



January 21, 2016

John B. King, Jr.
Acting Secretary of Education
U.S. Department of Education
400 Maryland Ave. SW, Room 3E306
Washington, DC 20202

Re: Docket No. ED-2015-OESE-0130

Dear Dr. King,

Attendance Works is a non-profit initiative that promotes better policy, research and practice around school attendance. We applaud ESSA for recognizing that no one measure of success is sufficient for examining whether a school is effectively meeting the needs of its students. We especially appreciate that ESSA requires schools to report on chronic absence (missing too much school for any reason). Such a requirement is an important step forward towards ensuring districts use data to identify which students are at risk and then which schools, neighborhoods or sub-populations are disproportionately affected by high levels of chronic absence.

Helping schools to monitor chronic absenteeism is an easy win given that schools are already required to report this data through the Office for Civil Rights and that the US Department of Education has already demonstrated a strong commitment to this issue through the launch of the federal initiative, Every Student, Every Day. Armed with this information, schools—often together with community partners—can then help students secure the additional supports they need to overcome barriers to getting to school. After all, students will only benefit from our investments in high quality instruction and teaching if they are in the classroom.

We believe guidance around the chronic absence provisions is needed in order to ensure effective use of chronic absence data. Our recommendations appear below:

- 1. Encourage districts to prevent chronic absence by taking an early warning approach. Advise schools to monitor when students miss 10% or more of school and use those data to trigger intervention throughout the year.**
Non-regulatory guidance should recommend that districts provide reports to schools on which and how many students are at risk of missing too much school on a weekly or bi-weekly basis, if not in real time. Timely access to such data is essential to prevention and early intervention.

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While we appreciate the value of reporting how many students miss 15 days or more over the course of an entire school year, a major danger of this provision is that schools will not take action until a child has already missed that number of days and is, as a result, behind academically. Changing outcomes requires adopting an early warning approach in which a percentage of days missed is used to trigger action as soon as child starts to miss too much school. Studies show, for example, that missing just two days during September predicts chronic absence for the remainder of the school year.

We recommend using a percentage of days missed to promote action. We typically suggest 10% for a number of reasons. A large research base shows this level of absenteeism is associated with significantly worse educational outcomes prekindergarten – 12th grade. In addition, 10% is easy to understand. This level of absenteeism helps to pin point who is at risk without creating a problem of over-identification.

Data systems used by districts or states can, without significant expense, be adjusted to calculate a percentage of days missed as well as total days missed. Attendance Works offers free data tools for anyone having trouble making the conversion.

- 2. Adopt a common 10% reporting requirement.** One challenge with the 15-day measure is that it does not correspond to the 10% definition cited by other federal agencies (for example, in the newly launched Federal initiative on chronic absenteeism, [Every Student, Every Day](#)) and already being used by numerous states. Connecticut, Indiana, Iowa, Mississippi, New Jersey, Ohio, Oregon, Rhode Island, and Tennessee have already begun producing reports on how many students are missing 10% or more of school. Arkansas and Washington are on the verge of making such data available. In California, such reporting is already required by law from districts.

We urge the federal government to reconcile the multiple measures by encouraging OCR to adopt the use of a 10% measure for future reports. A common reporting requirement would reduce confusion as well as allow for better comparisons across states and localities.

