

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION**

OMB No. 1810-NEW

MIGRANT EDUCATION PROGRAM (MEP)

**MIGRANT STUDENT INFORMATION EXCHANGE (MSIX) & MINIMUM DATA
ELEMENTS**

[8/13/07 Version Reflects Public Comments Received for 60-day Notice Issued 5/30/07]

A. Justification

Q1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

A1. The U.S. Department of Education (ED) is requesting approval of a new information collection that is necessary to implement statutory requirements for data collection under the Title I, Part C Migrant Education Program (MEP). The collection is necessary to establish a set of minimum data elements to be collected and transferred between State migrant education programs as part of a larger mandated Migrant Student Information Exchange (MSIX). The MEP is authorized under sections 1301-1309 of Part C of Title I of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind (NCLB) Act. The MSIX and the minimum data elements (MDEs) are authorized specifically under Section 1308(b).

The information collection addresses the following statutory requirements:

Section 1304(b)(3) which requires State Education Agencies (SEAs) to promote interstate and intrastate coordination by providing educational continuity through the timely transfer of pertinent school records (including health information) when children move from one school to another, whether or not the move occurs during the regular school year.

Section 1308(b)(1) which requires the ED to assist the SEAs in providing for the electronic transfer of migrant student records.

Section 1308(b)(2) which requires the ED, in consultation with the SEAs, to: ensure the linkage of migrant student record systems for the purpose of electronically exchanging health and educational information regarding migrant children among States; and determine the minimum data elements that each SEA shall collect and maintain for electronic exchange.

Section 1309(2) which provides the statutory definition of a migratory child. A total of 656,874 children -- ages 0-21 -- are eligible as reported by the States in the 205-06 Comprehensive State Performance Report (CSPR).

A copy of the relevant sections of Title I, Part C of ESEA is attached to this supporting statement as an electronic file named [Applicable Statutory Requirements.doc](#).

In response to Section 1308(b)(1), ED's Office of Migrant Education (OME) awarded a contract on September 30, 2006 to provide software design, development, implementation and maintenance for the MSIX system. The Department is supporting two pilot implementations during Fiscal Year 2007. Full implementation is scheduled to occur in late September 2007.

The MSIX system will provide the technology that will allow all States to share educational and health information on migrant children who travel from State to State and who, as a result, have student records in multiple States' information systems. The MSIX will work in concert with the existing migrant student information systems that States currently use to manage their migrant data to fulfill their sec. 1304(b)(3) responsibilities to ensure the appropriate enrollment, placement, and accrual of credits for migrant children nationwide.

In order to meet the sec. 1304(b)(3) requirements, the 49 SEAs participating in the MEP must request the records of eligible migrant children who arrive in their State or district and must transmit records of those migrant children who move out of their State or district to another location in a timely manner. The Department has been in consultation with the SEAs since 2002 to identify the appropriate set of "Minimum Data Elements" (MDEs) needed to fulfill the statutory requirements for records exchange. The consultation process has resulted in a set of 66 defined MDEs that can be retrieved electronically among all 49 States, relying to the maximum extent practicable on existing SEA information systems as the source of data that can be exchanged nationally. A document with descriptions for the MDEs is attached as [Approved MDE.pdf](#).

Q2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

A2. The information to be collected and maintained in MSIX is about individual migrant children who participate in the MEP and will be used by SEAs, migrant student educators, MEP personnel, school registrars, and school guidance counselors to retrieve consolidated educational and health information among all States on migrant children who move across district and state boundaries because of their migrant lifestyle.

The information collection will be conducted by SEAs who will collect, enter, and transmit MDEs digitally to the MSIX. New data collection for MSIX will be required for only 26 of the 66 MDEs; the rest will be available to the SEAs through other required data collections. In addition to the burden of collecting the new data, this information collection request also includes the burden estimate for maintaining, transmitting, and archiving all applicable MDEs in an electronic format as required by MSIX.

