

Suppressed Student Data and Goal-Setting Practices

Suppression is the limitation of data publicly reported to protect student privacy due to Family Educational Rights and Privacy Act (FERPA) rules and/or federal Best Reporting Practices. Within the state accountability system, the minimum N count is the minimum number of students required for determining and reporting accountability and federal classifications without compromising student privacy. To achieve the acceptable balance between inclusion and reliability, within what is technically possible, Kentucky used a [minimum n of 30](#) for each indicator per school level for all students and each student demographic group.

The n count may be met for an indicator, but student performance level data categories of novice, apprentice, proficient and distinguished (NAPD) may be suppressed in public reporting (e.g., small numbers in a level, no students in one of the student performance levels-NAPD). This suppression poses challenges to stakeholders engaging in improvement planning. As a result, the KDE has included several options for schools and districts to consider when establishing goals for the Comprehensive School Improvement Plan (CSIP) and Comprehensive District Improvement Plan (CDIP).

Access to Suppressed Data

Because of the small sizes of data, FERPA exceptions to disclosure of Personally Identifiable Information (PII) from educational records without parental consent must be considered if suppressed data is to be shared. FERPA provides for the following exception for schools and districts. As such, they may decide when and how to use the exception:

The disclosure is to other school officials, including teachers, within the agency or institution whom the agency or institution has determined to have legitimate educational interests.

FERPA specifically anticipates that a “volunteer” could be considered a school official:

A contractor, consultant, volunteer or other party to whom an agency or institution has outsourced institutional services or functions may be considered a school official under this paragraph provided that the outside party:

- (1) Performs an institutional service or function for which the agency or institution would otherwise use employees;
- (2) Is under the direct control of the agency or institution with respect to the use and maintenance of education records; and
- (3) Is subject to the requirements of [§ 99.33\(a\)](#) governing the use and redisclosure of personally identifiable information from education records.

Goal Setting and Improvement Planning

Achievement Gap Goals

When developing achievement gap targets, a school or district could find itself in the position of writing a goal for a group that is fully suppressed. In other words, there is no public information about their performance on the School Report Card (SRC). In this case, leadership teams may review the suppressed data individually and create a goal without referencing the current achievement level of the group directly. For example, a goal could state that, “The average performance of subgroup A in reading will increase by 5 percent.”

Another option for achievement gap goals could be to bind groups together and set a goal of relativity. For example, a goal could state that, “The gap between the lowest performing subgroup and the highest performing subgroup will decrease by 5 points.” This would again provide those with an educational need to know with a meaningful goal to work toward without exposing any suppressed data to the public.

Please note that [KRS 158.649](#) states that when local boards of education are determining whether each school achieved its targets for each group of students, boards are only considering data for a group of students including ten (10) or more students.

Targeted Support and Improvement (TSI) Schools

One of the issues with Targeted Support and Improvement (TSI) goal-setting is the suppression of detailed data, but not the general performance information. For example, a school may be TSI for special education, but then may have the detail data suppressed because fewer than three students in that subgroup performed at the distinguished level. This causes the entire NAPD spectrum to be suppressed. In this instance, a general goal such as, “The average performance of special education students in reading will increase by 5 percent” would be appropriate. This would not violate suppression as it is not tied to the NAPD spectrum, and the publicly available information already identifies that the special education subgroup is low-performing.

Implement Statistical Projections

You may have a clear picture of the trajectory of your scores over the past few years. If data has previously been available publicly but has been suppressed this year, you may choose to consider your past data and the increases made to estimate what could have been expected this year to inform goal-setting. For additional information and more specific details regarding statistical projections, please consult the [Forecasting Data to Inform Continuous Improvement Goals webinar](#) and [transcript](#).