assess whether students have been displaced. If so, local education agencies 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 local, state, and federal authorities, should follow their disaster recovery plans to facilitate and otherwise assist in these critical data activities.

- Ⓞ **Retrieve and restore lost data.** For organizations directly affected by a crisis, data and/or records may be lost temporarily or permanently. If a school or LEA loses both electronic and paper student records, an alternative source of this information will have to be identified. The LEA's offsite backup should be the first source; however, if backup records are not immediately accessible, the SEA may have a data warehouse with some, if not all, of the data.

Recommendation:

The disaster recovery team should determine the organization'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 enterprise.

Recommendation:

The first *data-related task* for an organization directly affected by a crisis is to inventory all systems and determine whether any data have been lost or otherwise made inaccessible.

Recommendation:
Use a formal chain of communication between agencies to initiate a collection of displaced student identifiers.

Recommendation:
Even during a crisis, data users must respect and protect the confidentiality of education data.

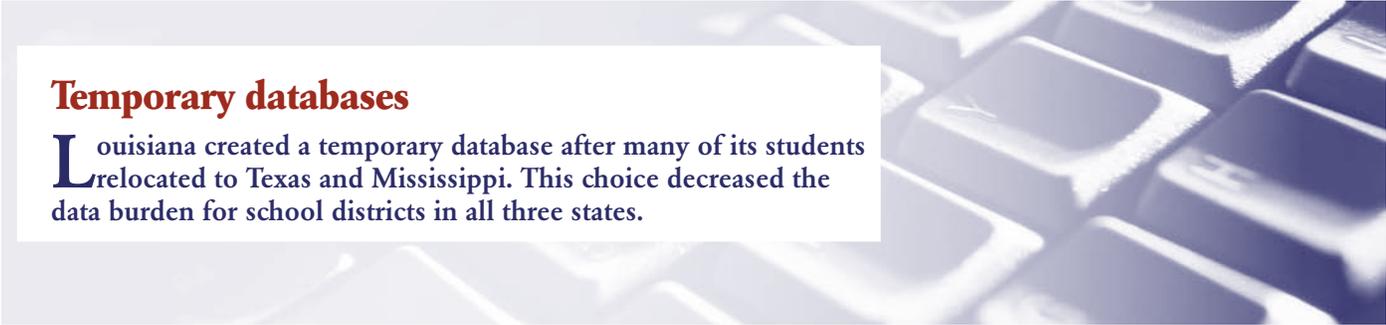
Recommendation:
During a crisis, staff should be prepared to query and analyze aggregate data in a variety of ways to support decisionmaking.

Recommendation:
SEAs may consider using a temporary database to help share displaced student data during a crisis.

- ⊙ **Communicating guidance on the use of crisis indicators.** After a crisis is declared, education authorities should officially communicate that a displaced student data collection has begun. 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 indicator. Relevant disaster code values (e.g., 01 = Hurricane Rita) and data collection timelines should be conveyed to specifically identify the event. Data entry staff need to be made aware of appropriate code set values so they can follow procedures established during crisis planning and record the information in the student information system. As always, administrators should remind staff that urgency does not justify decreases in data quality and that accurate data are especially important during a crisis. All available methods of communication should be considered if regular telecommunication, internet, mail, and other services are interrupted during the disaster.
- ⊙ **Sharing data.** During a crisis, data must be shared quickly across many levels of the education system. As students move, for example, their educational 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 students and schools that need them.
 - **INDIVIDUAL STUDENT RECORDS:** Individual student data must move quickly between agencies to guarantee the continuation of educational services to displaced students. Because these records are essential to a student's educational placement, the ability to exchange this information quickly and accurately is of the utmost importance. However, urgency is not necessarily more important than confidentiality. The Family Educational Rights and Privacy Act (FERPA), a federal law that protects the privacy of student education records, is relevant even during a crisis. Most states and many local education agencies have similar laws, regulations, and policies.
 - **AGGREGATE DATA:** In order to effectively manage educational, staffing, and financial resources, aggregate counts of displaced students may be requested by planning and oversight authorities. As with other types of data, aggregate counts may be needed on a different timeframe during a crisis than at other times. Staff should be prepared to query and analyze aggregate data in a variety of ways to support this decisionmaking.
- ⊙ **Brokering data exchange.** When a large number of students enter or exit a district or state in a short time, local resources and regular data-sharing processes may not be able to handle the increased demand. When this occurs, alternative means of sharing records will be necessary. 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. Of course, confidentiality and data quality issues are more easily controlled 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. New file formats are sometimes 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, 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

Louisiana created a temporary database after many of its students relocated to Texas and Mississippi. This choice decreased the data burden for school districts in all three states.





Chapter 4

AFTER A CRISIS: DISPLACED STUDENT DATA REPORTING AND EVALUATION

While identifying the time “before” a crisis is relatively easy, the transition from “during” to “after” a crisis is not always so clear. In this guide, “after” a crisis is defined as the time after the majority of displaced students have been enrolled in alternate 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, LEAs and SEAs 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 great change. 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 state and federal reporting requirements.

Recommendation:
Tracking displaced students following a crisis is an ongoing process given the high likelihood of multiple enrollments and withdrawals.

Hurricane information website

The Texas Education Agency created a website as a hurricane response resource for school administrators, teachers, and parents. This website, <http://www.tea.state.tx.us/hcane>, contained information about data collection and reporting procedures, accountability, assessment, curriculum, finance, and other relevant laws and regulations. Data about displaced student enrollments in Texas public schools were also included.

