

## Vermont Agency of Education

# Required Data Submission Escalation Procedure

### Purpose

The purpose of this document is to outline the processes associated with ensuring complete, accurate and timely data reporting to fulfill required conditions for receipt of funds administered by the Agency of Education (AOE), including federal Title funds. When submitting applications for funds, superintendents assure that they will comply with the Agency's data reporting requirements as a condition of receipt of any kind of AOE-administered grant funds.

The timely reporting of accurate data is essential for several purposes including but not limited to:

1. Required federal reporting that is directly tied to the Vermont's continued receipt of federal education funds,
2. Determinations of eligibility for reimbursement under programs such as the state-placed student program,
3. Determinations of allocations of funding to LEAs, and
4. Determinations of eligibility for specific funds at the LEA and/or school level (e.g., Title I eligibility and eligibility to operate a Schoolwide Title I program, eligibility for Title III Immigrant grant or Title V Rural Education Achievement Program (REAP) funding).

To ensure compliance with required federal and state reporting duties that maintain access to federal education dollars supporting Vermont's most vulnerable students, the AOE has established an escalation procedure for cases where LEAs have not submitted requisite data.

### Required Data Submissions

There are many statewide data collections administered throughout the year. This procedure shall apply to the following data collections that are administered by the AOE's Data Management and Analysis Division (DMAD):

- DC 04 - Year End Official
- DC 05 - Tuition Students Official
- DC 06 - Fall ADM Official
- Child Count
- Independent Census
- DC13 Headstart Unofficial

Each collection involves both an initial submission window and a second window for submission after receiving data quality reports. The annual timeline for submissions is published to [AOE's website](#).

After the first submission of any collection, LEAs receive a data quality report. Here's an example of a data quality report an SU/SD might receive:

Error_Check_Name	Description
Over_Fifteen_Percent	Fifteen percent change from one year to another.
No_Race_Presented	No race presented for these students
No_Students_With_FRL	Schools with no FRL status
Non_Exited_12_Graders	The number of exiting students this year compared to previous years is significantly different. Please Check to see if you are properly setting exit types on your students for Elem. to M.S., M.S. to H.S, H.S graduations.
Disputed_Students	Student exists in multiple schools at the same time. Please be advised this check will update based on other SU's submissions.

### **Roles and Responsibilities in Required Data Submissions**

It is the SEA's responsibility to collect, steward and report data required for receipt of state and federal education dollars from LEAs that receive those dollars (16 V.S.A. § 43).

It is the LEA's responsibility to submit data required for receipt of state and federal education dollars if they receive those dollars. It is the LEA's responsibility to review any data submission requirements, to collect and steward those data, and then report them to the SEA.

To do this work, as is outlined in nationally established [best practices](#), LEAs serve a critical role in ensuring data quality. LEAs operationalize the policies, rules and regulations that are set at state and federal levels in addition to their own internal governance. This means that across the nation, LEA personnel are most frequently those responsible for ensuring that their staff with data-related responsibilities are trained and capable of making sure that the data they collect, care for and use are accurate and high quality at the LEA and the school level of administration.

If there are data quality concerns raised by the SEA, it is the LEA's responsibility to review any data quality report carefully, correct any errors and upload those corrections during the resubmission window for those data.

Failure to correct errors results in serious problems, including over or under allocation of funds to LEAs, incorrect determinations of eligibility for specific funds at the school level, and inaccurate reporting of data to the federal government, which can misrepresent Vermont's status on accountability measures and jeopardize Vermont's ability to continue to receive those funds to support education programs.

Corrections of data errors after the resubmission window requires substantial additional work by both LEA and SEA staff, as well as disruptions to the ability of all LEAs to apply for CFP and other funds since one LEA's data often impacts calculations involving other LEAs.

## Resources and Supports

The AOE provides many resources and opportunities for group and individual technical assistance with accurate and timely data submission. Some of these supports include:

1. Providing a regularly scheduled avenue where LEA staff can receive training and ask questions about required data submissions.
2. Ensuring there are dedicated AOE staff who answer field questions during business hours. Since adjusting its standard operating procedures, DMAD prioritizes responding to all questions within 1 business day, usually in less than 1 hour.
3. Annually updated support materials that are provided for each data collection.
4. Creating a knowledge base that will allow DMAD documentation to be fully searchable and centrally located via the web.
5. Regularly scheduled communications (e.g. newsletters) announcing changes and training opportunities for field partners.

## Escalation Process

Some LEAs do not comply with requirements despite the supports provided. Because timely, accurate submission of data is an essential obligation of each LEA that receives federal and/or state funds, the following procedures have been put in place to ensure that this will occur:

1. LEAs will be notified through a contact list at least one week before, and the day of, a collection opening. They also will be notified months prior via newsletters and memos.
2. LEAs will receive an email reminder from DMAD if they have not logged into the collection mechanism within three weeks of the collection's submission deadline.
3. LEAs will receive additional email reminders from DMAD if they have not opened a collection each week for the last two weeks before the collection's submission deadline.
4. If a collection has not been opened within seven business days of the collection's submission deadline, the superintendent will receive a reminder call by a senior member of AOE's staff.
5. If the collection's submission deadline is missed, the LEA will be notified that the AOE will not process the following until the missing data are submitted:
  - a. CFP initial application
  - b. CFP and IDEA grant amendments
  - c. Requests for drawdowns of CFP and IDEA funds
  - d. Requests for drawdowns of other annual federal grant funds (To comply with USDA requirements, child nutrition funds will not be subject to these withholding procedures for failure to complete required reporting.)\*
6. If the LEA does not submit the missing data within 10 business days of the missed submission deadline, the LEA will be notified that AOE will take the following additional actions until the missing data are submitted:
  - a. Suspend the LEA's ability to draw down other state grant funds

- b. Suspend the LEA's ability to apply for any new federal or state funds, Agency-wide
- 7. Names of LEAs that fail to submit a required collection within 15 business days of a collection's submission deadline will be posted on the Agency's website.
- 8. Continued failure to submit quality data in a timely manner as required may result in the LEA being deemed no longer eligible to be granted funds administered by the Agency of Education.

All notices will be sent via email to the SU/SD superintendent, CFP team Leader, Data/IT Director and Business Manager.

\*Note: An SU/SD's lateness in required reporting will not adversely affect access to funds dedicated to the COVID-19 response (e.g. CRF or ESSER).