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3. **Encourage school districts to message to families about the impact of chronic absence.** School districts must allocate at least 1% of Title I dollars for parent engagement. Encourage districts to use these resources to help parents understand why daily attendance matters and what steps they can take to nurture a habit of attendance as well as get help with addressing barriers to getting to school.
4. **Encourage schools to incorporate attention to attendance into implementation of a multi-tiered system of support (MTSS).** Use non-regulatory guidance to encourage districts to use absenteeism as an important component of a multi-tiered systems of supports. Offer guidance for assigning students to different tiers based upon their historical and current level of absenteeism. Such an approach will encourage schools to focus on prevention and early intervention and leverage an existing framework with which many educators are already familiar. Title II funding could be used to support such professional development.
5. **Encourage districts to identify and enlist community agencies in addressing chronic absence.** Use non-regulatory guidance to encourage districts to forge partnership with public agencies and non-profits who have resources to help address barriers to attendance. Include information about how data can be shared without violating confidentiality requirements.
6. **Support the inclusion of chronic absence data in school report cards.** Use regulations about state and school district report cards to promote the public reporting of data on chronic absence. Such information is essential to helping parents understand what is happening in schools and for helping community partners identify schools in need of their resources.
7. **Promote the reporting of chronic absence by grade level:**
Use non-regulatory guidance to encourage states, as part of their early warning recommendations to districts, to suggest the monitoring and reporting of grade level data for chronic absence, along with information on race, ethnicity and vulnerable demographic status such as students with disabilities and students with English as a second language. Such data are critical to targeting interventions to the students who are struggling the most. Without grade level breakouts, school districts can easily overlook high levels of chronic absence starting in kindergarten and first grade. Chronic absence is typically highest in these early elementary grades, which are so critical to the development of key academic and social skills needed to succeed in school. But such patterns are easily

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masked when examining data for an entire elementary school since children in the older grades typically have much better attendance.

Like the United States Department of Education, we see data collection and reporting as essential to ensuring that all children, especially those from protected classes, have an equal opportunity to learn. Attendance data, used properly, can be an early warning sign that a student, a school or an entire district is headed off track. But too many places miss that warning signal because they focus only on how many students show up every day or on truancy or unexcused absences. In both cases, they fail to realize the cumulative toll that excused *and* unexcused absences can take on student achievement.

The research related to the 10 percent definition of Chronic Absence is clear:

- Missing 10 percent of the school year as early as pre-kindergarten and kindergarten can predict poor development of social skills, weaker reading skills by 3rd grade and higher rates of retention.ⁱ
- Missing 10 percent or more of school days in middle school can predict dropout rates in high school. The likelihood of dropout increases exponentially with every year of chronic absence.ⁱⁱ
- Low-income children are both more likely to be chronically absent in the early grades and more likely to suffer academically when they're absent than wealthier students, several studies show.ⁱⁱⁱ
- Children of color are disproportionately affected by absenteeism, according to studies in several states and an analysis of 2013 data from the National Assessment of Educational Progress (NAEP). Rates are highest among Native American students.^{iv}
- Students identified as needing special education services are more likely to miss too much school than other students, NAEP and state studies show^v.

If we hope to give all children an equal opportunity to succeed, we need to intervene before absenteeism erodes achievement. The United States Department of Education now has the opportunity to not just compel states to report on chronic absence, but also encourage its utilization so that it is meaningfully used to ensure students are in class and learning.

These comments are drawn from our experience working at the national, state and local level. Thank you for the opportunity to provide comments.

Sincerely,

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Director, Attendance Works

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ⁱ [Attendance in Early Elementary Grades: Associations with Student Characteristics, School Readiness and Third Grade Outcomes](#), Applied Survey Research, May 2011.

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Ehrlich Stacy B. et al. [Preschool Attendance in Chicago Public Schools: Relationships with Learning Outcomes and Reasons for Absences](#), University of Chicago, Consortium on Chicago School Research, May 2014

ⁱⁱ **Allensworth, Elaine M. et al.**, [Looking Forward to High School and College: Middle Grade Indicators of Readiness in Chicago Public Schools](#), University of Chicago, Consortium on Chicago School Research, November 2014.

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[Chronic Absence in Utah Public Schools](#), Utah Education Policy Center at the University of Utah, July 2012

ⁱⁱⁱ **Ready, Douglas D.**, [Socioeconomic Disadvantage, School Attendance, and Early Cognitive Development, The Differential Effects of School Exposure](#), Sociology of Education, October 2010.

Romero, Mariajose and Young-Sun Lee, [A National Portrait of Chronic Absenteeism in the Early Grades](#), National Center for Children in Poverty, Columbia University. October 2007

^{iv} [Mapping the Early Attendance Gap: Charting a Course for School Success](#), Attendance Works, September 2015

^v Ibid

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