

Moving Beyond the “Asian” Check Box

Analyses of national opportunities and challenges for education data reform through data disaggregation that recognizes the unique identities of Asian American, Native Hawaiian & Pacific Islander communities

Southeast Asia Resource Action Center



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Moving Beyond the “Asian” Check Box

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About the Southeast Asia Resource Action Center

The Southeast Asia Resource Action Center (SEARAC) is a national organization that advances the interests of Cambodian, Laotian, and Vietnamese Americans by empowering communities through advocacy, leadership development, and capacity building to create a socially just and equitable society. SEARAC was founded in 1979 to foster the development of nonprofit organizations led by and for Southeast Asian Americans. Today, SEARAC strengthens the capacity of community-based organizations led by refugees from around the world, serves as a coalition builder and leader among diverse refugee communities, carries out action-based research projects, fosters civic engagement among refugees, and represents refugee communities at the national level in Washington, DC and at the state level in California.

Special Thanks & Acknowledgements to Our Contributors

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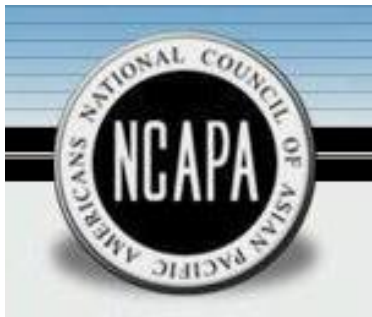
About AALDEF:

Founded in 1974, the Asian American Legal Defense and Education Fund (AALDEF) is a national organization that protects and promotes the civil rights of Asian Americans. By combining litigation, advocacy, education, and organizing, AALDEF works with Asian American communities across the country to secure human rights for all.



About APALA:

Founded in 1992, APALA is the first and only national organization of Asian Pacific American union members to advance worker, immigrant, and civil rights. As a member based organization, APALA has 17 Chapters in 12 states, serving as a bridge connecting Asian Pacific Americans (APAs) with the broader labor movement.



About NCAPA:

The National Council of Asian Pacific Americans (NCAPA), founded in 1996, is a coalition of thirty national Asian Pacific American organizations around the country. Based in Washington D.C, NCAPA serves to represent the interests of the greater Asian American (AA) and Native Hawaiian Pacific Islander (NHPI) communities and to provide a national voice for AA and NHPI issues.

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Executive Summary

- On May 4, 2012, the U.S. Department of Education (ED) issued a Request for Information (RFI), announcing that it is seeking to gather and share information about practices and policies regarding existing education data systems that disaggregate data on sub-groups within the Asian American/Native Hawaiian & Pacific Islander (AANHPI) student population.
- Asian American advocates used this RFI as an opportunity to demonstrate national demand for data disaggregation to make visible and address the academic achievement gaps that exist within AANHPI communities. Advocates launched a grassroots campaign to get at least 500 comments from students, parents, advocates, schools, and universities to respond to the RFI. Advocates met this goal, as a total of 711 total comments were submitted to ED.
- Of the 711 total comments received, the top 10 sources are listed below:
 - Student (331)
 - Individual (124)
 - Local Education Agency (LEA) (42)
 - Parent/Relative (49)
 - Organization (63)
 - Institute of Higher Education (IHE) (44)
 - State Education Agency (SEA) (22)
 - Other (21)
 - Public Elementary/Secondary School (13)
 - State Agency (2)
- Of the comments received, 42 institutions reported collecting disaggregated data. These 42 institutions came from three states (California, Washington, Hawaii) and three U.S. territories (Guam, American Samoa, and Micronesia.)
- Major opportunities for advocating for data disaggregation included the following:
 - Diverse stakeholders (ranging from LEAs, IHEs, community members and policy makers) spoke to *public will* for disaggregating data. Comments responded to the importance and need for data disaggregation to understand the educational needs of AANHPI students. Comments came from across the nation, including communities with emerging AANHPI populations such as Amarillo, TX and Charlotte, NC.
 - LEAs demonstrated *experience in collecting other types of granular data* including “Country of Origin” and “Language of Origin/Home Language.” While these variables are only proxies for a student’s ethnicity, and LEAs do not report this data, the ability for LEAs to collect this data speaks to existing knowledge and experience with collecting granular data. This practice and experience could be leveraged to also collect disaggregated data on race and ethnicity.
 - IHEs that received federal funding from the *Asian American Native American Pacific Islander Serving Institutions (AANAPISI) Program* reported that this was a *key source to fund research projects* that allowed for collecting disaggregated data, and that it motivated IHEs to analyze and report out on this disaggregated data for AANHPI students.
- Major challenges to implementing data disaggregation included the following:
 - LEAs, SEAs, and IHEs consistently commented that they do not disaggregate data beyond what is *mandated or “required”* by the federal government.

- Of the LEAs and IHEs that collected disaggregated data on AANHPI student ethnicities, *none reported this data to the state or federal government*. An exception is made for the Hawaii Department of Education who produces annual public reports with disaggregated data on student enrollment by ethnicity. However, student outcomes data, e.g. percentage of AANHPI ethnic groups who are meeting reading proficiency levels, are still not disaggregated by AANHPI ethnic groups for state or federal reports.
- Institutions often remarked on the *small number of Asian American students* within their district or state as a reason why they do not disaggregate data of AANHPI students. However, many of these institutions are located in regions or states that have seen tremendous growth within their AANHPI population. Additionally, for institutions that do disaggregate data, reporting out on small numbers of AANHPI sub-groups remained a challenge.
- The top *infrastructure changes* that would have to be made to disaggregate data include training staff, revising student enrollment forms, and revising databases.
- While some agencies see *data disaggregation as beneficial for students of other races and ethnicities as well*, others feel uncertain of how wide to expand race and ethnicity options.
- Institutions commented on the challenge of *accurately counting multi-racial students* under the U.S. Department of Education’s current data guidance to count all multi-racial students under the category of “Two or More Races.” Institutions representing Native Hawaiian and Pacific Islander students were especially concerned about the risk of undercounting Native Hawaiian students through this policy as a large proportion of these students are multi-racial.
- Institutions that disaggregated data on a wide scale (e.g., all school districts in a state, or all universities from one university system) reported that *keeping consistent data disaggregation practices across sites was a challenge*. Inconsistent data collection results in incomparable data and prevents institutions from understanding the needs of their AANHPI students.
- Two examples of large scale data disaggregation models were revealed through comments from the states of Hawaii and California. Hawaii’s Department of Education and California’s education institutions (including California Department of Education, University of California, and California State University college systems) were selected to highlight three best practices:
 - *Collective decision making processes* that other education agencies can utilize to make decisions on data disaggregation on a state-wide level,
 - The combination of *legislative and grassroots action* for data changes to respond to community needs, and
 - The formation of *partnerships between K-12 and higher education* data to truly serve the needs of AANHPI students.

