Annual Mandatory Collection of Elementary and Secondary Education Data through ED*Facts*

June 2010

ATTACHMENT E

ED*Facts* Data Set
Response to Public Comment
60-Day Public Comment Period

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INTRODUCTION

This attachment contains the response to public comments on the Annual Mandatory Collection of Elementary and Secondary Education Data through ED*Facts*.

The 60-day comment period for the ED*Facts* package ended on May 3, 2010. ED received comments from 25 SEAs (comments are noted as coming from the SEA), five from people at SEAs (comments are not noted as coming from the SEA), six non-profits (all primarily regarding the CRDC), and one from a State agency that was not the SEA (regarding reporting of the General Education Act Provision (GEPA) data). The comments represented 27 States.

ED received comments on the 15 directed questions, specific areas of data collection, and general policies and procedures. This document is organized into the following sections:

- Directed Questions
- Specific Areas of Data Collection
- General Policies and Procedures
- Changes to the ED*Facts* Data Set

Two SEAs who commented stated that they continue to support the efforts of ED to consolidate data collections and provide more timely and accurate data for accountability and program evaluation. In addressing the public comments and making revisions to the package, ED focused on recommendations from the public comments that continue to move ED*Facts* forward in achieving the goals of consolidating collections, obtaining high quality data, and reducing burden on data suppliers.

ED appreciates the time and attention the public spent on reviewing the ED*Facts* package and in composing thoughtful comments that shape the final data set, as evidenced in this attachment. ED reviewed, summarized and documented each comment prior to analyzing all comments. This documentation will aid in the finalization of this data clearance package and will serve to inform future policy decisions regarding ED*Facts*.

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

DIRECTED QUESTIONS

The paperwork clearance package posted during the 60-day public comment period included 15 directed questions in Attachment D. This section contains the public comments received to the directed questions and how ED is responding to the comments. Each of the directed questions is restated along with background information. The background information is followed by a summary of the public comments and ED's response.

Each commenter did not respond to all the directed questions. The number of commenters who responded to each directed question is provided at the beginning of the explanation of the public comment.

(1)   CHARTER SCHOOLS AND DISTRICTS – SUPPLEMENTAL INFORMATION

In the "Charter Schools and Districts" section of Attachment B-3, there is a list of data groups collected only on charter schools and districts (*e.g.,* "DG605 Charter school year approved" is the school year in which the charter school was initially approved). What is the most efficient way to collect these data? Should these data be collected through ESS, E*MAPS*, or another method?

Public Comments
A total of 14 SEAs responded to this question. The majority recommended using ESS to collect these data. When a reason was given it was either because E*MAPS* should be limited to metadata collection or because the volume of data was more efficiently handled through ESS. Most of the States that recommended using ESS recommended using a new charter specific file. However, two SEAs recommended adding these items to the directory file.

One SEA recommended E*MAPS* be used because the data were specific to charter schools. (This State has fewer than 20 charter schools. Several States have over 100 charter schools.)

Two SEAs raised the issue of whether the data would be submitted for all charters every year or only submitted for changes. If data were to be submitted only for changes, one of these two SEAs recommended using E*MAPS*.

Another SEA stated that Charter – approval agency type (DG594) and Charter school LEA status (DG653) would be the same for all charter schools in the State and therefore the data should be submitted through E*MAPS*.

One SEA recommended deriving Charter school year school opened (DG606) and Charter school year closed (DG654) from data already submitted.

One SEA recommended deleting charter status (DG29) because the separate charter school file could be used to identify charter schools. However, another SEA noted that staff found the charter school status in the directory file very useful.

Three SEAs discussed burden. One SEA expected to submit 50 records per year if only changes were required to be submitted. Another SEA estimated that the submission of this data would require 20 hours. The third SEA noted that the burden would be primarily in the first year to set up a separate charter file.

ED's Response
ED appreciates the thoughtful comments. The majority of SEAs recommended a separate ESS file for charter school data. ED will work with the SEAs to create a separate charter file. ED believes that the charter school status (DG29) is needed even if a separate charter file is submitted by the SEAs.

(2)   CONSOLIDATED ANNUAL REPORT (CAR) - CARL D. PERKINS CAREER AND TECHNICAL EDUCATION ACT OF 2006

Should the changes to the data groups used in the secondary education portion of the Consolidated Annual Report (CAR) be implemented in SY 2009-10 instead of waiting until SY 2010-11? Specifically, how would this impact burden on SEAs?

This clearance package includes significant changes to the data groups used for the CAR of the Carl D. Perkins Career and Technical Education Act of 2006 (1830-0569). Those changes are described in the section "Changes for Perkins IV CAR" of Attachment C. These data groups and the crosswalk to the CAR are described in the section "Career and Technical Education" in Attachment B-3.

Public Comments
A total of 17 SEAs provided a response to this directed question. Six SEAs indicated that the changes should be implemented in SY 2009-10. Four SEAs indicated that the changes should not be implemented in SY 2009-10. In addition, four SEAs while not indicating that the changes should be implemented stated that the SEA had the data needed and would be able to submit the data. Three SEAs provided information about their situations but did not offer an opinion on when the changes should be implemented. These three SEAs could provide most of the data required for implementation in SY 2009-10.

The four SEAs that indicated that the changes should not be implemented in SY 2009-10 provided the following reasons:
- Too much burden for a change this late in the school year
- Preference for more time to transition
- Burden of providing disaggregated data by racial ethnic and sex (membership)
- Burden of reporting when consortia are reported that are not accommodated by ED*Facts*

While the previous data set required disaggregation by racial ethnic and sex (membership), the current data set does not. Therefore the disaggregation of data by racial ethnic and sex (membership) is not a barrier to the early implementation of these changes.

ED's Response
The career and technical education data groups as proposed in this package align with the CAR. Some SEAs are ready to report these data through ED*Facts*. Therefore, ED will request OMB to allow the implementation of the changes in SY 2009-10. However, ED acknowledges that not all SEAs are ready. ED will allow SEAs on a data group-by-data group basis to request exemptions from submitting data as proposed in this package for SY 2009-10. This approach will allow SEAs that are ready for the change to begin transitioning CAR reporting to ED*Facts* while providing transition time for those SEAs that are not yet able to take advantage of this opportunity.

(3)   DISCIPLINE

What information about discipline in schools is lost if data are collected solely as a count of students disciplined? What burdens have States experienced in collecting the incident data in addition to the counts of students disciplined?

Data on discipline are needed for reporting on the *Safe and Drug-Free Schools and Communities Act* and the *Gun-Free Schools Act*. The ED*Facts* Data Set includes the collection of data on discipline both as counts of students disciplined (DG673 and DG596) and as incidents (DG523 and DG601) resulting in discipline actions. These data groups are described in the "Safe, Drug-Free and Gun-Free Schools" section of Attachment B-3. Incident data provide a more complete picture of school safety than student discipline data alone. Some States have indicated that collecting data on incidents is problematic.

Public Comments
A total of 20 SEAs and one non-profit provided public comments to this directed question.

Commenters indicated that information about the overall school safety climate would be lost if data were collected solely as a count of students disciplined. Other commenters indicated that incident data were not needed either because the data should focus on the student offenders or the data quality was so questionable that the data were not useful.

Many of the eight SEAs that supported collecting both the student and incident data indicated that there was not a major burden because the SEA had a system that collected both. Most of the six SEAs that supported collecting only counts of students were concerned with data quality. Most of these six SEAs also indicated that there was significant burden particularly in providing guidance to districts to collect the data and technical assistance to resolve scenarios not addressed in the guidance. Four SEAs did not express support for either approach, but did indicate that collecting incident data would be problematic because of data quality reasons, or the lack of an infrastructure to collect the data. SEAs cited lack of clarity in definition and inconsistency in handling incidents that take place between schools and districts as the two main data quality concerns for incident data.

ED's Response
ED does not minimize the concerns about data quality and burden. Nevertheless, ED agrees that collecting both incident and student counts provides a more complete picture of school safety. Thus, the ED*Facts* data set will continue to collect data on both incident and student counts.

(4)   DISPUTE RESOLUTION – IDEA TABLE 7 (OMB 1820-0677)

Should the IDEA Dispute Resolution Table 7 be integrated into the ED*Facts* data set for collection at the State level? What challenges do States anticipate in submitting these data through ED*Facts* using either ESS or E*MAPS*?

IDEA Dispute Resolution Table 7 collects data on dispute resolution (e.g., the number of written, signed complaints filed, the number of mediation requests received through all dispute resolution processes, the number of due process complaints filed, and the number of expedited due process complaints filed). These data would be collected only at the State level.

