OFFICE OF HIGHER EDUCATION



Grants for Students with Intellectual and Developmental Disabilities Annual Report

February 15, 2020

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About the Minnesota Office of Higher Education

The Minnesota Office of Higher Education is a cabinet-level state agency providing students with financial aid programs and information to help them gain access to postsecondary education. The agency also serves as the state's clearinghouse for data, research and analysis on postsecondary enrollment, financial aid, finance and trends.

The Minnesota State Grant Program is the largest financial aid program administered by the Office of Higher Education, awarding more than \$207 million in need-based grants to Minnesota residents attending accredited institutions in Minnesota. The agency oversees tuition reciprocity programs, a student loan program, Minnesota's 529 College Savings Plan, licensing and early college awareness programs for youth.

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Executive Summary

Grants for Students with Intellectual and Developmental Disabilities (ID Grant) provide financial assistance to eligible Minnesota resident students with intellectual and developmental disabilities who attend eligible Minnesota postsecondary institutions. The grant program was established in fiscal year 2018 and has received \$800,000 total in state appropriations with no allocation for administrative costs. Despite having access to grant resources of ID Grant, Federal Pell Grant, Minnesota State Grant, Institutional Aid, and Outside Government Resources, ID Grant students had more than \$800,000 in unmet tuition and fee costs during fiscal year 2020. A majority of ID Grant recipients were dependent with annual household income greater than \$60,000. Recommendations of the program are:

- Increase appropriation
- Expand allowable expenses
- Include appropriation for Office of Higher Education administration
- Incentivize institutions to develop more Comprehensive Transition & Postsecondary programs

Introduction

Grants for Students with Intellectual and Developmental Disabilities (ID Grant) was established by the 2017 Minnesota Legislature (Minnesota Statutes 136A.1215

(https://www.revisor.mn.gov/statutes/cite/136A.1215)) to provide financial assistance toward tuition and fees to postsecondary students with intellectual and developmental disabilities enrolled in a Comprehensive Transition & Postsecondary (CTP) programs at an eligible Minnesota postsecondary institutions (Appendix A). Programs at three institutions qualified for the ID Grant during fiscal years 2019 and 2020:

- Bethel University Saint Paul
 - Bethel University Inclusive Learning and Development (BUILD) Program
- Central Lakes College Brainerd
 - Occupational Skills Program (OSP)
- Ridgewater Community College Willmar
 - Occupational Skills Program (OSP)

The Office of Higher Education (OHE) is responsible for issuing program guidance and providing funding awards to institutions. Institutions are responsible for meeting program deadlines set by OHE, identifying students, calculating awards, distributing award notifications, disbursing awards, adjusting awards, and refunding excess funds to OHE.

Per statute requirements, OHE submits this report annually by February 15 to legislative committees with jurisdiction over higher education finance and policy. The report includes, at minimum: (1) the number of students receiving an award; (2) the average and total award amounts; and (3) summary demographic data on award recipients.

Appropriation Summary

The total ID Grant appropriation for fiscal years 2020 and 2021 is \$400,000. The appropriation does not include funds for administrative costs. Currently, the total ID Grant disbursed to institutions for fiscal year 2020 was \$199,982. Spring 2020 awards are still processing; therefore, the annual report submitted in 2021 will reflect final fiscal year 2020 data.

Total ID Grant appropriation for fiscal years 2018 and 2019 was \$400,000. The appropriation did not include funds for administrative costs. ID Grant funds were not disbursed to institutions during fiscal year 2018. During fiscal year 2018, OHE worked with eligible institutions to establish policies and procedures for the program both at OHE and on campus. Total ID Grant disbursement to institutions for fiscal year 2019 was \$378,377.85.