Background

WHAT WAS THE RFI:

On May 4, 2012, the U.S. Department of Education (ED) issued a Request for Information (RFI), announcing that it is seeking to gather and share information about practices and policies regarding existing education data systems that disaggregate data on sub-groups within the Asian American/Native Hawaiian & Pacific Islander (AANHPI) student population. The RFI can be found at: <http://1.usa.gov/AANHPIdata>.

WHY THE RFI WAS ISSUED:

ED planned to use this information to help state educational agencies (SEAs), local educational agencies (LEAs), schools, and institutions of higher education (IHEs) identify, share, and implement promising practices and policies for identifying and overcoming challenges to gathering and disaggregating data on AANHPI student populations.

WHO THE RFI TARGETED:

ED targeted the “General Public,” which included:

- Schools
- Local Education Agencies (LEAs)
- State Education Agencies (SEAs)
- Institutes of Higher Education (IHE)

Asian American organizations who wanted to use this RFI as an opportunity to demonstrate national demand for data disaggregation (including the Southeast Asia Resource Action Center, Asian American Legal Defense and Education Fund, Asian Pacific American Labor Alliance, and National Council of Asian Pacific Americans) implemented a campaign to get at least 500 comments from students, parents, advocates, schools, and universities to respond to the RFI.

WHAT THIS BRIEF IS ABOUT:

This policy brief analyzes the 711 comments that were submitted in response to the RFI to look at:

- Opportunities/positive trends for data disaggregation,
- Challenges to data disaggregation, and
- Existing models of large scale data disaggregation.

The brief concludes with recommendations to help diverse stakeholders call for disaggregated data to make visible and address the academic achievement gaps that exist within AANHPI communities.

METHODOLOGY

The 711 RFI responses were retrieved from <http://www.regulations.gov> by searching the RFI’s Docket ID Number: ED-2012- OESE-0009, and then entered into an Excel spreadsheet. While the website states that 713 comments were received, two of those comments were the RFI announcement; those two comments were not factored into the total number of actual comments received for this analysis.

Due to the large quantity of comments, the themes analysis focused on comments that came from LEAs, IHEs, SEAs, and community organizations. The comments were coded by five major themes—disaggregation of data, promising practices, opportunities, challenges, and community needs—and 15 sub-themes.

The “category” that comments came from were re-coded from their original entry to reflect comments that represent the official perspective of institutions. For example, comments that were listed as “LEAs” but that did not actually come from the LEAs were re-coded as “Individual.”

LIMITATIONS

The conclusions that were drawn were only from the 711 responses that were received. While other institutions are known to disaggregate data, for example, Seattle Public Schools, this information was not reflected in the findings as no comment was received from Seattle Public Schools.

Major Terms & Quick Facts/Figures about RFI Responses

List of Major Terms

Local Education Agency (LEA) – individual school districts that oversee elementary or secondary schools. (*e.g., Los Angeles Unified School District*).

State Education Agency (SEA) – state department of education that oversees policies and support for K-12 schools in each state (*e.g., Virginia Department of Education*).

Institute of Higher Education (IHE) – universities, academies, colleges that provide post-secondary education. (*e.g., University of Illinois at Chicago*).

Total Number of Responses

711

Comments by Category¹

Category	#
Student	331
Individual	124
LEA	42
Parent/Relative	49
Organization	63
IHE	44
SEA	22
Other	21
Public Elementary/Secondary School	13
State Agency	2
Total	711

Number of Institutions that Do/Do Not Disaggregate Data

Institutions that DO Disaggregate Data	40
Institutions that DO NOT Disaggregate Data	53
Institutions with Unclear Responses	11

¹ For the purposes of this chart, three categories include several types of comments: Organization, IHE, and Other. For example, the IHE category includes comments that are identified as Two-Year Institutions, Four Year Institutions, Private/Public Institute of Higher Education, etc. Please see Appendix A for a full description of sub-categories.

Institutions that Disaggregate Data

(listed in alphabetical order by state, then by name)

	Name	City	State
IHE	American Samoa Community College	Pago Pago	American Samoa
	California Community Colleges, Chancellor's Office (and affiliated colleges):	Sacramento	CA
	• Mission College	Santa Clara	CA
	• Yuba College	Marysville	CA
	• Los Angeles Pierce College	Woodland Hills	CA
	• City College of San Francisco	San Francisco	CA
	• De Anza College	Cupertino	CA
	• Long Beach Community College District	Long Beach	CA
	• Mt. San Antonio College	Walnut Creek	CA
	• Fullerton College	Fullerton	CA
	• Chabot College	Hayward	CA
	California State University, Office of the Chancellor (and affiliated colleges):	Long Beach	CA
	• San Diego State University	San Diego	CA
	• CSU Fullerton	Fullerton	CA
	• San Jose State University	San Jose	CA
	• California State Polytechnic University, Pomona	Pomona	CA
	• CSU Fresno	Fresno	CA
	Loyola Marymount University	Los Angeles	CA
	University of California, Office of the President (and affiliated colleges):	Oakland	CA
	• University of California, Berkeley	Berkeley	CA
University of Guam	Mangilao	GU	
University of Hawaii (and affiliated colleges):	Honolulu	HI	
• University of Hawaii – Hilo	Hilo	HI	
• University of Hawaii - West Oahu	Honolulu	HI	
College of Micronesia – FSM	Pohnpei	Micronesia	
North Seattle Community College	Seattle	WA	
LEA	ABC Unified School District	Cerritos	CA
	Elk Grove School District	Elk Grove	CA
	East Side Union High School District	San Jose	CA
	Fremont Union High School District	Sunnyvale	CA
	Fresno Unified School District	Fresno	CA
	Long Beach Unified School District	Long Beach	CA
	Garden Grove Unified School District	Garden Grove	CA
	Los Angeles Unified School District	Los Angeles	CA
	Milpitas Unified School District	Milpitas	CA
	San Ramon Valley Unified School District	Danville	CA
	Stockton Unified School District	Stockton	CA
	Sacramento City Unified School District	Sacramento	CA
SEA	California Department of Education	Sacramento	CA
	Hawaii State Department of Education	Honolulu	HI

Opportunities for Data Disaggregation

PUBLIC WILL

While challenges to data disaggregation exist, comments from stakeholders spoke to the public will for data disaggregation from LEAs and IHEs, to community members, and elected officials.

Support from LEAs/Educators/IHEs – While LEAs described challenges with developing new data systems, institutions were open to making changes to better serve their students. Elk Grove School District from California commented:

While educators are aware of the vast differences within the Asian population, detailed achievement gap analysis is not institutionalized, as it is with African American and Hispanic gap analysis. State and federal accountability policies have greatly impacted the subject areas and student subgroups for which districts and schools decide to provide targeted interventions and support.

