



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

September 3, 2024

Dear Chief State School Officer:

State and local report cards help ensure local educational agencies (LEAs), parents, families, educators, and communities have critical data and a common framework for gauging educational progress and success. Title I, Part A (Title I) of the Elementary and Secondary Education Act of 1965 (ESEA) requires States to annually share this important information.

Last year, the U.S. Department of Education (Department) conducted targeted monitoring of the ESEA's public reporting requirements—specifically, the requirements for States to: 1) prepare and widely share report cards that provide information on State, LEA, and school performance and progress in an understandable, uniform format; and 2) publicly report the State's progress in ensuring that low-income and minority children in Title I schools are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers. This letter shares what we learned from this effort and offers recommendations for State leaders working to strengthen their implementation of ESEA requirements. (You can find results of our 2023 targeted monitoring of ESEA's public reporting requirements¹ and all of our Title I monitoring reports [here](#); and additional resources regarding report cards [here](#).)

Background on State and Local Report Cards

ESEA section 1111(h) requires each State to annually publish State and local report cards that include information about public schools, including student and school performance metrics, accountability data (e.g., whether schools have been designated for improvement activities), per-pupil expenditures, educator qualifications, and other relevant information.² The ESEA requires State and local report cards to be:

- Concise;
- Presented in an understandable and uniform format;
- Accessible to the public, including parents and persons with disabilities; and
- To the extent practicable, provided in a language that parents can understand.

Updates: Chronic Absenteeism and Military-Connected Students

In addition to the recommendations below, I want to take this opportunity to provide two updates on the information required on State and local report cards. These updates are due to a change in the

¹ To find the targeted monitoring letters, search for “targeted monitoring” using the search box in the right-hand corner of the table.

² The local report card must include all information for the LEA as a whole and for each school served by the LEA. Thus, although individual school report cards are not explicitly required under the ESEA, information about each school is required to be included on the local report card. In practice, most States meet the local report card requirements by publishing separate LEA and school report cards.

Department’s data collection processes, which impact what data States must include on report cards, and revisions to the ESEA in 2020.

Chronic Absenteeism. In the wake of the COVID-19 pandemic, chronic absenteeism rates (e.g., students who miss 10 percent or more of the school year) have significantly increased, as reflected in data reported by States to the Department. Therefore, providing timely and actionable data on this topic is critical.

Beginning in the 2017-2018 school year, data on chronic absenteeism is no longer collected through the Department’s Civil Rights Data Collection (CRDC); instead, States submit these data to the Department through the annual *EDFacts* collection under section 203(c)(1) of the Department of Education Organization Act (20 U.S.C. 3413(c)(1)), as described in *EDFacts* file specification 195. Therefore, **State and local report cards must annually include the chronic absenteeism data submitted to the Department in EDFacts file 195.** Reporting this data will promote consistency across the State educational agency (SEA) and LEAs in how these data are defined and reported. In addition, SEAs should report these data on State and local report cards as soon as they are available so that the public has access to timely information. For example, we strongly encourage an SEA to include chronic absenteeism data from school year 2023-2024 when an SEA publishes its State and local report cards for that school year in fall 2024, even though the SEA is not required to report the data to the Department until later in the year. In addition to the chronic absenteeism rate, we encourage SEAs to also include on their report card information as to whether this rate is an increase or decrease over the prior school year (overall and by student group).

Military-Connected Students. In addition, the National Defense Authorization Act of 2020 amended section 1111(h)(1)(C)(ii) of the ESEA to modify the definition of “military connected” by removing the term “active duty.” Based on the amendment, this student group has been changed to “status as a student with a parent who is a member of the Armed Forces (as defined in section 101(a)(4) of title 10, United States Code).” Under 10 U.S.C. 101(a)(4), “Armed Forces” is defined to include the Army, Navy, Air Force, Marine Corps, Space Force, and Coast Guard, which would also incorporate their reserve components (i.e., Army National Guard and Air National Guard, and Army, Navy, Air Force, Marine Corps, and Coast Guard Reserves).

