Dear Chief State School Officer:

The purpose of this letter is to inform you of the plans of the National Center for Education Statistics (NCES) for collecting average daily attendance (ADA) data from States for the 2019-2020 and 2020-2021 school years (SYs). As you know, NCES collects ADA data annually through the National Public Education Financial Survey (NPEFS) for use, among other things, in distributing funds for several of the Department’s programs. We recognize that extended school building closures have necessitated remote learning, and that other unique challenges caused by the national emergency related to the novel coronavirus disease 2019 (COVID-19) have increased the complexities of ADA data reporting by States.

Due to these uncertain times, the Department is providing States flexibility for reporting SY 2019-2020 ADA data in order to ensure the data are consistent and as accurate as possible. As required by section 8101(1) of the Elementary and Secondary Education Act of 1965 (ESEA), each State will continue to report ADA based on either the Federal or the State’s definition of ADA.

The Federal definition of ADA is: (i) the aggregate number of days of attendance of all students during a school year; divided by (ii) the number of days school is in session during that year. [20 U.S.C. §7801(1)]. States and local educational agencies (LEAs) must also continue to maintain and, if requested, be able to provide appropriate records of student attendance for Department monitoring, audit, and other accountability purposes. In light of the challenges of the COVID-19 national emergency and consistent with authority provided under section 301 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as it relates to administrative flexibility, the Department will allow the following options for reporting SY 2019-2020 ADA data:

If using the Federal ADA definition, the following options are available:

1. **States unable to accurately report ADA for remote learning days occurring as a result of COVID-19.** Report the aggregate number of days of attendance of all students during SY 2019-2020 for each school or LEA and the number of days each school or LEA was in session during SY 2019-2020 until the date that school facilities closed for in-person learning due to COVID-19, and a State determined that it could no longer accurately report ADA.

2. **States able to accurately report ADA for remote learning days occurring as a result of COVID-19.** Report the aggregate number of days of attendance of all students during SY 2019-2020 for each school or LEA and the number of days each school or LEA was in session for the same school year. Under this option,
States would report attendance on days each school or LEA was in session and attendance was collected, including remote learning days (including distance education, distance learning, and digital learning) completed before the date SY 2019-2020 ended. If States have a temporary inability to report attendance, they may include in ADA data reporting those days for which attendance was collected subsequent to the interruption. States have the flexibility to report under this option even if they are unable to report remote learning days from all schools or LEAs.

If using your State ADA definition, the following options are available:

1. **States unable to accurately report ADA for remote learning days occurring as a result of COVID-19.** Report, consistent with State law or regulation, the aggregate number of days of attendance of all students during SY 2019-2020 for each school or LEA and the number of days each school or LEA was in session until the date school facilities closed for in-person learning due to COVID-19 and a State determined that it could no longer accurately report ADA or report under the Federal ADA definition for SY 2019-2020.

2. **States able to accurately report ADA for remote learning days occurring as a result of COVID-19.** Report ADA as defined by State law or regulation. Under this option, States would report on attendance on days each school or LEA was in session and attendance was collected, including remote learning days (including distance education, distance learning, and digital learning) completed before the date SY 2019-2020 ended.

NCES will continue to collaborate with States to ascertain the content of ADA data that States can accurately report and provide further clarification, if appropriate, in the FY 2020 reporting instructions to collect those data for SY 2019-2020. To support this effort, NCES will also provide technical support to State Fiscal Coordinators through quarterly interactive webinars to help support consistent collection and submission of accurate ADA data for SY 2020-2021. Furthermore, NCES has convened a panel of State Fiscal Coordinators and LEA-level personnel to review potential changes in how ADA data is being reported by LEAs and States, make recommendations to clarify ADA reporting instructions, and develop best practices for reporting ADA data. Based on comments and suggestions from State Fiscal Coordinators and LEA-level personnel, additional guidance on potential remote attendance tracking options for SY 2020-2021 will be provided.

We recognize that many LEAs adopted new attendance tracking methods at the end of SY 2019-2020, demonstrating that regular and consistent student attendance can be taken in a full-time remote environment. In addition, States and LEAs have had further time to plan for the collection of accurate remote learning attendance data. Therefore, for SY 2020-2021, we expect States and LEAs to resume normal tracking of student attendance, regardless of school building operational status. Specific examples of how to track student attendance during remote learning are provided in the Promising Practices Brief:
Improving Student Engagement and Attendance During COVID-19 School Closures
(available at: https://insightpolicyresearch.com/wp-content/uploads/2020/08/NSAES_COVID19_Whitepaper_Final_508.pdf), such as time a student spends on a learning platform, the frequency or quantity of online learning activities completed, and attendance during live virtual instruction.

If you or your staff have questions or concerns or comments about circumstances affecting your State or your LEAs and schools with regard to calculating and reporting ADA within the NPEFS, please contact Stephen.Cornman@ed.gov. For questions about reporting ADA for the Rural Education Achievement Program, please contact reap@ed.gov.

We recognize the transition to remote instruction has been challenging and are encouraged by the success of many LEAs in fully engaging their students this past spring. We encourage LEAs to take steps to ensure that regular tracking of student attendance and engagement remains a high priority whether instruction is provided in person or remotely. State leadership is imperative in this effort, and we stand ready to support you in this endeavor.

Sincerely,

Ruth E. Ryder
Deputy Assistant Secretary for Elementary and Secondary Education

James Lynn Woodworth
NCES Commissioner

cc: State Rural Coordinator
State Fiscal Coordinator