The attention that the federal government has given to this area, as evidenced by this Request for Information, coupled with new statistics of high educational attainment of Asian Indian and Taiwanese Americans that was recently in the news, has affected our district's plans for further data inquiry into this matter during the 2012-13 school year.²

Additionally, individual teachers, administrators and principals also submitted comments speaking to the necessity of data disaggregation for their students. Sandy Withlow, a Principal at Palo Duro High School (Amarillo, TX) commented:

As the United States truly becomes more of a "melting pot," students of many ethnicities and races are being served in school systems. Categorizing students into traditional subgroups (African American, Asian, White, Hispanic, etc.) does not allow for a true picture of learning. Additionally, lumping refugees and students with severely interrupted, limited or no formal education into the same subgroups skews data of learning, especially when these students must meet the same state and federal accountability measures as students who are Native Americans or have achieved high degrees of literacy and education in their language of origin. To categorize a Somali or Burmese refugee into respective African American or Asian subgroups is an error in the measure of learning. Growth should be measured from progress points of learning for students with severely interrupted or no formal education. It is grossly unfair for these students to be tested on the same scale and meet the same graduation requirements/timelines as American natives. Additionally, financial assistance should be awarded to schools who house large populations of refugee/immigrant students in order to provide transition services, accelerate learning, and assist families to become productive members in communities.³

Finally, IHEs that do not currently disaggregate data commented on being supportive of this new trend as a way to recognize the changing demographics of their students. For example, Middlesex County College from Massachusetts commented, "Middlesex is committed to student success. We provide a rich variety of support for American Asian and

² Comment ID: ED-2012-OESE-0009-0008.

³ Comment ID: ED-2012-OESE-0009-0674.

Pacific Islander students; however, we also realize there is much yet to be done. We look forward to learning what others are doing.”

Community Demand – Community comments from the RFI reflect a national trend as 498 out of 711 comments came from respondents who identified as students, individuals, or parents from across the country. Additionally, 50 comments came from organizations who attested to the student needs within their community, and the value of data disaggregation to raise awareness of those needs with policy makers.

Comments came from both communities with large numbers of AANHPI populations and communities with smaller, emerging populations. For example, one comment came from Quyen Vuong, Executive Director of the International Children Assistance Network (ICAN) located in Milpitas, CA.⁴ ICAN serves Vietnamese American families and youth from Santa Clara County, with the largest city being San Jose. According to the U.S. Census 2010, San Jose is home to the 10th largest population of Asian Americans in the country comprising 34.5% of the city’s total population of 945,942.⁵ Additionally, San Jose had the highest concentration of Vietnamese Americans out of all U.S. cities with a population of 100,486.⁶ Ms. Vuong commented that large educational challenges continue to exist in the Vietnamese American community, but are overshadowed by media reports that perpetuate the model minority myth, putting out stories about Vietnamese students graduating at the top of their class. As a result, funders (county, city, foundations) adopt a biased view that Vietnamese American students are doing very well and do not need any help or resources. In reality, Ms. Vuong comments, “many Vietnamese parents are crying out for help because their children [wander] the streets, join gangs, and drop out of school, etc.” ICAN is working hard to find resources to help the community but requires disaggregated data to illustrate the community’s needs.

Other comments came from cities with emerging AANHPI communities such as Charlotte, North Carolina. In contrast to the large population of Asian Americans in San Jose, CA, Asian Americans in Charlotte comprise only about 5% of the city’s total population of 731,424.⁷ Cat Bao Le, of the Vietnamese Association of Charlotte, shared that Charlotte is home to the largest Montagnard population outside of Southeast Asia.⁸ Montagnards are an ethnic minority from Vietnam who fought along the U.S. Special Forces during the Vietnam War. Ms. Le emphasized that disaggregated data could help us better understand the diverse needs of these Southeast Asian American communities. Although they are culturally, religiously, and linguistically different, Montagnard youth are often misidentified as Vietnamese in the Charlotte school system. Most Montagnard youth do not speak Vietnamese, but rather one of the five Montagnard dialects. Since Charlotte schools often misidentify these youth as Vietnamese, they have also failed to develop adequate programs to serve them, which further marginalizes this community that already has low educational outcomes due to their arrival as refugees with limited formal education.

These community comments reveal the national demand that exists for data disaggregation, and the importance of having accurate data to serve the needs of AANHPI students who are rendered silent when lumped together only as “Asian.”

Support from Policy Makers – State agencies and officials from California and Minnesota weighed in on their support of the U.S. Department of Education’s efforts to increase data disaggregation. The Council on Asian-Pacific Minnesotans, a

⁴ Comment ID: ED-2012-OESE-0009-0013.

⁵ Hoeffel, Elizabeth M.; Rastogi, Sonya; Ouk Kim, Myoung; and Shahid, Hasan. “The Asian Population: 2010” *2010 Census Briefs*, C2010BR-11, March 2012: page 13.

⁶ United States Census. “The Vietnamese Population in the United States: 2010” accessed online at http://www.bpsos.org/mainsite/images/DelawareValley/community_profile/us.census.2010.the%20vietnamese%20population_july%202011.pdf.

⁷ U.S. Census Bureau 2010. Summary File 1.

⁸ Comment ID: ED-2012-OESE-0009-0311.

state agency based in Saint Paul, MN, emphasized that further data disaggregation of AAPI students is needed “to truly understand and create programs and opportunities to meet the needs of students who are in need of help and assistance.”⁹ The agency also shared its findings from a state report that was released in 2012:

As a group, API students are doing well, but when we disaggregated the data, we saw stark differences between immigrant and refugee experienced students.

- For example, the 2011 Minnesota Comprehensive Assessment (MCA) exam revealed that only 12 percent of Burmese-Americans, 37 percent of Hmong-Americans, and 40 percent of Lao- and Cambodian- Americans were proficient in math while more than 78 percent of South Asians and Chinese were proficient.
- The 2011 MCA exam also revealed that only 17 percent of Burmese-Americans, 47 percent of Hmong-Americans, 57 percent of Lao-Americans, and 58 percent of Cambodian-Americans were proficient in reading while 87 percent of South Asians were proficient.

Without data disaggregation at the K-12 and higher education levels, my local school lacks critical information to target resources to address the diverse group of students who have unique needs.

The California Asian Pacific Islander Legislative Caucus also provided their support to the RFI with their comment:

Having a comprehensive understanding of the AANHPI community will allow SEAs, LEAs, and IHEs to address problems in certain AANHPI subgroups that are currently being ignored. Additionally, having a broader understanding of the AANHPI community will make these agencies more effective in handling their resources.¹⁰

The support from community members, school districts, educators, and public officials attests to the public will that exists for institutions to be responsive to the changing demographics and needs of the diverse AANHPI community.

