

STATEMENT REGARDING THE PUBLIC RELEASE OF DATA: CAUTIONS ABOUT INTERPRETATION

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The Freedom of Information Act (FOIA) established requirements for public agencies regarding the release of information to agencies or individuals regarding programs, services, or outcomes about which public agencies collect data. Chapter 12 of the Iowa Administrative Code (School Rules of Iowa) has been interpreted to establish a minimum n-size (the number of students in a group or subgroup) of 10, required for reporting. Any number in a group fewer than 10 is viewed as a potential violation of the Family Rights and Privacy Act of 1974 (FERPA), such that combining the number of students with other data could potentially disclose the identity of a student, which is not legal under FERPA.

We are releasing requested data as a good faith effort to meet the requirements of FOIA. However, because policy requires us to suppress data to protect the confidentiality of the individuals in the requested data, the validity of interpretations made about such data is questionable.

Data suppression policy includes two major ideas:

- If the number of students in a group is fewer than 10, that data cell is suppressed.
- If group classifications are related, and one group is fewer than 10, all of the data cells are suppressed. For example, if three of five racial/ethnic groups have more than 10 students, and two of five racial/ethnic groups have fewer than 10 students, data from all five subgroups are suppressed, to avoid the interpretation that the suppressed subgroups are non-existent.

Data suppression rules were applied to the 2006-2007 summary data for Adequate Yearly Progress (AYP) under the No Child Left Behind (NCLB) Act of 2001. Results showed that the original dataset of approximately 37,000 records was reduced to fewer than 7,000 records. When this suppressed dataset was analyzed, the number of White students was approximately 16 percent of the original number of White students in the population. Thus, while the provision of these data meets the requirements of FOIA without violating FERPA, the validity of the interpretation of any analyses of data involving subgroups of data is highly questionable, and is not recommended. The Iowa Department of Education is willing to work with those requesting information to provide a dataset that better represents the population in question, and through vigilant management and analyses of public data, valid interpretations might reflect the groups or subgroups under examination.