PAPERWORK REDUCTION ACT SUBMISSION SUPPORTING STATEMENT

Annual Mandatory Collection of Elementary and Secondary Education Data through EDFacts

August 2010

ATTACHMENT B-6

EDFacts Data Set School Improvement Grants

INTRODUCTION

This attachment explains how the data will be collected for the 18 metrics in the final requirements for the School Improvement Grants (SIG) program authorized under section 1003(g) of Title I of the ESEA for Tier I and Tier II schools that implemented one of the four required school intervention models and were served with SIG funds during the school year for which the SEA is reporting. ¹ (The final requirements for the SIG program define Tier I and Tier II schools and the four school intervention models.) Some of the data used in the metrics will come from the data collected through ESS (data groups in Attachment B-3). Some of the data will come from reporting under the State Fiscal Stabilization Fund (SFSF) program.

Appendix A, at the end of this document, lists changes to this document after the 30 day public comment period.

REPORTING METRICS

The final requirements for the SIG program include 18 metrics, which are listed in the table below.

	List of Metrics for the School Improvement Grants
	School Data
1	Intervention used (i.e., turnaround, restart, closure, or transformation)
2	AYP status
3	Which AYP targets the school met and missed
4	School improvement status
5	Number of minutes
	Student Outcome/Academic Progress Data
6	Percentage of students at or above each proficiency level on state
	assessments in reading/language arts and mathematics (e.g., Basic,
<u> </u>	Proficient, Advanced), by grade and by student subgroup
7	Student participation rate on state assessments in reading/language arts and
	in mathematics, by student subgroup
8	Average scale scores on state assessments in reading/language arts and in
	mathematics, by grade, for the "all students" group, for each achievement

¹ Final requirements were published on December 10, 2009 and are available at: http://www2.ed.gov/programs/sif/submitted-notice.doc; those requirements were amended by interim final requirements published on January 21, 2010, which are available at: http://www2.ed.gov/programs/sif/interim.doc. Together, these requirements are referred to in this document as "final requirements."

	List of Metrics for the School Improvement Grants
	quartile, and for each subgroup
9	Percentage of limited English proficient students who attain English
	language proficiency
10	Graduation rate
11	Dropout rate
12	Student attendance rate
13	Number and percentage of students completing advanced coursework (e.g.,
	AP/IB) and/or dual enrollment classes
14	College enrollment rates
	Student Connection and School Climate
15	Discipline incidents
16	Truants
	Talent
17	Distribution of teachers by performance level on LEA's teacher evaluation
	system
18	Teacher attendance rate

NEW DATA GROUPS

The table below lists the new data groups that will be collected for Tier I and Tier II schools that implemented one of the four required school intervention models and were served with SIG funds during the school year for which the SEA is reporting. (For a school implementing the closure model, an SEA must only complete the metric "Intervention used.") These data groups will be collected using an ED*Facts* collection tool.

Data Group Name	DG ID	Used for	Level
		metric	
Intervention used	728	Metric 1	Tier I and II schools only
School year minutes	729	Metric 5	Tier I and II schools only
Increased learning time	745	Metric 5	Tier I and II schools only
Average scale score table ²	730	Metric 8	State and Tier I and II schools
Achievement percentile table	751	Metric 8	State and Tier I and II schools
Student attendance rate	731	Metric 12	Tier I and II schools only
Advanced coursework	732	Metric 13	Tier I and II schools only
Dual enrollment classes	733	Metric 13	Tier I and II schools only
Advanced coursework/dual	734	Metric 13	Tier I and II schools only
enrollment classes			-
Teacher attendance rate	735	Metric 18	Tier I and II schools only

Also, for the purposes of the FY2009 SIG funds, baseline data (i.e., school year (SY) 2009-10 data) for the above data groups will be collected for Tier I and Tier II schools that implemented the restart, transformation, or turnaround model in SY 2010-11 and were served with SIG funds, to the extent that these data are available to the SEA. See Question K-4 in the ED's SIG guidance that addresses what ED means when it refers to the availability of data to an SEA.³

By October 31, 2010, each SEA that received FY 2009 SIG funds will submit a plan indicating the data groups listed above for which the SEA will have school year (SY) 2009-10 data available. The deadline for submitting the baseline data into EDF*acts* will be January 31, 2011. In addition, for Tier I and Tier II schools that will begin implementing the restart, transformation, or turnaround model in SY 2011-12, ED expects that all SEAs will be able to enter baseline data from SY 2010-11 for these schools into EDF*acts* by January 31, 2012.