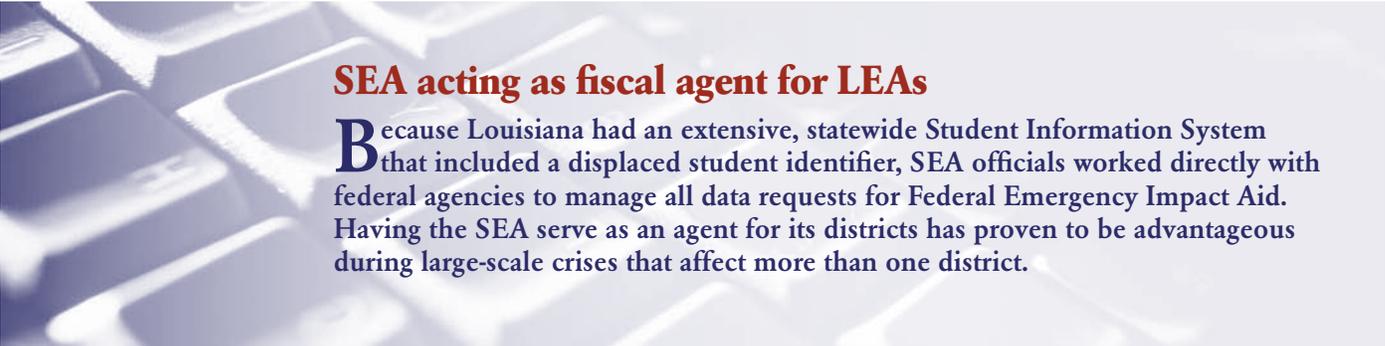
State and Federal Reporting

Depending on the magnitude of the crisis, tracking students for funding and accountability purposes will likely have ramifications on data systems and policies for a long time. Longitudinal data systems are especially vulnerable to disruption when an institution quickly or unexpectedly sees large student population changes—in or out.



Funding. When a large geographical area is affected by a disaster and federal aid is available, new data may be needed to allocate relief funds and other assistance. During these situations, federal agencies usually 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 some cases, the LEAs' burden may be reduced if the SEA communicates with the federal agency on behalf of its districts.

Auditing. When accepting federal emergency funds, agencies should anticipate audits of data submitted to verify funding eligibility. Auditors look for 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 redundant requests for funding the same student are not sought or received. After hurricanes Katrina and Rita, federal audits were conducted at the individual student level. To comply with these types of audits, agencies should have student data available in a format that accommodates reasonable audit requirements. These audits can be a burden for agencies, but if high quality data are maintained they should not be a problem.



SEA acting as fiscal agent for LEAs

Because Louisiana had an extensive, statewide Student Information System that included a displaced student identifier, SEA officials worked directly with federal agencies to manage all data requests for Federal Emergency Impact Aid. Having the SEA serve as an agent for its districts has proven to be advantageous during large-scale crises that affect more than one district.

Core data tracking. Following a crisis, routinely reported student data items are generally still required from schools and agencies to meet regular state and federal reporting needs. Clearly, large changes in student populations, such as those seen when numerous students are displaced, may substantially alter the statistical data normally reported by an agency. For example, longitudinal data on student enrollment, program participation, and other measures may fluctuate markedly due to an influx or outflow of displaced students. Explaining these extenuating circumstances in footnotes is appropriate wherever the data are published.

Accountability concerns. A large movement of students in or out of an agency can also influence accountability data. When this occurs, it may make sense to modify high stakes accountability requirements related to test scores, graduation rates, and subgroup membership to reflect the movement of displaced students. For example, most states measure student progress relative to state curriculum standards. Under some circumstances, excluding from testing those students not previously taught in the state may be reasonable. States and districts may wish to seek exemptions from state and federal accountability standards in these situations.

Recommendation: Remember to footnote reports and other published data when there are marked changes that may be a function of student displacement rather than normal measures of progress and participation.

Statewide testing and accountability

With respect to No Child Left Behind (NCLB) requirements for the school year following hurricane Katrina, the U.S. Department of Education sent a letter to all chief state school officers outlining temporary options for states affected by the crisis.

Regarding NCLB's Adequate Yearly Progress (AYP) requirement:

Option 1: Exercise Existing Natural Disaster Provisions of NCLB. NCLB does not require a school or district to move forward in the school improvement timeline if the reason for not making AYP is "due to exceptional or uncontrollable circumstances, such as a natural disaster."

Option 2: Establish a Separate Subgroup for Displaced Students. For school year 2005-06, the Secretary was willing to consider waiver requests from states for schools or districts heavily affected by the hurricanes that would allow them to establish a separate subgroup for displaced students for NCLB accountability and reporting purposes.

Under both options, states still had to "comply with current NCLB requirements for assessment, accountability, and reporting. All students, including displaced students, (had to) be tested on state assessments, and states (had to) ensure that their policies (helped) schools and districts meet the AYP target of testing at least 95 percent of students."

A copy of the letter, which provides more information on these options, may be viewed at <http://www.ed.gov/policy/elsecguid/secletter/050929.html>.

Discontinuing Temporary Systems

After a crisis is over and students have been permanently placed in new school districts, or have returned to their original districts, decisions must be made about the destruction of 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. Data sharing agreements that were made with other districts and states during the crisis may influence the organization's archival or destruction responsibilities.

Recommendation: Agencies should formulate a plan to archive or destroy temporary data systems based on usage agreements, confidentiality expectations, and other data-lifecycle considerations.

