

Clarifying requirements for the collection, reporting and use of National Standards achievement data

NZEI Te Riu Roa November 2011

This Annex provides some lines of questioning for Boards to engage with the Ministry of Education in order to clarify their obligations under NAG2A.

NAG 2A(b)¹ requires “annual reports to include school-level data under three headings:

- school strengths and identified areas for improvement
- the basis for identifying areas for improvement
- planned actions for lifting achievement.”

NAG 2A(c) also requires reporting on the numbers and proportions of students above, at, below and well below (4-point band) the Standards, including by Māori, Pasifika and gender (where an individual’s privacy is not breached). The information needs to show how students are progressing against the Standards as well as where they are achieving.

The numbers and proportions in relation to the 4-point band must be shown for all students including transient students and students with special needs.

The Ministry also requires Boards² to provide “an analysis in the annual report of the variance between the school’s performance and charter expectations...including those to do with National Standards”.

A. In relation to NAG 2A (b):

1. How is “school-level data” defined?
2. Identifying areas for improvement accurately may require a focus on smaller cohorts of students (by year, ethnicity, curriculum area etc) than aggregated school data. This has privacy implications for individual students. What is the Ministry’s advice in relation to preserving student privacy in this situation?
3. The Board has concerns about the validity and accuracy of National Standards data in relation to identifying school strengths and areas for improvement. What other types of assessment data than National Standards can be used to meet the requirements of NAG 2A(b)? How does Overall Teacher Judgement relate to this section of the NAG2A?
4. What does the Ministry intend to do with the information required under NAG 2A (b)?
5. What additional resources will be available to schools to support the “planned actions for lifting achievements”?

B. In relation to NAG 2A(c):

1. How should Boards respond to parents who request that their child’s National Standards achievement data is not submitted as part of the school’s data reporting to the Ministry? Do parents have a legal right to ask for this?

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<http://www.minedu.govt.nz/NZEducation/EducationPolicies/Schools/PolicyAndStrategy/PlanningReportingRelevantLegislationNEGSAndNAGS/TheNationalAdministrationGuidelinesNAGs.aspx#NAG2A>

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<http://www.minedu.govt.nz/NZEducation/EducationPolicies/Schools/SchoolOperations/PlanningAndReporting/Charters/GuidanceForBoards.aspx>

2. The NAG 2A requires reporting on the numbers and proportions of data. Does this mean for every year group, or whole-school data in relation to the 4-point band?
3. The Board has considerable concerns about student privacy and will be reviewing its data and privacy policies in the light of the introduction of National Standards. In the United States, minimum cohorts for reporting purposes range from 5-30 and average around 10. ERO has provided advice to individual schools where cohorts are, for example, in single figures. What is the Ministry's advice on minimum cohort size?
4. There have been a number of revisions and amendments to the Standards. Where data has been collected against a Standard that has subsequently been amended, is the school required to re-assess students?
5. The Board currently views assessment data primarily as a tool to inform teaching and learning; therefore assessments are conducted early in the year and in Term (....). How recent must data be for NAG2A(c) reporting purposes?
6. With year 0-2 students and year 3 students should it be birthday-related data or end-year data that is submitted?
7. The Ministry requires schools to include achievement data against National Students for "*for all students including transient students and students with special needs*". How is the school expected to include data on students arriving in schools just before or after assessments and OTJs are conducted and collected?
8. What qualitative ie non-numerical data may be used in order that the Ministry get an accurate picture of student progress and achievement at our school?

C. Variance reporting

1. In relation to the statement that Boards should provide an analysis in the annual report of the variance between the school's performance and charter expectations,,our school has had NS-related charter targets imposed on it by the Ministry late in 2011. These do not include specific achievement targets, only the gathering of baseline data, so it does not make sense to report on variance in this area. Does this meet the Ministry's requirements?

D. Ministry's role in data management and in protecting data integrity

In the Ministry's September 2010 Position Paper on Assessment³, the Secretary for Education states:

"Commentators and opinion makers do not necessarily have a direct role in contributing to teaching and learning. However, if they choose to access, publish, or comment on assessment information, it is important that they have some degree of assessment capability. For example they should, at the very least, understand the nature of the assessment landscape required to promote better learning and be able and motivated to interpret the information accurately and meaningfully and present it in a manner which is appropriate and will contribute to positive student outcomes rather than potentially mislead or do harm." (p 26)

The Position Paper also asserts:

³ <http://www.minedu.govt.nz/theMinistry/PublicationsAndResources/AssessmentPositionPaper.aspx>

“Aggregated information on its own does not indicate anything about the quality of teaching, the extent to which a school is making a difference for its students, or the extent to which it is supporting the learning for each and every student in the school. For this reason, comparisons between schools, solely on the basis of aggregated student information, are misleading.” (p 26-7)

It also states:

“The Ministry maintains that the publishing of raw, highly aggregated assessment data without qualitative context information will both undermine this collegial environment and subvert the reliability of the assessment data collected. The Ministry of Education considers that it is not appropriate to compare schools on a simplistic and misleading basis. This is a consistent position held by successive Governments in New Zealand and dating back at least to the 1998 Green Paper entitled Assessment for Success in Primary Schools.” (p 50)

1. What guarantee can the Ministry give that the media and other opinion makers will have “some degree of assessment capability” to accurately represent the data in our Board’s Annual Report?
2. What guarantee can the Ministry give that comparisons of schools based on misleading aggregated data will not take place?
3. What processes and checks does the Ministry have in place to ensure that such publications will not occur? Should they occur, what sanction does the Ministry have to prevent future or repeat publication?
4. The Position Paper also asserts that:

“Parents and whānau should receive trustworthy and meaningful information about their child’s achievement and progress...” (p 38).

Our Board has significant concerns about the consistency and robustness of National Standards. What quality assurance processes will the Ministry undertake to ensure the validity and reliability of data is increased?

5. What is the Ministry’s policy with regard to National Standards data integrity and objectivity? For example, how does the Ministry intend to deal with the following issues:

- *System non-interoperability.* Data collected in one system are not electronically transmittable to other systems. Re-entering the same data in multiple systems consumes resources and increases the potential for data entry errors.
- *Non-standardized data definitions.* Various data providers use different definitions for the same elements. Passed on to the national level, non-comparable data are aggregated inappropriately to produce inaccurate results.
- *Unavailability of data.* Data required do not exist or are not readily accessible. In some cases, data providers may take an approach of “just fill something in” to satisfy distant data collectors, thus creating errors.
- *Inconsistent item response.* Not all data providers report the same data elements. Idiosyncratic reporting of different types of information from different sources creates gaps and errors in macro-level data aggregation.

- *Inconsistency over time.* The same data element is calculated, defined, and/or reported differently from year to year. Longitudinal inconsistency creates the potential for inaccurate analysis of trends over time.
- *Data entry errors.* Inaccurate data are entered into a data collection instrument. Errors in reporting information can occur at any point in the process.
- *Lack of timeliness.* Data are reported too late. Late reporting can jeopardize the completeness of macro-level reporting and the thoroughness of review. Tight deadlines, for example, can lead to late reporting, poor data quality, and delayed implementation of program improvement efforts. Rushed reporting can often lead to poor data quality, while reporting that is delayed months or even years can often limit data utility.

6. What training, time and resources will the Ministry provide to our school to ensure high stakes data is produced accurately and reliably?

7. What are the Ministry's plans to process and validate data including ongoing management controls over data gathering?

8. What advice can the Ministry provide for our Board in reviewing and updating our policy on data and student privacy?