 $^{^{2}}$ SEAs would also submit metadata on the assessments that the scale scores are from.

³ Available at http://www2.ed.gov/programs/sif/sigguidance05242010.pdf

DATA COLLECTION BY METRIC

In the sections below there is an explanation of how the data will be obtained for each metric and, where applicable, how calculations will be made for the metrics.

SCHOOL DATA

There are five school data metrics.

Metric #1

Which intervention the school used (i.e., turnaround, restart, closure, or transformation)

This metric requires the collection of a new data group from Tier I and Tier II schools implementing one of the four required school intervention models and were served with SIG funds.

Group Name: Interven	Group Name: Intervention used ID: 728				
Section	School				
Definition	The type of interve	ntion used by the schoo	ol under the School		
	Improvement Gran	t (SIG)			
Permitted Values	Turnaround				
	Restart				
	Closure				
	Transformation				
Reporting Period	Regular School Year				
Reporting Levels	School ☐ LEA € State €				
Comment	Collected only for Tier I and Tier II schools that implemented				
	one of the four models and were served with SIG funds.				
STEWARD: OESE	D: OESE				

Metric #2

AYP Status

This metric will be obtained from the following data group listed in Attachment B-3.

Data group name	DG ID	File	Listed under topic
		X/	Accountability and Reporting
AYP status	32	N103	Provisions of ESEA

This data group is already collected at the school level.

Metric #3

Which AYP targets the school met and missed

This metric will be obtained from the following data groups listed in Attachment B-3.

Data group name	DG ID	File	Listed under topic
AMO mathematics status			Accountability and Reporting
table	554	X/N109	Provisions of ESEA
AMO reading/language arts			Accountability and Reporting
status table	552	X/N111	Provisions of ESEA
Elementary/middle			Accountability and Reporting
additional indicator status			Provisions of ESEA
table	556	X/N106	
High school graduation rate			Accountability and Reporting
indicator status table	557	X/N107	Provisions of ESEA
Mathematics participation			Accountability and Reporting
status table	555	X/N108	Provisions of ESEA
Reading/language arts			Accountability and Reporting
participation status table	553	X/N110	Provisions of ESEA

Metric #4

School improvement status

This metric will be obtained from the following data group listed in Attachment B-3.

Data group name	DG ID	File	Listed under topic
Improvement status - school		X/	Accountability and Reporting
	34	N130	Provisions of ESEA

This data group is already collected at the school level.

Metric #5aNumber of minutes

This metric requires the collection of a new data group from Tier I and Tier II schools.

Group Name: School	year minutes ID: 729			
Section	School			
Definition	The number of minutes that all students were required to be at school and any additional learning time (e.g., before or after school, weekend school, summer school) for which all students had the opportunity to participate.			
Permitted Values	Integer between 54,000 and 200,000			
Reporting Period	Regular school year (if part of implementing the restart, transformation, or turnaround model, then regular school year plus summer session)			
Reporting Levels	School ☐ LEA € State €			
Comment	Collected only for Tier I and Tier II schools that implemented the restart, transformation, or turnaround model and were served with SIG funds Example The regular school year for a school included 176 full school days and four half school days that all students were required to attend. The school is in an LEA where a full day is 390 minutes and a half day is 195 minutes. The school also provided 80 days of additional learning time for which all students had the opportunity to participate. The additional learning time lasted 90 minutes per day. The total minutes would be 76,620, calculated as follows: o 176 days multiplied by 390 minutes = 68,640 minutes; o 4 days multiplied by 195 minutes = 780 minutes; o 80 days multiplied by 90 minutes = 7,200 minutes; o Add the results: 68,640 minutes + 780 minutes			
	+ 7,200 = 76,620 minutes			
STEWARD: OESE	- 7,200 70,020 illimates			

Metric #5b

Types of increased learning time offered

This metric requires the collection of a new data group from Tier I and Tier II schools.

