DC
PUBLIC
CHARTER
SCHOOL
BOARD

POLICY TITLE: Data and Document Submission Policy	
ADOPTION/EFFECTIVE DATE: • AOIS Information Technology: September 30, 2011 • Attendance and Discipline Data Policy: May 1, 2012 • Updating the Language and Terms Used in Data Collection: November 19. 2012 • Data Management Policy: September 21, 2015	MOST RECENTLY UPDATED/ merged: December 19, 2016

PURPOSE
This policy establishes data submission standards for DC public charter schools.

The School Reform Act of 1995, D.C. Code §§ 38-1802.01 *et seq*. ("SRA"), requires the DC Public Charter School Board ("DC PCSB") to monitor the progress of each public charter school in meeting the goals and student academic achievement expectations specified in the charter granted to each school; adherence to health and safety regulations; compliance with applicable laws; and fidelity to the statute's governance standards.

In order to conduct such monitoring, DC PCSB collects compliance, finance, attendance, discipline, academic, and enrollment data electronically via various data collection systems[1]. DC PCSB also requires schools to validate various academic and nonacademic data throughout the year to ensure accurate reporting of school data.

POLICY
DC PCSB collects compliance, attendance, discipline, academic, financial, and enrollment data from public charter schools and uses the information to monitor performance. DC PCSB provides technological training to charter school staff annually and on an as-needed basis throughout the school year. DC PCSB also provides schools with instructions for submitting data, a calendar of submission dates, a list of data elements and their definitions

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[1] PCSB data collection systems as of May 2015 include Epicenter and ProActive; others may be added as needed.

annually. If additional data elements are required, or there are changes to the format or definition of a data element, DC PCSB will give public charter schools at least 30 days notice. Each year by August 1, DC PCSB updates the data submission calendar to reflect changes due to holidays.

DC PCSB provides timely and meaningful help to schools that encounter technical difficulties entering data into any of the established data systems and/or fixing data errors. If a school experiences technical difficulties that are because of a DC PCSB data system (or other entity's system which the school cannot control), has notified DC PCSB at least five business days before the data is due, and has an active "ticket" in its support system, the school will be given five business days (or more on a case by case basis) to load the data after the error is fixed. In extreme cases of technical difficulties beyond the school's control that occur within five days of a submission deadline, and DC PCSB was notified of the difficulty, DC PCSB may make an exception and grant the school time to submit the data.

Expectations for timely submission

Enrollment Data
Within five business days of a student enrolling in a school, the school must enter all demographic data and a corresponding "enter code" into DC PCSB's[2] data system. Likewise, within five business days of a student withdrawing from a school, the school must update the student record with the correct "exit code.[3]" If a student leaves a school for a nonpublic school (also known as a private placement); is identified as needing an IEP; exits from needing services; or is identified as an English Language Learner, the school must update the student record in DC PCSB's* data system and submit the corrected information on a monthly basis.

Attendance Data
Present, tardy, and absent (excused and unexcused) attendance status must be maintained each day for every student enrolled in the school for the current school year. These files must be uploaded into the school's established data system (Student Information System) each week. Then, for any given month that students are enrolled in a school, attendance data must be submitted to DC PCSB's established data system by five business days after the start of the next month.

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[2] *DC PCSB or OSSE's data system which DC PCSB pulls from, whichever is applicable.
[3] List of OSSE exit codes as of June 2014: https://www.dropbox.com/s/isy9oov5o9vn5it/Exit%20Codes%20-%20OSSE%20June%202014.xlsx?dl=0

Discipline Data

Discipline data must be submitted 14 days after the end of the that month. The school must enter or upload every suspension (with code[4]) and expulsion (with code) into DC PCSB's data system.

Data Validation

Schools are required to validate various data points throughout the year, including but not limited to data pertaining to the Performance Management Framework ("PMF"), Equity Reports, and Council Reports. There are validation windows for underlying student data as well as a school's overall rate. Data is considered validated when the school and DC PCSB agree upon the same rate and calculation for a given metric. Data that is changed during the validation process for a given report must also be changed in the school's Student Information System, when applicable. DC PCSB will provide validation windows. Schools will be expected to validate within those timeframes.

Compliance Documents

Schools must submit compliance documents into Epicenter (or other DC PCSB established database for compliance document collection) on the date listed on the Compliance Calendar. DC PCSB publishes a calendar of submission dates annually, prior to the beginning of the school year. Schools have up to two weeks to revise and resubmit any documents that are rejected.[5] Types of compliance documents that will be required include, but are not limited to school Annual Reports, monthly financial statements, board meeting minutes, the Board of Trustee roster; certificates of Occupancy, and procurement contracts.[6] All items on the Compliance Calendar are included in DC PCSB's Annual Compliance Review report, which is distributed to schools midyear. Documents due after the Compliance Review cycle must also be submitted on time (or the school may be subject to the consequences outlined below).