New data collection is needed for only some of the MDEs because 40 MDEs are collected through other sources, including the separately-approved information collections for the MEP Regulations and the Certificate of Eligibility (COE) and the Education Data Exchange Network (EDEN). The MDEs also include common business information from State or District computer systems. An example of a common business data item would be the *School Identifier Code* assigned by the State or District computer system.

Information reporting by SEAs will be required as follows:

Reporting Activity	Description	Timeframe
Initial Enrollment	Collect, maintain, and transmit all applicable MDEs	Within 10 days of the date the child is initially identified as eligible for the MEP
Semester, Trimester, or Summer/ Intersession Update	Collect, maintain, and transmit all applicable MDEs	Within 30 days of the end of the school or program term
MEP Child Update	Collect, maintain, and transmit all applicable MDEs for a child based on a child's interstate move	Within 4 days of a MSIX request for data based on a child's interstate move

The purpose of this new information collection is to enable MSIX to enhance the continuity of services for migrant children by providing a mechanism for the 49 SEAs participating in the MEP to exchange educational and health related information on migrant children who move from one State to another.. Pursuant to sec. 1308 of the ESEA, the new information requested will enable SEAs to exchange a minimum set of data elements that have been identified as necessary for fulfilling the requirements of the MEP for continuity of instruction. It is anticipated that the information made available through this collection will enable SEAs to reduce educational disruptions for migrant children, provide information needed for school placements, ensure academic credit for school work completed, streamline academic progression toward graduation requirements, and provide complete academic records needed for postsecondary education and employment opportunities. It is also anticipated that the existence and use of the MSIX will help to reduce incidences of unnecessary immunizations of migrant children because of a lack of timely, accurate health information, and facilitate the timely accrual of credits for secondary migrant students by providing accurate academic information on the student's courses and academic progress.

Q3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

A3. The information collection requires SEAs to transmit the MDEs as electronic information to the Department's MSIX system. Virtually all SEAs are already using automated information systems to collect, analyze and maintain information on migrant children, and to the extent consistent with digital information exchange requirements, SEAs may continue to use existing automated systems for collecting, maintaining, transmitting, and archiving the MDEs.

Q4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

A4. As noted in A2 above, we are aware that the some of the MDEs are already collected by States, and we will harvest and use these data for the MSIX. The information collected by the MSIX system is unique to each child enrolled in the MEP and, while some of the data are collected and available by States, they are not all collected or available for interstate information exchange on a national basis (and in a cross-State consolidated student file) through any other source. The MSIX information collection will not duplicate (or otherwise include) the burden of other information collections. Burden associated with the MDEs available from other authorized collections including COE and EDEN will not be duplicated, but States will be required to maintain and transmit the entire data set for MSIX.

Q5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

A5. Small businesses are not impacted by this data collection.

Q6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

A6. If the collection is not conducted, ED will be unable to carry out its statutory requirements under sec. 1308 of the ESEA. Additionally, SEA grantees of the MEP would be hindered in determining the educational and health status of migratory children who move between States, making prompt and appropriate educational placements, and providing for a continuity of services for migrant children. In addition, migrant children may be at risk of omitted or unnecessary immunizations. Secondary students may be unable to document coursework that could be important for graduation, entry into postsecondary education, or employment opportunities.

Q7. Explain any special circumstance that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

A7. Migratory moves by children throughout the school year provide special circumstances for expedited data collection. Sec. 1308(b)(2)(B) requires that SEAs shall provide “immediate access” to the required MDEs. ED and its contractors have determined, after some consultation with intended users among the State and local MEP staff, that this statutory requirement can best be achieved by an SEA transmitting applicable MSIX initial enrollment data to the Department within 10 days of determination that a child is eligible for the MEP, and within 4 days of a MSIX request by another State for data based on a child’s interstate move. It is anticipated that all other information collection requirements will conform to 5 CFR 1320.5, including the requirement for SEAs to provide updated information about children within 30 days of the end of each semester, trimester, intersession, or summer session.