Group Name: Increase	Group Name: Increased learning time ID: 745				
Section	School	School			
Definition	The types of increa	sed learning time provi	ided		
Permitted Values	Longer sch	ool year			
	Longer scho	ool day			
	Before or a	fter school			
	Summer scl	hool			
	Weekend so	chool			
	Other				
Reporting Period	Regular School Year (if part of implementing the restart,				
	transformation, or turnaround model, then regular school year				
	plus summer session	on)			
Reporting Levels	School ☐ LEA € State €				
Comment	Collected only for Tier I and Tier II schools that implemented				
	the restart, transformation, or turnaround model and were				
	served with SIG funds				
STEWARD: OESE	TEWARD: OESE				

STUDENT OUTCOME/ACADEMIC PROGRESS DATA

There are nine student outcome/academic progress data metrics.

Metric #6

Percentage of students at or above each proficiency level on state assessments in reading/language arts and mathematics (e.g. basic, proficient, advanced), by grade and by student group

This metric will be obtained from the following data groups listed in Attachment B-3.

Data group name	DG ID	File	Listed under topic
Academic achievement in			Accountability and Reporting
mathematics table	583	X/N075	Provisions of ESEA
Academic achievement in			Accountability and Reporting
reading/language arts table	584	X/N078	Provisions of ESEA

These data groups are already collected at the school level.

Metric #7

Student participation rate on state assessments in reading/language arts and in mathematics, by student subgroup

This metric will be obtained from the following data groups listed in Attachment B-3.

Data group name	DG ID	File	Listed under topic
Assessment participation in			Accountability and Reporting
mathematics table	588	X/N081	Provisions of ESEA
Assessment participation in			Accountability and Reporting
reading/language arts table	589	X/N081	Provisions of ESEA

These data groups are already collected at the school level.

Metric #8

(1) Average scale scores on state assessments in reading/language arts and in mathematics, by grade, for the "all students" group, and for each subgroup; and (2) Scale scores at three specific achievement percentiles.

This metric requires the collection of two new data groups at the state level from Tier I and Tier II schools that implemented the restart, transformation, or turnaround model and were served with SIG funds.

The data group below collects the average scale scores on state assessments.

Group Name: Average	Group Name: Average scale score table ID:730						
Section	Student						
Definition	The average scale scores on the state assessments in						
	mathematics and reading/language arts for students for whom						
	a scale score was d	etermined					
Permitted Values	Integer						
Reporting Period	Testing window						
Reporting Levels	School []	LEA €	State				
Grand Total	€						
(Education Unit Total)							
Comment	Collected only for	Fier I and Tier II schoo	ols that implemented				
	the restart, transform	mation, or turnaround	model and were				
	served with SIG fu						
CATEGORY SET	DESCRIPTION						
Category Set A	Academic Su	ıbject (Assessment)					
	Assessment A	Administered					
		(Assessment)					
		and Ethnic Groups					
Category Set B		ıbject (Assessment)					
		Administered					
		(Assessment)					
	Sex (Membership)						
Category Set C	Academic Subject (Assessment) Assessment Administered						
	Assessment Administered						
	Grade Level (Assessment) Disability Status (Only)						
Category Set D		ıbject (Assessment)					
Cutegory Set D	Assessment Administered						
	Grade Level (Assessment)						
	LEP Status (Only)						
Category Set E	Academic Subject (Assessment)						
	Assessment Administered						
	Grade Level (Assessment)						
	Economically Disadvantaged Status						
Category Set F	Academic Subject (Assessment)						
	Assessment Administered						
	Grade Level (Assessment)						
CUDTOTALC	Migrant Status						
SUBTOTALS	DESCRIPTION						
Subtotals 1		Subject (Assessment)					
		Administered					
CERTAIN CECE	Grade Level	(Assessment)					
STEWARD: OESE							

The data group below collects the achievement percentiles.

Group Name: Achievement percentile table ID: 751				
Section	Student			
Definition	The scale score at t	he cut point for a speci	ific achievement	
	percentile on the st	ate assessments in mat	hematics and	
	reading/language a	rts.		
Permitted Values	Integer			
Reporting Period	Testing window			
Reporting Levels	School []	LEA €	State	
Grand Total	€			
(Education Unit Total)				
Comment	Collected only for Tier I and Tier II schools that implemented			
	the restart, transformation, or turnaround model and were			
	served with SIG funds.			
CATEGORY SET	DESCRIPTION			
Category Set A	Academic Subject (Assessment)			
	Assessment Administered			
	Grade Level (Assessment)			
	Achieveme	nt Percentile		
STEWARD: OESE	STEWARD: OESE			

Please note that the data group above includes a new category—Achievement Percentile. Since this category did not exist in previous collections, the addition of the following category is required.

