

**General Comments:**

CDE urges the ED to work towards: (1) finalizing any data reporting changes through public comment **at least 6 months prior** to the school year so that school districts and the state education agencies will have sufficient time to make any necessary changes to their data collection systems; (2) synchronizing changes in future CSPR collections with changes in EDEN, and (3) eliminating duplicate and maximize pre-population of the CSPR with data collected through ED*Facts*.

First, the U.S. Department of Education's (ED's) timing for finalizing the proposed CSPR is too late given our state has already developed and released most of our data collections for the 2007-08 school year and, depending on the type of change, districts may not maintain the data. In order to have the data collected, cleansed and ready for CSPR and other state reporting, we have to release our data collection, the Consolidated Application Part I, in mid-May. Granted, as we bring our statewide longitudinal student information system on-line in 2009-10, our state should be able to respond to changes that are a matter of aggregating student data in a different manner.

We recognize the challenges facing States when new data elements are introduced. We have worked hard to keep CSPR as stable as possible. However, ED must sometimes introduce new data requirements due to legislative or regulatory changes. This year we have succeeded in keeping the CSPR, substantially the same as CSPR SY 2006-07, which received OMB approval in October 2007. The only new data elements requested in CSPR SY 2007-08 are those that pertain to: (1) science participation and achievement data, which were approved by OMB and included in the Consolidated State Application in SY 2002; (2) School Improvement reporting requirements provided for in Section 1003g regulations published in FY 2007. SEAs were informed through the 1003(g) application that they submitted to ED that they would be asked to provide the information requested in 1.4.8. The remainder of CSPR contain no new data elements.

See response to opening paragraph above.

Second, the ED has made some recent changes to the EDEN requirements that we anticipate will result in changes to future CSPR requirements. Specifically, the file specification for Discipline Incident has been changed. However, when we ask ED to clarify how next year's CSPR might change to reflect those changes, ED is unable to provide any information. It is important that changes to EDEN and CSPR be done simultaneously.

Third, we applaud ED's efforts to maximize EDFacts pre-population of the CSPR and integrate the EDFacts and CSPR; however, there are still several data sets we still have to submit separately because the pre-population is not yet supported (e.g., EDEN file N106 contains information on schools in need of improvement, yet, ED requires we submit the same data for CSPR in an Excel spreadsheet). Even more troublesome is the ED has recently sent states data quality reports that highlight differences between school improvement data reported through EDFacts and data reported through the Consolidated State Performance Report (CSPR). The biggest reasons there may be differences is the timing of when the files are submitted and outstanding issues with directory reporting. Requiring separate submissions of the same data result impose an unnecessary burden to states by creating a need for states to have to research and explain the differences. We suggest that ED allow those states that submit school- and district-level data for purposes of CSPR to be excused from submitting the data in EDFacts until such time that ED can use the EDFacts data to pre-populate the CSPR.

ED does not anticipate any changes to CSPR that would require new data collection at this time. However, we cannot predict with certainty that there will be no new regulations that will require CSPR to adopt new definitions for Discipline Incident. If that should occur, the CSPR would be prepopulated by the data collected by EDFacts.

In order to accommodate both the timing of the 2007-08 CSPR, ED was unable to utilize N106/Data Group #34 for the 2008-09 school year to pre-populate the 2007-08 CSPR, question 1.4.4.1. It is ED's intention to utilize data group #34 as the definitive source for this information regarding schools in need of improvement, starting with the data that would come in on the 2008-09 CSPR (the data in question 1.4.4.1 for the 08-09 CSPR will document schools in need of improvement in school year 2009-2010). If CA wishes to submit only the excel sheet in response to question 1.4.4.1 on the 2007-08 CSPR, and not submit data group #34 as part of N106 for school year 2008-09, that would be acceptable. We would ask that CA work through the EDFacts Partner Support Center to properly document this action, and that CA be prepared to submit the information via N106/data group #34 for the 2009-2010 school year .

#### **1.6.3.1.1 All LEP Student Participation in State Annual ELP Assessment**

In the “Number tested on the State annual ELP assessment” column, CDE includes only those students who had been previously identified as LEP and took the California English Language Development Test (CELDT). Students who took the CELDT for initial identification purposes are not included in this column. In the 2006-07 CSPR, CDE used the “LEP/One Data Point” column to report these students. CDE will be unable to report these students for the 2007-08 CSPR if the “LEP/One Data Point” column is removed.

Table 1.6.3.1.1 requires the number of LEP students who took the State annual ELP assessment, usually, the State ELP annual assessment takes place towards the end of the school year. All LEP students who took the State annual ELP assessment should be included in this participation. What CA referred to as "LEP who took CELDT for initial identification purposes," if these students took the CELDT at a different time (other than the State annual ELP assessment time), CA does not need to include them in the number tested on the State annual ELP assessment. If such students took the CELDT at the same time as the State annual ELP assessment, even if they had only one data point, they should be included in the "Number tested on the State annual ELP assessment". This table reports the number/count of all LEP students who were tested on the State annual ELP assessment (number participated in the required ELP annual assessment for LEP students.) If for any reason, CA could not report this number in 1.6.3.1.1, CA should comment in the comment box and provide the number of LEP NOT included this table.

#### **1.6.3.2.2 Title III LEP English Language Proficiency Results**

CDE reiterates our comment from the 60-day comment letter that the table in this section is calculating the percent of students who met the State definition of “Making Progress” and “Attainment” out of the total enrolled Title III LEP students. In order to have an accurate percent, a column should be added to allow for the number in cohorts to be entered. So the number of those “Making Progress” and “Attainment” is calculated against students in cohorts to derive an accurate percent

ED will discuss this issue with CA to determine how best to handle their situation. However, ED will not make a changes to CSPR to address this comment.

#### **1.6.3.6.2- 1.6.3.6.4 Monitored Former LEP (MFLEP) Students Results for Mathematics, Reading/Language Arts, Science**

The CSPR questions on MFLEPs are not consistent with the definition in EDEN file N126 – Title III Former Students. Since ED is continually moving for increased ED*Facts* population of the CSPR, section 1.6.3.6.2 – 1.6.3.6.4 should reflect what is being collected in file N126.

Since the CSPR will be populated with data from EDEN/ED*Facts*, CA should follow the EDEN Data Group N126 specifications. If there is any discrepancy, CA should put comments in the appropriate places for each of the tables related to MFLEP.