Public Comments
A total of 18 SEAs provided a response to this directed question:

- Four SEAs indicated that the IDEA Dispute Resolution data should be integrated into the ED*Facts* data set
- Two SEAs indicated that the IDEA Dispute Resolution data should be integrated into the ED*Facts* data set if E*MAPS* is used
- Four SEAs indicated that they did not object but did not support integrating the IDEA Dispute Resolution data into the ED*Facts* data set
- Two SEAs indicated that they did not object to integrating the IDEA Dispute Resolution data into the ED*Facts* data if E*MAPS* is used
- Six SEAs indicated that the IDEA Dispute Resolution data should not be integrated into the ED*Facts* data set

The six SEAs that indicated that the IDEA Dispute Resolution data should not be integrated into the ED*Facts* data set gave the following reasons:
- More complicated to submit data in ESS
- Difficult to convert the data to the ESS file format
- Little advantage to transitioning to ED*Facts*
- Increased burden

ED's Response
ED understands the challenges associated with transitioning to a new data submission process; however, ED believes the challenges can be minimized by using E*MAPS* to collect the IDEA Dispute Resolution data. E*MAPS* will allow IDEA data managers to submit the data in a format similar to the current Table 7 grid. Thus, ED*Facts* will begin to collect the IDEA Dispute Resolution data in the E*MAPS* systems starting with the SY 2010-11 data.

(5)   EXPULSION/SUSPENSIONS OR "MORE THAN ONE DAY"

Given the variation of State definitions of suspensions/expulsions, what information is lost if ED collected discipline data based on students being out of regular education program for more than one day as a disciplinary measure instead of expulsions/suspensions? What would be the change in burden?

Data on discipline are needed for reporting on the *Safe and Drug-Free Schools and Communities Act.* In the Consolidated State Performance Report (CSPR), the data are collected based on whether the student was expelled or suspended. Since definitions of expulsion and suspension vary among States, the ED*Facts* DG673 Students disciplined table pertains to whether the student was removed from their regular education program for more than one day. This data group is described in Attachment B-3 under the section "Safe, Drug-Free and Gun-Free Schools."

Below is a section of *The Uniform Data Set – A guide to Measures for the Uniform Management Information and Reporting System* that concerns the collection of data by more than one day:

> Suspensions and expulsions are broad terms encompassing a variety of specific disciplinary actions that differ in the exact nature of the resulting sanction. However, these terms uniformly refer to disciplinary actions that result in removal of the student from the regular classroom. Therefore, for Uniform Data Set (UDS) purposes, the term suspension or expulsion will be defined as any disciplinary action that results in removal from the regular classroom for at least one day. All incidents resulting in this disciplinary consequence, regardless of the local label (e.g., suspension, expulsion, suspension in-school, suspension out-of-school, expulsion with or without services) will be defined as an incident of suspension or expulsion. No distinction will be made between these terms for UDS reporting because there is no shared distinction among them across the States.

Public Comments
In response to the question about what information is lost if ED collected by removed for more than one day, 20 SEAs and one non-profit responded. Two SEAs favor making the change in discipline data collection from suspensions/expulsions to students being out of regular education for more than one day. Two SEAs cannot currently make the change since they do not collect data on the length of expulsions. While several SEAs indicated that the proposed change would not result in a loss of information, more SEAs commented that details such as the severity of the removal are lost. Commenters pointed out that removals for one or two days are very different than suspensions and expulsions. Further, the kinds and level of services provided for in-school suspensions, out-of school suspensions, and expulsions are very different.

In response to the question about burden, commenters were divided from those who indicated there would be no significant burden to those who indicated major overhauls of their collection systems would be needed.

- Three SEAs indicated the change would result in heavy burden
- Ten SEAs indicated the change would result in no to low burden
- Seven SEAs did not quantify the burden expected from the proposed change

Some commenters indicated that burden would be reduced if the ED*Facts* files could be used to populate the CSPR. One commenter recommend that instead of either more than one day or State defined expulsions and suspensions, ED should use the definitions of expulsions and suspensions

used in the Civil Rights Data Collection (CRDC). Another commenter suggested coordinating the terms in the uniform data set with IDEA.

Another commenter noted the utility of this data for dropout prevention efforts and recommended working with the National Forum on Education Statistics (Forum) to develop consensus before making any changes.

ED's Response
Based on the comments received for both this directed question as well as a request for a common set of disciplinary data definitions and standards (explained in the section "discipline data" later in this document), ED agrees with the commenter that more consensus in this area is needed. ED will continue to work with the National Forum on Education Statistics (Forum) on the collection of discipline data. In addition, the pending reauthorization of ESEA is likely to impact the collection of discipline data.

ED will continue to follow the recommended approach for the Uniform Data Set and collect the disciplinary removal data by removals for more than one day. However, ED will not be changing the CSPR to collect data by more than one day which means that the current ED*Facts* data cannot be used to populate that section of the CSPR.

(6)   HEADCOUNT AND FULL-TIME EQUIVALENT (FTE) OF STATE MIGRANT EDUCATION PROGRAM (MEP)

Should data on the MEP State director be removed from the ED*Facts* file (N/X065) and collected solely through manual entry in the Consolidated State Performance Report (CSPR)? Which approach results in less burden?

Data on the headcount and FTE of staff of the MEP are needed for reporting and oversight of the program. File N/X065 includes the FTE (DG515) and headcount (DG635) of MEP staff, including the State director. The FTE and headcount are collected in that file by session period (regular and summer/intersession).

The CSPR collects the FTE for the State MEP director for the entire program period (combining data for the two session periods). To populate this question in the CSPR, the numbers from N/X065 for regular and summer/intersession are added together. Some States had difficulty computing FTE by reporting period for the State director.

Public Comments
A total of 21 SEAs provided a direct answer to this directed question:

- 17 SEAs indicated that manual entry creates less burden
- 3 SEAs indicated that ESS files resulted in less burden
- 1 SEA indicated that either approach is acceptable

In addition, two SEAs provided comments. One SEA indicated that ESS files would result in the least burden if the CSPR were changed to collect the data by session period. Another SEA had no preference.

SEAs that supported continuing to collect the data through ESS preferred maintaining the status quo. One of these SEAs stated that whenever possible data should be collected through ESS.

ED's Response
While ED understands the preference for the status quo, since the majority of SEAs prefer manual entry, data on the MEP State director will be removed from the ED*Facts* data set.

(7)   HOMELESS STUDENTS

Should the assessment files collect data on "homeless students enrolled" instead of "homeless students served by McKinney-Vento Program?"

Data on the academic achievement of homeless students are needed for reporting and oversight of the McKinney-Vento Homeless Education Assistance Program. The assessment files (N/X075, 078, 079 and 081) include data on the subgroup of students who are homeless students served by the McKinney-Vento Program. Some States do not include in their student information systems and assessments systems a student's status as homeless students served. Instead the systems may include indicators of whether during the school year the student was homeless. Therefore, to obtain the data on homeless students served for the assessment files, these States have to conduct a separate collection of assessment data from LEAs. In addition, the definition of served varies greatly among States. A student who is reported as served in one State may not be reported as served in another State.

Public Comments
Of the 20 SEAs that responded to this direct question, 16 SEAs favored the collection of academic achievement data on all homeless students enrolled in LEAs with subgrants rather than only those students more directly served by a subgrant project. Two SEAs could support either option and of the two that were against the proposed change, one misunderstood that this change is only for the purposes of collecting statewide assessment participation and achievement information. ED would still collect students served by but not enrolled in an LEA with a subgrant. One State commented that better guidance is needed regarding what it means to be served by the McKinney-Vento Program.

One commenter suggested that the approach used for collecting homeless data for the assessment files should also be used for collecting homeless data pertaining to files N032 – Dropout and N040 – Graduates/Completers. Another commenter supported using "homeless students enrolled" data to pre-populate all of the CSPR.

ED's Response

The ED*Facts* data set will be changed to collect "homeless students enrolled" instead of "homeless students served by McKinney-Vento Program" for the assessment, dropout, and graduates/completers files. However, as explained in the section on McKinney-Vento in Attachment B-3, ED will continue to collect some data on the "homeless students served."

(8)   MAGNET SCHOOLS

How can the quality and consistency of reporting on magnet schools be improved?

The ED*Facts* data set includes DG24 Magnet status (listed in Attachment B-3 under section "Non-Fiscal Common Core of Data"). The Common Core of Data (CCD) includes information regarding whether a school is a magnet school. The Civil Rights Data Collection (CRDC) further refines the question by distinguishing magnet schools from schools with magnet programs.

Recently, ED compared the classification of schools reported as magnet to other sources. Many schools classified as magnet in the CCD were not classified as magnet in the other sources. Many schools classified as magnet in the other sources were not classified as magnet in the CCD. Schools are being inconsistently reported by magnet status.

Public Comments
A total of 15 SEAs responded. Commenters indicated that better definitions and guidance were needed to improve data quality. Three SEAs indicated that their States do not have any magnet schools. Some other SEAs indicated that either they did not collect data on magnet status or that the collection was voluntary. A few SEAs suggested a need for one master file source for magnet school data to improve data quality. Another State recommended that ED create an additional permitted value to distinguish between magnet schools and schools with magnet programs.

ED's Response
At this time, no changes are being made to the collection of Magnet status (DG24). ED plans to review the definition of magnet status against information requirements and current practices so that when ESEA is reauthorized any needed changes can be made. ED has documented States' suggestions and will give them full consideration prior to make any changes to the collection of Magnet status (DG24).

(9)   OPEN ENROLLMENT

What burden would be added to SEAs if an indicator of whether an LEA allows open enrollment for some or all of its students were added to the ED*Facts* Data Set?