Category Name:	Achievement Percentile	Steward: OESE	
Definition	Scale scores at three specific achievement percentiles.		
Permitted Values			
	Scale score at the 25 th percentile Scale score at the 50 th percentile (median) Scale score at the 75 th percentile		

In order to properly interpret the scale score data, metadata of the name of the assessments will be collected through a survey.

Metric #9

Percentage of limited English proficient (LEP) students who attain English language proficiency

This metric will be obtained from the following data group listed in Attachment B-3.

Data group name	DG ID	File	Listed under topic
LEP English language			Limited English Proficient Students
proficiency results table	676	N/X139	and Title III of ESEA

In previous school years, this data group was collected only at the state and LEA level. The requirement is being expanded to collect it at the school level for Tier I and Tier II schools that implemented the restart, transformation, or turnaround model and were served with SIG funds.

The metric would be calculated as follows:

Numerator	
# of LEP students who attain English language	DG676
proficiency on the annual state English language	Category set A (Proficiency status)
proficiency assessment.	where proficiency status = proficient
Denominator	
# of LEP students who took the annual state	DG676
English language proficiency assessment	Category set A (Proficiency status)

Metric #10

Graduation rate

This metric will be obtained from the following data groups listed in Attachment B-3.

Data group name	DG ID	File	Listed under topic
Graduation rate table			Accountability and Reporting
	563	X/N041	Provisions of ESEA
Regulatory extended time			Accountability and Reporting
adjusted-cohort gradation rate			Provisions of ESEA
table	697	X/N150	
Regulatory extended four-year			Accountability and Reporting
cohort gradation rate table	695	X/N150	Provisions of ESEA

These data groups are already collected at the school level.

DG563 will be used unless a state has an approved four-year adjusted cohort rate, as defined in 34 C.F.R. § 200.19(b)(1)(i)(A) (and, if the state is using an extended-year adjusted cohort rate, 34 C.F.R. § 200.19(b)(1)(v)(A)). Once a state has an approved adjusted cohort rate consistent with 34 C.F.R. § 200.19(b)(1)(i)(A) (and, if the state chooses, 34 C.F.R. § 200.19(b)(1)(v)(A)), DGs 697 and 695 will be used.

Metric 11

Dropout rate

This metric will be obtained from the following data groups listed in Attachment B-3.

Data group name	DG ID	File	Listed under topic
Dropouts table	326	X/N032	Non-Fiscal Common Core of Data
Membership table	39	X/N052	Non-Fiscal Common Core of Data

These data groups are already collected at the school level.

The metric would be calculated as follows:

Numerator	
# of students who dropped out in	DG 326
grades 7 through 12	Subtotal 1 where grade level = grade 7, 8, 9, 10, 11 or 12
Denominator	
# of students in membership on	DG39
October 1 in grades 7 through 12	Subtotal 4 where grade level = grade 7, 8, 9, 10, 11 or 12

Metric 12 Student attendance rate

This metric requires the collection of a new data group from Tier I and Tier II schools that implemented the restart, transformation, or turnaround model and were served with SIG funds.

Group Name: Student	Group Name: Student attendance rate ID:731				
Section	Student				
Definition		ool days during the reg	, t		
		ble, if part of implemen			
	transformation, or t	turnaround model) stud	ents attended school		
	divided by the max	imum number of days	students could have		
	attended school du	ring the regular school	year.		
Permitted Values	Percentage				
Reporting Period	Regular School Year (if part of implementing the restart, transformation, or turnaround model, then regular school year				
	, and the second				
	plus summer session)				
Reporting Levels	School ☐ LEA € State €				
Comment	Collected only for Tier I and Tier II schools that implemented				
	the restart, transformation, or turnaround model and were				
	served with SIG funds.				
STEWARD: OESE					

Metric 13

Number and percentage of students completing advanced coursework (<u>e.g.</u>, AP/IB) and/or dual enrollment classes

This metric requires the collection of three new data groups from Tier I and Tier II schools, Advanced coursework (DG732), Dual enrollment classes (DG733) and Advanced coursework/dual enrollment classes (DG734).

