

POLICY TITLE: Data and Document Submission Policy	
ADOPTION/EFFECTIVE DATE:	
<ul style="list-style-type: none"> • 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 	MOST RECENTLY UPDATED/merged: December 14, 2015

PURPOSE

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, PCSB collects compliance, finance, attendance, discipline, academic, and enrollment data electronically via various data collection systems¹. 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 will use the information for the express purpose of monitoring their performance. DC PCSB will provide technological training to charter school staff annually and on an as-needed basis throughout the school year. PCSB will also provide schools with instructions for submitting data, a calendar of submission dates, a list of data elements and their definitions 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 30 days notice.

DC PCSB will provide 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.

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

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 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."² 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) status must be completed on a daily basis for every student enrolled in the school for the current school year. These files must be uploaded into the established data system³ on a weekly basis.

Discipline Data

The school must enter or upload every suspension (with code⁴) and expulsion (with code) into DC PCSB's data system on a monthly basis.

Data Validation

Schools will be 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. Data is considered validated when the school and DC PCSB agree upon the same rate/ 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.

² List of OSSE exit codes as of June 2014: <https://www.dropbox.com/s/isy9oov5o9vn5it/Exit%20Codes%20-%20OSSE%20June%202014.xlsx?dl=0>

³ PCSB or OSSE's data system which PCSB pulls from, whichever is applicable.

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

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 will provide schools with a calendar of submission dates annually, prior to the beginning of the school year. Schools will 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, Elementary and Secondary Education Act (“ESEA”) required documents; and procurement contracts.⁶ All items on the Compliance Calendar can be 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

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. 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,

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.

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.

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 changes, 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

Disclaimer: This publication is designed to provide information on the subject matter covered. It is distributed with the understanding that the publisher is not engaged in rendering legal, accounting or other professional services. Readers will be responsible for obtaining independent advice before acting on any information contained in or in connection with this policy.