Consequences for Late Submission

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[4] List of discipline codes as of November 2015:
https://www.dropbox.com/s/ugb3yptxt7yuvhe/Discipline%20codes%20as%20of%20November%202015_DCPCSB.xlsx?dl=0

[5] "Rejected" documents in Epicenter are those that are returned to the submitter with instructions for revisions. Schools may request time beyond two weeks; PCSB staff will grant extensions on a case by case basis.

[6] Procurement contracts do not have a designated due date on the Compliance Calendar. They are to be submitted no later than 3 days after the contract is made.

Early Warning
An Early Warning is an email sent to the head of school by DC PCSB staff and is clearly labeled "early warning."   (This does not include communications between DC PCSB staff and school leadership that do not contain the header "early warning.") A school may receive this for failure to submit enrollment, attendance or discipline data within the timeframe allotted; failure to submit or revise documents for Compliance Review, Financial Review, and by law (e.g. financial statements, financial audits, notification of change in key leadership members); or failure to validate data within the timeframe allotted (e.g. for the PMF, Equity Reports, Council Reports). The Early Warning will provide a deadline for submitting the required data or documents before an Out of Compliance notice is issued.

Out of Compliance Notice
An *Out of Compliance* notice is an email sent by DC PCSB's executive director, deputy director, or senior managers to the head of school, for failure to submit requested data or documents within the timeframe provided in an early warning email. Schools may also receive this communication after receiving at least three early warning emails in the same school year. The Out of Compliance notice will provide a deadline for submitting the required data or documents before a Notice of Concern is considered.

Notice of Concern
If a school receives two Out of Compliance notices within a school year or fails to cure non-compliant documents within the timeframe provided, the board may vote to issue A Notice of Concern. Notices of Concern are taken into consideration during each school's five and ten year charter review and during the charter renewal process, particularly in cases where a school has frequently been issued one; cases where a school has been issued one multiple times for the same offense; and cases in which the issue that caused the Notice remained uncured for a long time. The Notice of Concern will provide a timeframe for curing the issue before further board action is considered. Schools issued a Notice of Concern in violation of the Compliance and Data Submission Policy will be subject to increased monitoring around timely submission.   DC PCSB staff will monitor school submissions, ensuring that no less than 100% of submissions are on time in the three months following the Notice of Concern. After three months of timely submissions and validations, DC PCSB staff may recommend that the Board lift the Notice of Concern.

Beginning in school year 2016-17, the Compliance Review Report will also capture the timeliness of data validations and financial statements, including annual audits. If a school receives a Compliance Review Report that classifies at least 60% of submissions, inclusive of data validations, as late, DC PCSB

staff may recommend that the Board issue a Notice of Concern. Uncured Notices of Concern may lead to further board action.

Expectations for Accurate Data in DC PCSB and OSSE Data Systems

All data entered into DC PCSB's data system by a school should be complete and accurate, to the best of the school's ability, 30 days from the end of the month in which it was submitted. Once this 30-day window has closed, the student-level attendance and discipline data will be considered accurate by the school and will be available to DC PCSB staff to produce reports for internal analyses.

However DC PCSB will continue to have validation windows to ensure business rules were applied consistently and calculations were done accurately for school-level reports that will be made public. In these cases, DC PCSB staff will (1) share with each school the rates that were calculated, (2) provide schools with at least two days to review the calculations and make any necessary revisions in the DC PCSB data management system, and (3) re-calculate the rates, if necessary, prior to producing a public report.

Schools must also reconcile any errors or discrepancies uncovered by DC PCSB or OSSE data reports.

Failure of schools to maintain *current, complete,* and *accurate* attendance and discipline data in a DC PCSB or OSSE data management system will increase the likelihood that the school will undergo a data audit or receive a Notice of Concern.

Updating Language and Terms in Data Collection

Changes to DC PCSB's oversight processes have resulted in DC PCSB adding, upgrading, and removing data systems as technologies improve and as DC PCSB's data needs change. The policy must be amended to reflect any necessary changes. For any DC PCSB policy that names a specific data system, the terms of this policy will remain binding even if the data systems change, unless revisions are made to the policy and approved by the DC PCSB Board. Such revisions must be approved by DC PCSB's Board in a public forum, and after a public hearing and public comment period.

Board Approval Acknowledged By:

Darren Woodruff
DC PCSB Board Chair

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