Group Name: Advar	Group Name: Advanced coursework ID:732				
Section	Student				
Definition	The number of stude	nts who complete adva	nced coursework		
	(such as Advanced P	lacement, Internationa	l Baccalaureate		
	classes, or advanced	mathematics).			
Permitted Values	Integer				
Reporting Period	Regular School Year	(if course completed o	during summer, then		
	regular school year p	lus summer session)			
Reporting Levels	School ☐ LEA € State €				
Comment	Collected only for Tier I and Tier II high schools that				
	implemented the restart, transformation, or turnaround model and				
	were served with SIG funds. "Completing advanced coursework"				
	means that a student finished an advanced coursework class for				
	which he or she received credit in accordance with state or local				
	requirements.				
Advanced	Advanced Placement (AP) is a program sponsored by the College				
Placement-	1	Board through which high school students can earn college credit			
			of courses identified by		
		preparation for AP tes			
	<u> http://www.collegeb</u>	<u>oard.com/student/testin</u>	ng/ap/about.html.		

International Baccalaureate classes-	The IB Diploma Programme, sponsored by the International Baccalaureate Organization, is designed as an academically challenging and balanced program of education with final
	examinations that prepares students, normally aged 16 to 19, for success at university and life beyond. The program is normally taught over two years. IB Diploma Programme students study six
	courses at higher level or standard level. Students must choose one subject from each of groups 1 to 5, thus ensuring breadth of
	experience in languages, social studies, the experimental sciences
	and mathematics. The sixth subject may be an arts subject chosen from group 6, or the student may choose another subject
	from groups 1 to 5. Additionally, IB Diploma students must meet
	three core requirements: the extended essay, the theory of
	knowledge course, and a creativity/action/service experience.
Advanced	Advanced mathematics includes the following: trigonometry,
Mathematics-	trigonometry/algebra, trigonometry/analytic geometry,
	trigonometry/math analysis, analytic geometry, math analysis,
	math analysis/analytic geometry, probability and statistics, and
	pre-calculus.
	Trigonometry courses prepare students for eventual work in
	calculus, and typically include the following topics: trigonometric and circular functions; their inverses and graphs; relations among
	the parts of a triangle; trigonometric identities and equations;
	solutions of right and oblique triangles; and complex numbers.
	Analytic geometry courses include the study of the nature and
	intersection of lines and planes in space.
	Math analysis courses include the study of polynomial, logarithmic,
	exponential, and rational functions and their graphs; vectors; set
	theory; Boolean algebra and symbolic logic; mathematical
	induction; matrix algebra; sequences and series; and limits and continuity.
	Probability and statistics courses introduce the study of likely
	events and the analysis, interpretation, and presentation of
	quantitative data.
	Pre-calculus courses combine the study of trigonometry,
	elementary functions, analytic geometry, and math analysis topics
	as preparation for calculus.
STEWARD: OESE	

Group Name: Dual enrollment classes		ID:733	
Section Student			
Definition	The number of high school students who complete at least one		

	class in a postsecondary institution.			
Permitted Values	Integer			
Reporting Period	Regular School Year (if course completed during summer, then			
	regular school year plus summer session)			
Reporting Levels	School ☐ LEA € State €			
Comment	Collected only for Tier I and Tier II schools that implemented			
	the restart, transformation, or turnaround model and were			
	served with SIG funds			
STEWARD: OESE				

Group Name: Advanced coursework/dual enrollment classes ID:734			ID:734
Section	Student		
Definition	The number of students who complete advance coursework		
	AND complete at least one class in a postsecondary institution.		
Permitted Values	Integer		
Reporting Period	Regular School Year (if course completed during summer, then		
	regular school year plus summer session)		
Reporting Levels	School [LEA €	State €
Comment	Collected only for Tier I and Tier II schools that implemented		
	the restart, transformation, or turnaround model and were		
	served with SIG funds.		
STEWARD: OESE			

The metric would be calculated to determine three percentages, as follows:

Percentage completing advanced coursework

Percentage completing dual enrollment classes

Percentage completing both advanced coursework and dual enrollment classes

For the percentage completing advanced coursework

Numerator	
# of students who completed	DG732
advanced coursework	
Denominator	
# of students in membership on	DG39
October 1 in high school grades	Subtotal 4 where grade level = grade 9, 10, 11 or 12

For the percentage completing dual enrollment classes

Numerator	
# of students who completed dual	DG733
enrollment classes	

Denominator		
# of students in membership on October	DG39	
1 in high school grades	Subtotal 4 where grade level = grade	
	9, 10, 11 or 12	

For the percentage completing both advanced coursework and dual enrollment classes

Numerator	
# of students who completed both	DG734
advanced coursework and dual	
enrollment classes	
Denominator	
# of students in membership on October	DG39
1 in high school grades	Subtotal 4 where grade level = grade
	9, 10, 11 or 12

Metric 14

College enrollment rates

This metric will be collected through SFSF reporting.