Consultation with the States has revealed that not all States are ready to transmit each of the 66 MDEs initially when the MSIX becomes operational. Although the Department encourages States to submit all of the MDEs that currently reside in their migrant student databases and the Department is ready to accept all MDEs from the beginning of the information collection period, to minimize the burden on SEAs to provide all of the MDEs to the MSIX when it initially becomes operational, the Department will require States to submit the MDEs in three phases. The first phase is scheduled to begin on October 1, 2007; the second phase will begin January 1, 2008; the third phase will begin April 1, 2008.

During MSIX Phase 1, SEAs will be required to transmit the following basic demographic data elements on each eligible migrant child (See: Approved MDE - Simple List.pdf for complete details on MDEs):

Basic Student Information and Demographics:

Category	MDE No.	MDE Name
Student Information:	1	MSIX Identification Number
	2	State Student Identifier
	3	State Student Identifier Type
	4	First Name
	5	Middle Name
	6	Last Name 1
	7	Last Name 2
	8	Suffix
	9	Sex
	10	Birth Date
	11	Multiple Birth Flag
	12	Birth City

13	Birth State
14	Birth Country
15	Birth Date Verification
16	Male Parent First Name
17	Male Parent Last Name
18	Female Parent First Name
19	Female Parent Last Name
20	Qualifying Arrival Date
21	Qualifying Move From City
22	Qualifying Move From State
23	Qualifying Move From Country
24	Qualifying Move To City
25	Qualifying Move To State
26	Eligibility Expiration Date

School/Project Enrollments:

28	Enrollment Date
29	Enrollment Type
30	School-Project Name
31	MEP Project Type
32	School Identification Code
33	Facility Name
34	Facility Address 1
35	Facility Address 2
36	Facility Address 3
37	Facility City
38	School District
39	Facility State
40	Facility Zip
41	Telephone Number
42	Grade Level
43	LEP Indicator
44	IEP Indicator
45	Continuation of Services Reason
46	Med Alert Indicator
47	PFS Flag
48	Designated Graduation School
49	Withdrawal Date

During MSIX Phase 2, SEAs will be required to transmit the following health and assessment data elements on each eligible migrant child:

Health and Assessment Information:

<u>Category</u>	<u>MDE No.</u>	<u>MDE Name</u>
Immunizations:	27	Immunization Flag

Assessments:

50	Assessment Title
51	Assessment Content
52	Assessment Type
53	Assessment Administration Date
54	Assessment Reporting Method
55	Score Results
56	Assessment Interpretation

During MSIX Phase 3, SEAs will be required to transmit the following course history data elements on each eligible secondary migrant child:

Course History Information:

Category	MDE No.	MDE Name
Course History:	57	Course Title
	58	Subject Area Name
	59	Course Type
	60	Academic Year
	61	Course Section
	62	Term Type
	63	Clock Hours
	64	Grade-to-Date
	65	Credits Granted
	66	Final Grade

During all three MSIX phases, SEAs must continue to submit all applicable MDE on each migrant child according to the timeframes discussed in this notice.

Q8. If applicable, provide a copy and identify the date and page number of publication in the FEDERAL REGISTER of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A8. A 60-day notice inviting public comment on this proposed Information Collection was published in the Federal Register on 05/30/07 at 72 FR 29994. Comments were received from 4 individuals or organizations. A summary of the comments and the Department's responses to the comments can be found in the attachment titled "MDE Comment Responses 8-14-07 v2." The following is a summary of the decisions made by the Department: reduced MDEs from 73 to 66; added a new burden category for near matches; eliminated burden associated with collecting specific immunization information in the form of a simple flag to indicate whether or not all immunizations for a student are available. A 30-day notice was published in the Federal Register on 08/03/07 soliciting further public comments.