Evaluating Response Activities

When the crisis is over, agencies should evaluate the effectiveness of their disaster recovery plan, including all components of data response efforts. Some of the major questions asked should include

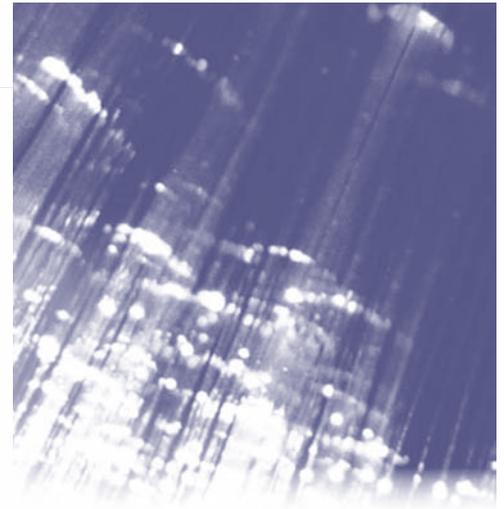
- ⊙ Was the data response planning adequate for the crisis?
- ⊙ What additional planning might have been helpful?
- ⊙ Did data systems and staff perform all of their necessary functions?
- ⊙ Did crisis data elements accomplish their purpose?
- ⊙ Should new data items be developed for future crises? If so, what items?
- ⊙ 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 inside and outside the state, as appropriate?
 - ⊙ Were data collection and reporting timelines met?
 - ⊙ 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 students?
 - ⊙ What changes to the disaster recovery plan should be implemented immediately, and what changes should occur after the next upgrade to the data system?
 - ⊙ What other lessons can be learned from the crisis and response?



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 statewide implementation of crisis data elements and tables and, ultimately, the statewide collection of crisis data. Some states are moving towards a statewide student information system (SIS), allowing districts to either directly use or connect to a state-run individual student data collection system. These states have an advantage when dealing with any change in their data needs because modifications can be made once at the state level and then be available to all districts with minimal effort. Because a statewide SIS also makes student data available to the state immediately (or almost immediately), detailed crisis information will be available as soon as a crisis is declared and data entry begins. Data quality is also improved by the ability to have centralized cross-district checks and feedback verification reports for the districts.

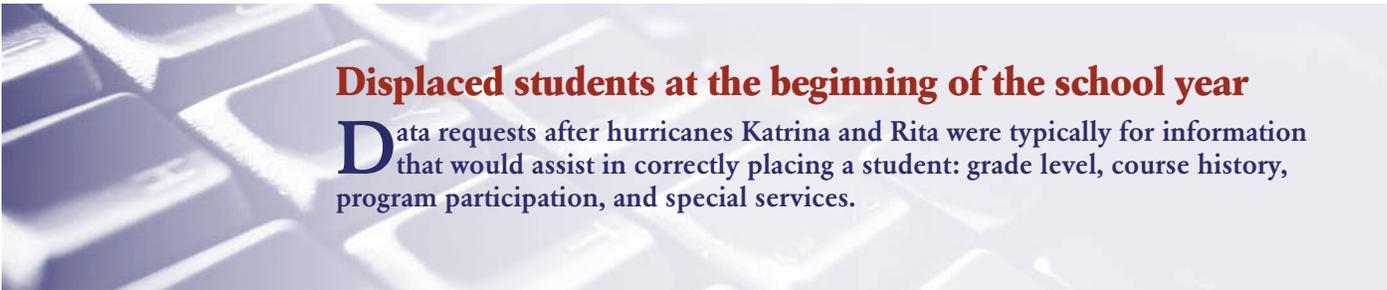
Many states that do not have a statewide SIS nevertheless have a system that allows districts to share individual student data with the state at various collection times during a school year. In this case, deploying statewide data collection changes will require districts and their vendors to modify their individual systems, which can be difficult to accomplish in a timely fashion. Once the districts are in compliance with the changes, these states will benefit from having student-level crisis data if a statewide crisis is declared. However, infrequent collection timelines could prove to be detrimental when immediate decisionmaking is required at the state level. States with a statewide SIS or an individual student record system also have the capability to report to the federal government on behalf of their districts, which can substantially decrease the data burden placed on LEAs.



States that rely only on statewide aggregate data collections lack the flexibility they will need during a crisis. After the hurricanes of 2005, for example, authorities had to target immediate aid and other resources based on weekly aggregate student counts. These counts were understood to be less than accurate because they were not current. Thus, under most crisis scenarios, agencies with statewide individual student-level data will be in a better position to respond to new demands than will states with only aggregate collection systems.

When Unique Statewide Student Identifiers Have Not Been Introduced

As explained in the Forum publication *Accounting for Every Student: A Taxonomy for Standard Student Exit Codes*, data systems that do not allow individual student tracking over time—especially following a transfer to another school system—hinder the generation of unduplicated enrollment counts and other characteristics of high quality student-level data. Statewide, unique student identifiers (IDs) greatly enhance efforts to monitor student movement within a state, but may be of limited value when students cross state lines, as occurred after hurricanes Katrina and Rita. In such cases, student records containing Social Security numbers may prove invaluable during the out-of-state movement.



Displaced students at the beginning of the school year

Data requests after hurricanes Katrina and Rita were typically for information that would assist in correctly placing a student: grade level, course history, program participation, and special services.