Data on the eligibility and use of public school choice are needed for reporting and oversight of the public school choice provisions of ESEA. An indicator of open enrollment would be useful in interpreting public school choice data.

Public Comments

A total of 19 SEAs responded to this question. Eight SEAs indicated that adding an indicator of open enrollment would create significant burden in the modifications of systems to collect the data and the training of LEAs. One SEA indicated that 250 hours would be needed at the SEA level and 10 to 20 hours per LEA. Six SEAs indicated that there would be minimal to no burden. Four SEAs stated that there was not sufficient information provided to assert the burden. One SEA responded to the concept of adding an open enrollment indicator but did not comment on how the action would impact its data collection burden.

Several SEAs indicated that more guidance would be needed, for example, clarifying whether open enrollment applies to inter district or intradistrict transfers.

Other commenters noted that open enrollment can have different timeframes, procedures, and eligibility so that an indicator of open enrollment would not mean the same thing between States or in some cases within States.

ED's Response

Based on the information provided, ED has determined that the information gained from an indicator of open enrollment is not offset by the burden of providing the data. As ED analyzes the data on the eligibility and use of public school choice, ED will need to collect metadata about enrollment practices so that the data can be properly reported and used.

(10)   STATE FISCAL STABILIZATION FUND (SFSF)

Attachment B-7 contains the data collection plan for SFSF. That plan includes collecting new data groups. What is the most effective method of collecting these data groups? Should the data be collected through ESS, E*MAPS*, or another method?

Public Comments

A total of 14 SEAs responded to this directed question. The majority of states favored using ESS as the collection method, while five states suggested using a combination of E*MAPS* and ESS. One state reported that it was unable to determine which is the better collection method at this time. Following existing practice, the comments suggested that "due to the number of records and the complexity, LEA and school level data should be collected through ESS; however SEA level data should be collected via E*MAPS*." Another commenter suggested that "LEA level data would be cumbersome to report via E*MAPS*."

Several comments were received regarding the timing and handling of any new data groups designed to meet the needs of SFSF metrics. Specifically, one State commented that "new data groups may cause an initial burden of 20-40 hours for a new ED*Facts* report in ESS if the data [are] already collected from the LEA by the SEA. [This] would increase infinitely if the SEA is

not presently collecting the data from the LEA." Another State commented that "given that the mandatory collection date for new SFSF required data elements is September 2011, it is premature to require a submission to ED at the same time." Another comment was received suggesting that any new data groups for SFSF metrics be collected "in a new series of ED*Facts* files for the SFSF indicators until we know that these indicators are included under the new reauthorization of ESEA."

ED's Response
While the final determinations regarding which collection systems are used is made after the Information Collection Clearance is finalized, ED agrees that a combination of systems would be needed to collect all the SFSF metrics.   ED clarifies the comment by noting that items collected only at the SEA level would most likely be collected via E*MAPS*, while items collected at the SEA and at a more granular level (LEA or school) would be collected at all levels via ESS. This is consistent with current practice since standing up the E*MAPS* system. To date, no LEA level data has been collected via E*MAPS*, and the data needed for SFSF do not suggest that E*MAPS* would be the most efficient collection tool when data are needed at the LEA or school levels.

The burden necessary to respond to the metrics for the SFSF program has already been discussed and cleared by the program office in finalizing its Phase 2 application. ED recognizes that several items will require new efforts by SEAs to collect new information from their SEAs. This was discussed with States in the SFSF clearance last fall (Docket ID ED-2009-OESE-007).

Regarding the comment that it is too early to require collection, ED agrees that this should not be a mandatory requirement for every State in the first year. The timing upon which a State would be required to begin reporting the new data elements needed for the SFSF metrics would be dependent upon the plan each State has submitted in its SFSF Phase 2 application. Any new file specifications would be required for submission at the time approved by the ED SFSF program office under that State's SFSF implementation plan. If approved, ED would add these new items to the ED*Facts* collection for the 2010-11 school year, thus enabling States to begin working with the data structure and format needed for successful submission.   Most States will not be required to submit any of the new items for 2010-11, but many would begin reporting in 2011-12.

Any new data groups created to address a need within the SFSF metrics will not be placed within an existing ED*Facts* file specification for collection. New specifications specific to the needs of SFSF will be created for any approved data groups. Once the ESEA is reauthorized, the entire data model behind ED*Facts* will be reevaluated on the basis of the information collection needs of the new law.

(11)   SCHOOL IMPROVEMENT GRANTS (SIG)

Attachment B-6 contains the data collection plan for SIG. That plan includes collecting new data groups for Tier I and Tier II schools that receive SIG. What is the most effective method of collecting these data groups? Should the data be collected through ESS, E*MAPS*, or another method?

Public Comments
A total of 14 SEAs responded to the directed question. Nine SEAs indicated that ESS would be the most effective way to collect these data groups. Four SEAs indicated that ESS should be used for most of the data groups but that E*MAPS* should be used for the SEA level data and any metadata to explain the data groups. One SEA was uncertain how to determine the preferred collection methodology since it does not yet collect all of the required data.

Two SEAs noted that these data should be in a new series of files. One SEA noted that metric 8 (average scale scores) needs its own file.

ED's Response
ED will create a new series of ESS files for the SIG data groups. ED plans to use E*MAPS* for the collection of the metadata but not for the collection of SEA level data.

Additional comments were received about Attachment B-6, which are included in the section for SIG under "Specific areas of the data collection."

(12 AND 13) STATEWIDE ASSESSMENTS – ACADEMIC ACHIEVEMENT AND PARTICIPATION

ED has combined the summary of the public comment and ED's response for directed questions 12 and 13.

Directed Question 12 (regarding academic achievement data)
Should the academic achievement files be combined by adding assessment type to N/X075, N/X078, and N/X079 and discontinuing N/X003? Are all children with disabilities (IDEA) who are enrolled in the grades for which State assessments are administered included in the data reported in N/X075, N/X078, and N/X079?

The data submitted on academic achievement for State assessments in mathematics (N/X075, DG583), reading/language arts (N/X078, DG584), and science (N/X079, DG585) aggregate the achievement results of all students. Data for children with disabilities (IDEA) by assessment type are required. Therefore, SEAs submit a separate file N/X003 to provide detailed data by assessment type on children with disabilities (IDEA).

Directed Question 13 (regarding participation data)
Should the assessment participation files be combined by including assessment type in N/X081 and discontinuing N/X093? Or should these files be combined by creating files for each

academic subject, that is, discontinuing N/X081 and N/X093 and creating new files for mathematics, reading/language arts, and science that include assessment type? Are all children with disabilities (IDEA) who are enrolled in the grades for which State assessments are administered included in the data reported in N/X081?

The data submitted in file N/X081 on participation in State assessments for mathematics (DG588), reading/language arts (DG589), and science (DG590) aggregate the participation of all students by the various assessment types. Participation data for children with disabilities (IDEA) by assessment type are required. Therefore, SEAs submit a separate file N/X093 to provide detailed data by assessment type on children with disabilities (IDEA).

Public Comments
A total of 21 SEAs responded to these questions. Twelve SEAs were in favor of combining files as proposed in the questions for reasons such as:

- Allows States to have different proficiency levels for different types of assessments
- Reduces burden (While there is additional burden in the first year, building the combined files will reduce burden in the later years)
- Ensures consistent guidance from ED
- Reduces discrepancies in State submitted data because the data are pulled at the same time for multiple purposes

Four SEAs, while not stating that they favored the proposed change, stated that they could submit combined files.

Five SEAs were not in favor of the proposal for the following reasons:

- Unique issues with reporting of children with disabilities (IDEA) including the reporting of LEP students who are also children with disabilities (IDEA) that apply only to the files submitted for Table 6
- Size of the files
- Burden to change processes so that combined files could be submitted

Fewer SEAs responded to the questions regarding the inclusion of children with disabilities (IDEA) data in the specified files. All of the 12 SEAs that responded to the inclusion of children with disabilities (IDEA) data in the assessment achievement files answered affirmatively that all children with disabilities (IDEA) are included in the data reported in N/X075, N/X078, and N/X079. Similarly, 11 SEAs said children with disabilities (IDEA) data are included in N/X081. One SEA responded that the file did not include assessment participation data for all children with disabilities (IDEA).

ED's Response
ED will be combining the assessment files because doing so will yield in the long term higher quality data at lower burden. ED shares the concern about the size of the files and will work individually with SEAs that experience problems in this area. ED agrees that there will be a

burden to SEAs to make the requisite changes, but that the initial burden will be offset in future years. ED does not agree that there are unique issues in reporting Table 6.

The combining of files does not impact Children with disabilities (IDEA) not participating in assessments table (DG491, N/X004).

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(14)   STATUS FILES

The data groups that are single values are consolidated together. Some States have indicated that the consolidated files are problematic to create. Indicate which, if any, of the status files listed below are problematic for your State. If a file is problematic, explain how the file should be divided.

- N/X103 Accountability
- N/X129 CCD School
- N/X130 ESEA Status
- N/X131 LEA End of SY Status
- N/X132 School End of SY Status

Public Comments
A total of 20 SEAs responded to this question. Three of the 20 stated that they had no significant problems submitting the status files. The other 17 indicated that they had some problems submitting the status files. These SEAs stated that there was burden in gathering unrelated data into a single file, and that they preferred submitting several small files versus one large file from multiple sources. Some of these noted that they had held files until all the data were gathered and thus missed some deadlines.

