

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION**

OMB No. 1810-0683

MIGRANT EDUCATION PROGRAM (MEP)

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

Updated 03-07-11

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 for the renewal and revision of the information collection that is necessary to implement statutory requirements for data collection under the Title I, Part C Migrant Education Program (MEP) and is required to obtain or retain benefits for the Minimum Data Elements – July 2010. The MEP is authorized under sections 1301-1309 Part C of the Elementary and Secondary Education Act (ESEA) as amended by the No Child Left Behind Act. The Migrant Student Information Exchange (MSIX) and the minimum data elements (MDEs) are authorized specifically under Section 1308(b) of statute. This collection is being renewed as the current collection expires November 30, 2010. We are also requesting the addition of three (3) new minimum data elements and two (2) new values to the current collection.

The collection is necessary to extend collection of the existing data elements as well as add three new data elements and two data values to the set of minimum data elements that are collected and transferred between State MEPs as part of a larger mandated MSIX. State educational agencies (SEAs) with MEPs will transfer the minimum data elements using the MSIX in order to facilitate timely class placement and credit accrual for migratory children. The burden hours associated with the data collection are required to meet the statutory mandate in Sec. 1308(b) of ESEA, as amended by No Child Left Behind, which is to facilitate the electronic exchange by the SEAs of a set of minimum data elements to address the educational and related needs of migratory children. For this revision, there is an overall reduction in burden hours. There are several factors that contributed to this burden reduction from what was reported in the original collection in 2007 - despite the fact that two data units are being added under assessment data entry and three additional data elements are being added to this revised collection. The reduction of burden is being considered an adjustment rather than a program change because although there were two new values and three new data elements added total, the burden associated with these additions is negligible. The reduction of burden is primarily due to: First, the original collection was based on the number of migrant children reported in the 2005-2006 CSPR (652,874) while this revised collection is based on the number of migrant children reported in the 2008-2009 CSPR (462,316) thereby reducing the burden for collecting data on 190,558 migrant children. Second, initial enrollment data was collected on 36 States in the past three years however, enrollment data still needs to be collected for 12 States (about 10% of the initial data) that have not yet submitted this information to the Department. Third, the number of States affected by this collection has been reduced from 49 States to 48 States as Connecticut is no longer participating in the Migrant Student Information Exchange Program.

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 462,316 children -- ages 0-21 -- are eligible as reported by the States in the 08-09 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 supported two pilot implementations during Fiscal Year 2007. Completion of the system occurred in late September 2007. The MSIX currently contains data for 36 States and 90% of the migrant student population. All States are expected to be loaded into MSIX by 2011.

The MSIX system provides the technology that allows 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 works 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 48 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. To date, 36 States have provided the initial enrollment information on their migrant students. The Department is currently working with the remaining 12 States who must also comply with submitting the initial enrollment data. 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 7169 defined MDEs that can be retrieved electronically among all 48 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 Minimum Data Elements – July 2010.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. An update and renewal of the data collection for MSIX will be required for only 28 of the 7169 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 including managing worklists and user accounts as required by MSIX.

An updated data collection is needed for only some of the MDEs because 41 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 updated information collection is to enable MSIX to enhance the continuity of services for migrant children by providing a mechanism for the 48 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 revealed that not all States were ready to transmit each of the 66 MDEs initially when the MSIX became operational. Although the Department encouraged States to submit all of the MDEs that currently reside in their migrant student databases and the Department accepted 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 became operational, the Department allowed States to submit the MDEs in three phases; Phase 1 basic student information and demographics, Phase 2 assessment information and Phase 3 course history information.. The phased implementation is no longer applicable as States have largely included the required minimum data elements in their State or MEP databases. During the next three years, States are expected to provide all of the 7169 minimum data elements in their first submission.