Unfortunate Timing

While there is never a “good” time for a crisis, some times are surely worse than others—and the timing of crises can have a significant impact on disaster response efforts. For example, hurricane Katrina reached land on August 29, 2005, at the very beginning of a school year. This created serious data issues, especially for student services and enrollment. 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 credits earned for graduation. The timing of a crisis can also affect data collection schedules, especially for systems still using aggregate collections. 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.



When a “Displaced” Student becomes a “Relocated” Student

One of the unanticipated questions arising after hurricanes Katrina and Rita related to what to do when a temporarily displaced student became a permanently relocated student. In other words, when is tracking a displaced student no longer necessary because the child had permanently relocated following the crisis? In preparation for this decisionmaking, a disaster recovery team should work with local or state authorities to determine how long the displaced student indicator will be used and how long it will remain attached to a student’s record. These are important questions given the stigma sometimes attached to being labeled “displaced” or “homeless,” especially for a long time. The following issues should be addressed to effectively manage the use of a displaced student indicator:

- ⊙ At what point following a crisis does a temporarily displaced student become a permanently relocated student?
- ⊙ How many times (i.e., for how many different moves) can a displaced student flag be used?
- ⊙ What information is needed about students already enrolled in school who are forced into an alternative setting because of the influx of displaced students? Should they be flagged as displaced students?
- ⊙ Do funding or accountability needs require maintaining the displaced student data for a specific amount of time? If so, how long should the flag be included in student records once students are no longer displaced?





Chapter 6

RECOMMENDED CRISIS DATA MANAGEMENT CHECKLIST

The immediate demand for data about students displaced by hurricanes Katrina and Rita was overwhelming for many school districts that gained or lost students because of the disasters. This guide provides recommendations for developing and maintaining data about students moving in or out of your agency because of a crisis. These recommendations are not a comprehensive disaster recovery planning tool. Rather, they are limited to data system planning activities intended to minimize the impact of a crisis and preserve or restore educational services to students following a crisis.

The items below summarize critical data issues for an agency before, during, and after a crisis. Additional details about these planning and response activities are available in chapters 2 through 5.

Before a Crisis: Planning for Displaced Student Data

⊙ EVALUATE YOUR DISASTER RECOVERY TEAM

- Ensure data management specialists are represented on your agency's disaster recovery team and, when appropriate, that a "data subgroup" is established.

⊙ ASSESS EXISTING STUDENT DATA SYSTEMS

- Automate all data systems and maintain all data in an appropriate electronic format.
- Verify that your student data systems are flexible enough to permit the creation of new applications and file formats as needed in a crisis situation.

⊙ IMPLEMENT PLACEHOLDERS FOR DISPLACED STUDENT DATA ELEMENTS

- Implement a displaced student indicator and associated crisis event table before they are needed in a crisis.
- In addition to a code that identifies a crisis, consider including other information to fully explain the event, including crisis name, crisis type, crisis start date, and a crisis descriptor.
- SEAs: Prepare to collect displaced student information from LEAs to meet state and federal reporting requirements related to a declared crisis.
- SEAs and LEAs: Coordinate, communicate and confirm data items and file formats before setting up any new elements or systems.

⊙ MAINTAIN DATA ELEMENTS

- Review and maintain all basic student data items in your SIS. In addition to basic student information, users must be able to access related data in other

In this guide, a crisis is defined as "any natural or manmade event that causes the displacement of students." A displaced student is defined as "a student who was enrolled or eligible for enrollment but, because of a crisis, has enrolled in another place."



systems including, for example, records from facilities, security, transportation, programs and services, and staff data systems. Several national data standards are available to inform these activities as necessary.

- Because federal agencies emphasize county-level action, be aware of your FIPS resources, including the national databases. The National Center for Education Statistics has an online tool that allows users to obtain FIPS County Codes for all public schools and districts in the United States, available at: <http://nces.ed.gov/ccd/districtsearch/index.asp>.

⊙ **REVIEW THE FREQUENCY AND TIMING OF DATA COLLECTIONS**

- Know the frequency and timing of your agency's current data collections.
- Be prepared to introduce additional data collections or collection cycles as necessary.

⊙ **REVIEW DATA POLICIES AND PROCEDURES**

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

During a Crisis: Collecting and Disseminating Data about Displaced Students

⊙ **EVALUATE THE CRISIS DECLARATION**

- The disaster recovery team should determine the organization'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 enterprise.

⊙ **ASSESS DATA SYSTEMS**

- Inventory data systems and determine whether any data have been lost or otherwise made inaccessible.
- Use a formal chain of communication between agencies to initiate collection of displaced student identifiers.
- Protect and respect the confidentiality of education data.
- Be prepared to query and analyze aggregate data in a variety of ways to support decisionmaking during a crisis.
- SEAs: Consider utilizing a temporary database to help share displaced student data during a crisis.

After a Crisis: Displaced Student Data Reporting and Evaluation

⊙ **REVIEW ONGOING DATA SHARING**

- Recognize that tracking displaced students following a crisis is an ongoing process given the high likelihood of multiple enrollments and withdrawals by displaced students.

⊙ **PLAN STATE AND FEDERAL REPORTING**

- Consider the possibility of the SEA stepping in as the fiscal agent for LEAs when requesting Impact Aid and other federal support.
- Footnote reports and other published data when marked changes may be a function of student displacement rather than normal measures of progress and participation.

⊙ **DISCONTINUE TEMPORARY SYSTEMS**

- Formulate a plan to archive or destroy temporary data systems based on usage agreements, confidentiality expectations, and other data lifecycle considerations.