COLLECTION OF “COUNTRY OF ORIGIN” AND “LANGUAGE OF ORIGIN/HOME LANGUAGE”

While the majority of LEAs and IHEs across the country do not collect disaggregated data, several reported collecting data on a student’s country of origin and home language. For example, Charlotte Mecklenburg Schools provided a report that listed 87 different “countries of origin” and “home languages” from academic school year 2012.¹¹ New Hampshire Department of Education also responded that “For English Language Learners, we do capture information about their country of origin, time in the US and native language.”¹²

LEAs also recognized that these variables were only a proxy for AANHPI sub-groups. For example, Miami Dade County Public Schools (MDCPS) commented:

MDCPS collects country of birth for all students. Data is analyzed to determine what countries students are coming from. But these analyses are based on the students being born outside the US. If a student is a second generation Asian student from China, their country of birth is US and not China. Therefore, producing analysis by country of birth would not capture all the diverse countries within the Asian population.¹³

While these variables are only proxies for a student’s ethnicity, and LEAs do not report this data, the ability for LEAs to collect this data speaks to existing knowledge and experience with collecting granular data. This practice and experience could be leveraged to also collect disaggregated data on race and ethnicity.

⁹ Comment ID: ED-2012-OESE-0009-0569.

¹⁰ Comment ID: ED-2012-OESE-0009-0712.

¹¹ Comment ID: ED-2012-OESE-0009-0028.

¹² Comment ID: ED-2012-OESE-0009-0710.

¹³ Comment ID: ED-2012-OESE-0009-0666.

ROLE OF ASIAN AMERICAN NATIVE AMERICAN PACIFIC ISLANDER SERVING INSTITUTIONS (AANAPIS) FUNDING TO INCENTIVIZE DATA DISAGGREGATION

IHEs that received AANAPISI funding reported that this was a key source to fund research projects that allowed for collecting disaggregated data, and motivated IHEs to analyze and report out on this disaggregated data for AANHPI students (see comments in Figure A below).

Figure A: Responses about AANAPISIs

San Jose State University	Mission College	Mt. San Antonio College
<p>We have reported our disaggregated data at our regional AANAPISI meetings.¹⁴</p>	<p>Based on Mission College’s proposed activities as outlined in its AANAPISI Part A & F grant objectives, this information is being used to develop targeted services to improve student progress and success and track the effectiveness of these services.¹⁵</p>	<p>How has the disaggregated data been publicly reported or used? As part of the application process for the AANAPISI grant to investigate the profile of AANHPI students: college enrollment, first-generation college status, financial need, academic performance, and basic skills placement (English and math). The data that allowed the school to qualify for our AANAPISI grant was outlined at an opening public reception for college employees, students, and community officials. The identity of individual students was kept confidential.¹⁶</p>
<p>University of Illinois, Chicago</p>		
<p>When UIC received the Asian American and Native American Pacific Islander Serving Institution (AANAPISI) grant in October of 2010, we were able to pursue institutional research to build upon the earlier data gathered from the 2004 CCSAA research. The grant initiatives include institutional data-gathering through an annual quantitative demographic survey that will be administered for the duration of the grant (2011-2014) as well as qualitative focus groups that were conducted this past spring of 2012 ... Right now, our institutional data effort at UIC through the AANAPISI grant remains the most successful effort to move this goal forward for the University of Illinois.¹⁷</p>		

¹⁴ Comment ID: ED-2012-OESE-0009-0183.

¹⁵ Comment ID: ED-2012-OESE-0009-0338.

¹⁶ Comment ID: ED-2012-OESE-0009-0620.

¹⁷ Comment ID: ED-2012-OESE-0009-0541.

Challenges for Data Disaggregation

MANDATE DRIVEN

LEAs, SEAs, and IHEs consistently commented that they do not disaggregate data beyond what is mandated or “required” by the federal government. For example, the Virginia Department of Education responded that “our SEA does not disaggregate race/ethnicity data beyond what is required by USED.” Similarly, the University of Maryland stated, “We do not collect any categories other than what is required because our university systems will not allow us. We only collect/report what is required by the federal government on race/ethnicity categories.

Local Collection vs. State Reporting – LEAs and IHEs that did report collecting disaggregated data came from three states (California, Hawaii, Washington) and three U.S. territories (Guam, American Samoa, and Micronesia). With the exception of Hawaii Department of Education, these LEAs and IHEs collect data of AANHPI sub-groups, but they do not publically *report* disaggregated data to the state or federal government on these sub-groups. While these LEAs and IHEs collect data of AANHPI sub-groups, they do not publically *report* disaggregated data to the state or federal government on these sub-groups. Rather, all the subgroups are aggregated into either the Asian or Pacific Islander categories for state and federal reporting. California’s Department of Education and Hawaii’s Department of Education are highlighted in Table 1 to illustrate this challenge as they were the only two SEAs that collect disaggregated data statewide, but neither report disaggregated data at the state level.

Table 1: California Collection vs. Reporting

	California Department of Education ¹⁸ California Longitudinal Pupil Achievement Data System (CALPADS)	Hawaii Department of Education ¹⁹ Student Enrollment System
Groups Collected	Asian Indian Cambodian Chinese Filipino Hmong Japanese Korean Laotian Vietnamese Other Asian Guamanian Hawaiian Samoan Tahitian Other Pacific Islander	Chinese Filipino Native Hawaiian Japanese Korean Portuguese Samoan Indo-Chinese (Cambodian, Vietnamese, Laotian, etc.) Micronesian (Marshallese, Pohnpeian, Chuukese, etc.) Tongan Guamanian/Chamorro Other Asian Other Pacific Islander
Groups Reported	Except for assessment results, almost all reports publically posted do not disaggregate the data by the Asian subgroups. For public reports, California uses the federal racial reporting categories with the exception of adding a Filipino subgroup. California has a two-decade history of reporting Filipino as a separate subgroup.	For reports that require more limited ethnicity categories (e.g., AYP), HIDOE utilizes crosswalks to ensure consistent aggregation or “roll up” into the prescribed categories.

¹⁸ Comment ID ED-2012-OESE-0009-0693.

¹⁹ Comment ID ED-2012-OESE-0009-0199.

A caveat in this finding is that while HIDOE does not disaggregate data of AANHPI ethnicities for their Annual Yearly Progress (AYP) results (e.g. percentage of students who have reached math/reading proficiency requirements under No Child Left Behind), HIDOE *does* produce public reports with disaggregated data on *student enrollment by ethnicity* through the School Status and Improvement Report (<http://arch.k12.hi.us/school/ssir/2011/honolulu.html>).²⁰ These annual reports include enrollment data for 21 ethnicity categories.