ED's Response
Each status file is listed, below, with a table of the file's data groups. An "X" indicated the data group will be included in the file. A note is provided for data groups that will be reorganized into another status file or removed.

N/X103 Accountability

DG	DG Name	Placement
518	AMAO II ELP attainment	X
569	AMAO I ELP making progress	X
688	AMAO III AYP for LEP	X
32	AYP status	X
617	Alternate approach status	X
699	School poverty designation	X (Based on attachment F)

N/X129 CCD School

DG	DG Name	Placement
22	Title I school status	X
24	Magnet status	X
573	Shared time status	X
644	Teachers (FTE)	Move to N/X059

N/X130 ESEA Status – There are no changes to this file.

DG	DG Name	Placement
34	Improvement status - school	X
36	Persistently dangerous status	X
662	Improvement status - LEA	X

N/X131 LEA End of SY Status

DG	DG Name	Placement
614	REAP alternative funding status	X
524	Integrated technology status	X
664	Truants	Move to new file for discipline data
652	Public school choice funds spent	Move to new file for PSC/SES data
679	Public school choice/SES 20 percent obligation	Move to new file for PSC/SES data
651	SES funds spent	Move to new file for PSC/SES data
680	SES per pupil expenditure	Move to new file for PSC/SES data
454	School totals	Deleted - will no longer be collected
603	GFSA reporting status	Move to new file for discipline data

N/X132 School End of SY Status

DG	DG Name	Placement
~~699~~	~~School poverty designation~~	~~Added from N/X103~~
693	School Improvement Funds status	X
694	School Improvement Funds allocation table	X
31	School poverty percentage	X
56	Economically disadvantaged students	X
110	Migrant students eligible regular school year	Move to new file for migrant data
514	Consolidated MEP funds status	Move to new file for migrant data
603	GFSA reporting status	Move to new file for discipline data

Below are the data groups that will be in three new status files.

New file for discipline data

DG	DG Name	Collection Levels
664	Truants	LEA / School (for SIG only)
603	GFSA reporting status	LEA / School

New file for public school choice and supplemental educational services data

DG	DG Name	Collection Levels
652	Public school choice funds spent	LEA
679	Public school choice/SES 20 percent obligation	LEA
651	SES funds spent	LEA
680	SES per pupil expenditure	LEA

New file for migrant data

DG	DG Name	Collection Levels
110	Migrant students eligible regular school year	School
514	Consolidated MEP funds status	School

Detailed information about recommendations for the status files
The specific recommendations provided by the SEAs and ED's response are included, below, by file. ED considered both the number of SEAs recommending the changes and the reasons for the changes when deciding which recommendations to implement. Not all of the 17 SEAs that indicated they had some problems submitting the files provided recommendations for how to improve the status files.

Recommendations for N/X103 Accountability
Ten SEAs provided recommendations for changes to this file and "School poverty designation (DG699)," which is used in combination with the classes taught by highly qualified teacher files (N/X063 and N/X064) to respond to questions in the CSPR.

# of SEAs	Recommended change	Reasons for change	ED's Response
8	Remove School poverty designation (DG699) and added it to either: • The classes taught by highly qualified teacher files (N/X063 and N/X064) since it is used with that data • School SY End File (N/X132) which has a similar data group School poverty	This data group is ready at a different time than the other data groups in the file	~~DG699 will be removed. It will be added to N/X132~~ Based on comments during 30-day public

	percentage (DG31)		comment period, left in N/X132
4	Separate AYP data groups from the AMAO data groups	The data come from separate sources	These data are all accountability data and belong in the same file.

Recommendations for N/X129 CCD School

Ten SEAs provided recommendations for changes to this file.

# of SEAs	Recommended change	Reasons for change	ED's Response
7	Remove Teacher (FTE) (DG644)	This data group has a different source than the other data groups. This data group belongs with N/X059	This data group will be removed and added into N/X059 Staff
3	Remove Title I status (DG22)	This data group needs to be updated.	This change will not be made. Since the number of data groups in the file has been reduced, updating the Title I status will be less of an issue.
2	Remove Shared time school status (DG573)	This data group has a different due date.	This change will not be made. With the revisions, the due date for shared time status is the same as the others in the file.

Recommendations for N/X130 ESEA Status

Four SEAs provided recommendations for changes to this file. Two SEAs responded that submitting these files poses no problem.

# of SEAs	Recommended change	Reasons for change	ED's Response
4	Remove Persistently dangerous school status (DG36)	This data group should be in a file with other discipline data groups.	This change will not be made. The other discipline data is metric and a status data group cannot be added to it.

Recommendations for N/X131 LEA End of SY Status

Ten SEAs provided recommendations for changes to this file, although no State provided recommendations for each data group in this file. This file and N/X132 School End of SY Status are the most complicated status files. The table below provides the suggestions made for each data group in this file and the tally of States offering a specific suggestion.

# of SEAs	PSC/SES	DG614 REAP	DG664 Truants	DG603 GFSA status	DG454 School totals	DG524 Technology
1		Stop collecting		Group w/LEA level GFSA		With other technology data
2		Stays in 131	Stays in 131	Stays in 131	Stays in 131	Stays in 131
			With other discipline data	With other discipline data		
3		Put With Separate PSC/SES	Separate		Separate	Separate
					Stop collecting	
4				Separate		
8	Separate					

ED's Response
Eight of the ten SEAs recommended separating PSC/SES data groups from the end of school year status files. Since there are five PSC/SES data groups, ED agrees that it makes sense to create a new file from these data groups. The SEAs were divided on whether the REAP data group should remain with the PSC/SES data groups. To create a new file focused on PSC/SES, ED will not include non-PSC/SES data groups such as the REAP data group. The SEAs were divided on whether the remaining data groups should be separate or remain together. Slightly more SEAs were in favor of separate files. The discipline data groups (DG664 and DG603) will be pulled out while the rest will remain in the end of school year status files.

Recommendations for N/X132 School End of SY Status
Twelve SEAs provided recommendations for changes to this file. This file and N/X131 LEA End of SY Status are the most complicated status files. There was an error in the information provided in the directed question. In the directed question, three data groups related to public school choice and supplemental educational services were listed in error as part of this file. Those three data groups were deleted from the data set. The table below provides the suggestions made for each data group in this file and the tally of States offering a specific suggestion.

SEA	DG693 and 694 School improvement status	DG 31 School poverty percentage	DG 56 Economically Disadvantaged students	DG110 Migrant students	DG514 MEP status	DG603 GFSA status
1	Add to new files for SIG metrics	W/ DG56 Add DG699	W/ DG31 Add DG699	In program year file	In program year file	In school year file with LEA version
	In Regular SY file	In Oct 1 file (w/ DG56)	In Oct 1 file (w/DG31)			
2						
3		With DG56	With DG31	Separate		
4	Separate					
5				With DG514	With DG110	
6						Separate

ED's Response
ED agrees with the nine SEAs that recommended DG110 and DG514 be separated from the end of school year status file. A separate file will be created to collect the Migrant program data for these two data groups. The rest of the recommendations for moving data groups out of the status file had support from fewer than seven of the SEAs, thus the non-Migrant data groups in the file will remain in the school end of school year status file.

(15)   TITLE I STATUS

Should eligibility for Title I program type be collected separately from the program type participation?

In each State, certain schools are determined to be eligible for Title I funding according to the socioeconomic status of the student population served. Based on a school's eligibility, it may participate as a Title I school either as a targeted assistance program (TAS) or a schoolwide program (SWP). Schools eligible for a schoolwide program may also choose to have a targeted assistance program. In file N/X129 CCD School, ED collects in a single field the eligibility (targeted assistance, schoolwide, not eligible) and the program type (targeted assistance, schoolwide, none) for each school.

Public Comments
A total of 16 SEAs responded to this question. Eight SEAs indicated that the Title I data should be collected as it currently is with eligibility collected with program type participation. Four SEAs indicated that eligibility should be collected separately from program type participation. Two SEAs had no preference. Two SEAs recommended that only program type participation be collected.

SEAs that supported maintaining the current data collection method commented that the current method provides the program information needed. Several SEAs stated that their data collection systems are already set up to report these data and that collecting one data element is less burdensome than collecting two. One SEA noted that it makes it easier to identify eligible but not served schools.

The SEAs that preferred separating the data provided a variety of reasons:
- Improved data accuracy because the data are more straightforward
- Deadline for data for CCD is earlier than the State's Title I application deadline
- Eligibility and participation are completely different data

In addition to the 16 SEAs that responded to the question, one SEA commented that the Title I status data should not be used to validate the pool of secondary schools eligible for identification as a Tier II school under SFSF, Race to the Top and Title I School Improvement.

ED's Response
ED will maintain the current method of collecting Title I status data, the favored approach based on the public comments submitted. ED needs data both on eligibility and program type participation. ED disagrees with the SEA on the use of Title I status data to determine federal program eligibility. To the extent that a school must be a Title I school to participate in a program, ED can use the data on Title I status to validate the school's eligibility.