Program Overview

Postsecondary Institution Eligibility

To be eligible to award an ID Grant, an institution must meet all of the following conditions:

- · Be located in Minnesota
- Offer a Comprehensive Transition and Postsecondary (CTP) program (degree, certificate, non-degree, or non-certificate program), as defined in Code of Federal Regulations, title 34, section 668.231 (Appendix B)
- Meet the definition of eligible institution, as defined in <u>Minnesota Statute 136A. 103</u> (https://www.revisor.mn.gov/statutes/cite/136A.103)
- Have the necessary administrative computing capability to administer the program on campus and electronically report student data records to OHE
- Provide student-level data to OHE, including information on student financial aid from federal, state, and institutional sources

Student Eligibility

To be eligible for an ID Grant, a student must meet all of the following conditions:

- Have an intellectual disability, as defined in Code of Federal Regulations, title 34, section 668.231:
 - Cognitive impairment characterized by significant limitations in:
 - Intellectual and cognitive functioning
 - Adaptive behavior as expressed in conceptual, social, and practical adaptive skills
 - Currently, or was formerly, eligible for special education and related services under the Individuals with Disabilities Education Act (IDEA), including a student who was determined eligible for special education or related services under the IDEA but was home-schooled or attended a private school
- Be enrolled in and attend a CTP program at an eligible Minnesota postsecondary institution
- Apply using the FAFSA or Minnesota state financial aid application

- Have tuition and fees not covered by the Federal Pell Grant, State Grant, or institutional aid
- Be a Minnesota resident as defined in <u>Minnesota Statutes 136A.101</u>, <u>Subd. 8</u>
 (https://www.revisor.mn.gov/statutes/cite/136A.101)
- Be a graduate of a secondary school/GED recipient or be at least 17 years of age at the time of
 disbursement (high school students enrolled in postsecondary courses prior to receiving their
 high school diploma are not eligible for an ID Grant)
- Not be in default on a student educational loan
- Not be more than 30 days in arrears for child support payments owed to a public child support
 enforcement agency unless the student is complying with a written repayment plan

Application Process

A student applies for an ID Grant by completing the Free Application for Federal Student Aid (<u>FASFA</u> (https://studentaid.ed.gov/sa/fafsa)). A student who is not a United States citizen or eligible non-citizen applies for an ID Grant by completing the <u>Minnesota state financial aid application</u> (http://www.ohe.state.mn.us/mPg.cfm?pageID=2056).

To ensure available funds are distributed among eligible students in a timely manner, FAFSA and Minnesota state financial aid applications receive priority awarding when completed prior to July 1 of the upcoming academic year. For example, an application completed prior to July 1, 2019 for academic year 2019 – 2020 (July 1, 2019 – June 30, 2020) would receive priority in the awarding process. Students with incomplete applications prior to or on July 1 or applications started on or after July 1 may be added to an institutional wait list, as determined by the postsecondary institution.

Award Process and Formula

On July 1 of each academic year, institutions submit the demographic and financial data of eligible students to OHE, including but not limited to:

- Student name
- Cost of attendance (COA)
- Expected Family Contribution (EFC)
- Tuition and fees
- Pell Grant
- MN State Grant

- Institutional aid
- Other governmental aid

ID Grant funds cannot be used for books, supplies, transportation, housing, or other educational expenses. The minimum award is \$50 per term. ID Grant awards are calculated based on the student's remaining need in the following calculation.

Program tuition and fees for semester

- Federal Pell Grant (actually received by student)
- Minnesota State Grant (actually received by student)
- Institutional Aid
- = ID Grant (≤ Maximum ID Grant)

Based on availability of funds for each term, OHE determines a term maximum grant amount. Institutions then award eligible students up to the maximum grant amount or their remaining need whichever is less. Throughout the term, OHE notifies institutions if there are any excess funds that can be used to make awards to any students on their institutional wait list. If there are excess funds after all eligible students have been awarded for the term, the funds are added to the amount of funds available for the next term.

Students and Awards

Fiscal Year 2019

Institutions submitted ID Grant rosters to OHE on July 1, 2018 and January 1, 2019. At the end of the academic year, institutions performed a final review of the rosters and provided confirmation to OHE by August 31, 2019. ID Grant rosters included data for 37 eligible students during fall 2018 and 35 eligible students during spring 2019.

Based upon 37 students with financial need for ID Grant funds during fall 2018, awards were determined to a maximum term award of \$5,405 per student. For spring, maximum term awards were increased to \$8,433. The maximum grant in fiscal year 2019 was \$13,838.