At a minimum, this student group must include students with parents on “active service.” Under 10 U.S.C. 101(d)(3), this would include individuals on active duty, full-time or part-time National Guard duty, and full-time or part-time Reserve status. It would not include students with a parent who is a retiree, a veteran, or in the Retired Reserves or students with a family member (e.g., sibling or grandparent) other than a parent or guardian who meets the definition of being a member of the Armed Forces. While an SEA may establish a more expansive definition, the SEA must be able to report the military-connected student group consistent with the updated definition. The Department encourages each SEA to publish its definition of “military-connected” alongside this data, so it is clear to the public which students are included in the student group.

Recommendations

Below we offer recommendations for how to improve the quality and utility of State and local report cards and educator equity data based on our observations in the targeted monitoring of the ESEA’s public reporting requirements in Title I.

Recommendation 1: Publish report cards in a timely manner so parents and other stakeholders can meaningfully use the data.

Report cards are an important resource for helping parents, families, and others understand a school's challenges and successes. An SEA should publish State and local report cards as soon as possible after the conclusion of the school year, ideally before or as close to the start of the following school year as possible. Timely publication of report cards can help parents and families have informed, targeted conversations about their child's school as the school year begins.

Recommendation 2: Improve translation features into languages other than English and provide effective communication and accessibility for individuals with disabilities.

State and local report cards must be presented in an understandable and uniform format, accessible to the public, including person with disabilities, and, to the extent practicable, written in a language that parents can understand (ESEA section 1111(h)(1)(B) and (h)(2)(B)). The Department recommends that an SEA produce versions of its report card in multiple languages, to the extent possible and based on the needs of the school communities it serves. It may be beneficial for an SEA to translate State and local report cards in the State's most common languages, as determined by the State, without requiring a user to first contact the SEA. For example, an SEA could embed a translation feature in its online State and local report cards that allows a user to select from a list of the most common languages in the State or have translated versions of the information available for the user to view. An SEA could also post copies of the report card translations online and in any other forum likely to reach the intended audiences, as well as provide supplemental information, inserts, or links to the report card in other languages. SEAs should also periodically check that translation features work consistently throughout the webpages that display report card information and make any needed updates to the accessibility and functions of these tools.

Parents who do not speak the most commonly spoken languages in the State must also have meaningful access to State and local report cards. An SEA may provide this access in the same way it does for its major language groups. If that is not practicable, an SEA could consider translating the report card upon request, translating a comprehensive summary of the report card, or providing oral interpretations of the report card.

Additionally, under section 504 of the Rehabilitation Act of 1973 (Section 504) and Title II of the Americans with Disabilities Act, SEAs and LEAs must ensure that communications with individuals with disabilities are as effective as communications with others (28 CFR § 35.160 and 34 CFR § 104.4(b)(1)(iii)). Thus, States must share annual report cards in a way that provides parents and other individuals with disabilities with an equal opportunity to access the report cards. To do so, the SEA must take the appropriate steps to ensure effective communication and accessibility through auxiliary aids and services and by ensuring that its websites, mobile applications, or other electronic communications meet the applicable accessibility standards under Title II (see 28 CFR Part 35, Subpart H). In addition, the Americans with Disabilities Act Title II regulations were recently updated to establish requirements (see [here](#)), including the adoption of specific technical standards, for making web and mobile applications accessible, which SEAs and LEAs will need to meet by the required compliance dates.

Further, providing easier ways to access translations, such as a clearly labeled option to access or request accommodations for interpreting report cards, helps ensure that a more diverse population of individuals can access the information. An SEA may also consider providing instructions on how to

access and understand the information presented on report cards. Examples include offering workshops for parents and community members; developing and posting FAQs or short training videos on navigating report cards; or providing other assistance on how to access and use report card features.

Below are examples of how States support individuals with limited English proficiency and individuals with disabilities in accessing and understanding information presented on report cards.

- One SEA incorporates a feature that translates its State and local report cards into nine different languages and has screen-reader compatibility and color contrast guidelines to assist individuals with disabilities. Data are presented so that users can easily access each element either on a desktop or mobile device.
- One SEA includes a brief statement on its report cards on how to request interpretation services or printed material in a language other than English. This statement is translated into the four most spoken languages, other than English, in the State.
- One SEA provides substantial information on its website about how its webpage is accessible for individuals with disabilities. The SEA’s website includes a form that a user can submit to report an accessibility issue with any specific webpage.

Recommendation 3: Use visualization tools and graphics to present an overview of report card information in a concise format to allow a user to easily access more comprehensive information.