PUBLIC COMMENTS ON SPECIFIC AREAS OF THE DATA COLLECTION

This section contains the public comments on specific areas of the data collection. The table below lists the data subject areas for which public comments were received. The table includes the attachment where these data appear in this package.

Subject Area	Attachment
Accountability and Reporting Provisions of ESEA	B-3
Career and Technical Education	B-3
Charter Schools and Districts	B-3
Civil Rights Data Collection	B-4
Directory	B-1
Discipline Data	B-3
Funding Flexibility (Transfer Table)	B-3
General Education Provisions Act	B-3
Individuals with Disabilities Education Act	B-3
Limited English Proficient Students and Title III of ESEA	B-3
McKinney-Vento Homeless Program	B-3
Neglected and Delinquent Program	B-3

Subject Area	Attachment
Migrant Education Program	B-3
Non-Fiscal Common Core of Data	B-3
Public School Choice and Supplemental Educational Services	B-3
Safe, Drug-Free and Gun-Free Schools	B-3
School Improvement Grants	B-6
State Fiscal Stabilization Fund	B-7
Technology	B-3

For ease of reading, public comments that are technical and relate to specific data groups are presented in a table while public comments that are more general in nature are presented in paragraphs.

ACCOUNTABILITY AND REPORTING PROVISIONS OF ESEA

ED received one comment about consortium level data and several comments about specific data groups in this section.

Public Comments – Consortium level
The Accountability file (N/X103) needs to be able to be reported at the consortium level, not just the LEA level.

ED's Response
The file specification for the Accountability file (N/X103) contains instructions on how to report data for consortia.

DG	Public Comments	ED's Response
High school graduation rate indicator status table (DG557)	Eight SEAs had comments about the permitted values. The SEAs requested clarification of when to use "goal only," "target only," or "both goal and target." One SEA stated that since the goal is always greater than the target, if a school/district meets the goal, they automatically meet the target.	ED agrees and will change the permitted values for this data group to "Met (goal)," Met (Target)," and "Did not meet (goal or target)." The option "met (both goal and target)" is deleted.

DG	Public Comments	ED's Response
School Improvement Funds (DG694 and 693)	A commenter noted that section 1003 funds are available for more than one year and stated that, as a result, the data may be incomplete.	ED is requesting data on the most recently completed regular school year (plus summer, if 1003(a) or 1003(g) funds were used during this time). These data will yield information on what occurred during the regular school year (and, if applicable, summer) even if the data reflect use of only a portion of the funds available over two years. The explanation of the reporting period for these data groups has been revised.
	A commenter asked for a definition of school year, specifically whether to report on the period of the State's school year or the Federal fiscal year.	An SEA should report on the most recently completed regular school year (plus summer, if indicated and if 1003(a) or 1003(g) funds were used during this time). For example, in many States the reporting period for school year 2010-2011 will be the regular school year (e.g., September 2010 to June 2011) and summer if 1003(a) or 1003(g) funds were used during summer 2011. ED is not asking the SEA to report on the period covering the Federal fiscal year, which runs from October 1 to September 30. The explanation of the reporting period for these data groups has been revised.

CAREER AND TECHNICAL EDUCATION

ED received several comments on the data collected for career and technical education. In addition to questions on the following topics, ED received specific comments on the category sets and data groups.

- Definition of CTE Concentrators
- Incomplete Data
- Unduplicated Counts
- Negotiated Definitions
- Reporting by Consortia
- Due dates
- Reporting period
- Reporting by ED*Facts*
- Subtotals

The specific comments and responses on category sets and data groups are in the tables following the discussion of the above-listed general topics.

Public Comment s– Definition of CTE Concentrators
The phrase "CTE concentrator" should be replaced with "CTE senior concentrator." Junior concentrators should not be included.

ED's Response
The refinement is not needed. Students are counted when they exit the program regardless of whether the student is a junior or senior concentrator.

Public Comments – Incomplete Data
Some SEAs reported that they did not have data for all category sets used in the Perkins data groups. For example, one SEA noted that data on displaced homemakers should not be collected at the secondary level since the State's definition of displaced homemaker does not apply to secondary students, resulting in no data for category set G. Another SEA indicated that it did not have data to report for category set F (by single parent status), category set G (by displaced homemaker), or category set I (by Tech-Prep). The SEAs requested that these category sets be optional or that permitted values include "missing" and "not collected."

ED's Response
The Carl D. Perkins Career and Technical Education Act of 2006 (1830-0569) requires the collection of data on these subgroups; however, some States may not yet have the data. Instead of reporting data as missing or not collected in the ESS files, States will provide information to E*MAPS* regarding which data are not available and why. SEAs will not submit data to ESS for data they have identified in E*MAPS* as unavailable.

Public Comments – Unduplicated Counts
The data collections for some CTE data groups require unduplicated counts while others only require a count. CTE concentrators academic achievement table (DG681), CTE concentrators in graduate rate table (DG702), CTE concentrators in programs for non-traditional table (DG704), CTE concentrators placement table (DG736), CTE contractors technical skills table (DG705) and CTE participants in programs for non-traditional table (DG703) request the "number of" while CTE concentrators exiting table (DG521) and CTE contractors graduates table (DG320) request the "unduplicated number of." All should be "unduplicated."

ED's Response
ED agrees. The word "unduplicated" is used when the data by category set, subtotal or total should be unduplicated. The word "unduplicated" will be added to the definitions of the data groups mentioned except for DG681. DG681 is defined as including both reading and mathematics. The data are unduplicated by academic subject not at the category set level. A comment will be added to DG681 that the data are unduplicated by academic subject.

Public Comments – Negotiated Definition
Several SEAs noted that the numerators and denominators and the definitions of the data groups do not apply to their State or to most States since most States have negotiated definitions in their State plans. Some SEAs provided suggested rewording for the definitions. Other SEAs

recommended that there be no standard definitions and instead the States would be advised to use the definitions from their State plans.

ED's Response
ED has decided to leave the definitions as they are. These definitions reflect the non-regulatory guidance. Instead, the following comment is added to each data group: "If a State has a negotiated definition that is different, the State should use that definition."

Public Comments – Reporting by Consortia
The description of the directory in B-1 (SEA, LEA, and school) does not include reporting by consortia. Data for Perkins can be appropriately reported by consortia.

ED's Response
Data can be reported by consortia either using an LEA already in the directory as the lead LEA or setting up a consortia LEA with an education entity type of "other." This information will be included in the file specification.

Public Comments – Due Dates
One SEA reported that by definition the data for CTE concentrators graduation rate table (DG702) are not available until after the December 31 due date.

ED's Response
In cases where the State has a different computation period for data, the State has or can negotiate a different reporting scheme. Adjustments have and can be made in such instances. States should work individually with OVAE to define in their State plan the period for reporting and the year in which the data will be reported. This guidance will be included in the file specification.

Public Comments – Reporting Period
What is the definition of the reporting period "school year?" Is it the school year as defined by the State?

ED's Response
Yes. States may have individually negotiated a State plan with ED that defines the "school year." This guidance will be included in the file specification. The reporting period has been clarified in the relevant CTE data groups in attachment B-3.

Public Comments – Reporting by ED*Facts*
The reporting of CTE data through ED*Facts* has prompted the State to eliminate the legacy CAR data collection and instead extract the data from the State's student level database. The program office is working to understand how this new process of extracting data from the database and building files relates to the legacy CAR. Some data are difficult. The State is concerned about the accuracy of data by category set E (migrant status), category set F (single parent status), and category set G (displaced homemaker).

ED's Response

SEAs are responsible for ensuring their data collection and reporting systems yield valid and reliable data. ED appreciates the work required to transition to using the State's student level database to obtain the data on career and technical education, and recognizes the resulting benefits outweigh the burden.

Public Comments – Subtotals

For CTE concentrators graduates table (DG320) and CTE Concentrators academic achievement table (DG681), how does adding a subtotal by "diploma/credential (expanded)" and "proficiency status" instead of using the data by male and female improve data accuracy? Commenters requested an example of the recommended file layout.

ED's Response

Previously, data for all students was calculated by combining the data that was aggregated by sex (membership). Since it is possible that the data by sex (membership) is incomplete because the sex of some students is not known, ED added a subtotal. The subtotal represents the data for all students. The new file layout example will be included in the file specification.

The table below contains public comments on the category sets used in the Career and Technical Education data groups and ED's response to the comments.

Category Set	Public Comments	ED's Response
C – Data by disability status	How can disability status under ADA be a reporting requirement for Perkins when it is inconsistent with ESEA? According to the Perkins IV legislation, States are to report under the subgroups the State uses for ESEA reporting (Perkins IV: Section 113. (c)(2)(A): "Except as provided in paragraphs (3) and (4), each eligible agency that receives an allotment under section 111 or 201 shall--… disaggregate data for each of the indicators of performance under subsection (b)(2) for the categories of students described in section 1111(h)(1)(C)(i) of the Elementary and Secondary Education Act of 1965 and section 3(29) that are served under this Act…."	The Perkins program continues to allow States to use either disability status by ADA or by IDEA. States typically use one of the two measures and are encouraged to align their data collection and reporting to maintain consistency between measurements and classifications.
	Category set C is "Disability Status (only) OR Disability Status (ADA)" does this mean State report either, both or pick one?	States report one or the other depending on their State plan.
E – Data by migrant status	Does the definition of Migrant children align to the definition under ESEA as States are required to disaggregate data for Perkins IV reporting utilizing the subgroups specified under ESEA?	Yes, Perkins does not further define migrant. The ESEA definition is the same as the Perkins definition.