The average ID Grant award in fall was \$4,395.57 and spring was \$6,164.05. The average annual ID Grant award was \$10,226.43. The minimum annual ID Grant award was \$895.00, and the maximum annual ID Grant award was \$13,838.

Due to Data Suppression Policy for Student Information (<u>Appendix C</u>), the total number of students per institution is not reported in the upcoming tables.

Table 1. Fiscal Year 2019 Students and Awards - Grants for Students with Intellectual and Developmental Disabilities

Postsecondary Institution	Total Students	Fall 2018 Awards	Spring 2019 Awards	Total Awards
Bethel University	<u>≥</u> 10	\$124,315.00	\$177,093.00	\$301,408.00
Central Lakes College	<10	\$13,947.00	\$13,367.00	\$27,314.00
Ridgewater Community College	<u>≥</u> 10	\$24,374.00	\$25,281.85	\$49,655.85
Totals	37	\$162,636.00	\$215,741.85	\$378,377.85

Note: Awards refer to ID grant amounts awarded and disbursed to students as confirmed by institutions.

The total annual tuition and fees charged to ID Grant students for FY2019 was \$908,677.85. The annual sum of Federal Pell Grant, Minnesota State Grant, and Institutional Aid was \$124,105.00. The difference was a need of \$784,572.85. The ID Grant contributed \$378,377.85 and Other Government Aid contributed \$309,179.32 to the need for tuition and fees. A remaining need of \$97,015.68 was unmet among the 37 ID Grant students.

Fiscal Year 2020

Institutions submitted ID Grant rosters to OHE on July 1, 2019 and January 1, 2020. Rosters included data for 33 eligible students during fall 2019 and 34 eligible students during spring 2020.

Based upon estimations of 35 students with financial need for ID Grant funds during fall 2019, awards were determined to a maximum term award of \$2,857 per student. For spring, maximum term awards were increased to \$3,857. The maximum grant in fiscal year 2020 was \$6,714.

The average ID Grant award in fall was \$2,590 and spring was \$3,321. The average annual ID Grant award was \$5,835. The minimum annual ID Grant award was \$813, and the maximum annual ID Grant award was \$6,714.

Table 2. Fiscal Year 2020 Students and Awards - Grants for Students with Intellectual and Developmental Disabilities

Postsecondary Institution	Total Students	Fall 2019 Awards	Spring 2020 Awards	Total Awards
Bethel University	<u>≥</u> 10	\$62,854.00	\$88,711.00	\$151,565.00
Central Lakes College	<10	\$9,406.80	\$9,583.00	\$18,989.80
Ridgewater Community College	<10	\$13,221.00	\$14,612.00	\$27,833.00
Totals	34	\$85,481.80	\$112,906.00	\$198,387.80

Notes: Awards refer to ID grant amount awarded and disbursed to students as estimated by institutions. Awards will be updated in a future report.

The total annual tuition and fees charged to ID Grant students for FY2020 was \$937,313.16. The annual sum of Federal Pell Grant, Minnesota State Grant, and Institutional Aid was \$101,276.50. The difference was a need of \$836,036.66. The ID Grant contributed \$198,387.80 and Other Government Aid contributed \$0.00 to the need for tuition and fees. A remaining need of \$817,648.86 was unmet among the 34 ID Grant students.

Demographics

The demographics section of this report includes 60 unique ID Grant students. Eleven of 71 ID Grant students participated in both fiscal years 2019 and 2020. This section reflects FAFSA data pertaining to race, gender, age, dependency status, and income group.

The average age of ID Grant students was 20 years. The maximum age was 27 years and minimum age was 18 years. Age data correlated with a majority of ID Grant students having a FAFSA dependency status of dependent. In addition, all students had a marital status of single.

Due to Data Suppression Policy for Student Information (<u>Appendix C</u>), the only race and ethnicity information that can be disclosed is 52 percent of ID Grant students identified as White with an additional 38 percent as unavailable.

As shown in Figure 1, ID Grants students who identified as male exceeded students who identified as female. Although, data for 37 percent of ID Grant students was unavailable.

