



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

MEMORANDUM

DATE: April 7, 2009

TO: Bridget Dooling
Office of Information and Regulatory Affairs
Office of Management and Budget

THROUGH: Kate Mullen
Regulatory Information Management Services
U.S. Department of Education

FROM: Lisa Gillette
Education Program Specialist
Office of Elementary and Secondary Education,
Office of Migrant Education

SUBJECT: Change to Currently Approved Collection: OMB No. 1810-0662-v.6

Attached for your review and clearance please find a change worksheet for information collection package OMB 1810-0662-v.6. We are submitting this worksheet to reflect a change in the burden hours associated with this package and to provide a copy of the final National Certificate of Eligibility (COE) and associated instructions.

As you will recall, on September 5, 2008, your office initially approved this package, which included the COE and related instructions for its completion. Because the approved package moved forward without the benefit of a large number of public comments on the format and content of the proposed COE, our offices mutually agreed that the Office of Migrant Education (OME) would make technical and editorial changes to perfect the final product. The change worksheet reflects a decrease in the number of burden hours OME expects based on the changes that were made to the COE and related instructions.

A summary of the significant changes OME made based on comments is provided in Attachment A to this memorandum. As this summary shows, the change in burden is largely due to the elimination of several less important data elements that were included as part of the proposed COE. These elements are not essential for documenting eligibility for the Migrant Education Program (MEP) and therefore have been removed. The original information collection package, of which the COE was just one component, estimated a total of 531,098 burden hours.¹ We believe the elimination of these data elements from the

¹ The other components of the information collection package include: re-interviewing documentation, quality control documentation, needs assessments and service delivery plans, program evaluations, and program exclusions.

COE will reduce the number of burden hours for completing the COE from 433,333 hours to 425,000. The revised estimate for the number of total annual burden hours is 522,765.

Attached for your convenience is a final copy of the COE and associated instructions.

If you or your colleagues have any questions/concerns about the change worksheet, please do not hesitate to contact me at 202-205-0316 or at lisa.gillette@ed.gov.

Enclosures

General Changes to the COE and Instructions

- The revised COE allows States the flexibility to organize the Family and Child Data on the COE based on State need and preference. States will be able to place the Qualifying Move & Work, Comment, Parent Signature and Eligibility Data Certification Sections on the COE according to State need and preference, but they will not be able to alter the content of these sections.
- The revised COE allows States to collect State-specific data, where space is available, to meet State need and preference. We agreed that we could allow States this flexibility while still meeting the requirements to document program eligibility.
- The revised COE collects dates in a 6-digit format (DD/MM/YY) rather than an 8-digit format (DD/MM/YYYY).
- The revised COE is aligned to other MEP data collection requirements. This allows States to collect data for more than one collection (e.g., the Migrant Student Information Exchange, the Consolidated State Performance Report) via this single document.

Changes by Section on the COE

Family Data Section:

- The following data elements were deleted because they were either not necessary for documenting MEP eligibility or they did not align with other MEP information collection requirements:
 - State Name
 - Male Parent Last Name 2
 - Female Parent Last Name 2
 - Homebase Address
 - Homebase City
 - Homebase State
 - Homebase Zip
 - Homebase Telephone
 - Homebase District

Child Data Section:

- The following data elements were deleted because they were unnecessary for documenting eligibility:
 - Present School District
 - From School District
 - Birth City
 - Birth State
 - School or Project Name
 - Grade Level
 - School Enrollment Date

Qualifying Move & Work Section: The revised COE has 6 questions that must be completed. The following changes were made to those 6 questions:

- The data element labeled “country” is no longer required to be collected in the second response to Question #1. It should not have been included on the proposed COE. A child cannot move to a country other than the U.S. and be eligible for the MEP.
- The data element labeled “Qualifying Arrival Date” collected in Question #1 of the proposed COE has been moved to Question #3 of the revised COE. This is an important data element for MEP eligibility and commenters thought it was best included as its own question.
- Question #2 has been revised to capture all of the qualifying move options that exist for the MEP. The revised Question #2 also allows for the date of both moves when the worker and child do not move together. The proposed COE only captured a limited number of move options and dates were collected in the Comments Section. Commenters felt it was necessary to capture the dates as part of the question in order to ensure that required documentation was not overlooked.
- Question #5 on the revised COE (previously #4) was modified to no longer collect employer’s name and address for all COEs. Employer’s name is only necessary for documenting child eligibility in cases where the State relies on its own documentation of temporary employment. Therefore, employer’s name will only be collected as part of Question #6c on the revised COE.
- “Personal Subsistence,” included as part of Question #4 on the proposed COE, was moved to Question #5 on the revised COE. Commenters did not want this data element to add to the amount of space available for the eligibility section, therefore it is reflected as a set aside to #5 and will only be collected when applicable.
- “Self Employment,” included as part of Question #4 on the proposed COE, was deleted. Previously, it provided an option in cases where workers did not have an employer. However, employer’s name is no longer being collected in instances where self-employment would need to remain an option.
- Question 6c (previously 5c) was revised to no longer require a comment in those cases where the State uses its own data to document the temporary nature of certain employment. The proposed COE should not have required a comment.

Comments Section:

- The COE and the associated instructions were revised to more clearly indicate when comments on the COE are required. The COE heading for this section now includes a prompt to indicate what comments must be included in this section.

Parent Signature & Eligibility Data Certification Sections:

- The signature blocks for both the parent signature and the eligibility data certification were slightly modified based on comments from the public and Office of General Counsel (OGC). The current language has been approved by OGC.

Changes to the Instructions

- We made changes to the instructions as they relate to the changes on the COE.
- We eliminated examples and recommendations that were included in the instructions. Commenters seemed to confuse instructions that were required and

those that were recommended. We will include this type of information in a document with a question and answer format.