⊙ **EVALUATION**

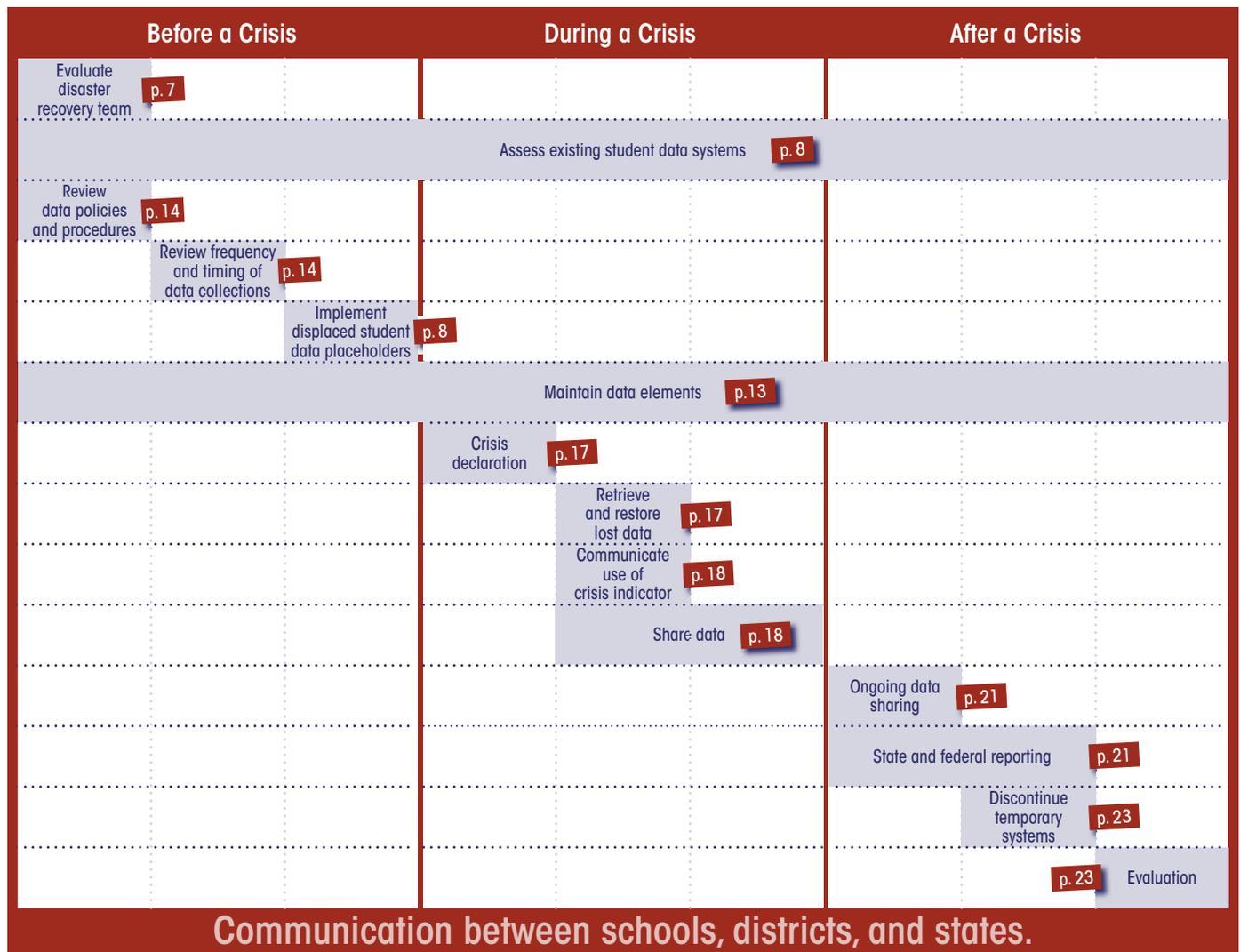
- Evaluate the effectiveness of your agency’s disaster recovery plan to improve future planning efforts and emergency responses.

⊙ **OTHER CHALLENGES**

- Proactively address issues that frequently challenge organizations, including
 - Statewide Student Information Systems (SIS)
 - Unique, statewide student identifiers
 - Timing of crises
 - Displacement status

Crisis Data Management Timeline

The Crisis Data Management Timeline below is based on the major planning and response components described in this guide. Additional details about these planning and response activities can be found in earlier chapters.





Conclusion

Educators have always been committed to providing high quality educational services to all students, but crises, in some form or another, will continue to disrupt the lives of students, schools, education agencies, and communities. The ability to efficiently and accurately track displaced students allows an education agency to continue educational services during and after a crisis. This resource provides actionable guidance to support the development and maintenance of timely, accurate data about displaced students moving in or out of your agency.

Several issues relevant to crisis data management are beyond the scope of this document, such as the displacement of teachers and staff. During hurricanes Katrina and Rita, many of the same issues affecting the tracking of displaced students also applied to locating displaced staff, although some concerns, such as identifying a teacher's certification status, were unique to staff as they sought work in other school districts. Similarly, tracking health and finance data beyond education records is an important issue for planners, but outside of the scope of this resource.

One final issue not addressed in this document is the impact that schools, districts, and states can have on federal policies to improve how the education community deals with future crises. The experiences of states and districts are an invaluable resource for federal decisionmaking. It is hoped that crisis management planning undertaken by education data system managers will lead to additional questions, ideas, and actions that can benefit us all during future crises.