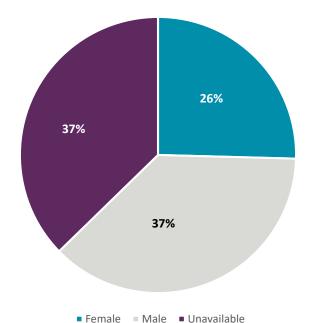
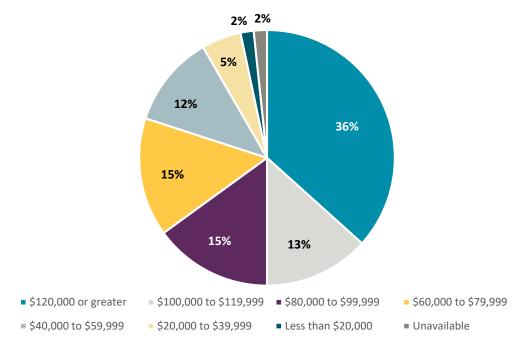


Figure 1. Gender – Grants for Students with Intellectual and Developmental Disabilities

Figure 2 depicts several income groups for ID Grant students. Income group data was based upon parent adjusted gross income for dependent students and student adjusted gross income for independent students. Eighty percent of ID Grant funds were disbursed to students with annual household income of \$60,000 or greater.





Recommendations

The Minnesota Office of Higher Education (OHE) puts forth recommendations based upon this report and conversations with postsecondary institutions and stakeholder groups.

Recommendation 1: Increase ID Grant appropriation.

Each fiscal year, the combination of ID Grant, Federal Pell Grant, Minnesota State Grant, Institutional Aid, and Outside Government Resources do not meet the tuition and fees need for ID Grant students. During fiscal year 2020, more than \$800,000 of need was unmet by the various funding sources. An appropriation increase would lessen the financial burden of tuition and fees for ID Grant students.

Recommendation 2: Expand ID Grant allowable expenses.

ID Grant cannot be applied to educational living expense costs like room and board, meals, and transportation. Financing educational living expenses can be a substantial barrier for students, and the ID Grant does not address that barrier.

<u>Recommendation 3:</u> Include appropriation for OHE administration of the ID Grant.

The statute governing the ID Grant does not include an appropriation to OHE for the administration of the program. OHE experiences administrative challenges with no program resources. An appropriation for administration would enhance the quality and secure the longevity of the ID Grant program.

<u>Recommendation 4:</u> Incentivize institutions to develop more Comprehensive Transition & Postsecondary programs.

The State of Minnesota has 128 college campuses, but only three campuses offer ID Grant eligible programs for students with intellectual and developmental disabilities. Conversations with stakeholder groups have indicated that some Minnesota students are seeking CTP programs in nearby states due to limited options in Minnesota¹. Increasing eligible ID Grant institutions in the state will provide students with more financially feasible options for pursuing postsecondary education. In order to achieve this goal, the state may need to develop additional programming to better-incentivize institutions to create programs for students with intellectual and developmental disabilities.

In 2017 and 2019, the Legislature requested that the Board of Regents of the University of Minnesota to offer a program for students with intellectual and development disabilities at the University of Minnesota Morris². Unfortunately, the program was not established because, according to the 2018 University of Minnesota Report to the Legislature, "given the lack of an existing infrastructure, the

¹ Currently, Wisconsin has two CTP programs at Edgewood College and University of Wisconsin Whitewater; Iowa has one CTP program at University of Iowa; and South Dakota has one CTP program at Augustana University.

² Minnesota 2017 Session Law, Article 2, Section 18 (https://www.revisor.mn.gov/laws/2017/0/89/) and Minnesota 2019 Statute 137.45

⁽https://www.revisor.mn.gov/statutes/2019/cite/137.45?keyword_type=all&keyword=137.45)

implementation timeline and initial sizes for student cohorts specified in the legislation are not feasible." The purpose of the ID Grant to provide financial assistance to eligible Minnesota resident students with intellectual and developmental disabilities who attend eligible Minnesota postsecondary institutions cannot be accomplished without more eligible ID Grant Minnesota postsecondary institutions.

The Office of Higher Education welcomes questions and further discussion regarding the recommendations for Grants for Students with Intellectual and Developmental Disabilities.