In addition to the requests for public comment issued regarding this specific information collection package, please note that the proposed MDEs for MSIX were developed over several years and, as such, reflect considerable input from State and local MEP staff as to information deemed essential to support the continuity of services to interstate and intrastate migratory children. The consultation activities are required by Sec.1308(b) of the ESEA. The information collection is a culmination the Department's years of activities to gain input from the States, local districts, migrant program educators, counselors, and other stakeholders.

On April 12, 2000, ED formed the Common Data Element (CDE) Committee comprised of 12 members who were nominated by the State Directors of Migrant Education and charged with recommending a set of minimum common data elements that would provide essential information for use by teachers, counselors, and other migrant education personnel. The identified elements recommended by the Committee were intended to support activities that would increase the rate of high school completion for interstate secondary migrant students since studies had identified information on secondary credit accrual

as one of the most critical challenges for interstate coordination. The group met four times over a period of six months and identified a preliminary list of data elements needed to support the enrollment, grade/course placement, and credit accrual of migrant students.

The CDE Committee determined that the primary purposes of a record linking system for exchanging migrant student records are to provide school and migrant education personnel with the data essential to facilitate (1) the timely enrollment of school-age migrant children, (2) the placement of migrant children in the appropriate grade level and courses of instruction, and (3) for secondary students only, the accrual of course credits needed to graduate from high school.

In May 2002, ED published a notice in the Federal Register¹ announcing the proposed requirements for the MDE that a State would collect and maintain for the purpose of electronically exchanging educational and health information for all migratory students. A copy of the notice is available as [FedReg 5-28-02.pdf](#).

In the September 2002 Report to Congress, entitled “Maintenance and Transfer of Health and Educational Information For Migrant Students by the States,” one of ED’s major findings regarding the data elements was that a consensus does not exist within the migrant education community on maintaining the MDE necessary to facilitate the proper and timely school enrollment, grade and course placement, and credit accrual of migrant students. The area causing the most concern was the need to collect and maintain data elements specific to course placement and credit accrual decisions for secondary migrant students.

ED also conducted a series of eleven focus groups to solicit reactions to the usefulness and applicability of the MDEs from the primary users of the information—guidance counselors or MEP staff functioning as counselors. The draft reports, submitted by the focus groups to ED on February 24, 2003, indicated that they generally believed that the collection of the data was important and that the right set of data elements were requested, although some of the data elements may not be readily available.

Additional State consultations occurred as depicted in the chart below. This input was used to derive the current list of data elements as well as their definitions and gather input for the MSIX requirements that would best meet the State’s needs.

	Date	State Consultation with ED
1	October 25 – 26, 2004	Consulted with Texas
2	November 15 – 16 2004	User Group Meeting #1 - Washington, D.C. - Consulted with 50 State representatives
3	November 2004	New Director's Meeting - MSIX Discussion - Consulted with approx. 30 State representatives
4	November 17, 2004	Meeting with 30 State IT Representatives
5	November 18, 2004	Consulted with Pennsylvania
6	December 20, 2004	Industry Day - RFI Meeting with Potential Bidders - Over 100 participants
7	January 2005	Annual State Director's Meeting - MSIX discussion
8	January 11 – 12, 2005	Consulted with Washington State
9	January 13 – 14, 2005	Consulted with Oregon

¹ Federal Register / Vol. 67, No. 102 / May 26, 2002 / Notices.

10	January 25 - 26, 2005	User Group Meeting #2 - Atlanta, GA - Consulted with approx. 20 State representatives
11	April 4 – 5, 2005	CA Meeting with COEstar and WestEd
12	November 2005	New Director's Meeting - MSIX Discussion - Consulted with approx. 30 State representatives
13	January 2005	Annual State Director's Meeting - MSIX discussion; Consulted with approx. 50 State representatives
14	November 2006	User Group Meeting #3 - Consulted with several State representatives
17	November 2006	New Director's Meeting - MSIX Discussion - Consulted with approx. 30 State representatives
15	January 2007	User Group Meeting #4 - Consulted with several State representatives
16	March 2007	User Group Meeting #5 - Consulted with several State representatives
18	January 2007	Annual State Director's Meeting - MSIX discussion; Consulted with approximately 50 State representatives
19	May 2007	National Association of State Directors of Migrant Education (NASDME) Meeting - MSIX Update and discussion
20	June 2007	User Group Meeting #6 - Consulted with several state representatives

Recent correspondence to the SEAs regarding the minimum data elements and the MSIX has included a letter to Chief State School Officers ([chiefstateletter.pdf](#)) on December 12, 2006 and a Memorandum to State Directors of Migrant Education ([statememo-20061218.pdf](#)) on December 18, 2006.