Appendix A

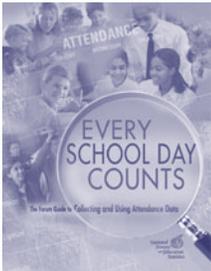
FORUM AND OTHER NCES RESOURCES

NCES Handbooks and NCES Handbooks Online

Handbooks Online An online resource for standard education terms, definitions and classification codes. <http://www.nces.ed.gov/programs/handbook>

The *NCES Handbooks* are a valuable source of metadata for organizations and individuals interested in education data. These print and online resources define standard education terms for students, staff, schools, local education agencies, intermediate education agencies, and state education agencies. The *Handbooks* are intended as reference documents for public and private organizations, including education institutions and early childhood centers, as well as education researchers and other users of education data. In order to improve access to this valuable resource, NCES has also developed the *NCES Handbooks Online*, a web-based tool that allows users to view and download information via an electronic table of contents, a drill-down finder, element name and first letter searches, and advanced query options.

Every School Day Counts: The Forum Guide to Collecting and Using Attendance Data (NFES 2009–804)



<http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2009804>

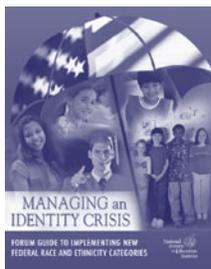
This guide offers best practice suggestions on collecting and using student attendance data to improve performance. A standard set of codes to improve the comparability of attendance data across districts and states is included. The publication also presents real-life examples of how attendance information has been used by school districts.

Education Data Model Version 1 (PK–12)

<http://nces.ed.gov/forum/datamodel/index.aspx>

This resource provides a catalog of the data used in PK–12 education and a description of the relationships among those data. The supporting website includes helpful documents, usage vignettes, a web-based tool for browsing the Data Model, and links to open-source tools that can be used for viewing, exploring, and applying the model.

Managing an Identity Crisis: Forum Guide to Implementing New Federal Race and Ethnicity Categories (NFES 2008–802)



http://nces.ed.gov/forum/pub_2008802.asp

This best-practice guide was developed to help state and local education agencies implement new federal race and ethnicity categories, thereby reducing redundant efforts within and across states, improving data comparability, and minimizing reporting burden. Users may select and adopt strategies that will help them quickly begin the process of implementation in their agencies.

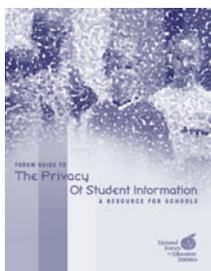
Forum Curriculum for Improving Education Data: A Resource for Local Education Agencies (NCES 2007–808)



http://nces.ed.gov/forum/pub_2007808.asp

This curriculum supports efforts to improve the quality of education data by serving as training material for K–12 school and district staff. Lesson plans, instructional handouts, and related resources are provided, as are concepts necessary to help schools develop a culture for improving data quality.

Forum Guide to the Privacy of Student Information: A Resource for Schools (NFES 2006–805)



http://nces.ed.gov/forum/pub_2006805.asp

This publication helps school and local education agency staff better understand and apply the Family Educational Rights and Privacy Act (FERPA), a federal law that protects the privacy interests of parents and students in student education records. It defines terms such as “education records” and “directory information”; and offers guidance for developing privacy policies and information disclosure procedures related to military recruiting, parental rights and annual notification, videotaping, online information, media releases, surveillance cameras, and confidentiality concerns related specifically to health-related information. Much of the guidance relating to privacy policies would be of interest to organizations generating business rules about the topic.

Accounting for Every Student: A Taxonomy for Standard Student Exit Codes (NCES 2006–804)



http://nces.ed.gov/forum/pub_2006804.asp

This best-practice guide 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 particular school or district. It is based on exit code systems used in state education agencies across the nation, and on a thorough review of existing literature on the subject.

Forum's Technology Suite

http://nces.ed.gov/pubs2005/tech_suite

This online resource combines material from previously published Forum guides into one comprehensive document that will be updated periodically. The suite presents a practical, comprehensive, and proven approach to assessing, acquiring, instituting, managing, securing, and using technology in education settings.

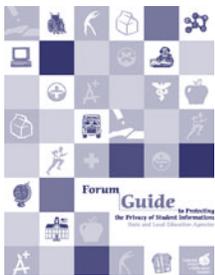
Forum Guide to Building a Culture of Quality Data: A School and District Resource (NCES 2005–801)

http://nces.ed.gov/forum/pub_2005801.asp



This publication asserts that good data, like good students, are produced in schools. While it is undeniably harder to teach a student than it is to collect statistics, certain procedures can help achieve both goals. Recently, awareness has grown about the link between effective teaching, efficient schools, and quality data. The quality of information used to develop an instructional plan, run a school, plan a budget, or place a student in a class depends on the school data clerk, teacher, counselor, and/or school secretary who enter data into a computer. With that in mind, the focus of this report is on data entry—getting things right at the source.

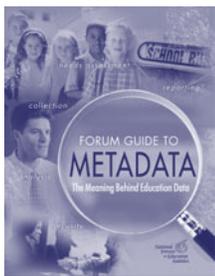
Forum Guide to Protecting the Privacy of Student Information: State and Local Education Agencies (NCES 2004–330)



http://nces.ed.gov/forum/pub_2004330.asp

This guide presents a general overview of privacy laws and professional practices that apply to information collected for, and maintained in, student records. It also provides an overview of key principles and concepts governing student privacy; summarizes federal privacy laws including recent changes; identifies issues concerning the release of information to parents and external organizations; and suggests good data management practices for schools, districts, and state education agencies. Much of the guidance relating to privacy policies would be of interest to organizations generating business rules about the topic.