Additionally, the efforts of individual IHEs and their states' Board of Higher Education are disconnected. For example, the University of Illinois at Chicago has collected disaggregated data of AANHPI students since 2004 from a demographic profile survey that was conducted by their Chancellor's Committee on the Status of Asian Americans.²¹ In October of 2010, the University used its AANAPISI grant to conduct additional research based off of this demographic survey to "allow us to connect specific student identification numbers to regularly gather institutional data sets so we can learn more about AAPI students and also track progress."²² In contrast, the Illinois Board of Higher Education, which oversees all Illinois public universities, stated that it is constructing a longitudinal data system that collects data by race, but that this data will not be disaggregated by specific AANHPI populations.²³ These two contrasting comments illustrate disjointed efforts at individual institutions and their corresponding governing bodies which have authority to change policies institutionally for all the universities they govern.

UNIVERSITY OF ILLINOIS AT CHICAGO

Regionally in the Midwest, there were discussions within the network of Asian American student affairs staff through the Committee on Institutional Cooperation to work together on efforts to push the campuses of the Big Ten within the CIC to disaggregate data. It was a recognized need, but until now, a regional attempt has not been successfully implemented. Staff and faculty at the campuses of the University of Illinois at Chicago and at Urbana-Champaign hoped that any efforts at one campus would help the other campus since the University shares the same data system software called Banner. Once the categories are set up at one campus, presumably the other campuses would also be able to use it. Right now, our institutional data effort at UIC through the AANAPISI grant remains the most successful effort to move this goal forward for the University of Illinois.

UIC Comment, page 4

"SMALL NUMBER OF STUDENTS"

Institutions often remarked on the small number of Asian American students within their district or state as a reason why they do not disaggregate data of AANHPI students. New Mexico Public Education Department commented, "New Mexico public schools has a 1.3% population of Asian and Pacific Islander students. (3,372 AAPI students out of 334,324 total students). Because of the statistically small population, the New Mexico Public Education Department does not disaggregate on the Asian and Pacific Islander population."²⁴

According to the U.S. Census Bureau, many of these institutions were located in regions or states that have seen tremendous growth within their AANHPI population. For example, analysis of Census 2010 data found that "Counties that experienced the fastest growth in the Asian population were primarily in the South and the Midwest" and that "throughout the South and Midwest, there were several counties where the Asian alone-or-in combination population grew 200 percent or more (see examples in Table 2 below). For example, this was seen in counties in Texas, Florida, and

²⁰ Ibid.

²¹ Comment ID: ED-2012-OESE-0009-0541.

²² Ibid.

²³ Comment ID: ED-2012-OESE-0009-0678.

²⁴ Comment ID: ED-2012-OESE-0009-0688.

Georgia.”²⁵ While the population of AANHPI students appears low at the LEA level, demographics data from the U.S. Census Bureau suggests a need to update data collection practices to better reflect quickly changing communities.

Table 2: “Small Number of Students” vs. Census Demographics

Institution	RFI Responses about Small Number of Students	U.S. Census Bureau Demographics Data
Pennsylvania Department of Education	“State of Pennsylvania has a very small population of both students and staff for the AAPI subgroups to justify the cost and manpower to collect disaggregated Asian and Pacific Islander related data” ²⁶	Philadelphia, PA is ranked 9 out of 10 in “Ten Places With the Largest Number of Asians: 2010” ²⁷
Gwinnett County Public Schools, Florida	“As of November 1, 2011, Georgia Department of Education report of full-time-equivalent enrollment in GCPS indicates 217 students among a district student population of 162,370 enrolled in 133 school facilities. The count of 217 students represents approximately one-tenth of one percent of the GCPS student population. GCPS has not pursued the disaggregation of data for ANHPI students due to their small representation in the district; therefore, the district has encountered no barriers to such disaggregation.” ²⁸	AAPI growth was between 100-199.99% from 2000 to 2010. ²⁹
Elk Grove School District, California	“At the school level there are simply not enough students representing each of the detailed subgroups on which to make policy or targeted instructional decisions.” ³⁰	Elk Grove, CA is ranked 11 th in Places with the Largest Number of Asian populations. ³¹

For organizations that do disaggregate data, reporting out on small numbers of AANHPI sub-groups remained a challenge. For example, Sacramento Unified School District responded:

It is informative to disaggregate the data to the subgroup level. However, some groups have such small numbers that we need to suppress numbers when there are only 10 or fewer students. It is not useful information to compare groups with small numbers because there are huge swings in one direction or another.³²

The University of California also responded that they have a policy of not reporting out public data for groups of students where the count is less than five.³³ Public reporting of disaggregated data would then have to abide by each state and institution’s policy on the minimum number of students required per group before public reporting is permissible.

²⁵ Hoeffel, Elizabeth M. et al: page 12.

²⁶ Comment ID ED-2012-OESE-0009-0690.

²⁷ Hoeffel, Elizabeth M. et al: page 12.

²⁸ Comment ID ED-2012-OESE-0009-0235

²⁹ Hoeffel, Elizabeth M. et al: page 11.

³⁰ Comment ID ED-2012-OESE-0009-0008.

³¹ Hoeffel, Elizabeth M. et al: page 11.

³² Comment ID: ED-2012-OESE-0009-0680.

³³ Comment ID: ED-2012-OESE-0009-0708.

INFRASTRUCTURE CHANGES

The top changes that would have to be made to disaggregate data include training staff, revising student enrollment forms, and revising databases. Harper College (Palatine, IL) provided a cost-estimate of \$10,000 to disaggregate data of AAPI students based off of their experience in revising their data system in 2009 to comply with the U.S. Department of Education’s new guidance on data collection, requiring schools to ask first if a student is/is not Hispanic.³⁴ When the Hawaii Department of Education (HIDOE) revised its data categories to have more AANHPI race options, HIDOE also decided to re-survey its existing students so that state records could be updated using the new race categories. For this re-survey to happen, HIDOE commented that “Identification and deployment of resource support from the state level would need to be planned and organized. Projected costs were minimal, because the limited re-survey effort did not incur substantial financial burden to schools.”³⁵ While infrastructure changes are essential to data disaggregation, both examples demonstrate that changes are feasible. HIDOE’s response also suggests that costs may be less than expected.

EXTENT OF DATA DISAGGREGATION VS. EXPANDED BENEFITS FOR OTHER COMMUNITIES

Education agencies responded that there was uncertainty with how wide the scope of data disaggregation should be. In response to the challenge that would exist for data disaggregation, New Jersey Higher Education/Office of the Secretary of Higher Education responded, “making this a common practice in the Asian and Native Hawaiian or Other Pacific Islander [groups] is likely to lead to the desire to disaggregate other racial and ethnic groups.”³⁶ Alternatively, other agencies responded that it would also be beneficial for other racial categories to have expanded options. Los Angeles Pierce College responded:

Despite the large number of options, I feel there is a major gap for our students from the Middle East (Iran, Iraq, Kuwait, Jordan, etc.). It seems likely that they select "White" as their ethnicity, but this is inadequate, especially given the specificity of the other Asian and the Latino options. There should be other options for these students.³⁷

These conflicting comments suggest that while some agencies see data disaggregation as beneficial for students of other races and ethnicities as well, others feel that the uncertainty of how wide to expand race and ethnicity options is a challenge.