Q9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

A9. No gifts or payments to be made to respondents.

Q10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulations, or agency policy.

A10. All persons who access the information must accept and sign the MSIX Rules of Behavior, which is a detailed description of the safeguards that each system user must follow to protect the privacy and security of the information. The Rules of Behavior ([MSIX Rules of Behavior.pdf](#)) require compliance with the confidentiality standards in the Privacy Act of 1974 as amended. A Privacy Impact Assessment ([MSIX PIA.pdf](#)) is published online. The Department will publish a System of Records Notice for MSIX in the near future.

Q11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

A11. The regulations do not require any questions of sensitive nature in this collection of information.

Q12. Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden*

hours for customary and usual business practices.

- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
- Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

A12. Estimated hour burden for the collection of information.

Amortized over three years, we estimate that it will require a total of 7,806 hours per SEA respondent on an annualized basis to complete the requirements of this information collection. There are 49² participating SEAs. MEP enrollment varies greatly among the States, and we have also estimated the overall burden as 582 hours annually per 1,000 enrolled children in MEP as a means for enabling individual SEAs to assess the impact of the information collection burden.

Amortized over three years, we estimate that it will require approximately 4,230 hours per SEA respondent on an annualized basis to address the requirements of Initial Enrollment. We estimate that it will require 2,861 hours per State to address the requirements of Semester, Trimester, or Summer/Intersession updates. We estimate that it will require 715 hours per State to address the requirements of providing 4-day updates regarding eligible children who have moved on an interstate basis.

Amortized over three years, the annualized information collection burden is estimated at 382,508 hours for all requirements and all SEA respondents. These estimates were developed by program staff with prior experience in the State-level administration of the MEP. (See the tabular summaries below for a fuller explanation of the calculations.)

Total Burden Hours

By Reporting Timeframe	Annualized Burden Hours for All Respondents
Initial Enrollment with 10-Day Reporting	207,274
Semester, Trimester, or Summer/Intersession Update	140,187
MEP Child Update	35,047
ANNUALIZED TOTAL FOR ALL SEAs	382,508
Average Hours per SEA	7,806
Average Person Years per SEA (at 2,080 hours each year)	3.8
Average Hours per 1,000 Enrolled Children (of 656,874 Children)	582

² We estimate 49 SEAs since, as of FY 2006, Rhode Island, the District of Columbia and Puerto Rico are no longer participating in the MEP.

Initial Enrollment with 10-Day Reporting

Initial Enrollment with 10-Day Reporting	Frequency of response	# of Respondents	Average # of Hours per Respondent	Total Hours Over Three Years	Description
Data Collection	Upon determination of a child's eligibility for MEP	49 SEAs	2,711	132,823	This estimate includes time required for SEA staff to collect information from schools and programs with migrant children regarding educational and health status data about individual children. The data must be submitted within 4 days of determination of eligibility.
Data Entry	Upon determination of a child's eligibility for MEP	49 SEAs	2,813	137,854	Effort to key data into a computer system.
Data Maintenance, Transmission, Archiving, Multiple Moves, and IT Overhead	Upon determination of a child's eligibility for MEP	49 SEAs	5,524	270,678	This estimate includes the effort to maintain, transmit, and archive data as well as provide IT support for the information collection process.
Record Matching	Upon determination of a child's eligibility for MEP	49 SEAs	1,642	80,467	This estimate includes the effort to review, compare and match multiple records to ensure the unique identification of a student. Assumes 3% of population and 5 minutes on average to resolve each near match.