Category Set	Public Comments	ED's Response
F – Data by Single parent or pregnancy status	Since pregnancy status is a medical condition and thus covered by HIPPA, could the data category name "single parent or pregnancy status" be changed?	ED agrees. The name has been changed to "single parent status" which aligns with the term used in the CAR. The definition remains the same. Single pregnant women are to be counted in "single parent status."
H – Data by LEP status (Perkins)	How can SEAs use LEP based on the definition in Perkins when it is inconsistent with ESEA? According to the Perkins IV legislation, States are to report under the subgroups the State uses for ESEA reporting (Perkins IV: Section 113. (c)(2)(A): "Except as provided in paragraphs (3) and (4), each eligible agency that receives an allotment under section 111 or 201 shall--… disaggregate data for each of the indicators of performance under subsection (b)(2) for the categories of students described in section 1111(h)(1)(C)(i) of the Elementary and Secondary Education Act of 1965 and section 3(29) that are served under this Act…."	For purposes of reporting data for the CAR, SEAs are to use the definition of LEP laid out in the Perkins IV legislation. Because the Perkins IV LEP definition is less complex than the definition of LEP in ESEA, this approach allows States to be fully compliant with Perkins IV while experiencing less reporting burden.

The table below contains comments on the specific Career and Technical Education data groups.

DG	Public Comments	ED's Response
CTE concentrators graduates table (DG320)	The permitted values of the data categories "diploma/credential" and "diploma/credential (expanded)" are not adequately defined. Provide clear definitions preferably referencing categories used for ESEA reporting.	ED disagrees that the permitted values can be defined referencing ESEA reporting. The permitted values of "diploma/credential" are the permitted values that have been used for reporting of CCD for years. The permitted values for "diploma credential (expanded)" add two additional permitted values for Perkins reporting of "GED" and "Regular high school diploma in conjunction with a proficiency credential, certificate, or degree if offered by the State." These permitted values are based on the definitions negotiated with each State. ED will review these definitions in the future.

DG	Public Comments	ED's Response
CTE concentrators academic achievement table (DG681)	One commenter noted that the revision to this data group made the definition much clearer and eliminated confusion.	ED appreciates the feedback that changes were helpful.
CTE concentrators in graduate rate table (DG702)	Does the data group include in the computation as "not graduated" students in the cohort still enrolled in school for States reporting graduation rate based on the cohort method?	Yes. If a State computes graduation rate using the cohort method, then CTE students should likewise be reported. However, if the student graduates in a following year, the student can be counted as a graduate in that year in the numerator. This guidance will be included in the file specification.
CTE concentrators in programs for non-traditional table (DG704)	This data group should be "completers" not "concentrators" as specified in the Perkins IV legislation, Sec. 113 (2) (vi) "and completion of career and technical education programs that lead to non-traditional fields."	ED does not have a definition of completers. The data group is collecting data on the non-traditional students who enrolled and met the criteria negotiated with ED for completing the program.
CTE concentrators placement table (DG736)	One SEA reported that there was no State system for collecting the data. LEAs collect the data and send it to the SEA. However, there are no penalties to the LEAs if they don't provide data to the SEA.	States should align their collection and reporting systems to ensure valid and reliable reporting.
	Several SEAs stated that the scope of the students implied by the definition was different than the scope of students for whom the State was collecting placement information.	States should use the definition negotiated with ED for this indicator.

CHARTER SCHOOLS AND DISTRICTS

ED received one comment about the Charter School Program Awards Database and several comments about specific data groups.

Public Comments
One State recommended consolidating the Charter School Program Awards Database into ED*Facts*.

ED's Response

As discussed in Attachment B-1 under "Legacy Collections – Charter School Program (CSP) Grant Award Database (OMB1855-0016)," the CSP Grant Award Database was transformed to take advantage of the data available through ED*Facts*. The CSP Grant Award Database continues to collect data specific to charter schools funded by the CSP program. The system includes reconciling grant awards. ED*Facts* does not currently have the capacity for this reconciliation. As ED reviews its information technology investments, it will explore the merging of these two systems.

In addition to the above comment, ED received very specific comments about the data groups for charter schools and districts. The table below contains the comments and responses.

Data Group	Public Comments	ED's Response
594 Charter – approval agency type	Additional permitted values are needed for authorizers who are intermediate school districts (ISD)/regional educational service agencies (RESA) or are community colleges.	ED agrees that a permitted value for community colleges should be added. ISD and RESAs should be reported as LEAs.
DG594 Charter – approval agency type	Charter schools can transfer their contract from one authorizer to another. Does this item refer to the school's first authorizer or should this be updated when a school transfers to a new authorizer?	The authorizer should be updated when a school transfers to a new authorizer. The definition has been clarified.
DG605 Charter school year approved	Does this data group apply to all charter schools or only those charter schools receiving charter school grant funds?	It applies to all charter schools.
DG605 Charter school year approved	The State may approve a preliminary agreement prior to approving the charter contract. Should the school be reported as approved when it has a preliminary agreement?	No. The school is approved when the charter contract is approved and not when the preliminary agreement is signed.
DG605 Charter school year approved	Clarify the meaning of "initially approved."	"Initially approved" is when the authorizer has approved the charter and all parties have signed the performance contract.

Data Group	Public Comments	ED's Response
DG653 Charter school LEA status	One SEA indicated that none of the permitted values are applicable to the State. The SEA requested that the permitted value "An LEA for programs authorized under ESEA and IDEA but not under Perkins," be added.	In some States, programs under Perkins are operated through consortia not school districts. Some charter school LEAs are for elementary grade levels and have no secondary grades which would participate in Perkins programs. In either case, States should ignore the reference to Perkins in the permitted values and make the assignment based on how the charter school LEA is handled for IDEA and ESEA.
DG654 Charter – school year closed	Does "year closed" refer to the school year that the school last provided educational instruction to students or the school year that the closure was legally finalized?	"Year closed" refers to the year the closure is legally finalized. The definition has been clarified.
DG594, DG605, DG654,and DG606	The reporting period "on occurrence" needs to be defined. Instead, a snapshot in time is suggested.	ED agrees. The reporting period will be changed to October 1.
DG605, DG654, and DG606	It is recommended that ED collect calendar dates instead of school years.	School year is sufficient and specific dates are not needed.

CIVIL RIGHTS DATA COLLECTION

In this area, ED received comments about:
- Annual and Universal Collection
- Public Availability of Data
- Data Collection Disaggregated by Socioeconomic Status
- Racial/Ethnic Categories
- Data Burden
- Data Related to Women and Girls
- Single Sex Classes
- Teacher Qualifications
- Charter Schools
- Discipline Data
- Data on Incarcerated Youths
- Prekindergarten Discipline
- Athletics
- Bullying and Harassment
- Graduation Testing
- Alternative Schools

- School Expenditure Data
- Students with Disabilities

Public Comments – Annual and Universal Collection
Several commenters urged ED to collect data annually from all schools receiving federal financial assistance. These commenters stressed the importance of the CRDC collection.

ED's Response
The CRDC has primarily been a biennial data collection of a sample of LEAs with occasional collections from a universe of all LEAs. Beginning with the 2009-10 CRDC, the sample size was expanded from 6,000 to 7,000 LEAs. ED is currently planning for the next CRDC to be for the 2011-12 school year and to include a universe of all LEAs. This will provide both the planning time and other resources needed to successfully undertake the 2011-12 as a universe of all LEAs. As part of this planning process, ED will be exploring the feasibility of collecting additional data from SEAs through ED*Facts*.

Public Comments – Public Availability of Data
Commenters recommended that ED make the data that the CRDC collects publicly available and disseminate it widely.

ED's Response
ED has a longstanding commitment to transparency and recognizes the importance of making de-identified CRDC data available to the public. ED will continue to make the CRDC data available to the public consistent with ED's privacy policies, as it has in the past. A new CRDC Web site was launched in November 2009 that makes the data easier to find, navigate and manipulate. This Web site also includes State and national projections of CRDC data. The Web site contains CRDC data from 2000-2006, and will also include the 2009-2010 data when they become available.

Public Comments – Data Collection Disaggregated by Socioeconomic Status
Public comment was received requesting that the data be disaggregated by socioeconomic status, as designated by student eligibility for free and reduced-price lunch.

ED's Response
While ED believes socioeconomic status would be a useful data point for ED generally, collecting this information as part of the CRDC is not within OCR's regulatory authority.

Public Comments – Racial/Ethnic Categories
A commenter expressed concern about the impact of collecting data by the new seven racial and ethnicity categories and recommended that ED revise the policies set forth in ED's October 2007, "Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education." See 72 Fed. Reg. 59,266, (Oct. 19, 2007).

ED's Response

ED went through an extensive process, including opportunity for public comment, in developing the 2007 Final Guidance. Comments requesting changes to the provisions of the Final Guidance are beyond the scope of the request for public comment for this data collection.

