



# K-12 Education: Education Needs to Address Significant Quality Issues with its Restraint and Seclusion Data

GAO-20-345

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## Fast Facts

The Department of Education requires public school districts to biennially report incidents of restraint (restricting a student's movement) and seclusion (confining a student to a space alone).

Education's data quality checks may not catch misreporting or statistical outliers:

- 70% of districts reported 0 incidents of restraint and seclusion, but Education's quality check only applies to fewer than 100 large districts
- Education doesn't have a quality check for districts reporting relatively high incident rates like one that reported an average of 71 restraint incidents per student per year

Our [recommendations](#) are to improve data quality

**Seclusion Room in a Classroom**



Source: GAO photos. | GAO-20-345

## Highlights

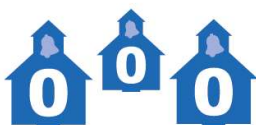
### What GAO Found

The Department of Education's (Education) quality control processes for data it collects from public school districts on incidents of restraint and seclusion are largely ineffective or do not exist, according to GAO's analysis of school year 2015-16 federal restraint and seclusion data—the most recent available.

Specifically, Education's data quality control processes were insufficient to detect problematic data in its Civil Rights Data Collection (CRDC)—data Education uses in its efforts to enforce federal civil rights laws (see figure). For example, one rule Education used to check the quality of data submitted only applied to very large

school districts, although GAO and Education's own analyses found erroneous reporting in districts of all sizes. Education also had no rules that flagged outliers that might warrant further exploration, such as districts reporting relatively low or high rates of restraint or seclusion. GAO tested for these outliers and found patterns in some school districts of relatively low and high rates of restraint or seclusion. Absent more effective rules to improve data quality, determining the frequency and prevalence of restraint and seclusion will remain difficult. Further, Education will continue to lack information that could help it enforce various federal civil rights laws prohibiting discrimination.

### Data Quality Issues GAO Identified in Department of Education 2015-16 CRDC Restraint and Seclusion Data



#### Erroneous "zero" reporting

70 percent of all districts reported zero incidents, but CRDC rule requiring districts to verify zeros only applied to 30 of the nation's 17,000 districts.



#### Relatively low rates of incidents

No rule exists to identify potential underreporting. We identified some very large districts that reported very low rates of restraint and seclusion.



#### Relatively high rates of incidents

No rule exists to identify high rates of restraint or seclusion. We identified some districts with relatively high rates of restraint and seclusion. Most serve high proportions of students with disabilities.



#### Illogical data submitted

Almost 600 schools reported more students restrained or secluded than incidents, but the rule to identify those cases only applied to less than 1 percent of schools.

Source: GAO analysis of Department of Education's Civil Rights Data Collection (CRDC) for school year 2015-16 data. | GAO-20-345

Note: All analyses used public-use file, except illogical data, which used a restricted-use file.

Officials in the nine school districts GAO visited lacked a common understanding of the CRDC's restraint and seclusion definitions. Similarly, officials GAO interviewed in all three state educational agencies (Kentucky, Washington, and Wisconsin) and all seven stakeholder groups expressed similar concerns about the clarity of these definitions. For example, officials inconsistently interpreted the word *alone* in the definition of seclusion and, therefore, on whether to count an incident if a teacher was in the room. Absent clearer definitions, Education will continue to lack quality information on restraint and seclusion in public schools.

Officials in school districts GAO visited identified several benefits to collecting these data, including identifying patterns in student behavior and developing interventions that can reduce the need for restraint and seclusion. Officials also

said that analyzing their data helped them identify needs for additional staff training and student support services.

## Why GAO Did This Study

Every 2 years, Education requires nearly all school districts to report incidents of restraint and seclusion. Generally, restraint is restricting a student's ability to move, and seclusion is confining them alone in a space they cannot leave.

The House Committee on Appropriations' explanatory statement accompanying the Consolidated Appropriations Act of 2018 included a provision for GAO to evaluate the CRDC's restraint and seclusion data. This report examines (1) the effectiveness of CRDC data quality control procedures, (2) selected districts' interpretation of CRDC's restraint and seclusion definitions, and (3) selected districts' use of data. GAO analyzed CRDC's quality control processes for school year 2015-16, and interviewed officials from seven stakeholder groups and over 50 school and district officials in three states. GAO selected states, districts, and schools to obtain a range of perspectives on using restraint and seclusion data and interpreting CRDC definitions of restraint and seclusion. Selection criteria included changes in reported incidents year to year and laws requiring districts to report incidents to states.