Total Over Three Years for Initial Enrollment	(Hours)	49 SEAs	12,690	621,823	Hours: Total for three years.
	(Person Years, based on 2080 hours)		6.1	298.95	Person Years: Total for three years.
Annualized Average	(Hours)	49 SEAs	4,230	207,274	Hours: Annualized average.
	(Person Years, based on 2080 hours)		2.03	99.65	Person Years: Annualized average.

Semester, Trimester, or Summer / Intersession Update

Semester, Trimester, or Summer / Intersession Update	Frequency of response	# of Respondents	Average # of Hours per respondent	Total Hours	Description
Data Collection	Recurring Update: Per School Semester, Term, or Summer/ Intersession Period	49 SEAs	2,115	103,631	This estimate includes time required for SEA staff to collect and update information about enrolled children from LEAs and programs after each semester or program period.
Data Entry	Recurring Update: Per School Semester, Term, or Summer/ Intersession Period	49 SEAs	2,177	106,649	Effort to key data into a computer system.
Data Maintenance, Transmission, Archiving, Multiple Moves, and IT Overhead	Recurring Update: Per School Semester, Term, or Summer/ Intersession Period	49 SEAs	4,291	210,280	This estimate includes the effort to maintain, transmit, and archive data as well as provide IT support for the information collection process.

Total Over Three Years for Semester, Trimester, or Summer / Intersession Update	(Hours)	49 SEAs	8,583	420,560	Total for three years. Burden is at the same level for each of the three years.
	(Person Years, based on 2080 hours)		4.13	202.19	Total for three years. Burden is at the same level for each of the three years.
Annualized Average	(Hours)	49 SEAs	2,861	140,187	Annualized average.
	(Person Years, based on 2080 hours)		1.38	67.4	Annualized average.

MEP Child Update

MEP Child Update	Frequency of response	# of Respondents	Average # of Hours per respondent	Total Hours	Description
Data Collection	Update as Required by Child Interstate Move	49 SEAs	529	25,908	This estimate includes time required for SEA staff to collect information from schools and programs regarding eligible children who have moved on an interstate basis. The data must be available within 4 days after determination of eligibility.
Data Entry	Update as Required by Child Interstate Move	49 SEAs	544	26,662	Effort to key data into a computer system.
Data Maintenance, Transmission, Archiving, Multiple Moves, and IT Overhead	Update as Required by Child Interstate Move	49 SEAs	1,073	52,570	This estimate includes the effort to maintain, transmit, and archive data as well as provide IT support for the information collection process.

Total for MEP Child Update	(Hours)	49 SEAs	2,146	105,140	Hours: Total for three years. Burden is at the same level for each of the three years.
	(Person Years, based on 2080 hours)		1.03	50.55	Person Years: Total for three years. Burden is at the same level for each of the three years.
Annualized Average	(Hours)	49 SEAs	715	35,047	Hours: Annualized average.
	(Person Years, based on 2080 hours)		0.34	16.85	Person Years: Annualized average.

Estimates of Annualized Burden to SEA Respondents:

Initial Enrollment. The annualized burden of the requirement for States to provide Initial Enrollment information for MEP-eligible children is estimated at 207,274 hours per year. Enrollment is an ongoing process with children entering and exiting a State’s program during all applicable years.

Semester, Trimester, or Summer/Intersession Update. The annualized burden of the requirement for updating information within 30 days after each educational term (semester, trimester, or summer/ intersession period) for all enrolled MEP children is estimated at 140,187 hours per year. This is an ongoing process, and the burden remains at a constant level in each of the three years.

MEP Child Update. The annualized burden of the requirement for States to provide updated information for MEP-eligible children who have moved on an interstate basis is estimated at 35,047 hours per year. This is an ongoing process, and the burden remains at a constant level in each of the three years.