Accurately Counting Multi-Racial Students – Institutions commented on the challenges posed by the U.S. Department of Education’s data guidance to count all multi-racial students under the category of “Two or More Races.” The Hawai’i Office of Hawaiian Affairs emphasized that this new “Two or More Races” category would have “resulted in a significant undercounting of Native Hawaiians, which is particularly problematic for the state for two reasons. First, Native Hawaiians represent approximately 25 percent of the state’s student population. Second, the state has a unique fiduciary responsibility to Native Hawaiians that is set forth in state and federal law.”³⁸ While Hawaii Department of Education found a way to count multi-racial Hawaiian students through revising who is counted under their “Native Hawaiian” category, the Office of Hawaiian Affairs still recommends that this category be revised since “states that lack

³⁴ Comment ID: ED-2012-OESE-0009-0476.

³⁵ Comment ID: ED-2012-OESE-0009-0199.

³⁶ Comment ID: ED-2012-OESE-0009-0478.

³⁷ Comment ID: ED-2012-OESE-0009-0676.

³⁸ Comment ID: ED-2012-OESE-0009-0505.

large populations of and fiduciary relationships with Native Hawaiians have not adopted these policies [like Hawaii Department of Education] and are likely undercounting Native Hawaiians.”³⁹

CONSISTENCY

Institutions that disaggregated data on a wide scale (e.g., all school districts in a state, or all universities from one university system) reported that keeping consistency in data disaggregation across sites is a challenge. For example, Dr. Shirley Hune of the University of Washington shared the challenges of working with data from the Office of Superintendent of Public Instruction (OSPI) from Washington State:

The data collected by OSPI are conducted through an annual survey conducted by each school district which is then forwarded to the State and compiled at the State level. Each district may also collect its own data.

Weaknesses include:

- [T]he annual survey consists of many variables of students characteristics; some are required, others are optional. Too many districts collect only the required variables. Optional collection varies widely by district.
- [T]here are nearly 300 school districts in WA State – no consistency or uniformity in their reporting and in collecting data disaggregated beyond just separating out AAs and PIs.
- [V]ariables are easily misinterpreted. For example, language use, we found was also used as a proxy for ethnic identification. If a parent indicated that the child spoke Chinese at home then the student was labeled Chinese. Chinese students who did not speak Chinese might not be identified as Chinese American. Hence even the ethnic count data may vary widely once compiled.⁴⁰

American Samoa Community College also commented on the difficulty of maintaining consistent data collection practices across community colleges:

In 2009-2010 the Pacific Postsecondary Education Council (PPEC) compiled a Pacific Regional Fact Book consisting of the facts from each of the Western Association of Schools and Colleges (WASC) accredited institutions in the Pacific. Each of the PPEC institutions collected and reported disaggregated data differently. The only common report that all PPEC institutions were required to complete and submit was the Integrated Postsecondary Education Data System (IPEDS). The problem with this report is that the categories for ethnicity do not distinguish the various entities represented in the Pacific region. Most students attending the PPEC institutions fall into one category set out in the IPEDS, Native Hawaiian or Other Pacific Islander. This category does not allow justification for the 18 postsecondary institutions and island entities represented in the PPEC. Similar to the lumping of Pacific Islanders as Asian Pacific, the Other Pacific Islander category is not representative of the unique and varied Pacific entities.⁴¹

The lack of consistency in how data is collected results in incomparable data and prevents institutions from understanding the needs of their AANHPI students. These comments reveal the importance of providing institutions with clear, consistent directions and guidance in data collection processes so that the resulting disaggregated data can be used effectively to examine academic trends across institutions.

³⁹ Ibid.

⁴⁰ Comment ID: ED-2012-OESE-0009-0616.

⁴¹ Comment ID: ED-2012-OESE-0009-0555.

Existing Models of Large Scale Data Disaggregation

The RFI provided a tremendous opportunity to learn what data disaggregation practices exist from the individual institution level (e.g., specific colleges/universities) to state-wide practices. The following examples from Hawaii Department of Education and California’s education institutions (including California Department of Education, University of California, and California State University college systems) were selected to highlight three best practices:

- 1) Providing a blueprint for collective decision-making processes that other education agencies can utilize to make decisions on data disaggregation on a state-wide level,
- 2) The combination of legislative and grassroots action for data changes to respond to community needs, and
- 3) The formation of partnerships between K-12 and higher education data to truly serve the needs of AANHPI students.

HAWAII STATE DEPARTMENT OF EDUCATION (HIDOE): BLUEPRINT FOR COLLECTIVE DECISION MAKING PROCESS TO ACHIEVE STATE-WIDE DATA DISAGGREGATION

HIDOE has collected disaggregated data for many years through its state-wide student database. HIDOE states, “Prior to 2010, 14 ethnicity categories were collected through the student enrollment form. In 2010, HIDOE leveraged the transition to new federal reporting categories to expand the ethnicity/race categories collected to 17.” Figure B comes from HIDOE’s comment which lists the new race and ethnic categories that the state began collecting. The categories highlighted in the table below remained consistent. In the expanded categories, Hispanic (ethnicity) is collected through the “two part question” and all other categories are considered race.

Figure B: HIDOE Ethnicity Categories

14 Ethnicity Categories (prior to 2010)	17 Ethnicity/Race Categories
Hispanic	Hispanic (ethnicity)
American Indian or Alaskan Native	American Indian or Alaskan Native
Black	Black
Chinese	Chinese
Filipino	Filipino
Native Hawaiian	Native Hawaiian
Japanese	Japanese
Korean	Korean
Portuguese	Portuguese
Samoan	Samoan
White	White
Indo-Chinese (Cambodian, Vietnamese, Laotian, etc.)	Indo-Chinese (Cambodian, Vietnamese, Laotian, etc.)
Part Hawaiian	Micronesian (Marshallese, Pohnpeian, Chuukese, etc.)
Other/Not Specified	Tongan
	Guamanian/Chamorro
	Other Asian
	Other Pacific Islander

(Data Source: HIDOE RFI Comment, page 4.)

