Gap Analysis: Data and SPP/APR

For more information, visit <https://ectacenter.org/topics/gensup/dms-preparing.asp>

# Using this Worksheet

This worksheet is based on the [OSEP Data and SPP/APR Protocol](https://sites.ed.gov/idea/files/Parts-B-and-C-Data-and-SPPAPR.docx), and can help identify gaps in your data system. By completing the worksheet, you will assess your state’s status on the three Overarching Questions included in the protocol. Use this information to develop plan(s) to address gaps.

# Data System: Component Definition

A data system designed to ensure that the data collected and reported are valid and reliable and that information is reported to the Department and the public in a timely manner. The data system will inform and focus a state’s improvement activities as well as verifying that the data collected and reported reflect actual practice and performance.

# Instructions

Compile, organize, and make accessible to team members all written documents, including internal and public-facing policies and procedures, for each system assessed. Then, use the gap analysis worksheet to review each overarching question's Protocol Items and complete the following:

* Use the Systems Overview developed in **Step 3** to identify current policies, procedures, and practices related to each Protocol Item.
* Determine if what you are doing aligns with the foundational information in **Step 4**.
* Determine if what you are doing (or need to do) is described in your written procedures. Record the document and page number or section where this information can be found.
* Determine and record a status code: 1, 2, 3, or 4.
* Note anything missing or that needs modification.
* Document your key conclusions for the overarching question.

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| Status Code | Definition |
| 1 | We are doing it correctly and it is documented. |
| 2 | We are doing it correctly, but it needs to be documented. |
| 3 | We are doing some of it, but not all of it, and documentation needs to be developed or modified. |
| 4 | We need to give this item a lot of attention. |

# Overarching Questions

1. Does the state have a system in place to collect valid and reliable data?
2. Does the state have a system in place to report timely and accurate data?
3. How does the state use its data to analyze performance across SPP/APR indicators and other priority areas, with a focus on improving educational results and functional outcomes for all children with disabilities? Specifically, how does the state: 10 assess trends across the state; and 2) determine the specific needs of each local program?

## **A.** Does the State have a system in place to collect valid and reliable data?

* [34 CFR §300.600 — State monitoring and enforcement](https://www.ecfr.gov/cgi-bin/text-idx?SID=d5c896fe726fbb38e2e24cdf2c9ee26c&mc=true&node=se34.2.300_1600&rgn=div8)
* [34 CFR §300.601 — State performance plans and data collection](https://www.ecfr.gov/cgi-bin/text-idx?SID=d5c896fe726fbb38e2e24cdf2c9ee26c&mc=true&node=se34.2.300_1601&rgn=div8)
* [34 CFR §§300.640–645 — Reporting program information](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-F/subject-group-ECFR4f9a33f19162f53)
* [34 CFR §303.124 — Data collection](https://www.ecfr.gov/cgi-bin/text-idx?SID=312a2d77f17a66c5cc47a9932869aa46&mc=true&node=se34.2.303_1124&rgn=div8)
* [34 CFR §§303.700–704 — State monitoring and enforcement](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-H/subject-group-ECFRe32b04708514b9c)
* [34 CFR §§303.720–722 — Data requirements and reporting](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-H/subject-group-ECFR3e0e263a5f4758b)
* [20 U.S.C. §1416(a)(3) — Monitoring priorities](https://sites.ed.gov/idea/statute-chapter-33/subchapter-ii/1416/a/3)
* [20 U.S.C. §1416(b)(2)(B) — Data Collection](https://sites.ed.gov/idea/statute-chapter-33/subchapter-ii/1416/b/2/B)
* [20 U.S.C. §1418(b) — Data reporting](https://sites.ed.gov/idea/statute-chapter-33/subchapter-ii/1418/b)
* [20 U.S.C. §1442 — Federal administration](https://sites.ed.gov/idea/statute-chapter-33/subchapter-iii/1442)

### General Information

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| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | The State must collect valid and reliable [IDEA Part B/Part C Section 618 data](https://sites.ed.gov/idea/data/). |  |  |  |
| 2 | The State must collect valid and reliable data for the [IDEA Part B/Part C SPP/APR](https://sites.ed.gov/idea/spp-apr/), as defined by Section 616. ([Part C SPP/APR Indicators](https://osep.grads360.org/services/PDCService.svc/GetPDCDocumentFile?fileId=39971)) |  |  |  |
| 3 | The State has policies and procedures to collect data required under IDEA Part B/Part C Section 616 and Section 618 required data collections, *including*: |  |  |  |
| 3a | assigned roles and responsibilities that establish decision-making authority and accountability for the State’s IDEA data system(s) |  |  |  |
| 3b | business rules/processes for documenting, recording, and communicating rules used during the collection and validation of IDEA data |  |  |  |
| 3c | data quality and validation processes (e.g., edit checks, database format checks, field validation restrictions, import restrictions/checks) designed to support high quality data |  |  |  |
| 3d | data security processes for accessing, storing, backing up, recovering, transferring, encrypting, and destroying data and preventing breach or loss |  |  |  |
| 3e | communication mechanisms to share and disseminate information related to IDEA Section 616 and Section 618 data collection requirements at the State and local levels, including training and guidance/technical assistance |  |  |  |
| 3f | processes to ensure that local programs are implementing policies and procedures consistent with IDEA Section 616 and Section 618 data collection requirements, including monitoring and oversight |  |  |  |