Additional information about the basis of the burden estimates is available in a supplementary document, available as [MSIX_MDEs.pdf](#), which lists all 66 MDEs and identifies the 26 that will require data collection and entry. Spreadsheet details about the burden estimate are in another attachment, available as [MDE List for Burden Estimate\(83I\).xls](#).

There are 66 MDEs required for MSIX. Of these, data collection and entry are required for 26 elements. The remaining data elements are collected and entered through other means such as for EDEN or the MEP's Certificate of Eligibility, but they are included in the estimate of indirect costs for data maintenance, updating, and transmission. Burden was estimated per data element in seconds and assumes that most data collection, maintenance, and related activities would be organized into each State's ongoing process for information, collection, recordkeeping, and data processing. For example, all new enrollees in a MEP might normally be processed at the same time. Also, certain data element groups require multiple entries--such as Course Type records, which could entail up to 44 occurrences of entry. These variations have been included in the estimates and included in the list of MDEs identified in our response to Question 1.

Our calculations are based on 2,080 hours (or 260 days) per person year.

Estimates of Annualized Cost to SEA Respondents:

Amortized over three years, the overall annualized cost nationally is \$10,067,604. Divided by 49 SEAs, the average cost per respondent is \$205,461. The calculations use an average cost of \$26.32³ an hour for all SEA respondents involved in collection, entry, maintenance, archiving, and IT systems. Using the break-down of hours presented above, the estimated costs are as follows:

By Reporting Timeframe	Annualized Burden Hours for All Respondents	Annualized Cost Nationally @ \$26.32	Cost per SEA @ \$26.32
Initial Enrollment with 10-Day Reporting	207,274	\$5,455,459	\$111,336
Semester, Trimester, or Summer/Intersession Update	140,187	\$3,689,716	\$75,300
MEP Child Update	35,047	\$922,429	\$18,825
ANNUALIZED TOTAL FOR ALL SEAs	382,508	\$10,067,604	\$205,461
Average Hours per 1,000 Enrolled Children (of 656,874 Children)	582		\$15,318

³ The Mean hourly earnings value for State and Local Government white collar occupations of \$26.32 is based on U.S. Bureau of Labor Statistics National Compensation Survey: Occupational Wages in the United States, June 2005 (Bulletin 2581).

Initial Enrollment with 10-Day Reporting

Initial Enrollment with 10-Day Reporting	Average # of Hours per Respondent	Total Hours Over Three Years	Nationally		Per SEA	
			Person Years	Cost @ \$26.32 per Hour	Person Years	Cost @ \$26.32 per Hour
Data Collection	2,711	132,823	63.86	\$3,495,914	1.30	\$71,345
Data Entry	2,813	137,854	66.28	\$3,628,329	1.35	\$74,048
Data Maintenance, Transmission, Archiving, Multiple Moves, and IT Overhead	5,524	270,678	130.13	\$7,124,243	2.66	\$145,393
Record Matching	1,642	80,467	38.69	\$2,117,891	0.79	\$43,222
Total Over Three Years for Initial Enrollment	12,690	621,823	298.95	\$16,366,377	6.10	\$334,008
Annualized Average	4,230	207,274	99.65	\$5,455,459	2.03	\$111,336

Semester, Trimester, or Summer / Intersession Update

Semester, Trimester, or Summer / Intersession Update	Average # of Hours per respondent	Total Hours	Nationally		Per SEA	
			Person Years	Cost @ \$26.32 per Hour	Person Years	Cost @ \$26.32 per Hour
Data Collection	2,115	103,631	49.82	\$2,727,563	1.02	\$55,665
Data Entry	2,177	106,649	51.27	\$2,807,011	1.05	\$57,286
Data Maintenance, Transmission, Archiving, Multiple Moves, and IT Overhead	4,291	210,280	101.10	\$5,534,574	2.06	\$112,950
Total Over Three Years for Semester, Trimester, or Summer / Intersession Update	8,583	420,560	202.19	11,069,147	4.13	225,901
Annualized Average	2,861	140,187	67.40	3,689,716	1.38	75,300