HIDOE’s comment also described its process of creating a steering committee to make decisions on how data collection/reporting should be changed state-wide. The steering committee created a Race and Ethnicity Workgroup in 2010 to determine the policies and procedures necessary for the implementation of the new Office of Management and Business (OMB) revised requirements for the collection and reporting of race and ethnicity data. The Race and Ethnicity Workgroup consisted of representatives across the state that were “critical in that they represent those that collect, maintain, report, and are impacted by the race and ethnicity data” including:

- Systems Accountability Office
- Hawaiian Language Immersion and Hawaiian Studies Program
- Charter School Office
- Information Resource Management Branch and the Information Support Systems Branch
- School principals
- Complex Area Superintendents.⁴²

HIDOE also shared its list of five key decisions that needed to be made by the Race and Ethnicity Workgroup. In addition to listing the questions, HIDOE described the resulting recommendation that was made, and key arguments in favor of or opposed to the recommendation that was made. Figure C below lists the five major questions.

Figure C: Key Decisions in HIDOE Data Collection⁴³

<p>1) Key Decision(s) Required: In addressing new <i>data collection</i> requirements, how would existing HIDOE race and ethnicity categories be revised so Hawaii’s more detailed race classifications would correspond to the smaller set of federal categories?</p>
<p>2) Key Decision(s) Required: In addressing new <i>data reporting</i> requirements, how would existing HIDOE race and ethnicity categories be cross-walked (i.e., integrated or “rolled-up”) to the new federal reporting categories? How should the existing HIDOE categories be rolled-up to the smaller set of federal categories?</p>
<p>3) Key Decision(s) Required: Did HIDOE need to formally record when schools utilize <i>observer identified</i> designation when race or ethnicity is not entered by a student or family representative?</p>
<p>4) Key Decision(s) Required: Should the HIDOE conduct a limited <i>re-survey</i> of students following the new federal guidelines to meet NAEP, [i.e., National Assessment of Education Progress] expectations?</p>
<p>5) Key Decision(s) Required: Should HIDOE student database application systems (i.e., database systems storing student electronic records) be modified to reflect the new state designations for race and ethnicity?</p>

HIDOE’s practice of engaging all stakeholders on who would be responsible for data disaggregation and its transparency in detailing major decisions that were made by consensus provides a blueprint for other institutions to expand their data collection processes.

⁴² Comment ID ED-2012-OESE-0009-0199.

⁴³ Ibid pages 5-7.

CALIFORNIA DEPARTMENT OF EDUCATION, CALIFORNIA STATE UNIVERSITY AND UNIVERSITY OF CALIFORNIA SYSTEMS: LEGISLATIVE & GRASSROOTS ACTION AS IMPETUS FOR DATA DISAGGREGATION & K-16 PARTNERSHIPS

The 23 comments from California LEAs (55% of all comments from LEAs), and 15 from California IHEs (36% of all comments from IHEs) resulted in a rich story of how data disaggregation resulted in California.

Legislative Action – The University of California, California Department of Education, and California State University system, all reported that they follow the data collection policies set forth by California’s Government Code section 8310.5 which requires that state agencies collect disaggregated data for the Asian American and Pacific Islander sub-groups. Additionally, the California Department of Education also collects data on Hmong and Tahitian students, both of which are additional categories that are not required by California Code 8310.5 (see Figure D below).

Figure D: California AANHPI Categories

California Code 8310.5 AANHPI Categories ⁴⁴	California Department of Education AANHPI Categories ⁴⁵
Asian Indian	Asian Indian
Cambodian	Cambodian
Chinese	Chinese
Filipino	Filipino
Guamanian	Guamanian
Hawaiian	Hawaiian
Japanese	Hmong
Korean	Japanese
Laotian	Korea
Samoan	Laotian
Vietnamese	Samoan
	Tahitian
	Vietnamese

Based off of the RFI comments that were received, California was the only state with legislative statute that requires the collection of data on AANHPI sub-groups.

Grassroots Action – In addition to California’s legislative code, the University of California also attributes grassroots mobilizing as a key factor for the University’s change in data collection for AANHPI students. The University of California, Office of the President responded:

Several factors precipitated the University’s change in race/ethnicity data collection. During the 2006-07 academic year, members of the Asian Pacific American Coalition undergraduate student group at UCLA launched the “Count Me In!” campaign that was supported by thousands of UC students throughout the system. The campaign sought to encourage the University to break down the general list of AAPI categories into more discrete [A]ANHPI subpopulations. Their request echoed calls from UC faculty for more granular research data. Also, during the 2007-08 legislative session, California passed Assembly Bill 295 (Lieu), which required specific state agencies to add 10 ethnicities to the list of 11 subgroups the U.S. Census was already tracking. The timing

⁴⁴ California Government Code 8310.5. Accessed online at http://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml.

⁴⁵ California Department of Education. “Frequently Asked Questions - Do we still collect the Asian sub-group information?” Accessed online at <http://www.cde.ca.gov/ds/dc/es/refaq.asp>

of the student-led grassroots campaign and state legislative action aligned with the University's own analysis for the need to disaggregate data, which ultimately resulted in the revised data collection policy.⁴⁶

Of all comments received, the California State University (CSU) had the most exhaustive race and ethnic category options for their students. The CSU also cited the combination of legislative and community action as reasons for why the CSU began further data disaggregation:

A series of state legislative initiatives before and after the new millennium [that] sought to more precise[ly] enumerate[e] race/ethnicity, a quest for increased quality in reporting, and a desire to be more responsive to the input of community groups...prompted the CSU Office of the Chancellor to decide to provide students with an exhaustive list of close-ended categories; the process yielded 113 different racial and ethnic subgroups.⁴⁷

K-16 Partnerships – In addition to collecting data of 113 different racial and ethnic subgroups, the CSU created a joint partnership of the California Department of Education and the Early Assessment Program (EAP) to understand the achievement gaps in college preparation among 11th grade students. Data from this partnership informed the CSU AAPI initiative to target the following communities, which were identified, based on CSU data from the EAP tests, as needing additional assistance to improve their chances for college access.

- Samoan
- Tongan
- Marshallese
- Hawaiian
- Cambodian
- Hmong
- Laotian
- Fijian
- Underserved Chinese, Vietnamese, Filipino, Korean, Thai.⁴⁸

This partnership between an institute of higher education and the state's K-12 data system is highlighted to provide an example of how accurate, transparent data from both the K-12 and higher education systems have resulted in targeted programs to improve college access and retention for AANHPI students who are underrepresented in higher education.

ABOUT THE EARLY ASSESSMENT PROGRAM & CALIFORNIA STATE UNIVERSITY PARTNERSHIP

"The Early Assessment Program (EAP) tests are voluntary examinations taken by end-of-year 11th grade students attending public schools. The results provide students, teachers, and school administrators with indicators on the readiness of students to enroll in college-level English and mathematics courses. The CSU already knew that most high school graduates were not ready to enroll in college-level English and mathematics. The EAP was developed as a readiness indicator to encourage students and the schools to use the often wasted Senior Year to get students up to speed for their future. The following URL provides EAP Test Results for 2011: <http://eap2011.ets.org/ViewReport.asp>. Results from the CSU Early Assessment Test are provided by students' ethnic, racial and national background, as well as by economic disadvantage."