Public Comments – Data Burden
Several commenters expressed support for the practice of using data from ED*Facts* instead of also collecting the same data through the CRDC. One commenter recognized the benefit of moving towards having all CRDC data collected through ED*Facts*, but expressed concern about additional burden if States were expected to provide data that they currently do not collect.

ED's Response
ED recognizes the importance of efforts to reduce reporting burden and plans to continue working with stakeholders and States to identify additional opportunities to do so. In this data collection, ED is not proposing to require States to collect data that they are not already collecting and reporting for other purposes.

Public Comments – Data Related to Women and Girls
Two commenters recommended significantly expanding the collection of data related to women and girls. A commenter proposed collecting data on the number of pregnant and parenting students and the type of education they are receiving including whether they are in alternative schools or programs for pregnant students. The commenter recommended identifying whether an alternative school is an alternative school for pregnant or parenting students. The commenter recognized the need for ensuring that the data be collected in a manner that protects the privacy of individual students.

ED's Response
In light of the significant changes that were made to the CRDC data collection beginning with the 2009-10 CRDC, ED has determined it would not be appropriate to increase burden by making the proposed changes at this time.

Public Comments – Single Sex Classes
Two commenters recommended collecting data on the race and ethnicity of students in single sex classes; whether equal coeducational options are offered; whether a single sex class of equal quality is offered to the opposite gender; and school-level expenditures on single-sex programs for boys and girls.

ED's Response
While several of the data collection items proposed by the commenter would provide useful information, reporting on these items in the CRDC would significantly increase the scope and burden of the data collection. Therefore, the proposed data items will not be collected at this time.

Public Comments – Teacher Qualifications

A commenter recommended that ED expand the data on teachers that is collected by the CRDC to include data on out-of-field teachers.

ED's Response
ED*Facts* already collects data on highly qualified teachers pursuant to the Elementary and Secondary Act of 1965 (ESEA). This ESEA data can be combined with the CRDC data on the number of teachers meeting certification requirements, teacher experience and teacher absences to provide a more complete picture of teacher quality at the school level. Therefore, ED is not proposing that further changes be made to the CRDC at this time.

Public Comments – Charter Schools
A commenter recommended expanding the CRDC to include the collection of data for all charter schools and to monitor the student attrition and graduation rate of every charter in the country.

ED's Response
The data collected by the CRDC identifies whether a school is a charter school and collects the same information for each charter school as for every other school that is included in the CRDC. ED is proposing to collect a universe survey which will include all charter schools for the next CRDC. Graduation and attrition data will be collected for charter schools to the same extent that it is collected for other schools.

Public Comments – Discipline Data
A commenter recommended expanding the discipline data collected for students served under Section 504 of the Rehabilitation Act of 1973 to include data disaggregated by race, ethnicity, gender, and LEP status. Commenters also recommended collecting data on the causes of school-based arrests and referrals, reenrollment and disenrollment rates for students after disciplinary actions have been taken, the types of incidents leading to arrests and referrals to law enforcement, the average length of time students spend in alternative schools, agreements between schools and police departments, types of incidents and form of discipline, and the educational outcomes for students returning from juvenile justice facilities.

ED's Response
ED recognizes that the proposed changes would provide valuable information. ED also recognizes that the discipline data collected by the CRDC has been significantly expanded and that, based upon considerations of the burden upon LEAs, these proposed changes should not be undertaken at the present time.

Public Comments – Data on Incarcerated Youths
A commenter recommended expanding the CRDC to include all juvenile justice facilities, including local detention facilities and private facilities, and to include adult facilities with incarcerated juveniles.   Another commenter recommended conducting a separate survey of facilities requesting information such as: is the student being held at such a facility subject to a juvenile or criminal justice proceeding; is the student being held at the facility pursuant to a court order; has the student been in custody for ninety days or more; how many hours of instruction are provided; and data concerning access to highly qualified teachers and ability to transfer

credits. One commenter asked that the data collection include disaggregated data about adult and youth incarceration.

ED's Response
The 2009-10 CRDC was expanded to include State juvenile justice agencies. As part of the planning for the next CRDC, ED will assess the feasibility of including incarcerated youths in other facilities.

Public Comments – Prekindergarten Discipline
Two commenters recommended collecting data on suspension and expulsion of prekindergarten students. They cited the data from the National Prekindergarten Study by the Foundation for Child Development indicating that prekindergarten rates of expulsion are greater than expulsion rates for K-12. They expressed concern that the prekindergarten students with some of the greatest need for prekindergarten programs may be particularly at risk for being excluded from those programs through suspension and expulsion.

ED's Response
ED recognizes the value and importance of collecting data on suspension and expulsion from prekindergarten programs and is, therefore, proposing to collect data on whether prekindergarten students have been suspended once, suspended more than once, or expelled. The data will be disaggregated by race/ethnicity, sex, disability and LEP.

Public Comments – Athletics
 A commenter recommended requiring schools to provide information about the benefits and services provided for every team from school and non-school sources (i.e. booster clubs, donations, and fundraisers) including the number of female and male students participating in athletic programs and the expenditures made for their sports teams and as well as expenditures for travel, equipment and uniforms; expenditures for all team playing facilities, locker rooms, and training and medical facilities; and expenditures for publicity, including school-sponsored support and any extracurricular or press activities. The commenter recommended collecting data on the overall performance of each team including total practices and competitions scheduled, along with regular-season and post-season statistics and total annual revenue generated. In addition, the total numbers of team coaches, trainers, and medical personnel should be reported, and for each, that data should be broken down by gender, employment status, and professional qualifications. The average annual institutional salaries of head and assistant coaches for both men's and women's teams should be included as well. Information about co-ed teams and the race/ethnicity of participants should also be added. A commenter also recommended that the CRDC continue to collect all data, including athletics from the same school year and that additional steps be undertaken to improve the quality of the athletics data collected.

ED's Response
As suggested by the commenter, ED plans to continue to collect all CRDC data from the same school year. Additional edit checks have also been incorporated in the CRDC to address the quality concerns raised by the commenter. ED believes that reporting on the additional requested

items, while potentially providing useful information, would increase the scope of the burden on the data collection and therefore does not propose to include additional items at this time.

Public Comments – Bullying and Harassment
A commenter urged ED to create separate reporting categories for harassment based on sexual orientation and for harassment based on cyber-bullying.

ED's Response
Although Title IX covers sexual harassment directed at gay or lesbian students to the same extent as other students, and prohibits harassment on the basis of gender stereotyping, it does not prohibit discrimination on the basis of sexual orientation. In addition, while collecting information on cyber-bullying could yield useful data, ED believes the burden of collecting this information in the CRDC exceeds the benefit at this time.

Public Comments – Graduation Testing
A commenter recommended that the CRDC collect data on graduation testing, which was previously collected by the CRDC. The commenter recommended that this data be collected in addition to data on retention in grade.

ED's Response
ED believes that collecting data on graduation testing would create additional burden on LEAs that would not be justified in light of the data that would be available on retention in grade including at the high school level.

Public Comments – Alternative Schools
Commenters recommended collecting additional data on alternative schools including whether it is a disciplinary alternative school or a school using an alternative curriculum.   They also recommended collecting data on students' average length of stay, teacher quality, student reenrollment and graduation rates upon return to their home schools.

ED's Response
The CRDC already collects data on whether an alternative school is for students with discipline problems, academic difficulties or is another type of alternative school. The CRDC collects data for all schools, including alternative schools, on the total number of teachers, the number of teachers meeting all State certification requirements, teacher experience and teacher absence. ED believes that the burden of adding additional unique data collection for alternative schools outweighs the benefits at this time.

Public Comments – School Expenditure Data
A public commenter asked why the school finance data, which was first collected as a one-time ARRA reporting requirement, was being added to an ongoing data collection.

ED's Response
ED is proposing to continue to collect the same data that was included in the 2009-10 CRDC.
School finance data provides important information that is relevant to understanding access to
equal educational opportunity.

Public Comment – Students with Disabilities
A commenter recommended that the CRDC expand the collection of data for students with
disabilities who are served solely under Section 504 of the Rehabilitation Act of 1973 to include
all data items collected by the CRDC.

ED's Response
The 2009-10 CRDC significantly expanded the amount of data collected on students with
disabilities who are solely served under Section 504. Given the increased collection of data
related to Section 504 students, ED believes that further expansion should not be made at this
time.

DIRECTORY

ED received comments about how to report data when more than one State agency is involved,
the definition of SEA, and the school level directory. In addition, there were comments about
specific directory data groups.

Public Comments – Reporting when more than one state agency is involved
One State indicated that the State agencies do not define LEAs and schools in the same way and
thus some entities used by one of the State agencies do not have the NCES IDs needed for
reporting through ED*Facts*

ED's Response
Each commenter needs to coordinate to create its hierarchy of LEAs and schools for reporting.
As a State enters an entity into ED*Facts*, the ED*Facts* system will automatically assign an NCES
ID to an entity according to its designated hierarchy if an NCES ID does not yet exist for that
entity. While each State's entity designations are unique, all States should be able to report
within the taxonomy of SEA/LEA/schools. The Partner Support Center is available to work with
States in developing an appropriate hierarchy for reporting.

