

Below is some general guidance to address questions regarding the Record Integration Tracking System (RITS) and student documentation. **Please note that this guidance does not constitute legal advice.** Please refer to your Local Education Agency (LEA) legal counsel if you have further questions or for your LEA specific enrollment policies.

## Utilization of Legal Documentation to Obtain SASIDs

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When available, use the student's birth certificate to verify the legal name and birthdate for the student. If the birth certificate is not available, then the LEA may use other sources to confirm the child's legal name and date of birth. A birth certificate, if available, is the best evidence of the child's birthdate and legal name, and in general shouldn't reveal citizenship status as it shows place of birth and legal name but not current citizenship status. That said, an LEA must also be very careful not to do anything that would have a "chilling effect" on student enrollment and it must adhere to all state and federal laws.

\*See Student Rights to Attend School Regardless of Citizenship Status' below.

If the LEA is under an Office of Civil Rights (OCR) or Department of Justice (DOJ) settlement agreement or court order then it should follow those stipulations, if there are any, pertaining to enrollment. If a birth certificate is not available, the LEA may use another legal document to confirm the child's birth date and legal name, including any of those listed below. Please note that the below list is not comprehensive. Check with your LEA's legal counsel if your district uses other types of documents.

## Partial List of Possible Documents That May Be Used to Confirm Student Legal Name and Date of Birth

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- Birth Certificate
- Passport
- State-Issued ID
- Adoption papers
- Previously Verified School Records
- Baptismal or Church Certificate
- Hospital Certificate
- Physician's Certificate
- I-94 form

## Student Rights to Attend School Regardless of Citizenship Status

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In Plyler v. Doe [ 457 U.S. 202 (1982)] the United States Supreme Court ruled that children and young adults who are not legally admitted to the United States have the same right to attend public primary and secondary schools as do U.S. citizens and permanent residents. As a result of the Plyler ruling, public schools may not:

- Deny admission to a student during initial enrollment or at any other time on the basis of citizenship status.
- Treat a student disparately to determine residency.
- Engage in any practices to "chill" the right of access to school.
- Require students or parents to disclose or document their immigration status.
- Make inquiries of students or parents that may expose their citizenship status.
- Require social security numbers from all students.



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## Possible Exceptions to Legal Names

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Though it is very important to use legal names so that data is accurate for funding, assessment and other authorized data purposes, the priority should always be the safety and well-being of students. That being said, the following are exceptions:

- Witness protection program
- Transgender students

\*For more information please refer to the section below on 'Guidance for Obtaining SASIDs for Various Types of Students'

## Entering Students into RITS Web to Ensure Timely Case Review and to Minimize Duplicate SASIDS

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### Student Names

- Conduct a **student search** first! This is very important to prevent duplicate SASIDS and to maintain the accuracy of student data. Chances are good that a student already has a SASID, even if they are new to school. This is because many children are entered into the system as infants or preschoolers for Special Education or for the Colorado Preschool Program.
- Use **full legal names** for all students, this includes the complete middle name whenever possible. Middle names help to distinguish students with common first and last names.
- Please follow the name that appears on the student's **legal document** for entry into RITS. Please note that many Spanish surnames have both the father's and mother's surnames and both should be shown as a surname. Please don't use one surname as a middle name. This rule applies to all last names where there are hyphenated or two last names. Please also note that some foreign birth certificates may list a last name first.
- Use "NMN" in the **middle name** field if the birth certificate states there is no legal middle name.
- **Only use letters and common punctuation** in the name fields. The only acceptable punctuation is a - dash, a space, and an ' apostrophe.
- **Use spaces to separate multiple names** except when hyphenation is used on legal documentation. The RITS Matching Engine treats a hyphen as a different character and could miss a match on a name that uses a space instead. Also, be aware hyphenated names are frequently reversed.
- If a student's name is presented legally with a suffix, please enter it in the suffix field.
- Don't use **nicknames**, like "Johnny" for John, as these are variables and hard to track.
- If a student's name is presented legally with a generation number, please enter it in the suffix field.

