

**3. OMB Comment #3: (supp. statement, Item 15) All of the burden change (-12,286 hours) is reported in ROCIS as a program change. However, from the explanation provided in the supporting statement (pasted below), some of the change should be an adjustment and some should be a program change. Please break this out so we can adjust ROCIS accordingly. Additionally, this is a sizeable burden reduction for this collection (almost half of previously approved burden). Since only one SEA has submitted its data through EDFacts, I imagine that most of the burden reduction must come from the other sources. Please submit a chart that outlines the amount of burden reduction attributed to each of the causes and an explanation of how ED arrived at each figure.**

OSDFS Response: After careful review, we have determined that our response to Item #15 of the supporting statement was not accurately articulated. It is because of the direction ED is moving to collect data and transition states into submitting data via EDEN that the following program adjustment was made:

Total Burden Change

Type of Burden Change	Estimated Hours	Explanation
<p><b>Program Adjustment</b></p> <p><i>Cause: Change due to a reduction in the number of respondents (SEAs, LEAs, large LEAs and other LEAs) and the amount of time estimated to prepare and submit this form.</i></p>	-12,286	Total number of respondents and estimated number of hours to prepare and submit the report was reduced from the previous submission. This determination was based on a survey of States conducted by the EDEN team and because respondents have established data collection systems that now include data from the GFSA report. As a result, SEAs and LEAs require less time to to prepare and submit their GFSA report.
<b>Total Burden Change</b>	-12,286	