Forum Guide to Metadata: The Meaning Behind Education Data (NCES 2009-805)



http://nces.ed.gov/forum/pub_2009805.asp

The purpose of this guide is to empower people to more effectively use data as information through the use of metadata (data about data). To accomplish this, the publication explains what metadata are, why they are critical to the development of sound education data systems, what components comprise a metadata system, what value metadata bring to data management and use, and how to implement and use a metadata system in an education organization.





Appendix B

UNDERSTANDING RELEVANT FEDERAL LAWS

This appendix provides an overview of four important federal laws that affect displaced students. (The information was obtained from the cited websites.)

Family Educational Rights and Privacy Act (FERPA)

FERPA (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. It affords parents the right to access and amend their children's education records, and gives them some control over the disclosure of the information in these records. Students and their parents entrust schools with their personal information with the expectation that this information will be used by the schools to serve the needs of the students effectively and efficiently. School districts maintain and use personal information for a variety of educational purposes while students are in school. To protect the privacy of students and their families, school staff are legally and ethically responsible for safeguarding the information collected about and from students.

In an emergency, FERPA permits school officials to disclose without consent education records, including personally identifiable information from those records, to protect the health or safety of students or other individuals. At such times, records and information may be released to appropriate parties such as law enforcement officials, public health officials, and trained medical personnel. See 34 CFR § 99.31(a)(10) and § 99.36. This exception is limited to the period of the emergency and generally does not allow for a blanket release of personally identifiable information from a student's education records.

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 FERPA website: <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

McKinney–Vento Act

The McKinney–Vento Homeless Assistance Act protects the educational rights of students experiencing homelessness. It provides legal protections so that children and youth in homeless situations can enroll in, attend, and succeed in school and preschool programs. It also establishes procedures to enroll children quickly, assess their needs, and provide services. Finally, the McKinney–Vento Act requires that every school district designate a local homeless education liaison; the local liaison is the district’s point person for addressing needs that derive from loss of housing and is, therefore, a key contact for relief agencies. Students who are displaced by a crisis are generally covered by the McKinney–Vento Act.

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 that has a compulsory residency requirement as a component of the state’s compulsory school attendance laws or other laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, or success in school of homeless children and youths, 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 alone 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 student academic achievement 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 103(a)(1)]; 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; are abandoned in hospitals; or are awaiting foster care placement;

- 
- (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 103(a)(2)(C)];
 - (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 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

The McKinney–Vento Website: <http://www.ed.gov/programs/homeless/index.html>

Health Insurance Portability and Accountability Act (HIPAA)

In 1996, Congress enacted the Health Insurance Portability and Accountability Act (HIPAA) to ensure continued health insurance coverage to individuals who change jobs, and to establish standards regarding the electronic sharing of health information. For purposes of HIPAA, “covered entities” include health plans, health care clearinghouses, and health care providers that transmit health information in electronic form in connection with covered transactions (45 CFR 160.103).

Technically, schools and school systems that provide health care services to students may qualify as “covered entities” under HIPAA. However, the final regulations for the HIPAA Privacy Rule exclude information considered “education records” under FERPA from HIPAA privacy requirements. This includes student health records and immunization records maintained by an education agency or institution, or its representative; as “education records” subject to FERPA, these files are not subject to HIPAA privacy requirements. In addition, school nurse or other health records maintained on students receiving services under the Individuals with Disabilities Education Act (IDEA) are considered “education records” and also subject to that Act’s confidentiality provisions. Consequently, these records are subject to FERPA and not the HIPAA Privacy Rule. Nevertheless, certain activities, when performed by a school, could be subject to other provisions of HIPAA that concern electronic transactions. According to the preamble to the December 2000 final rules, “the educational institution or agency that employs a school nurse is subject to our (HIPAA) regulation if the school nurse or the school engages in a HIPAA transaction.” HIPAA transactions are defined in the Code of Federal Regulations (CFR) as “the transmission of information between two parties to carry out financial or administrative activities related to health care,” including submitting claims. However, consent must still be secured under FERPA before the records are disclosed.

The HIPAA Website: <http://www.hhs.gov/ocr/hipaa>



US Department of Education's Hurricane Recovery Act and Emergency Impact Aid for Displaced Students

The mission of the Impact Aid Program is to disburse Impact Aid payments to local educational agencies that are financially burdened by federal activities and to provide technical assistance and support services to staff and other interested parties.

The Hurricane Recovery Act authorized three grant programs to assist school districts and schools in meeting the educational needs of students displaced by Hurricanes Katrina and Rita and in helping schools that were closed as a result of the hurricanes to reopen as quickly and effectively as possible. Under this program, the Department awarded emergency Impact Aid funding to SEAs. SEAs provided assistance to LEAs for the cost of educating students enrolled in public and nonpublic schools who were displaced by Hurricanes Katrina and Rita during the school year 2005–2006.

The Hurricane Help for Schools Website: <http://www.hurricanehelpforschools.gov>

U.S. Department of Education Impact Aid Office Website: <http://www.ed.gov/about/offices/list/oes/impactaid/index.html>



Appendix C

GLOSSARY

Terms used in this guide

Crisis: Any natural or manmade event that causes an unstable or dangerous situation. A crisis sometimes, although not always, results in the displacement of students. In this document, a crisis is defined as “any natural or manmade event that causes the displacement of students.”