Appendix A:

Minnesota Statutes Governing Grants for Students with Intellectual and Developmental Disabilities

2019 Minnesota Statutes

136A.1215 GRANTS FOR STUDENTS WITH INTELLECTUAL AND DEVELOPMENTAL DISABILITIES.

Subdivision 1. Establishment. A program is established to provide financial assistance to students with intellectual and developmental disabilities that attend a Minnesota postsecondary institution.

Subd. 2. Eligible students. A postsecondary student is eligible for a grant under this section if the student:

- 1) meets the eligibility requirements in section <u>136A.121</u>, <u>subdivision 2</u>;
- 2) is a student with an intellectual disability, as defined in Code of Federal Regulations, title 34, section 668.231, and is enrolled in a comprehensive transition and postsecondary program under that section; and
- 3) attends an eligible institution, as defined in section <u>136A.101</u>, <u>subdivision 4</u>.

Subd. 3. Application. To receive a grant under this section, a student must apply in the form and manner specified by the commissioner.

Subd. 4. Maximum grant amounts. (a) The amount of a grant under this section equals the tuition and fees at the student's postsecondary institution, minus:

- 1) any Pell or state grants the student receives; and
- 2) any institutional aid the student receives.
- 3) If appropriations are insufficient to provide the full amount calculated under paragraph (a) to all eligible applicants, the commissioner must reduce the maximum grant amount available to recipients.

Subd. 5. Reporting. By February 15 of each year, the commissioner of higher education must submit a report on the details of the program under this section to the legislative committees with jurisdiction over higher education finance and policy. The report must include the following information, broken out by postsecondary institution:

- 1) the number of students receiving an award;
- 2) the average and total award amounts; and
- 3) summary demographic data on award recipients.

Appendix A 13

Appendix B:

Federal Regulations Governing Financial Assistance for Students with Intellectual Disabilities

2019 Federal Regulations

§ 668.231 Definitions.

The following definitions apply to this subpart: *Comprehensive transition and postsecondary program* means a degree, certificate, non-degree, or non-certificate program that:

- 1) Is offered by a participating institution;
- 2) Is delivered to students physically attending the institution;
- 3) Is designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment;
- 4) Includes an advising and curriculum structure;
- 5) Requires students with intellectual disabilities to have at least one-half of their participation in the program, as determined by the institution, focus on academic components through one or more of the following activities:
 - a. Taking credit-bearing courses with students without disabilities.
 - b. Auditing or otherwise participating in courses with students without disabilities for which the student does not receive regular academic credit.
 - c. Taking non-credit-bearing, non-degree courses with students without disabilities.
 - d. Participating in internships or work-based training in settings with individuals without disabilities; and
- 6) Provides students with intellectual disabilities opportunities to participate in coursework and other activities with students without disabilities.

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Appendix C:

Data Suppression Policy for Student Information

Purpose

The purpose of this policy is to ensure the protection of private data on students when releasing summary data about our institutions and students.

Increased attention to education has led to an expansion in the amount of information on students and institutions reported by the Minnesota Office of Higher Education (OHE). Such reports offer a challenge of meeting reporting requirements while also meeting legal requirements to protect each student's personally identifiable information (Family Educational Rights and Privacy Act [FERPA]) (20 U.S.C. § 1232g; 34 CFR Part 99). Recognizing this, subgroup disaggregations of the data may not be published if the results would yield personally identifiable information about an individual student (or if the number of students in a category is insufficient to yield statistically reliable information). States are required to define a minimum number of students in a reporting group or subgroup required to publish results consistent with the protection of personally identifiable information (34 CFR § 200.7)

Scope

This policy applies to all reports generated by OHE, by OHE's contractors and by third parties working on OHE's behalf. This policy does not apply to data shared with employees of OHE or contractors of OHE.

Policy

OHE may release summary data, including aggregate student counts for all groups including those of less than 10. However, OHE will not release any *other information* regarding the group.

Other information is defined as information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school (institution) community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty. Other information may include, but is not limited to: gender, race/ethnicity, disability, citizenship, income and wages, expected contributions and birth date or birthplace information. Other information also includes aid awarded for the following programs: Postsecondary Child Care Grants, Minnesota Indian Scholarship Program, Minnesota GI Bill, State Grant Dream Act and Federal GI Bill.

