



STATE OF HAWAII
DEPARTMENT OF EDUCATION

P.O. BOX 2360
HONOLULU, HAWAII 96804

OFFICE OF THE SUPERINTENDENT

August 8, 2019

USDOE Office of Civil Rights
400 Maryland Avenue, SW
Washington, DC 20202-1100

Attention: Civil Rights Data Collection Survey Coordinator

Dear Coordinator:

The Hawaii State Department of Education (HIDOE) requests to amend certified data that was submitted for the 2015-16 Civil Rights Data Collection (CRDC).

During the 2017-18 data collection, inconsistencies were identified in the student discipline data, especially in reporting School Days Missed Due to Out-of-School Suspension, a new category that started with the 2015-16 data collection. The inconsistencies in student discipline data resulted in the doubling or tripling of data counts of suspended days. The discrepancy occurred with the data extracted for reporting, which resulted in totaling the number of suspended days for each school by offense rather than by incidents. This created a duplication of counts, as single incidents can have multiple or "stacked" offenses. As an example, a student suspended for a single incident involving fighting and having contraband might have had his or her suspension days counted twice, once for fighting and then a second time for contraband.

HIDOE's business rules of reporting also lead to inflated counts in race designations, e.g., the Native Hawaiian/Pacific Islander subgroup. This was caused by:

- Self-reported designations of student race by parents/guardians; and
- Self-reported primary race of a student determining the race category for reporting student discipline data.

HIDOE values accurate data reporting to ensure equity and quality supports for our students. Therefore, it is critical that we are allowed to correct the 2015-16 data collection, as well as allowance to have a notation added to the CRDC data site <https://ocrdata.ed.gov>, indicating that Hawaii has identified errors in the 2015-16 data collection.

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Please confirm the approval for this request. In the event that this request is not approved, we would appreciate guidance on alternatives that we may pursue to inform anyone viewing 2015-16 CRDC information for Hawaii of inconsistencies in the submission. HIDOE has retained a third party to verify our data correction.

The designated point of contact for HIDOE is Mel Decasa, the Hawaii lead for Federal Compliance Reporting. Mr. Decasa may be contacted at (808) 784-6060 or Meliton.Decasa@k12.hi.us.

Thank you for your consideration on this matter.

Sincerely,



Dr. Christina M. Kishimoto
Superintendent

CMK:md

c: Hawaii Board of Education Members
ACLU Executive Director