Crisis event table: A data table that identifies and describes a crisis.

Displaced student indicator: An indicator that flags a student displaced by a crisis (usually associated with a specific crisis code in a student record).

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.

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, calamitous event causing substantial damage, loss, or destruction. See also FEMA-declared disaster.

Disaster recovery: The process, policies, and procedures related to restoring or continuing critical business activities in an organization after a natural or human-induced disaster. With respect to data, it is the process, policies, and procedures for regaining access to data—records, hardware, software, etc.—and communications.

Disaster recovery planning: A subset of a larger process known as “business continuity planning” 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, hardware, communications, networking, and other IT infrastructure following a disaster.



Displaced student: A student who was enrolled, or eligible for enrollment, but due to a crisis has enrolled in another place.

FEMA-declared disaster: An event that the Federal Emergency Management Agency has formally recognized as a disaster based on its predefined criteria. The federal disaster law restricts the use of arithmetical formulas or other objective standards as the sole basis for determining the need for federal supplemental aid. As a result, FEMA uses a number of factors to determine a disaster's severity, magnitude, and impact. In evaluating a state governor's request for a "major disaster" declaration, a number of primary factors and other relevant information are considered in developing a recommendation to the President for supplemental disaster assistance. Primary factors considered include

- the amount and type of damage (number of homes destroyed or with major damage);
- the impact on the infrastructure of affected areas or critical facilities;
- imminent threats to public health and safety;
- the impact to essential government services and functions;
- the unique capability of the federal government;
- the dispersion or concentration of damage;
- the level of insurance coverage in place for homeowners and public facilities;
- assistance available from other sources (federal, state, local, voluntary organizations);
- state and local resource commitments from previous, undeclared events; and
- the frequency of disasters over recent time period.

FIPS County code: A five-digit, Federal Information Processing Standard (FIPS) code that uniquely identifies counties and county equivalents in the United States, as well as certain U.S. possessions and freely associated states. The first two digits are the FIPS state code and the last three are the county code within the state or possession. For example, in the code "48453," 48 represents Texas and 453 is Travis County. (See <http://www.epa.gov/enviro/html/codes/state.html> and <http://www.census.gov/geo/www/fips/fips65/index.html>)

Homeschooling: The education of children at home, typically by parents but sometimes by tutors, rather than in a formal setting of public or private school. Homeschooling is a legal option for parents who wish to provide their children with a different learning environment than exists in nearby schools.

Nonpublic school: An institution that provides educational services and is primarily funded by nonpublic funds (e.g., tuition).

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, etc.

Temporary data exchange: An agreement of limited duration between two organizations that permits data to be shared. 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.



Acronyms used in this guide

ADA: Average Daily Attendance

ADM: Average Daily Membership

FEMA: Federal Emergency Management Agency

FERPA: Family Educational Rights and Privacy Act

FIPS: Federal Information Processing Standard

FTE: Full-Time Equivalent

IEU: Intermediate Education Unit

LEA: Local Education Agency

NCES: National Center for Education Statistics

SEA: State Education Agency

SIS: Student Information System

USED: United States Department of Education



Appendix D

ADDITIONAL RESOURCES

National Center for Homeless Education (2006). *What School District Administrators Should Know About the Educational Rights of Children Displaced by Disasters*. Available at <http://www.serve.org/nche>.

National Center for Homeless Education (2006). *School as a Safety Net: Connecting Displaced Children With Educational and Support Services*. Available at <http://www.serve.org/nche>.

Rand Gulf State Policy Institute (2006). *Student Displacement in Louisiana After the Hurricanes of 2005: Experiences of Public Schools and Their Students*. Available at <http://www.rand.org/rgspi>.

Southern Education Foundation (2007). *Education after Katrina: Time for a New Federal Response*. Available at <http://www.southerneducation.org>

Texas Education Agency (2006). *TEA 2006 Accountability Manual*. Available at <http://www.tea.state.tx.us/perfreport/account/2006/manual>

Texas Education Agency (2007). *Secondary School Completion and Dropouts in Texas Public Schools 2005–06*. Available at: <http://www.tea.state.tx.us/research>.

State websites:

Texas Portal for Katrina/Rita: <http://www.state.tx.us/portal/tol/en/hurricane-katrina>

Hurricane Ike IRS Disaster Relief: <http://www.irs.gov/newsroom/article/0,,id=186874,00.html>

Texas Governor's Hurricane Recovery: <http://www.governor.state.tx.us/hurricane/>

PEIMS Crisis Code Reporting for Students Displaced by Hurricane Ike:

<http://ritter.tea.state.tx.us/taa/peims092508.html>

Texas Education Hurricane Information: <http://ritter.tea.state.tx.us/hurricane>

Louisiana Hurricane Educator Assistance Program (HEAP):

<http://www.doe.state.la.us/lde/tsac/2707.html>

Louisiana Foreign Donations: <http://www.doe.state.la.us/lde/finance/2421.html>

Louisiana Restart Aid: <http://www.doe.state.la.us/lde/impactaid/iarso.aspx>

Louisiana Emergency Information Directory: <http://www.doe.state.la.us/lde/emergency.html>

Louisiana Impact Aid: <http://www.doe.state.la.us/lde/impactaid/aid.aspx>

Louisiana Department of Education Emergency Blog: <http://emergencylde.blogspot.com/>

Mississippi Katrina Recovery Information: <http://www.mde.k12.ms.us/Katrina/>