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. The 60 day Federal Register notice published on August 20, Vol.75 page 51449. The proposed data collection published on August 20, 2010 received comments from one commenter. The data collection was updated to reflect changes based on those comments as follows. The originally proposed five additional data elements were reduced to three data elements and two data values added to existing data elements. Specifically, data elements SAT Score and ACT Composite Score were deleted and added as an acceptable value of the MDE "assessment type"; "other" was added as an acceptable value for the MDE "assessment interpretation". The comments provided by the commenter and the Department's response are included in [Minimum Data Elements Comments and Responses.doc](#).

A State consultation specifically for the purpose of soliciting input regarding the minimum data elements occurred in the past three years. The Department conducted an MDE webinar with nine State representatives in December 2009. This input was used to propose 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.

Recent correspondence to the SEAs regarding the minimum data elements and the MSIX has included a letter to State Directors of Migrant Education regarding the use of their MSIX Data Quality Grant to support the collection and transmission of the MDE (MSIX Data Quality Grant Letter 1-scanned.pdf) on July 12, 2010 and a letter to State Directors of Migrant Education (MSIX Data Quality Grant Letter 2-scanned.pdf) on July 14, 2010 regarding the use of grant funds before the expiration date. (These letters are being included with the collection for informational purposes.)

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. Although this collection does not provide any guarantee of confidentiality, all persons who access this 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 published a System of Records Notice for MSIX on [System of Records--Migrant Student Information Exchange.mht](#). This was published in the Federal Register on December 5, 2007, Vol. 72, number 233, pages 68572-68576.

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.

To provide context to this revised collection, we would like to note that there are several factors that contributed to a lessened burden than what was reported in the original collection in 2007 despite the fact that we are adding three additional data elements and two new values to the revised collection. First, the original collection was based on the number of migrant children reported in the 2005-2006 CSPR (652,874) while this revised collection is based on the number of migrant children reported in the 2008-2009 CSPR (462,316) thereby reducing the burden for collecting data on 190,558 migrant children. Second, we have collected the initial enrollment data on 36 States in the past three years since the 2007 collection was approved, therefore we need only collect the initial enrollment data (estimated at 10% of the total migrant population) for the 12 States that have not yet submitted this information to the

Department in addition to all 7169 of the MDE from each State that identifies new migrant children. We estimated that there will be 69,421 new migrant children per year. Third, the number of States affected by this collection has been reduced from 49 States to 48 States as Connecticut is no longer participating in the MEP in addition to Rhode Island, the District of Columbia and Puerto Rico.

Amortized over three years, we estimate that it will require a total of 7,510 hours per SEA respondent on an annualized basis to complete the requirements of this information collection. There are 48 participating SEAs. MEP enrollment varies greatly among the States, and we have also estimated the overall burden as 780 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 4,440 hours per SEA respondent on an annualized basis to address the requirements of Initial Enrollment. We estimate that it will require 2,456 hours per State to address the requirements of Semester, Trimester, or Summer/Intersession updates. We estimate that it will require 614 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 360,491 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	213,127
Semester, Trimester, or Summer/Intersession Update	117,891
MEP Child Update	29,473
ANNUALIZED TOTAL FOR ALL SEAs	360,491
Average Hours per SEA (Annualized)	7,510
Average Person Years per SEA (at 2,080 hours each year)	3.6
Annualized Hours per 1,000 Enrolled Children (462,316 of Children)	780

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	48 SEAs	3,331	159,874	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 10 days of

					determination of eligibility. Assumes 100% first year and 25% in each second and third years due to moves.
Data Entry	Upon determination of a child's eligibility for MEP	48 SEAs	3,241	155,583	Effort to key data into a computer system. Assumes 100% first year and 25% in each second and third years due to moves.
Data Maintenance, Transmission, Archiving, Multiple Moves, and IT Overhead	Upon determination of a child's eligibility for MEP	48 SEAs	6,572	315,457	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	48 SEAs	176	8,467	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)	48 SEAs	13,320	639,381	Hours: Total for three years. Assumes 100% first year and 25% in second and third years.
	(Person Years, based on 2080 hours)		6.4	307.39	Person Years: Total for three years. Assumes 100% first year and 25% in second and third years.
Annualized Average	(Hours)	48 SEAs	4,440	213,127	Hours: Annualized average.
	(Person Years, based on 2080 hours)		2.13	102.46	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 Over Three Years	Description
Data Collection	Recurring Update: Per School Semester, Term, or Summer/ Intersession Period	48 SEAs	1,820	87,356	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	48 SEAs	1,864	89,480	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	48 SEAs	3,684	176,836	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)	48 SEAs	7,368	353,672	Hours: Total for three years. Burden is at the same level for each of the three years.
	(Person Years, based on 2080 hours)		3.54	170.03	Person Years: Total for three years. Burden is at the same level for each of the three years.
Annualized Average	(Hours)	48 SEAs	2,456	117,891	Hours: Annualized average.
	(Person Years, based on 2080 hours)		1.18	56.68	Person Years: Annualized average.

