

APPENDIX E

USED Final Guidance on self-identification

The federal government has issued the following information to assist school districts with understanding identity issues in the context of the new guidelines.

NEW RACE and ETHNICITY REPORTING REQUIREMENTS

Self-Identification or Observer-Identification

Principle 1: Self-identification is preferable.

1. Individuals must always be encouraged to identify their own race and ethnicity. Staff members may be asked to re-identify themselves in their records. Self-identification of racial and ethnic categories is strongly recommended in the *Final Guidance* as the choice for collecting the data, although respondents are *not required* to do so. If a parent, student, or staff member declines to select the student's or staff's race and ethnicity, identification by observers *should* be used. Observer identification is a last resort to identify the race and ethnicity of a student and this practice is allowable.
2. Aside from the instructions in the *Final Guidance*, self-identification of race and ethnicity is found to be the most consistent and accurate mode of racial and ethnic data collection. It is also the approach that is most socially acceptable, most cognizant of individual privacy, and promoted by the 1997 OMB Standards as respectful of "individual dignity." While observer identification (as a last resort) provides information about how individuals are perceived in their communities, self-identification allows each individual to assert his or her own racial and ethnic identity.

Observer identification is used as "a last resort," after other efforts to increase the chance of having a parent identify the student or a student to identify himself or herself have failed. Self-identification is based on how people define themselves and their children.
3. In the case of elementary and secondary students, self-identification includes the selection of race and ethnicity categories by a student's parents or guardians. The *Final Guidance* indicates that the identification of a student's racial and ethnic categories is to be made *primarily* by parents or guardians (i.e., the parent's choice should be used; this is not considered "observer" identification.) If there is a conflict between the choices of a student and his or her parent, the parents' choice should be used for the record.
4. If a parent refuses to identify the race or ethnicity of a student, but the student later volunteers to self-identify him- or herself, the data should be used, unless there is a reason to question the accuracy of the information. The designated observer should verify the response according to school district procedures.

(con't)

Principle 2: Observer-identification is required as a last resort.

1. The *Final Guidance* recognizes the burden placed on school and district personnel in observer identification, and that the practice may not yield data as accurate as those from self-identification. However, absent self-identification or existing records, observer identification is considered preferable to having no data at all. Students and parents who are reluctant to self-identify should be informed that observer identification will be used. This may discourage them from refusing to self-identify. Self-identification is the preferred choice of selecting an individual's race and ethnicity, though a person is not required by law to make these selections.
2. School district policy should indicate the steps to be taken before an observer makes a selection. These steps may include reviewing the enrollment form with the parent at registration, or sending a second letter or making a phone call to follow up with the parent when the information is not volunteered. In any case, the observers should be prepared to explain, if asked, that the school district and state are required to provide such information as an aggregate to the federal government; that the school district is required to select race and ethnicity categories for students on their behalf if parents or students decline to answer the questions; and that the school district will maintain the confidentiality of individual race and ethnicity records. Also be ready to explain federal law and state policy regarding the confidentiality of racial and ethnic data and the benefits of the new categories in allowing a person to choose his or her race and ethnicity. All observers should be trained on the procedures for racial and ethnic identification. These include the steps taken to ensure that respondents have refused to self-identify after being given the choice rather than simply having overlooked the question, and the statements to be made when asked about the process.
3. It is generally a good practice to designate one administrator to be the observer to select on students' behalf. However, states and districts vary in how they assign this responsibility. In Wyoming, the principal is the only staff member authorized to perform observer identification. Elsewhere, the responsibility falls on others such as school clerks or may be shared among many staff members. School districts may choose to allow multiple staff members to perform observer identification; for example, they may designate an individual who speaks the parent's native language. There are advantages to placing the responsibility with the school principal/superintendent, rather than sharing it among clerks and other staff. This policy offers two main benefits: (1) it improves the consistency of the data collection process, and (2) in the event that students, staff members, or parents become dissatisfied with the observer identification process, this policy seats responsibility with one authoritative source, thus avoiding the confusion that might result if the burden were spread among numerous staff members.

(con't)

4. The state should provide clear guidance to school districts in establishing district policies:
Who would identify a student's race and ethnicity if the student and his or her parent did not self-identify;
How a parent should be alerted that an observer will identify if no such information is provided, not only to encourage response from the parent, but also to protect the school and district if the parent later objects to the selection; and *Whether* data selected through observer identification are *flagged* in the data set.
5. For staff data, note that an agency may obtain the racial and ethnic information from existing employment records or observer-identification if an employee declines to self-identify.
6. It was the experience of Everett School District, Massachusetts, that more changes (and self-identification) in racial and ethnic categories were obtained through interviews than through surveys. This was especially true when interviews were in the parent's language (other than English). The school district found that some parents had limited literacy skills in their native languages. Because of this, the district carried out one-on-one interviews in addition to sending a letter. In these interviews, parents were more likely to change their children's race and ethnicity than were parents who filled out printed surveys. While interviewing seems to be a more accurate way to collect the information, school districts will have to balance this advantage with the additional cost.
7. Observers should not tell a student, a parent, or a staff member how he or she should classify himself or herself. When asked, simply restate the question, explaining the definition within a race or ethnicity category. If a parent just states that a student is Hispanic, observers should encourage the parent to also select one or more race categories because people of Hispanic origin may be of any race.
8. Observers should be encouraged to stay within their own comfort zone. Visual identification of multiple race background is a difficult task. Observers should attempt this if they are comfortable doing so. Supporting information, such as personal information from a teacher or knowledge about common race combinations within the community, can be helpful in making such determinations.
9. There is no federal requirement to "flag" a student's record in the information management system if his or her race and ethnicity categories are selected by an observer. However, while this is an additional expense, it would be a helpful piece of information kept at the school or district level. It need not be transmitted to the state.

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10. Observer identification may not be feasible in cases such as distance education. Following up with parents via telephone or electronic mail are probably the only feasible options. In some extreme cases of geography, for instance, it can be almost impossible to observe a student. For example, in Yukon-Koyukuk School District in Alaska a district that spans nearly 65,000 square miles and is roughly the size of Wisconsin a distance education program administrator cannot stroll over to the child's classroom or call his or her parents in for a meeting. Data collectors from the school or district can speak to the student or parents and try to allay any reservations about providing race and ethnicity information. However, parents are free to refuse to give this information no matter how hard one tries to convince them to do so. In distance education or other virtual programs, the state should provide guidelines about methods school districts should employ to collect racial or ethnic information and to handle refusals.

APPENDIX H is excerpt directly from:

National Forum on Education Statistics, Race/Ethnicity Data Implementation Task Force. (2008). *Managing an Identity Crisis: Forum Guide to Implementing New Federal Race and Ethnicity Categories* (NFES 2008-802).

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