### Possible Follow-Up Questions (apply to both Section 616 and Section 618 data collections)

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| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 4 | What are the positions/titles and responsibilities of State staff (or contractors) involved in collecting IDEA data? |  |  |  |
| 5 | Are there multiple data systems used to collect IDEA data in the State? If so, how does each of these systems function, and how is each of these systems connected? |  |  |  |
| 6 | What documents outline each of the IDEA data collection requirements (including timelines, definitions, calculation methods, and data sources)? |  |  |  |
| 7 | What documents outline business rules and data validation/quality procedures? |  |  |  |
| 8 | How are IDEA data collection requirements (including timelines, definitions, calculation methods, data sources) communicated to State and local personnel? Specifically, is training required; is training standardized across the State; and how are State and local personnel notified of updates or changes? |  |  |  |
| 9 | How are business rules/data validation/quality procedures communicated to State and local personnel? Specifically, is training required; is training standardized across the State; and how are State and local personnel notified of updates or change? |  |  |  |
| 10 | What materials (e.g., written instructions, demonstration videos, templates) exist to help data submitters understand data collection requirements and associated policies and procedures, and how are those materials accessed? |  |  |  |
| 11 | Describe how the State ensures that the IDEA Section 616 and Section 618 data it collects, including any data obtained from local programs and other offices/programs within the State, are valid and reliable. Specifically, how does the State assess the quality and accuracy of the Section 616 and Section 618 data collected from each data source? |  |  |  |
| 12 | How does the State ensure data quality/data validation processes are consistent across different data collection systems and platforms? |  |  |  |
| 13 | Are data quality reports run at the State level, and, if so, are the reports available to local programs? |  |  |  |
| 14 | Who monitors data quality reports, and what is the process for ensuring that data quality issues are addressed? |  |  |  |
| 15 | How does the State support data submitters to address data quality issues and/or issues with validity and reliability? |  |  |  |

### Key Conclusions

## **B.** Does the State have a system in place to report timely and accurate data?

* [34 CFR §300.601 — State performance plans and data collection](https://www.ecfr.gov/cgi-bin/text-idx?SID=d8cf5e381e12fe34194a1903a87a95df&mc=true&node=se34.2.300_1601&rgn=div8)
* [34 CFR §300.602 — State use of targets and reporting](https://www.ecfr.gov/cgi-bin/text-idx?SID=a846185045a4c75a7b5c17028e24ff7f&mc=true&node=se34.2.300_1602&rgn=div8)
* [34 CFR §303.701 — State performance and data collection](https://www.ecfr.gov/cgi-bin/text-idx?SID=719c7ed64196139fe67f5b4ae8c9c7b5&mc=true&node=se34.2.303_1701&rgn=div8)
* [34 CFR §303.702 — State use of targets and reporting](https://www.ecfr.gov/cgi-bin/text-idx?SID=719c7ed64196139fe67f5b4ae8c9c7b5&mc=true&node=se34.2.303_1702&rgn=div8)

* [20 U.S.C. §1416(b) — State performance plans](https://sites.ed.gov/idea/statute-chapter-33/subchapter-ii/1416/b%22%20%5Co%20%22Link%20to%2020%20U.S.C.%2020%20U.S.C.%201416%28b%29)
* [20 U.S.C. §1418 — Program information](https://sites.ed.gov/idea/statute-chapter-33/subchapter-ii/1418)
* [20 U.S.C. §1442 — Federal administration](https://sites.ed.gov/idea/statute-chapter-33/subchapter-iii/1442)

### General Information

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| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | The State has policies and procedures to report timely and accurate data required under IDEA Part B/Part C Section 616 and Section 618 required data collections, *including*: |  |  |  |
| 1a | assigned roles and responsibilities that establish decision-making authority and accountability for the State’s IDEA data system(s) |  |  |  |
| 1b | business rules/processes for documenting, recording, & communicating business rules used during the collection and validation of IDEA data |  |  |  |
| 1c | data quality and validation processes (e.g., edit checks, database format checks, field validation restrictions, import restrictions/checks) designed to support high quality data |  |  |  |
| 1d | data security processes for accessing, storing, backing up, recovering, transferring, encrypting, and destroying data and to prevent breach or loss |  |  |  |
| 1e | communication mechanisms to share and disseminate information related to IDEA Section 616 and Section 618 data collection requirements at the State and local levels, including training and guidance/technical assistance |  |  |  |
| 1f | processes to ensure that local programs are implementing policies and procedures consistent with IDEA Section 616 and Section 618 data collection requirements, including monitoring and oversight |  |  |  |
| 2 | The State must report timely and accurate IDEA Part B/Part C Section 616 and Section 618 data (States submit the data to OSEP via EDFacts files and the EMAPS system). |  |  |  |
| 3 | The State must report data for the IDEA Part B/Part C State Performance Plan/Annual Performance Report (SPP/APR), as defined by Section 616 (States submit the data to OSEP via the SPP/APR reporting tool in EMAPS). |  |  |  |
| 4 | The State must report annually to the public on the performance of each local program located in the State on the targets in the SPP and make the SPP and APR available through public means. |  |  |  |