### Dates of Birth

- Always check **legal documentation** for the correct birth date. Be aware that many foreign birth certificates and other foreign legal documents have the month and day reversed from how they are written in the U.S. For example: a foreign birth certificate/legal document might read 01/07/2014 for July 1, 2014.
- Be careful not to use the birth certificate issue date instead of the date of birth.
- Enter the date of birth as **MM/DD/YYYY**, including the back slashes between month/day and day/year.
- Check to make sure that the date of birth for your record entry makes sense with the grade chosen. If a student's grade (for example a SPED student, a gifted student or student who has limited schooling from another country) falls outside of the age to grade range contact the RITS consultant to help input the correct information into RITS.

\*For more information see: <http://www.cde.state.co.us/datapipeline/gradetoageedits>



## Local Identifiers (LASIDS)

- If possible, use the following format: first four digits of the district or LEA code plus the student identifier in the LEA's student information system with zeros in between the district code and the student ID for a total of 14 digits in RITS Web.
- In RITS Pipeline the district or LEA code automatically appends to the front of the submitted LASID so the LASID should only have 10 digits which includes the student number from the district's or LEA's student information system.

## Gender

- An LEA is required to choose male or female. See below for transgender students. Currently there is no field for students who do not want to identify with any gender.

## District/School Type/School

- The LEA must update (using drop down boxes) all of these fields. Please double check school field after saving and before leaving the record to ensure the right school is selected. Often RITS will default to the first school in the drop-down list.

## MSI Last Updated (only on existing records)

- This is the Master Student Index and it notes the last time the record was updated.

## Active/Inactive Indicator (only on existing records)

- This notes whether or not a record is active or inactive.

## Comments Box

- Optional field for LEAs to include information that may be helpful to CDE in issuing a SASID quicker should the SASID request go into case review.
- Do not include any information that is not necessary to clear the case.
- After entering the information please put your initials and the date like this (rr- 9/21/19) so that it's clear who's making the comment. Here are some standardized acronyms: LN=last name; FN=first name; MN=middle name; DOB=Date of Birth; Prev Dist=previous district.

## Other Information for Entering Student Names into RITS Web

If a student already has a record in RITS, it is the receiving LEA's responsibility to update the record, not the previous Colorado LEA on the record. To ensure data accuracy, the existing RITS record should be updated soon after the student enrolls and begins attending the new LEA. RITS student records can be accessed in RITS Web until students reach the age of 23.



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## Guidance for Obtaining SASIDS for Various Types of Students

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### Charter School Students

For data accuracy purposes, it's a good idea for districts to work closely with their charter school counterparts and to provide them with training and clear directions on how to accurately submit data.

### Facility Students

Increasingly LEAs have questions about students in facilities. For most questions please direct those to the Facilities School Office at CDE.

- Please note that no SASID is needed for a student if that student is privately placed in the facility by parents. This is regardless of in-state or out-of-state residency.
- A district would request a SASID for a facility student if a facility is located within their boundaries and the student's parents' rights are terminated or if the parents are incarcerated, deceased or their whereabouts are unknown as well as if the student had a public placement into the facility. In other words, publicly placed students into facilities need SASIDS. Mark those students as non-attending.

\*See: <http://www.cde.state.co.us/facilityschools>.

### Foster Care Students

- Obtaining legal documentation for SASID requests can sometimes be challenging for this group of students. If there are issues with receiving needed documentation, your LEA's Child Welfare Education Liaison (CWEL) should be able to help. For more detailed information see: [http://www.cde.state.co.us/dropoutprevention/fostercare\\_legislationandguidance](http://www.cde.state.co.us/dropoutprevention/fostercare_legislationandguidance) or [http://www.cde.state.co.us/dropoutprevention/fostercare\\_index](http://www.cde.state.co.us/dropoutprevention/fostercare_index)
- A student in foster care can register at a new school even if they don't have all of the standard enrollment documents. Per Colorado law, the school district or school shall enroll the student in school within five school days after receiving the student's education information and records, regardless of whether: 1)The school district or school has received the student's certificate of immunization; 2)The student can comply with any requirements pertaining to the use of school uniforms or other clothing restrictions; or 3)The student can comply with any other pre-enrollment restrictions or requirements imposed by the school district or school. If these items are missing, the school or CWEL caseworker can work together to obtain missing documents.

\*Please note that under the Every Student Succeeds Act (ESSA) enrollment is immediately.