CSU Comment, Page 5.

⁴⁶ Comment ID: ED-2012-OESE-0009-0708.

⁴⁷ Comment ID: ED-2012-OESE-0009-0294.

⁴⁸ Ibid: page 5.

Recommendations to Incentivize Data Disaggregation

DEMAND DATA DISAGGREGATION FROM THE GROUND UP – RECOMMENDATIONS FOR COMMUNITY ADVOCATES

Institutions that disaggregate data reveal that community demand played a pivotal role to push for data changes. Community advocates can do the following to sustain the momentum that was generated from this RFI campaign:

- Increase awareness about your presence and the challenges in your communities – There is a need for LEAs and IHEs to better understand the presence and needs of AANHPI students. This knowledge is especially important for institutions that are located in census tracts that have seen tremendous growth within their AANHPI community. Community advocates are integral to educating institutions about these demographic changes, and to keeping them accountable to serving the needs of AANHPI students.
- Implement grassroots campaigns to change local and state data collection and reporting – California’s Count Me In campaign speaks to the power of collective action to change the entire data collection and reporting policies of the University of California. This campaign also attests to changes that are possible at the local and state level that do not require federal action.
- Work collaboratively with other data campaigns – Community advocates can benefit from building relationships with other education data campaigns, such as the Data Quality Campaign and Education Trust to collectively call for more accurate, transparent data on student needs. More outreach and education is also needed to inform these allies of how AANHPI student needs can be integrated into their campaigns to call for a better education system to serve all students.

LEAD LOCAL CHANGES – RECOMMENDATIONS FOR LEAS AND IHES

While federal policies guide the minimum requirements of data collection and reporting policies, LEAs and IHEs have the authority to implement data disaggregation policies that are beyond what is required.

- Begin collecting and reporting out on student data that does exist – These local changes set precedence for other local actions to happen across the country, and provide other institutions with knowledge on the feasibility and effectiveness of data disaggregation. These changes can also encourage federal policy makers to call for national changes if they can see real life examples of multiple institutions that are effectively disaggregating data and using that data to serve student needs.

Additionally, LEAs and IHEs in California that collect disaggregated data should also *report* on this data. Collecting data alone without any public reporting deprives AANHPI students of the data needed to truly understand and serve their needs.

- Seek out federal resources, partnerships, and find cost-sharing/cost-effective ways to implement data disaggregation – LEAS can utilize funds from Race to the Top to build new data systems, and IHEs can leverage AANAPISI funding to develop new data systems. LEAs can also form partnerships with private companies to update their data system. Additionally, the California State University and University of California examples demonstrate how costs can be shared across institutions to develop data disaggregation systems that serve multiple campuses.

FRESNO UNIFIED SCHOOL DISTRICT

In 2009-10 Fresno Unified began work in collaboration with Microsoft to build a new student information system, rather than to purchase an SIS, [Student Information System] off the shelf. The additional autonomy that comes with designing a system in-house allowed us to add additional subgroup disaggregation into our student ethnicity collection. As the system launched in 2010-11, we were able for the first time to calculate the number of Hmong students in the school district.

FUSD Comment, pages 2-3.

UNIVERSITY OF CALIFORNIA

College and university systems may also wish to consider adopting cost-saving practices such as integrating the collection of disaggregated data into existing systems; collecting data centrally, rather than by individual campuses or departments to eliminate duplication of effort; connecting related databases that capture demographic information to facilitate data retrieval; and phasing in the collection of disaggregated data for new students, while refraining from surveying past students.

UC Comment, page 5.

REVISE FEDERAL REGULATIONS, RESOURCES, AND STRATEGIES – RECOMMENDATIONS FOR FEDERAL POLICY MAKERS

The 498 comments from community members across the country demonstrate the importance of data disaggregation to AANHPI communities. The following recommendations are provided to federal policy makers to remain accountable to this demand.

- Revise the U.S. Department of Education’s Data Guidance – The RFI explicitly states that the U.S. Department of Education is not considering modifying its racial and ethnic data collection and reporting requirements set forth in its 2007 Final Guidance.⁴⁹ However, the comments in response to the RFI demonstrate that there is large community demand and willingness from educators and institutions to consider revisions to this data guidance. We urge the Department to issue a request for information to improve the 2007 Guidance, followed by an opportunity for public comment on proposed changes to the Guidance.
- Increase federal and state resources for data disaggregation – Comments from AANAPISIs emphasized the importance of having additional federal resources to drive data disaggregation practices to develop, use, and report out on disaggregated data to better serve AANHPI students. Other federal grant programs such as Race to the Top, the Elementary and Secondary Education Act, and the Statewide Longitudinal Data Systems Grant Program, should also incentivize data disaggregation practices and policies. Additionally, the U.S. Department of Education should encourage IHEs to include data disaggregation as part of their AANAPISI grant request.

⁴⁹ Federal Register. “Request for Information To Gather Technical Expertise Pertaining to the Disaggregation of Asian and Native Hawaiian and Other Pacific Islander Student Data and the Use of Those Data in Planning and Programmatic Endeavors” Vol.77, No. 87, Friday, May 4, 2012: pg. 26531.

- Prioritize data disaggregation across existing data movements – The U.S. Department of Education should prioritize data disaggregation across all of its data change efforts, including the development of national longitudinal data sets and the development of the Common Education Data Standards, a national collaborative effort to develop voluntary, common data standards for a key set of education data elements.⁵⁰ Additionally, the U.S. Department of Education should also incentivize data disaggregation by the Smarter Balanced Assessment Consortium and the Partnership for Assessment of Readiness of College and Careers, as the two consortia develop new student assessments aligned to the Common Core State Standards.

⁵⁰ Common Education Data Standards. “What is CEDS” accessed online at <https://ceds.ed.gov/whatIsCEDs.aspx>.

Appendix A – About RFI Categories

The following lists the sub-categories that were included in each major category in the table listed on page 10, “Comments by Category.”

Student

Individual

LEA

Parent/Relative

Organization

- Community Organization
- Association/Organization
- Academic/Think Tank
- Civil Rights Organization
- National Advocacy Organization
- Faith Based Organization
- Law Firm
- Legal Aid Organization
- Tribal Organization

IHE

- Two-Year Public Institution of Higher Education
- Private/Non-Profit Institution of Higher Education
- Four-Year Public Institution of Higher Education

SEA

Other

- Union
- State Legislature
- Military
- Minority Serving Institution
- School Administrator
- Teacher

Public Elementary/Secondary School

State Agency



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