Date: April 3, 2008

To: Provosts/ Vice Presidents, Academic Affairs
   Vice Presidents, Administration
   Vice Presidents, Student Services
   Chief Information Officers
   Human Resources Directors

From: Marsha Hirano-Nakanishi
      Assistant Vice Chancellor, Academic Research and Resources

Subject: “Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education”

Changes in federal regulations significantly impact future collection, maintenance, and reporting of racial and ethnic data for students and employees. In response to the changes, the Chancellor’s Office has created internal teams to analyze the issues, develop strategies, and create plans for a systemwide response. Campuses will not need to take specific action until the Chancellor’s Office teams have developed and shared the systemwide approach and final plans. The mandatory changes, however, will require cross-divisional teamwork on the campuses and at the Chancellor’s Office.

This memorandum provides general background on the project and introduces the Chancellor’s Office divisional teams that will be in touch with campus counterparts to understand current practices and to share information and timelines.

Federal Final Guidance. On October 19, 2007, the U.S. Department of Education posted to the Federal Register the "Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education" (see the Federal Register, Volume 72, Number 202, pp. 59266-59279). Educational institutions are required to implement this guidance in time to report data for the 2010-2011 college year; the Chancellor’s Office provides reports to the Department of Education on the behalf of CSU campuses, including information about race and ethnicity.

cc: Presidents

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California Law. State law currently requires the collection, maintenance, and reporting of more detailed racial and ethnic information regarding students and employees. In addition, state legislation often increases the number of racial/ethnic categories. It is permissible to collect more than the federal requirement.

Individual Preferences. Individual students and employees will be able more fully to identify their racial and ethnic identities. However, the CSU feels strongly that once we have offered the opportunity to define racial and ethnic identities as fully as possible, we also should know students’ and employees’ individual preferences if the system or the campus is asked to place them in a single racial/ethnic category. This additional information will permit the CSU and its campuses to elaborate on individual preferences, e.g., for the individuals who will reported on as “two or more races/ethnicities” under some reporting mandates.

Collection, Maintenance, and Reporting. The federal changes require the collection and maintenance of detailed racial/ethnic data for individuals, similar to the detail collected in the 2000 Census. While there is only one Department of Education reporting standard, other standards have been disseminated by the federal Office of Management and Budget, e.g., for the handling of complaints and disparate impact. It is premature now to specify all the ways that the CSU system and individual campuses may wish to use the richness of racial and ethnic data about CSU students and employees to elaborate upon campus and system diversity. Along with governmental reporting mandates, rich data about the diversity of the CSU and the campuses can provide opportunities to demonstrate the effectiveness of our outreach efforts and to leverage external funds.

The Chancellor’s Office Teams. Since November 2007, Chancellor’s Office personnel from Academic Affairs, Human Resources, and Information Technology Services have been conferring on how to meet the Department of Education reporting requirements and related strategic issues. Through systemwide planning, the divisional teams hope to minimize the burden on the 23 campuses and system office that changes in the collection, maintenance, and reporting of racial and ethnic data can entail.

The following Chancellor’s Office personnel have been meeting to develop strategies, technical plans and a timeline so the 2010-11 reports are delivered on-time and according to specifications.

Student Data: Philip Garcia, Senior Director, Analytic Studies; James Blackburn, Director, Enrollment Management Services; Rachel Hendrickson, Director, Student Academic Support (liaison to CSUMentor contractor)

Employee Data: Jo Anne Plaisted, Senior Manager, HR Data Research & Analysis; Tammy Hines, CMS Human Resources Systemwide Manager, Gary Simpson, Senior Lead Analyst/Programmer, HR Information Support & Analysis

Information Technology Services: Cheryl Kwiatkowski, Senior Director, Enterprise Information Management, has agreed to act as coordinator for planning and implementing changes. In addition, the ITS team members include: Ron Basich, Director, Enterprise Application Systems, Darlene Daclan, CMS Student Administration; Eleanor Roberts, Acting CMS Human Resources Project Director

The Student Data team members already have been communicating with campus counterparts. The other teams will be in touch with the campuses soon. If you have any questions about this memorandum, please free to contact me at mhirano-nakanishi@calstate.edu, 562-951-4767.