### Special Education (SPED) Students

- LEA's should work closely with their special education contacts at their assigned Administrative Unit (AU) to receive and submit needed information including information needed for SASIDS.
- Administrative Units, which could include a BOCES, need SASIDS if they are providing services to special education children who are not in a district school.
- Please note that a child can appear as early as infancy (code 002) in RITS due to being identified in Child Find which is a Special Education program.



- Districts which have private schools within their boundaries and have private school students who are parentally placed in private school and who are on an Individualized Service Plan (ISP) and receiving services from an AU are required to have a SASID.

## Online School Students

- For data accuracy purposes, it's a good idea for districts to work closely with their online school counterparts and to provide them with training and clear directions on how to accurately submit data.

## Transgender Students

Local education agencies (LEAs) are more frequently requesting technical assistance from the Colorado Department of Education (CDE) regarding how to handle transgender students within the Record Integration Transfer System (RITS). This document aims to assist districts in this effort. While school districts are required under federal and state laws to institute board policies that protect students from discrimination, bullying and harassment on the basis of multiple categorizations of individuals, including sexual orientation, this guidance is directed specifically to addressing RITS and the integration of gender nonconforming and transgender students. LEA board policies may already address the assignment of identifiers.

To assist in understanding how to obtain SASIDs for transgender students, definitions are provided below. Students might or might not use these terms to describe themselves.

Gender identity means an individual's "innate sense of one's own gender," (3 CCR 708-1, Rule 81.2(C)) a deeply held sense or psychological knowledge of one's own gender, regardless of the gender assigned at birth.

Transgender means those individuals "having a gender identity or gender expression that differs from societal expectations based on gender assigned at birth." (3 CCR 708-1, Rule 81.2(B))

Gender expression means "external appearance, characteristics, or behaviors typically associated with a specific gender." (3 CCR 708-1, Rule 81.2(D)) Gender expression is the way we communicate our gender identity to others.

Gender nonconforming describes people whose gender expression differs from stereotypical or prevailing social expectations, such as "feminine" boys, "masculine" girls, and those who are perceived as androgynous. The term gender variant is sometimes used.

All situations with transgender or gender nonconforming students should be handled on a case-by-case basis. In every decision, the school should consider the age of the student, the student's preferences, the student's maturity level, the age of other students and any other pertinent factors.

The Colorado Department of Education has no need to gather data on or report students by gender nonconforming or transgender status. Therefore district policies and practices surrounding identifier assignment may be upheld without the involvement of the state. The department recommends that LEAs honor the wishes of the student's own self-identification in terms of gender of record. LEAs may record within RITS a change in gender identity without documentation. LEAs are encouraged to make such a change between school years, rather than in the middle of a school year if the student is remaining within the same school unless there is an issue with safety or legality. A gender identity change may be made at any time for a student transferring to a different school. Regardless of the new gender



designation the originally generated Colorado State Assigned Student Identifier (SASID) must remain constant in order to track longitudinal progress.

The RITS system relies heavily on legal documentation for recording official student names. LEAs are encouraged to update RITS using name changes reflected within legal documentation if at all possible. Student information systems can be designed to have places for legally-given and preferred names. Privacy and confidentiality protocols should be applied. Local education agencies may want to specifically cover how name changes will be handled in any type of district policy or individual student plan that is developed. When a name is changed the assigned Colorado SASID must remain the same.

Student safety is of utmost importance. A safe and secure learning environment is essential. Changes may be made to student demographic information within the RITS system if extenuating circumstances indicate that the district, school, parent(s)/ guardian(s) or individual has a concern that the health and well-being of the student is threatened. However, LEAs should record the information being altered, (i.e., gender, first and middle names from the birth certificate) in a restricted area, either within the student information system or in a student file, to reference should RITS identification questions or other needs for the official name arise.