MEP Child Update

MEP Child Update	Average # of Hours per respondent	Total Hours	Nationally		Per SEA	
			Person Years	Cost @ \$26.32 per Hour	Person Years	Cost @ \$26.32 per Hour
Data Collection	529	25,908	12.46	\$681,891	0.25	\$13,916
Data Entry	544	26,662	12.82	\$701,753	0.26	\$14,321
Data Maintenance, Transmission, Archiving, Multiple Moves, and IT Overhead	1,073	52,570	25.27	\$1,383,643	0.52	\$28,238

Total Over Three Years for MEP Child Update	2,146	105,140	50.55	\$2,767,287	1.03	\$56,475
Annualized Average	715	35,047	16.85	\$922,429	0.34	\$18,825

Q13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

A13. The only costs to respondents are those shown above for staff time for data collection, data entry, and certain other activities. The other activities include data maintenance, transmission, archiving, responding to the possibility of multiple moves during the school year, and IT overhead. SEAs already collect many of the data elements, and most have information systems in place. There should be no additional record-keeping costs beyond those covered under customary and usual business practices

Q14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

A14. Estimated annualized Federal cost:

We estimate the annualized Federal Cost to collect, maintain and transmit the MDEs through the MSIX system to be \$2,382,637 calculated as follows:

	ED Staff Time in Government FTEs	ED Staff Time Costs (Loaded with Benefits, 3% increase annually)	MSIX Contract Costs	Totals
FY 2006		\$0	\$5,919,975	\$5,919,975.00
FY 2007	2.20	\$264,440	\$1,997,522.23	\$2,261,962.23
FY 2008	2.20	\$272,373	\$1,777,688.80	\$2,050,061.80
FY 2009	2.20	\$280,544	\$1,585,051.24	\$1,865,595.43
FY 2010	2.20	\$288,961	\$1,611,638.56	\$1,900,599.08
FY 2011	2.20	\$297,629	\$0.00	\$297,629.33
Total		\$1,403,947	\$12,891,876	\$14,295,823
Annualized Federal Cost including development and full operation		\$233,991	\$2,148,646	\$2,382,637

The cost of the MSIX system includes development funded in Fiscal Year 2006 and implemented in Fiscal Year 2007. Funding in Fiscal Years 2007 through 2010 pays for acquisition and maintenance until the contract expires on September 29, 2011.

The cost of Federal personnel time is estimated at \$120,200 per full-time person per year in Fiscal Year 2007. The Federal personnel cost is based on a GS-13 in an intermediate pay step who works in the Washington, DC area, and it is fully loaded with the cost of fringe benefits. The annual cost as been escalated at a rate of 3 percent per year as an adjustment for possible cost of living increases to Federal pay. Federal personnel cost is extended through Fiscal Year 2011 because contractor operations will not expire until September 29, 2011. The average annualized Federal personnel cost for 2.2 Full Time Equivalent (FTEs) is \$233,991.

The MSIX contractor costs are based on a contract that has been awarded, including the costs of option years to continue operating the system until the contract expires. The average annualized contractor cost is \$2,148,646.

The overall \$2,382,637 annualized cost of MSIX for both Government FTE and contractor costs is the average per-year cost, based on a total of \$8,078,218.54 which has been funded in Fiscal Years 2006 through 2010.

Q15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

A15. Not applicable because this is a new information collection.

Q16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for

the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

A16. The collection of information does not require publication of the information or use of complex analytical techniques. Summary information may be reported by the Secretary in tabular form to the States, Congress and the public.

Q17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

A17. Given that the information collection will be conducted by SEAs with data transmitted electronically, the proposed display of the expiration date of OMB approval for the data collection would be inappropriate because the collections are being done by SEAs rather than the Federal Government or through a Federal contractor.

Q18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

A18. There are no proposed exceptions to the certifications.

B. Collections of Information Employing Statistical Methods

The data collection does not require that statistical methodology be employed.