STUDENT CONNECTION AND SCHOOL CLIMATE

There are two student connection and school climate metrics.

Metric 15

Discipline incidents

This metric will be obtained from the following data groups listed in Attachment B-3.

Data group name	DG ID	File	Listed under topic
Discipline incidents table	523	X/N030	Safe, Drug-Free and Gun-Free Schools

This data group is already collected at the school level.

Metric 16

Truants

This metric will be obtained from the following data groups listed in Attachment B-3.

Data group name	DG ID	File	Listed under topic
Truants	664	X/N131	Safe, Drug-Free and Gun-Free Schools

In previous school years, this data group was collected only at the state and LEA level. The requirement is being expanded to collect at the school level for schools that implemented the restart, transformation, or turnaround model and were served with SIG funds.



There are two talent metrics.

Metric 17

Distribution of teachers by performance level on LEA's teacher evaluation system

This metric will be collected through SFSF reporting.

Metric 18

Teacher attendance rate

This metric requires the collection of a new data group from Tier I and Tier II schools that implemented the restart, transformation, or turnaround model and were served with SIG funds.

Group Name: Te	Group Name: Teacher attendance rate ID:735				
Section	Staff		•		
Definition	The number of FTE days	s teachers worked divid	led by the maximum		
	number of FTE-teacher v	working days.			
Permitted	Percentage (to 2	decimal places)			
Values					
Reporting	Regular School Year (if part of implementing the restart,				
Period	transformation, or turnaround model, then regular school year plus				
	summer session)				
Reporting Levels	School [LEA €	State €		
Comment	Collected only for Tier I and Tier II schools that implemented the				
	restart, transformation, or turnaround model and were served with				
	SIG funds. Teachers are considered to be "absent" if the definition				
	below is met.				
Absent- STEWARD:OESE	A teacher is absent if he or she is not in attendance on a day in the regular school year when the teacher would otherwise be expected to be teaching students in an assigned class. This includes both days taken for sick leave and days taken for personal leave. Personal leave includes voluntary absences for reasons other than sick leave. Do not include administratively approved leave for professional development, field trips or other off-campus activities with students.				

APPENDIX A – CHANGES TO VERSION USED IN 30-DAY PUBLIC COMMENT PERIOD

The table below lists the changes to the version used in 30-day public comment period.

Section	Change	Explanation for Change
All	Change "New" and "Revised" notes	Unless noted otherwise in the document,
All	are removed for items that	, ,
	were "new" or "revised" in	these changes have been incorporated into
		the final package.
New data	the 30-day package. Moved web address to a	Formatting
	footnote	Formatting
groups New data	Added the word "table" to the	To conform to the naming convention for
	end of the data group name of	data groups.
groups and metric 8	DG730.	data groups.
Metric 8	Deleted "achievement	DG730 did not align with the description of
Wietric o	percentile" from the category	metric 8. Metric 8 is the average scale
	sets and subtotal of DG730	score for all students and each subgroup
	and added a new data group,	AND the scale score at the cut point for
	Achievement percentile table	three specific achievement percentiles for
	(DG751).	all students by subject and grade level at
	(23/31).	the school. DG730 originally was designed
		to collect the scale scores at three specific
		achievement percentiles for all students
		AND each subgroup. Thus DG730
		collected data in excess of that required by
		metric 8. DG730 was redesigned to collect
		only the average scale scores for all
		students and each subgroup. A new data
		group (DG751) was added to collect the
		scale scores at the cut point for certain
		achievement percentiles for all students
		(and not each subgroup) at the school.
		With these changes the data groups now
		match the data needed according to the
		description of metric 8. The data needed
		according to the description of metric 8
		was less burden than the data as defined by
		the data group.