The ESEA requires that State and local report cards be concise and presented in an understandable and uniform format (ESEA section 1111(h)(1)(B)(i)-(ii) and (h)(2)(B)(i)-(ii)). These requirements could be difficult to meet given the breadth and complexity of information the report cards must include. To address this challenge, an SEA could display the report cards on an interactive platform that allows users to see high-level data about the State, LEA, and school, and to click through to access additional information within that category through drop-down menus or other interactive tools. An SEA could also provide an introductory section that highlights key report card elements, such as by summarizing data for a specific report card element in plain language to assist users in understanding the element (e.g., an SEA may describe or link to the State’s graduation requirements and provide the State trend in graduation rate data) before directing the user to more detailed data. A State could also consider providing a data dictionary or “hover” feature that provides further explanation of each data element.

Visualization tools that are dynamic and allow users to interact with key information on report cards without having to navigate to other parts of an SEA’s website can help simplify complex information.

For example:

- One SEA developed a report card platform that includes a homepage with multiple dropdown menus on key topics, such as assessments, graduation and postsecondary information, discipline and attendance, and per pupil expenditures. For example, a user can select the drop-down menu for assessments to access clearly labeled tabs that provide information on academic achievement, growth, and participation. The tab for academic achievement provides the user with instructions for creating data tables or charts, so that a user can filter between different school years, achievement levels, subjects, and student groups to generate a color-coded bar graph of the filtered data. The drop-down menus also include information on protecting student privacy, options to download data visualizations in different formats (e.g., a JPEG image or PDF document), relevant data notes, and access to general information by linking to more detailed information and resources elsewhere on the State’s website. Access to these features

from the same report card location enables a user to effectively interpret and interact with the report card information and data from one homepage.

- One SEA features a homepage that allows the user to access required information on easy-to-understand tiles that provide brief descriptions of the data that may be found if selected, including information on State-level data and school improvement, and a user guide for in-depth understanding of report card details. Additionally, the search function is presented at the top of the homepage, so that a user can navigate to State, LEA, or school report cards.

Recommendation 4: Present data in different ways to engage multiple audiences and target the needs of the audience.

Different audiences view report card data for different reasons. For example, parents may use report cards to get more insight into the overall performance and funding of a specific school. Researchers may want to view, analyze, or download multiple data elements across LEAs and schools. Accordingly, an SEA may consider designing its report card to present information that is driven by the needs of different audiences, which may include developing different features or tools.

For example:

- One SEA developed a feature for its local report cards to allow the comparison of a specific school or LEA against 12 schools or LEAs on a range of information published on report cards (e.g., per-pupil expenditures, number of teachers, performance on statewide assessments). The feature provides the option to either compare the school or LEA against (1) similar schools or LEAs or (2) schools or LEAs in the same geographic area. This peer comparison feature is a helpful tool to provide context around certain report card information for each school and LEA and support the interpretation of results.
- One SEA developed “Compare” and “Analyzer” features on its State and local report cards, which provide users the ability to easily look at report card data across multiple schools or LEAs within a single webpage and to customize reports to include specific data elements. The same SEA also uses navigational features and clearly labeled topics, which allow a user to easily access the desired information.
- Multiple SEAs include features that allow a user to print, email, or text the specific report card (or element of a report card) for a school, LEA, or State. Additionally, States may develop the webpage or applications such that a user can easily view State and local report cards on a smartphone.

Recommendation 5: Be transparent about privacy protections and other data limitations when including information due to varying requirements for student group data.

Report cards must include privacy protections for students so as not to reveal any personally identifiable information. (ESEA section 1111(i)). We strongly encourage States to provide clear information for the user when student group information is suppressed due to small student counts. For example, the Department recommends that when reporting any required student group information, the SEA include all required student groups in its display with a note for each student group for which data was suppressed due to a small student count. To further promote transparency, the Department also recommends that State and local report cards contain a description of the SEA’s privacy protection methodologies.

When reporting data on report cards, the Department encourages SEAs to carefully review the student groups for which the State is required to disaggregate for each report card element, as there are variations among elements and some student groups were newly required under the 2015 reauthorization of the ESEA. For example, student achievement data was newly required for military connected students, students experiencing homelessness, and children in foster care. (ESEA section 1111(h)(1)(C)(ii) and (2)(C)). State and local report cards also must now include graduation rates for students experiencing homelessness and children in foster care. (ESEA section 1111(h)(1)(C)(iii)(II) and (2)(C)).

