

U.S. Department of Education Office for Civil Rights

Civil Rights Data Collection

February 2022

Data Notes Addendum: Notice of Known Data Quality Issues in the 2015–16 Civil Rights Data Collection Restraint and Seclusion Module

Purpose of Data Notes Addendum

The U.S. Department of Education’s Office for Civil Rights (OCR) issues this notice in response to a report by the U.S. Government Accountability Office (GAO) entitled [*K-12 Education: Education Should Take Immediate Action to Address Inaccuracies in Federal Restraint and Seclusion Data*](#) (Reissued with Revisions on July 11, 2019). In the report, GAO found that many school districts, including nine of the nation’s largest school districts, reported zero incidents of restraint and seclusion. This raised questions about the completeness and accuracy of school districts’ restraint and seclusion civil rights data. An investigation by the Department revealed that some districts reported anomalous restraint and seclusion data for the 2015–16 school year. Consequently, this notice is to inform the public of known data quality issues involving the restraint and seclusion module for the 2015–16 Civil Rights Data Collection.

About the Civil Rights Data Collection

The Civil Rights Data Collection (CRDC) is a biennial survey required by the U.S. Department of Education’s (Department) Office for Civil Rights (OCR) since 1968. The CRDC measures factors that impact education equity and opportunity for students. It collects wide-ranging data, including data on student access to courses, programs, resources, instructional and other staff, and school climate factors, such as student discipline. The CRDC is part of OCR’s overall strategy for administering and enforcing civil rights statutes that prohibit discrimination based on race, color, national origin, sex, and disability. In addition, the CRDC is a valuable resource for other Department offices and Federal agencies, policymakers and researchers, educators and school officials, parents and students, and the public who seek data on student equity and opportunity.¹

The 2015–16 CRDC collected data from a universe of public local educational agencies (LEA) and schools, including long-term secure juvenile justice facilities, charter schools, alternative schools, and schools serving students with disabilities. OCR administered the 2015–16 CRDC from January 2017 to June 2017 and included data from a population of 17,370 LEAs and 96,440 schools. OCR publicly released the 2015–16 CRDC data on April 24, 2018 and released an updated data file on September 28, 2018.

¹ Additional information and FAQs regarding the CRDC are available at <https://www2.ed.gov/about/offices/list/ocr/frontpage/fag/crdc.html>.

Known Data Quality Issues Involving the 2015–16 Restraint and Seclusion Data Module

Data users should be cautious when using the restraint and seclusion data reported for the 2015–16 CRDC. GAO and OCR observed the following data quality issues for the 2015–16 CRDC restraint and seclusion data:

- **Underreporting of Incidents:** Although about 70 percent of LEAs reported zero incidents of restraint and seclusion for the 2015–16 school year, an analysis of the 30 largest LEAs with more than 100,000 students enrolled revealed that 9 of them inaccurately reported zeroes when they actually had incidents.² In addition, many LEAs incorrectly reported zeroes, instead of leaving cells blank for data that the LEAs did not collect.
- **Logical Inconsistencies:** Some LEAs reported numbers of students who were subjected to restraint or seclusion that were greater than the numbers of incidents of restraint or seclusion for the 2015–16 school year. However, for each student restrained or secluded, there should be at least one incident of restraint or seclusion reported.³
- **Overreporting of Incidents:** Some LEAs reported numbers of incidents of restraint or seclusion for the 2015–16 school year that exceeded the numbers of incidents expected based on total student enrollments.⁴

Data users may access the 2015–16 public-use data file user’s manual and the 2015–16 data notes at: <https://ocrdata.ed.gov/resources/downloaddatafile>.

Data Quality Improvements to the Restraint and Seclusion Module

Since the administration of the 2015–16 CRDC, OCR has taken several steps to improve the quality of restraint and seclusion data submitted by school districts. Specifically, OCR:

- Created instructions for data submitters on how to complete the Restraint & Seclusion Module and when it is to appropriate to report zeros (i.e., the school or district collects the data, but no students fall in that category); Nulls (i.e., the school or district does not collect the data) or Not Submitted (i.e., the school or district did not submit the data). OCR first provided this instruction for the 2017–18 CRDC, and they appear at the beginning of all CRDC modules.
- Requires the submission of a quick plan for the 2020-21 CRDC, if a school or district did not collect restraint and seclusion. The quick plan must report why the district is unable to report restraint and seclusion data and provide actionable steps for how it intends to report the data in the future. Districts that report having a policy against restraint and seclusion are required to provide a weblink to the policy.

² See U.S. Government Accountability Office, *K-12 Education: Education Should Take Immediate Action to Address Inaccuracies in Federal Restraint and Seclusion Data*, pages 3-8, (Reissued with Revisions on July 11, 2019), <https://www.gao.gov/products/gao-19-551r>.

³ See U.S. Government Accountability Office, *K-12 Education: Education Needs to Address Significant Quality Issues with its Restraint and Seclusion Data* (April 21, 2020), pages 21-22, <https://www.gao.gov/products/gao-20-345>.

⁴ *Id* at 17-21.

- For the 2020–21 CRDC, OCR implemented three submission system data quality rules that will result in an error message if school districts:
 - Report restraint and seclusion incidents that fall below a data-driven threshold;
 - Report restraint and seclusion incidents that are above a data-drive threshold; and
 - Report higher numbers of students subjected to restraint and seclusion than the number of restraint and seclusion incidents.

OCR is committed to releasing quality data to the public through the CRDC. To learn more about the CRDC, please visit <https://www2.ed.gov/about/offices/list/ocr/data.html>.