

## **ED Response to Prior Term of Clearance**

1810-0646: Application Package for the REAP Small, Rural School Achievement Program  
2/18/2009

### OMB Comment:

Please update us on any developments with collecting SEA data through EDEN/EDFacts, as mentioned in the prior terms of clearance:

“This package collects information from both SEAs and LEAs. In the near future, ED plans to begin collecting SEA data via the EDEN/ EDFacts system. When this transition occurs, ED agrees to submit a change worksheet (OMB Form 83-C) to account for the reduction in burden. ED will continue to use this OMB number to collect data from LEAs.”

### ED Response:

The Eligibility Spreadsheet under OMB 1810-0646 collects from States LEA-level data that is needed to determine which LEAs are eligible to participate in the REAP program, and to determine SRSA grant award allocations to individual eligible LEAs. The system we have instituted for determining eligibility and allocations pursuant to the REAP statute is complex, time-bound and incorporates data from several sources. The process we use is similar to the processes the Department uses to determine eligibility and allocations for Title I and other formula grant programs, none of which rely on *EDFacts* as the primary data source for making those determinations.

Nonetheless, we have explored with *EDFacts* ways that *EDFacts* data might support our needs. After numerous discussions with *EDFacts* staff, we have determined jointly that it is not feasible at this juncture for *EDFacts* data to be the primary source of data to feed into that process.

The LEA level Average Daily Attendance (ADA) that we collect from SEAs on the eligibility spreadsheets is defined in statute as “...the total number of students in average daily attendance at all of the schools served by the local educational agency...” This definition is not consistent with the definition of ADA that States use in providing ADA data for the *EDFacts* collection.

We do use data from *EDFacts*/CCD collection in developing our universe of schools. Locale code data comes from the Census. We then match the local code data to individual schools within each LEA to determine the proper locale code for the entire LEA. The poverty data we use to determine which LEAs are eligible for the RLIS program also comes from Census.

In addition, we are beginning to collect AYP and REAP-Flex data through *EDFacts*. The REAP-Flex data pre-populates CSPR at the SEA level, and also provides LEA level data for program monitoring and reporting purposes.

We anticipate that the AYP data will become more useful when *EDFacts* has incorporated meta-tags to identify school districts based that participate in SRSA and RLIS. At this time, we have to provide the universe of SRSA and RLIS districts to *EDFacts* in order for the *EDFacts* staff to run the AYP reports that we need, for example, the AYP status of districts after three years of participation in the program. Since the REAP program office already has the data derived from the eligibility spreadsheets in our Access database, it is simply easier and more reliable for us to run the reports ourselves.