MEP Child Update

MEP Child Update	Frequency of response	# of Respondents	Average # of Hours per respondent	Total Hours Over Three Years	Description
Data Collection	Update as Required by Child Interstate Move	48 SEAs	455	21,839	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	48 SEAs	466	22,370	Effort to key data into a computer system.

Data Maintenance, Transmission, Archiving, Multiple Moves, and IT Overhead	Update as Required by Child Interstate Move	48 SEAs	921	44,209	This estimate includes the effort to maintain, transmit, and archive data as well as provide IT support for the information collection process.
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Total for MEP Child Update	(Hours)	48 SEAs	1,842	88,418	Hours: Total for three years. Burden is at the same level for each of the three years.
	(Person Years, based on 2080 hours)		0.89	42.51	Person Years: Total for three years. Burden is at the same level for each of the three years.
Annualized Average	(Hours)	48 SEAs	614	29,473	Hours: Annualized average.
	(Person Years, based on 2080 hours)		0.3	14.17	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 213,127 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 117,891 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 29,473 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 Minimum Data Elements - Jul 2010.pdf which lists all 7169 MDEs and identifies the 28 that will require data collection and entry.

There are 7169 MDEs required for MSIX. Of these, data collection and entry are required for 28 elements. The remaining data elements are collected and entered through other means such as for EDEN/EDFACTS 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 \$9,488,123. Divided by 48 SEAs, the average cost per respondent is \$197,669. The calculations use an average cost of \$26.32¹ an hour for all SEA respondents involved in collection, entry, maintenance, archiving, and IT systems. Using the breakdown 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 (12 SEAs)	213,127	\$5,609,502	\$116,865
Semester, Trimester, or Summer/Intersession Update	117,891	\$3,102,881	\$64,643
MEP Child Update	29,473	\$775,720	\$16,161
ANNUALIZED TOTAL FOR ALL SEAs	360,491	\$9,488,123	\$197,669
Average Hours per 1,000 Enrolled Children (462,316 of Children)	780		\$20,530

Initial Enrollment with 10-Day Reporting

Initial Enrollment with 10-Day Reporting	Average # of Hours per Respondent	Total Hours Over Three Years	National		Per SEA	
			y	Cost @ \$26.32 per Hour	Person Years	Cost @ \$26.32 per Hour
Data Collection	3,331	159,874	76.86	\$4,207,887	1.60	\$350,657
Data Entry	3,241	155,583	74.80	\$4,094,940	1.56	\$341,245

¹ 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).

Data Maintenance, Transmission, Archiving, Multiple Moves, and IT Overhead	6,572	315,457	151.66	\$8,302,827	3.16	\$691,902
Record Matching	1,642	8,467	4.07	\$222,851	0.79	\$18,571
Total Over Three Years for Initial Enrollment	13,320	639,381	307.39	\$16,828,506	6.40	\$1,402,375
Annualized Average	4,440	213,127	102.46	\$5,609,502	2.13	\$467,458