The 'Official Records' section of *"Guidance for Educators Working with Transgender and Gender Non-Conforming Students"* from CASE, CASB, CEA and One Colorado gives the following general advice regarding the recordation of transgender or gender nonconforming students:

The district is required to maintain a mandatory permanent student record, or "official record," that includes a student's legal name and legal gender. However, to the extent that schools are not legally required to use a student's legal name and gender on other school records or documents, schools are encouraged to use the name and gender preferred by the student. School districts should follow local school board policy in addressing requests to alter student records. If a district would revise a current or former student's records to reflect a change of name or marital status, then districts should process a student's request for a name change or gender status change in the same manner. It is not unlawful for a district to require all record revision requests to be supported by documentation of a court order or amendment of state or federally-issued identification. In situations where school staff or administrators are required by law to use or to report a transgender student's legal name or gender, such as for purposes of standardized testing, school staff and administrators should confer with students and, if a concern persists about disclosure of confidential information, should confer with legal counsel.

The Record Integration Transfer System can be updated without sending these students into case management. An LEA's RITS contact should make successive field changes to a student's record in RITS, one at a time. After each change, the update button should be pressed. These deliberate steps will allow the student to be updated without departmental case review and involvement.

The following resources were used to compile the transgender guidance contained within this document:

Boulder Valley School District, Policy Exhibit AC-E3, *Guidelines Regarding the Support of Student who are Transgender and Gender Nonconforming*

Colorado Association of School Executives, Colorado Association of School Boards, Colorado Education Association and One Colorado, *Guidance for Educators Working with Transgender and Gender Nonconforming Students*.



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## RITS Web

- System that contains SASIDS.
- Suitable for looking up a small number of students and for requesting SASIDS for a small number of students.
- Has separate access from RITS Pipeline.

## RITS READ Match Tool in Data Pipeline

- System for uploading spreadsheets and sending them to RITS Web to request SASIDS.
- May also be used to look up students and possible matches.
- Allows LEAS to search for many possible matches in the system, rather than looking for one student at a time.
- Better than RITS Web when requesting SASIDS for a large number of students.
- Helps the LEA to receive new SASIDS faster.
- Refer to File Layout and Definitions documents on RITS web page [http://www.cde.state.co.us/datapipeline/yr\\_rits](http://www.cde.state.co.us/datapipeline/yr_rits) for correctly submitting spreadsheets. Trainings can also be found at this link.

## RITS Batch in Data Pipeline

- System for uploading spreadsheets and sending them to RITS Web, allowing the LEAs to update RITS by submitting records that already have a SASID.
- Better than RITS Web when updating SASIDS for a large number of students.
- Refer to File Layout and Definitions documents on RITS web page [http://www.cde.state.co.us/datapipeline/yr\\_rits](http://www.cde.state.co.us/datapipeline/yr_rits) for correctly submitting spreadsheets. Trainings can also be found at this link.

## Misc.

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### Grade Level

- The first week of December the entire October Count Submissions for each district will be downloaded into RITS, it is at this time that grades will roll forward. The grade for that specific student will reflect what was reported on your October Count. If a student is entered in the RITS System after October Count then the grade will reflect what has been entered by the district.

## Glossary of Terms

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**AU**-Administrative Unit-a school district, board of cooperative services, a multi-district consortium approved by CDE or the State Charter School Institute, that is providing educational services to special education children and that is responsible for the local administration of these rules. All AUs shall be approved by the CDE.

**BOCES**-Board of Cooperative Educational Services- Frequently BOCES are a group of smaller districts that band together to use their collective for a better use of funds.

**CSI**-Charter School Institute-The Colorado Charter School Institute (CSI) is the state's only non-district charter school authorizer.

**DOB**-Date of Birth

**ESSA**-Every Student Succeeds Act-Federal Education Legislation

**FN**- First Name

**LASID**-Locally Assigned ID (e.g. student number in LEA's Student Information System)

**LEA**-Local Education Agency-can be a district, a BOCES, an AU, Charter School Institute, Colorado School for the Deaf and Blind etc.

**LN**-Last Name



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**MN**-Middle Name

**MSI**-Master Student Index-Notes the last time a RITS record was updated.

**PREV DIST**- Previous District

**RITS**-Record Integration Tracking System-assigns each student in the state of Colorado a unique student ID that will stay with the student for the life of their public school career

**SASID**-State Assigned Student ID-Random number assigned to students enrolled in a public LEA.

**SEA**-State Education Agency-The SEA in Colorado is the Colorado Department of Education.

**SIS**-Student Information System

**SPED**-Special Education