OHE will suppress other information for aggregate student counts of less than 10 in for the following reasons:

- the information could identify an individual,
- the report will be released to an audience that includes recipients other than individuals to whom OHE may disclose personally identifiable information pursuant to federal or state law,
- the number of students in a grouping is 100% of all students, or the number of students in a suppressed cell can be derived from existing information.

Individuals and organizations to which OHE discloses information will be directed that its redisclosure to anyone who is not authorized to receive that information under state and/or federal law is prohibited. Disclosure of data by the Minnesota Office of Higher Education is subject to Minnesota Government Data Practices Act (MGDPA, Minnesota Statutes Chapter 13) and the Family Educational Rights and Privacy Act (34 CFR Part 99.31).

Additionally, any use of education records by another state agency, its employees, agents, or contractors is subject to and shall be consistent with applicable provisions of the Family Educational Rights and Privacy Act (FERPA) and the Minnesota Government Data Practices Act (MGDPA) including, but not limited to, FERPA regulations at 34 C.F.R. § 99.32 through 99.35, regarding recordkeeping, re-disclosure, and destruction of education records.

Definitions

- Personally identifiable information (PII): Data that identifies the individual. For the purposes of education records, PII is defined by federal law as information that includes, but is not limited to a student's name; the name of the student's parent or other family members; the address of the student or student's family; a personal identifier, such as the student's social security number, student number, or biometric record; other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name; other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school (institution) community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; and information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates.
- Summary Data: Statistical records and reports aggregated from data on individuals in a way
 that individuals are not identified and from which neither their identities nor any other
 characteristic that could uniquely identify an individual is ascertainable.

Classification of Information

Pursuant to Minn. Stat.§ 13.02, subd. 12 and M.S.136A.162, data on students collected and used by the Minnesota Office of Higher Education are private data on individuals, including data on applicants for financial assistance collected and used by the Minnesota Office of Higher Education for student financial aid programs administered by that office.

Best Practices in Reporting

Per the U.S. Department of Education's SLDS Technical Brief (NCES-2011-603), *Statistical Methods for Protecting Personally Identifiable Information in Aggregate Reporting*, the following best practices may be used to protect each student's personally identifiable information:

- 1. Minimize the amount of enrollment details reported in the profile of the school (institution), district (sector), or state in reports of outcome measure results. If possible, use enrollment data for a different date than that of the reported outcome measures and label the different dates (e.g., report enrollment data for a date different from the assessment date, such as fall enrollment for a spring assessment). In so doing, tell the readers that the data on student enrollment by grade and by selected student characteristics are included to provide context for the results presented but should not be assumed to exactly match the student composition at the time the outcome was measured.
 - a. Report the percentage distribution of students by grade at the school (institution), district (sector), or state level in a standalone table without any of the outcome measures or reporting subgroup details.
 - b. Report the percentage distribution of students by reporting subgroup at the school (institution), district (sector), or state level in a standalone table without any of the outcome measures or enrollment by grade details.
 - c. Do not report the details of the enrollment data within each reporting subgroup by individual grades.
- 2. Use a minimum of 10 students for the reporting subgroup size limitation.
 - a. Suppress results for all reporting groups with 0 to 9 students.
 - b. Suppress results for reporting subgroups with 0 to 9 students and suppress each of the related reporting subgroups regardless of the number of students in the subgroup (i.e., suppress the other subgroup(s) of the set of subgroups that sum to the overall group). In instances with 3 or more subgroups, the subgroups with

0 to 9 students can be combined with each other or with the smallest reportable subgroup to form an aggregated subgroup of 10 or more students to allow for the reporting of data for larger subgroups.