Semester, Trimester, or Summer / Intersession Update

Semester, Trimester, or Summer / Intersession Update	Average # of Hours per respondent	Total Hours	National	Cost @ \$26.32 per Hour	Per SEA Person Years	Cost @ \$26.32 per Hour
			y Person Years			
Data Collection	1,820	87,356	42.00	\$2,299,203	0.88	\$47,900
Data Entry	1,864	89,480	43.02	\$2,355,119	0.90	\$49,065
Data Maintenance, Transmission, Archiving, Multiple Moves, and IT Overhead	3,684	176,836	85.02	\$4,654,322	1.77	\$96,965
Total Over Three Years for Semester, Trimester, or Summer / Intersession Update	7,368	353,672	170.03	9,308,644	3.54	\$193,930
Annualized Average	2,456	117,891	56.68	3,102,881	1.18	\$64,643

MEP Child Update

MEP Child Update	Average # of Hours per respondent	Total Hours	National	Cost @ \$26.32 per Hour	Per SEA Person Years	Cost @ \$26.32 per Hour
			y Person Years			
Data Collection	455	21,839	10.50	\$574,801	0.22	\$11,975
Data Entry	466	22,370	10.75	\$588,780	0.22	\$12,266

Data Maintenance, Transmission, Archiving, Multiple Moves, and IT Overhead	921	44,209	21.25	\$1,163,580	0.44	\$24,241
Total Over Three Years for MEP Child Update	1,842	88,418	42.51	\$2,327,161	0.89	\$48,483
Annualized Average	614	29,473	14.17	\$775,720	0.30	\$16,161

The only costs to respondents are those shown above for staff time for data collection, data entry, and certain other activities such as resolving child near matches. 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

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. There are no start-up costs to this collection.

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 for the next three years to be \$3,173,383 calculated as follows:

	ED Staff Time in Government FTEs	ED Staff Time Costs (Loaded with Benefits, 3% increase annually)	MSIX Contract Costs	Totals
Historical Cost				
FY 2006		\$0	\$7,980,831.42	\$7,980,831.42
FY 2007	2.20	\$264,440	\$3,129,097.33	\$3,393,537.33
FY 2008	2.20	\$272,373	\$3,262,624.00	\$3,534,997.00
FY 2009	2.20	\$280,544	\$2,941,550.00	\$3,222,094.19
		\$178,938	\$4,328,526	\$5,687,184
Next Three Years				
FY 2010	2.20	\$288,961	\$2,627,000.00	\$2,915,960.52
FY 2011	2.20	\$297,629	\$3,000,000.00	\$3,297,629.33
FY 2012	2.20	\$306,558	\$3,000,000.00	\$3,306,558.21
Total		\$1,889,443	\$8,627,000	\$9,520,148
Annualized including development and full operation		\$297,716	\$2,875,667	\$3,173,383

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 2012 however because contractor operations will expire September 29, 2011 and it is expected that the contract will be re-competed and the system continued. The average annualized Federal personnel cost for 2.2 Full Time Equivalents (FTEs) is \$297,716.

The MSIX contractor costs are based on a contract that has been awarded, including the costs of option

years to continue operating the system and an additional one year after the current contract expires. The average annualized contractor cost is \$2,875,667.

The overall \$3,173,383 annualized cost of MSIX for both Government FTE and contractor costs is the average per-year cost, based on a total of \$9,520,148 which has been funded in Fiscal Years 2010 through 2012.

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

A15. For this collection, there is an overall reduction in burden from what was reported in the original collection in 2007. There are several factors that contributed to this burden reduction – despite the fact that three new data questions and two new values are being added to this collection. The overall reduction of burden is being considered an adjustment rather than a program change because the burden impact of adding these three new data questions and two new values is considered to be negligible. The overall reduction in burden is due to several factors: The number of respondents was reduced from 49 States to 48 States as Connecticut is no longer participating in the MEP. Each respondent provides data to the MSIX in nightly database submissions thereby creating 365 responses per year, per respondent. The total annual responses were reduced from 17,885 to 17,520 because the number of States was reduced by one respondent (Connecticut). Therefore, the total annual hours decreased from 382,494 to 360,491 (a reduction of 22,003 burden hours) because of the reduction in the number of States, the reduction in the number of migrant children participating in the program, and the previous collection of the initial enrollment data for 36 States.

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.