Please refer to Appendix A of the Department’s [*Opportunities and Responsibilities for State and Local Report Cards Informational Document*](#) for more information regarding required student group disaggregation by report card element (e.g., for a list of elements that require information presented for both children with and without disabilities and for students who are and are not economically disadvantaged). SEAs may elect to include information on their report cards for additional student groups beyond those that are required.

Recommendation 6: Regularly engage in ongoing and meaningful discussions with diverse stakeholders to update report cards and ensure they are meeting stakeholder need.

SEAs should regularly review their State and local report cards to evaluate whether they are meeting stakeholder needs, both in the level of information and the way the data are presented. SEAs could consider organizing focus groups, surveys, or other ways of gathering feedback from parents and the community on possible report card improvements. Additionally, SEAs should be engaging a variety of stakeholder groups, such as teachers, principals and other school leaders, SEA and LEA officials, business groups, and civil rights groups, when developing report cards. The Department encourages SEAs to make this process as open and transparent as possible by providing multiple opportunities for stakeholder input throughout the design, development, and implementation of report cards.

There are many ways that SEAs can involve parents and stakeholders in decisions related to report cards, including but not limited to:

- Holding accessible meetings at varying locations (including virtual options) across the State and at multiple times during the day and targeted meetings to ensure the input of underrepresented groups (e.g., holding meetings on or near military bases to solicit input from military-connected families);
- Publishing an accessible mock-up or drafts of possible designs and updates an SEA may be considering for its report cards prior to meetings so that participants can come to meetings informed and prepared, and/or to provide feedback on the earlier versions that SEAs can consider for later versions;
- Providing translation and interpretation services to encourage the participation of parents with limited English proficiency; and
- Encouraging comments on posted versions of reports or templates on the State website for those unable to attend meetings in person.

For example, one SEA includes a report card feedback link that is accessible throughout its report cards. The link requests certain contact information for the user (*i.e.*, name, email address, user’s role) and prompts the user to provide the feedback topic (e.g., accessibility, general comment, suggestion) before entering a summary of the feedback for improving report cards. Such feedback can assist an SEA in continuously updating its report card platform to provide easier access to critical information.

Finally, to ensure report cards can be updated regularly and quickly, our review found that SEAs that produce and manage their report cards in house often have some flexible contractual support for continuous updates to report cards, allowing them to more efficiently meet stakeholder needs and ESEA requirements. For example, one SEA described how shifting from a contractor for production of all report card elements to producing report cards in house with on-demand contractual support for specific tasks and data elements allowed the SEA to make timely, ongoing updates to its report cards. By comparison, some of the SEAs we monitored that fully contracted for production of State and local report cards had difficulty making modifications or adding new information to report cards to respond to stakeholder feedback.

Recommendation 7: Report additional contextual information that helps the user interpret data to make informed decisions.

Beyond what is required by the ESEA, an SEA is encouraged to include on its State and local report cards any other information it believes will help inform parents, students, and other members of the public about the progress of each elementary and secondary school. (ESEA section 1111(h)(1)(C)(xiv)). To increase report card usefulness, many SEAs are taking advantage of the full range of available data and are producing more comprehensive State report cards that extend beyond the required elements.

Some examples of additional data an SEA may include:

- Information, where available, on postsecondary education enrollment. The ESEA requires that, depending upon the availability of data, report cards include rates of postsecondary education enrollment for the cohort of students who enroll in programs of postsecondary education in the first academic year that begins after the students' graduation. The Department provides additional information on this requirement in section J of *Opportunities and Responsibilities for State and Local Report Cards Informational Document*.
- Information on the percentage of students requiring or not requiring remediation in postsecondary education.
- Information on access to technology for students and educators.
- Information on the amount of funds the SEA has reserved under ESEA section 1003 for school improvement.
- Other data that provides a holistic view of a school's performance, such as availability of school counselors, arts programs, and other aspects of a well-rounded education.

For additional examples, please see question B-2 of the Department's *Opportunities and Responsibilities for State and Local Report Cards Informational Document*.