- 3. Use only whole numbers when reporting the percentage of students for each category of an outcome measure (e.g., the percentage assessed).
- 4. Do not report the underlying counts for the subgroup or group totals (i.e., the denominators of the percentages); also do not report the underlying counts of students in individual outcome categories (i.e., the numerators).
- 5. For reporting variables/outcomes measures for subgroups, use the following standards to protect student privacy:
 - a. For reporting variables/outcome measures with more than 300 students and no related subgroup with fewer than 200 students, use the following approach:
 - i. Recode categories with values of 99 to 100 percent to greater than or equal to 99 percent (≥99 percent).
 - ii. Recode categories with values of 0 to 1 percent to less than or equal to 1 percent (≤1 percent).
 - iii. Otherwise, report the percentage of students in each category using whole numbers.
 - b. For reporting variables/outcome measures with 201 to 300 students and no related subgroup with fewer than 200 students, use the following approach:
 - i. Recode categories with values of 98 to 100 percent to greater than or equal to 98 percent (≥98 percent).
 - ii. Recode categories with values of 0 to 2 percent to less than or equal to 2 percent (≤2 percent).
 - iii. Otherwise, report the percentage of students in each category using whole numbers.
 - c. For reporting variables/outcome measures in which the number of students ranges from 101 to 200, use the following option in this group and all related subgroups with more than 200 students:
 - i. Recode categories with values of 98 to 100 percent to greater than or equal to 98 percent (≥98 percent).
 - ii. Recode categories with values of 0 to 2 percent to less than or equal to 20 percent (≤2 percent).

- iii. Recode the percentage in each remaining category in all reporting groups or subgroups to intervals as follows (3–4, 5–9, 10–14, 15–19, . . ., 85–89, 90–94, 95–97).
- d. For reporting variables/outcome measures in which the number of students in the smallest reporting group or subgroup ranges from 41 to 100, use the following option in that group or subgroup and use option 5c for each related reporting group or subgroup with more than 100 students:
 - i. Recode categories with values of 95 to 100 percent to greater than or equal to 95 percent (≥95 percent).
 - ii. Recode categories with values of 0 to 5 percent to less than or equal to 5 percent (≤5 percent).
 - iii. Recode the percentage in each remaining category in all reporting groups or subgroups to intervals as follows (6–9,10–14, 15–19, 20–24, . . ., 85–89, 90–94).
- e. For reporting variables/outcome measures in which the number of students in the smallest reporting group or subgroup ranges from 21 to 40,use the following option for that group or subgroup, use option 5d for each related reporting group or subgroup with 41 to 100 students, and use option 5c for those with more than 100 students:
 - i. Recode categories with values of 90 to 100 percent to greater than or equal to 90 percent (≥90 percent).
 - ii. Recode categories with values of 0 to 10 percent to less than or equal to 10 percent (≤10 percent).
 - iii. Recode the percentage in each remaining category in all reporting groups or subgroups to intervals as follows (11–19, 20–29, . . ., 80–89).
- f. For reporting variables with 10 to 20 students in the smallest subgroup, use the following option for that group or subgroup, use option 5e for each related group or subgroup with 21 to 40 students, use option 5d for those with 41 to 100 students, and use option 5c for those with more than 100 students:
 - i. Collapse all outcome measures to only two categories, using the same collapsing rules across all subgroups for each outcome measure (e.g., assessment results collapsed to below the proficient level and at or above the proficient level by sex, racial and ethnic groups, disability status, etc.).

- ii. Recode categories with values of 0 to 20 percent to less than or equal to 20 percent (≤20 percent), and recode the other category to greater than 80 percent (> 80 percent).
- iii. If both collapsed categories have percents of 21 to 79 percent, recode the percentage in each collapsed category to intervals as follows (21–29, 30–39, . . . , 70–79).
- 6. For each outcome measure reported at the district (sector) level, if results for a group or subgroup have been collapsed, recoded, or suppressed in only one school (institution) in the district (sector), apply the same collapsing, recoding, or suppression rule for that group or subgroup in a second school (institution) or at the district (sector) level (i.e., for any specific measure and group or subgroup, there must be either no school (institution)-level data suppressed for a specific subgroup or the data for that subgroup must be suppressed for at least 2 schools (institutions) or for one school (institution) and the district (sector).
- 7. For each outcome measure reported at the state level, if results for a group or subgroup have been collapsed, recoded, or suppressed in only one district (sector) in the state, apply the same collapsing, recoding, or suppression rule for that group or subgroup in a second district (sector) (i.e., for any specific measure and group or subgroup, there must be either no district (sector)-level data suppressed for a specific subgroup or the data for that subgroup must be recoded or suppressed for at least 2 districts (sectors).