### Possible Follow-Up Questions

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| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 5 | What are the positions/titles and responsibilities of State staff (or contractors) involved in reporting IDEA data? *Consider the following:* |  |  |  |
| 5a | Are different personnel responsible for reporting to ED and for public reporting?  |  |  |  |
| 5b | Are different personnel responsible for reporting Section 616 (SPP/APR) and Section 618 data?  |  |  |  |
| 5c | Are different personnel responsible for reporting specific data sets or indicators within Section 616 (SPP/APR) and/or Section 618 data collections? |  |  |  |
| 6 | What documents outline each of the IDEA Section 616 and Section 618 data reporting requirements (including timelines, definitions, calculation methods, and data sources)? |  |  |  |
| 7 | How are IDEA data reporting requirements (including timelines, definitions, calculation methods, data sources) communicated to personnel? Specifically, is training required; is training standardized across the State; and how are State and local personnel notified of updates or changes? |  |  |  |
| 8 | What materials (e.g., written instructions, demonstration videos, templates) exist to help personnel understand data reporting requirements (and associated policies and procedures), and how are the materials accessed? |  |  |  |
| 9 | Describe how the State ensures that the IDEA Section 616 and Section 618 data it reports, including any data reported by other offices/programs within the State, are timely, accurate, and complete. Specifically, how does the State assess the timeliness, accuracy, and completeness of all IDEA data reported to the Department and to the public? |  |  |  |
| 10 | How does the State ensure data reporting processes are consistent across different data collections and indicators (and systems, if applicable)? |  |  |  |
| 11 | Can the State’s data system link various data elements, including child-level data, across elements, and/or across Statewide systems, and/or with school, classroom, teacher/service provider data? |  |  |  |
| 12 | Who monitors Section 618 data quality reports and OSEP responses to the State’s SPP/APR, and what is the process for ensuring that data reporting issues are addressed? |  |  |  |
| 13 | How does the State support data submitters to address data reporting issues such as timeliness, completeness, and accuracy? |  |  |  |

### Key Conclusions

## **C.** How does the State use its data to analyze performance across SPP/APR indicators and other priority areas, with a focus on improving educational results and functional outcomes for all children with disabilities? Specifically, how does the State: 1) assess trends across the State; and 2) determine the specific needs of each local program?

* [34 CFR §300.602 — State use of targets and reporting](https://www.ecfr.gov/cgi-bin/text-idx?SID=a846185045a4c75a7b5c17028e24ff7f&mc=true&node=se34.2.300_1602&rgn=div8)
* [34 CFR §303.702 — State use of targets and reporting](https://www.ecfr.gov/cgi-bin/text-idx?SID=719c7ed64196139fe67f5b4ae8c9c7b5&mc=true&node=se34.2.303_1702&rgn=div8)
* [20 U.S.C. §1416(b) — State performance plans](https://sites.ed.gov/idea/statute-chapter-33/subchapter-ii/1416/b)
* [20 U.S.C. §1418 — Program information](https://sites.ed.gov/idea/statute-chapter-33/subchapter-ii/1418)
* [20 U.S.C. §1442 — Federal administration](https://sites.ed.gov/idea/statute-chapter-33/subchapter-iii/1442)

### General Information

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 1 | Each State must use the targets established in the SPP/APR and priority areas to analyze the performance of each LEA/EIS provider.  |  |  |  |
| 2 | Each State must make annual determinations on the performance of each LEA/EIS provider. |  |  |  |

### Possible Follow-up Questions

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| --- | --- | --- | --- | --- |
| ID | Protocol Item | Evidence | Status Code | What’s Missing/Next Steps |
| 4 | What are the positions/titles and responsibilities of State staff responsible for data analysis activities?  |  |  |  |
| 5 | How are decisions made regarding State-level IDEA data analysis activities, *including*: |  |  |  |
| 5a | which data analysis activities are conducted, |  |  |  |
| 5b | when/how frequently data analysis activities are conducted, and |  |  |  |
| 5c | how the results of the data analysis activities are used to inform decisions (such as training, professional development, technical assistance, and program improvement efforts)? |  |  |  |
| 6 | Are there recommendations (or requirements) in place for State or local personnel to conduct data analysis activities? |  |  |  |
| 6a | Describe the types of IDEA data analyses that occur at both the State and local levels. |  |  |  |
| 7 | How does the State support data analysis activities and data use at the State and local levels? Specifically, does the State develop and disseminate written guidance, training, and/or data products to support data analysis and use? |  |  |  |

### Key Conclusions

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