Educator Equity Reporting

Each SEA is required to describe in its ESEA consolidated State plan how low-income and minority children enrolled in Title I schools are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers. The SEA must also describe the measures the State will use to evaluate and publicly report its progress with respect to such description. (ESEA section 1111(g)(1)(B)).

A common issue we have encountered in discussions with SEAs over the past several years is confusion about these educator equity measures and the separate educator qualification information for

State and local report cards established under ESEA section 1111(h)(1)(C)(ix) and (h)(2)(C). The *type* of educator information differs for these ESEA requirements as described in the table below:

Report Cards: Educator Qualifications <i>(ESEA section 1111(h)(1)(C)(ix) and (h)(2)(C))</i>	State Plan: Reporting Progress on Educator Equity <i>(ESEA section 1111(g)(1)(B))</i>
<p>Each State and local report card must include, in the aggregate and <u>disaggregated by high-poverty and low-poverty schools</u>, the <i>number</i> and <i>percentages</i> of:</p> <ol style="list-style-type: none"> 1. Teachers teaching with emergency or provisional credentials 2. Inexperienced teachers, principals, and other school leaders 3. Out-of-field teachers 	<p>Consistent with the measures described in the State plan, the State must evaluate and publicly report its progress on how <u>low-income and minority children enrolled in Title I schools</u> are not served at disproportionate rates by:</p> <ol style="list-style-type: none"> 1. Ineffective teachers 2. Inexperienced teachers 3. Out-of-field teachers

Recommendation 1: Report progress on educator equity measures at least every two years.

Although the ESEA does not require the SEA to report its progress on a specific timeline, the Department strongly encourages the SEA to report on its progress towards achieving educator equity at least every two years. Reporting these data at least every two years allows stakeholders to have regular access to information about how the SEA’s efforts are progressing.

Recommendation 2: Report educator equity measures on State and local report cards.

While the educator equity requirements are different from the State and local report card requirements, reporting these educator equity data via State and local report cards will improve transparency and accessibility of the data and likely improve the utility of each component to improve decision-making. An SEA could accomplish this by publicly reporting both the State plan educator equity information and report card educator qualification information in the same location on the State’s report cards.

Recommendation 3: Provide an explanation of the State-defined educator terminology and the steps a State is taking to evaluate progress on its educator equity measures and address issues with disproportionate rates of access to educators.

Each State has discretion to define the terms ineffective, out-of-field (e.g., teaching in an area without the proper certification), and inexperienced (e.g., less than three years of teaching experience) teachers in its ESEA consolidated State plan. The Department recommends the SEA clearly explain each term for the user. For example, one SEA includes a section in its educator equity report with its definitions for Title I schools with high/low percentages of students of color; Title I schools with high/low poverty; and inexperienced, out-of-field, and ineffective teachers as defined in the State’s ESEA consolidated State plan.

Additionally, the Department also recommends that each State provides a description of the steps it is taking to address issues with disproportionate rates of access to educators. For example, one SEA provides an explanation of the steps it is taking to: (1) attract and prepare educators (e.g., partnering with an institution of higher education to ensure educator preparation programs meet local need); (2) develop, support, and retain educators (e.g., provide more opportunities for leadership); and (3)

leverage other SEA resources. The SEA includes a flow chart of how these actions may address root causes and improve access to educators for low-income and minority children in Title I schools. States may also include students with disabilities and English learners as part of these efforts.

If a State is considering changes to its educator equity measures (e.g., the definition of ineffective teachers), the State must submit a State plan amendment request for these changes. For additional information on the process to amend a State plan, please see: <https://oese.ed.gov/files/2023/10/Memo-to-State-Directors-State-Plans-and-Accountability-Fall-2023.pdf>.

Thank you for your focus on improving transparency for parents, families, and the public and to ensure all children receive a fair, equitable, and high-quality education. The Department encourages States to reach out to the Title I, Part A team for details on how these and other strong practices can be tailored to your State's needs. If you have any questions or need additional information, please contact OESE.TitleI-A@ed.gov.

Sincerely,

/s/

Adam Schott
Principal Deputy Assistant Secretary
Delegated the Authority to Perform the
Functions and Duties of the Assistant Secretary
Office of Elementary and Secondary Education

cc: State Title I, Part A Directors