## Recommendations



GAO made six recommendations, including that Education expand its CRDC business rules to cover all districts, develop additional quality controls to address misreporting, address factors underlying misreporting, and refine and clarify its definitions. Education agreed with these recommendations.

### Recommendations for Executive Action

Agency Affected	Recommendation	Status
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Office for Civil Rights for the

The Assistant Secretary for the Office for Civil Rights

 Closed - Implemented  




Agency Affected	Recommendation	Status
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<p>Department of Education</p>	<p>should revise its CRDC business rule to require that every school district reporting zeros, regardless of district size or numbers of students with disabilities, affirm the zeros are correct during the CRDC data submission process. (Recommendation 1)</p>	<p>Education agreed with this recommendation. In June 2022, the agency provided documentation that it had enhanced its CRDC submission system by requiring every school district reporting zeroes in the restraint and seclusion module to affirm that the zeroes were correct.</p>
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Office for Civil Rights for the Department of Education

 **Priority Rec.** 

The Assistant Secretary for the Office for Civil Rights should develop and implement a CRDC business rule that targets schools and school districts that report very low numbers of incidents and set data-driven thresholds to detect such incidents. (Recommendation 2)

 **Closed - Implemented**  


Education agreed with this recommendation. As of June 2022, the agency developed a responsive business rule that targets schools and school districts based on data analysis of prior years' submissions. The agency set data-driven thresholds so that the user receives an error message if the rate of restraint or seclusion incidents fall below the set threshold.

Agency Affected	Recommendation	Status
<p>Office for Civil Rights for the Department of Education</p>	<p> <b>Priority Rec.</b> </p> <p>The Assistant Secretary for the Office for Civil Rights should develop and implement a CRDC business rule that targets schools and schools districts that report very high number of incidents and set data-driven thresholds to detect such incidents. (Recommendation 3)</p>	<p> <b>Closed - Implemented</b> </p> <p>Education agreed with this recommendation. As of June 2022, the agency developed a responsive business rule that targets schools and school districts based on data analysis of prior years' submissions. The agency set data-driven thresholds so that the user receives an error message if the rate of restraint or seclusion incidents fall above the set threshold.</p>
<p>Office for Civil Rights for the Department of Education</p>	<p>The Assistant Secretary for the Office for Civil Rights should apply the CRDC business rule targeting illogical data at the school level to all schools, regardless of the number of incidents reported. (Recommendation 4)</p>	<p> <b>Closed - Implemented</b> </p> <p>Education agreed with this recommendation and implemented it. As of June 2022, the agency developed a responsive business rule based on data analysis of prior years' submissions. The user receives an error message if there is a logical inconsistency between the number of students subjected to restraint and seclusion and the number of incidents, regardless of the number of incidents reported.</p>
<p>Office for Civil Rights for the Department of Education</p>	<p> <b>Priority Rec.</b> </p> <p>The Assistant Secretary for the Office for Civil Rights should identify the factors that cause underreporting and misreporting of</p>	<p> <b>Closed - Implemented</b> </p> <p>Education agreed with this recommendation and stated that it would determine the best means to implement it. In</p>

Agency Affected	Recommendation	Status
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restraint and seclusion and take steps to help school districts overcome these issues. (Recommendation 5)

February 2023, Education reported that its Office for Civil Rights is developing a plan to engage some districts in a series of listening sessions in order to help determine what is driving the under and misreporting . As of August 2024, Education had solicited feedback during a panel at a public conference in the previous year, in August 2023. Education conducted a separate listening session with data submitters from 9 districts in September 2023. Education also reviewed the questions users had when they contacted the CRDC support center. Using this information, Education...

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Office for Civil Rights for the Department of Education

The Assistant Secretary for the Office for Civil Rights should further refine and clarify federal restraint and seclusion definitions and take steps to ensure that this information is conveyed to school districts. This could include providing common classroom scenarios that highlight the differences between a restraint and an escort, and a time out and a seclusion. (Recommendation 6)

✔
Closed – Implemented

Education agreed with this recommendation. In summer 2021, Education's Office for Civil Rights (OCR) conducted listening sessions with school administrators, teachers, education groups, advocacy organizations, and other stakeholders to obtain feedback on the Civil Rights Data Collections (CRDC) definitions of mechanical restraint, physical restraint, and seclusion. Based on that feedback, OCR developed revised definitions and included those revisions in the 2021-22 CRDC Information Collection Request package, which was published in the

Agency Affected	Recommendation	Status
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Federal Register for public comment. On April 18, 2023, the U.S. Office of Management and Budget approved OCR's proposed information collection request...


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## Full Report

- [Highlights](#)  
Page (1 page).
- [Full Report](#)  
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