Public Comments – Definition of SEA
One commenter noted that the definition of SEA is limited to the SEA that is responsible for
ESEA. How are other State agencies that are responsible for elementary and secondary
education reported?

ED's Response
The text in Attachment B-1 under the definition of SEA has been expanded to explain how the
designation of "SEA" may apply to other State agencies.

Public Comments – School level directory
One SEA requested that the school level directory be postponed until March 31 to allow SEAs to complete other tasks.

ED's Response
The data collection needs to become timelier. Moving the due date for the school level directory to later in the year does not support that goal.

In addition to the above comments, ED received very specific comments about the data groups for charter schools and districts. The table below contains the comments and responses.

Topic	Public Comments	ED's Response
Education Agency Type (DG453)	One commenter indicated that the change in the definition of the permitted value "other" for Education agency type (DG453) in the directory would increase data collection efforts by requiring the reporting of more entities.	The change does not require any additional reporting. The change was to explain the types of entities that might be reported as "other" so that if a State needed to report these entities the state knew where to report them.
Reconstituted Status (DG743)	Three SEAs requested more information about Reconstituted status (DG743). SEAs also requested information on how these data will be used.	The definition of the data group has been revised and comments added to better explain the data requested.

DISCIPLINE DATA

ED received comments about the need for a common set of disciplinary data definitions and standards.

Public Comments
Three SEAs requested that ED*Facts* use a common set of disciplinary data definitions and standards because the current approach is difficult and confusing for the LEAs. For example, under the current approach Students disciplined table (DG673, N/X136) includes tobacco possession while Children with disabilities (IDEA) reasons for unilateral removal table (DG476, N/X007) does not.

ED's Response
ED acknowledges that the discipline data can be confusing. Many of the definitions used are statutorily based and as such cannot be changed unilaterally by ED. For example, The IDEA statute requires States to report the number of children with disabilities subject to disciplinary removals, number of incidents, and duration of disciplinary actions, by race, ethnicity, limited English proficiency, gender, and disability category (20 USC 1418(a)(1))(A)(v) and (D)). In

addition, IDEA statute requires States to report the number of children with disabilities who are removed to alternative education environments or expelled as compared to children without disabilities who are removed to alternative educational environments or expelled (20 USC 1418(a)(1)(E). The definitions for "dangerous weapons", "drug offenses", and "serious bodily injury" used in the IDEA Discipline Data are defined in the IDEA statute and regulations (20 USC 1415(k)(7)(B), (C), and (D); 34 CFR 300.530(i)(2), (3), and (4)). Similar yet different terms and definitions for the Safe and Drug Free Schools and Communities program are also defined in statute.

Recognizing the data collection challenges, last July, ED met with the Agenda Committee of the National Forum on Education Statistics (Forum) to discuss updating the document *Safety in Numbers* which is a guide to the collection of discipline data. ED will continue to work with the SEAs and through the Forum to improve the guidance on the collection of discipline data.

FUNDING FLEXIBILITY (TRANSFER FUNDS TABLE)

ED received comments about the data group Transfer funds table which is being deleted from the data set.

Public Comments
One SEA stated that they agreed with deleting Transfer funds table (DG663) from the data set because two of the four programs that could transfer funds are no longer funded. Another SEA asked if these data would still be part of the CSPR.

ED's Response
While the data group is being removed from the ED*Facts* data set, the CSPR will continue to have the question on transfer of funds. The file in ED*Facts* collected the data at the LEA level while the CSPR collects the data only at the SEA level.

GENERAL EDUCATION PROVISIONS ACT

In this area, ED received comments concerned reporting more detail about distributions to postsecondary institutions, definitions of SEAs, guidance in the file specifications, and information provided to SEAs to assist with GEPA reporting.

Public Comments – Distributions to postsecondary institutions
Currently, funds distributed to postsecondary institutions are reported in aggregate as distributions to non-LEAs. In this package, ED changed the definition of "other agency" which is a permitted value under Education agency type (DG453) to include "postsecondary schools or agencies reported in order to include a postsecondary 'shared time' school, such as community colleges or technical institutes." Given this change to the definition, we recommend that ED collect more detailed data on amounts distributed to postsecondary institutions.

ED's Response
ED will explore collecting more detailed data on distributions to postsecondary institutions.

Public Comments – Definition of SEA
The definition of State education agency (SEA) is written to cover only one State agency. In some States, other State agencies are responsible for the grants under *Carl D. Perkins Career and Technical Education Act of 2006.*

ED's Response
The definition of SEA in Attachment B-1 is provided to clarify that the directory data should be reported about that State agency. In some States, data for the ED*Facts* collection will come from other State agencies. We have added language to that section.

Public Comments – Guidance in the file specifications
The file specification guidance does not explain how States report when the State consolidates Title I (CFDA 84.048A) funds with Title II (CFDA 84.243) funds as allowed under *Carl D. Perkins Career and Technical Education Act of 2006.*

ED's Response
ED agrees that such guidance should be included in the file specifications.

Public Comments – Information provided to SEAs
Previously ED provided a list of State-administered programs included in the GEPA 424 data collection listed by CFDA number, program name, and allocation amounts. This information was very helpful.

ED's Response
ED will explore ways to provide this information in the future.

<div align="center">INDIVIDUALS WITH DISABILITIES EDUCATION ACT</div>

In this area, ED received comments about three specific topics:
- Possible changes to the permitted values of the category Education Environment (Early Childhood)
- The inclusion of students who exited special education in assessment data
- Increasing the number of SEAs that are ESS-only for Table 6 which collects data on statewide assessments

Public Comments – Education Environment (Early Childhood)
Some SEAs expressed concern about being able to modify their information systems to collect data by the revised permitted values for the category educational environment (early childhood).

ED's Response
For States unable to comply with the permitted values for the category educational environment (early childhood) for SY 2010-11, alternate permitted values have been added to the ED*Facts* data set for SY 2010-11 only that will allow these States to report educational environment data for all children.

Public Comments – Students who exit special education
Table 6 and the CSPR have different requirements for the inclusion of students who have exited special education.

ED's Response
Children who have exited special education before the State's testing window should not be included in the assessment data as children with disabilities (IDEA). The data reported as data for children with disabilities (IDEA) should include only children who are children with disabilities during the testing window. The confusion may be caused by the inclusion of these students in the subgroup for children with disabilities (IDEA) for purposes of calculating adequate yearly progress (AYP). While students who exited special education can be included in the subgroup children with disabilities (IDEA) for calculating AYP, these students are not included in the subgroup when reporting data on participation or academic achievement on statewide assessments.

Public Comments – ESS only for Table 6
Based on the chart provided, it appears that the number of States approved for ESS-only submissions has increased over the years with the exception of Table 6 which collects data on statewide assessments. One SEA suggested that ED form a "working group" to gather information from the States in order to increase the number of ESS-only States.

ED's Response
Instead of a working group, ED will be using existing venues to discuss improving the quality of data on statewide assessments so that more SEAs can obtain "ESS-only" status.

LIMITED ENGLISH PROFICIENT STUDENTS AND TITLE III OF ESEA

In this area, ED received comments about the annual collection of data and comments about two data groups.

Public Comments
Several SEAs asked if the annual request for data for the Title III program was inconsistent with a provision in section 3121 of ESEA, Title III, Part A calling for evaluation every second fiscal year. The commenters were concerned that under that provision LEAs could refuse to provide data to the SEA.

ED's Response
Other provisions in EDGAR allow SEAs to require from subgrantees the data that are necessary to comply with federal reporting. Section 76.720 requires annual reporting by the State. Section 76.722 allows States to require reporting by subgrantees that is necessary for the State to comply with section 76.720.

In addition to the above comment, we received very specific comments about the data groups for LEP students and Title III. The table below contains the comments and the response.

Data Group	Public Comment	ED's Response
Title III LEP English language proficiency results table (DG050)	Are students who attained English proficiency also counted as "making progress?"	Under ESEA, each State defines "making progress." A State may include in its definition of "making progress" students who score proficient and have scores from two test administrations.
LEP enrolled tables (DG678)	Expressed support for the removal of the category "proficiency level"	No response needed.

MCKINNEY-VENTO HOMELESS PROGRAM

In this area, ED received comments about the information needs of the McKinney-Vento Homeless Program.

Public Comments

One commenter stated that data for this area are available from the State's student information system and are necessary for the proper functioning of ED. The commenter also noted that LEAs need to understand the importance of these data perhaps through ED mandating a system of data collection across the States. Another commenter recommended that the category "homeless unaccompanied youth status" be added to "Homeless students enrolled table (DG655)" so that data on unaccompanied youth could be collected from all LEAs instead of just from LEAs that have subgrants. Another commenter recommended that ED identify the districts with subgrants in order to better monitor how the program is performing.

ED's Response

ED agrees that the data are important and that data on unaccompanied youth would be useful. ED does not have the authority to mandate a data collection system across the States for this program. Through technical assistance and other activities, ED will continue to communicate the importance of these data. While ED agrees that data on unaccompanied youth from all LEAs would be useful in understanding homelessness, at this time, the extra burden of data collection exceeds the benefits of having the data. ED currently reviews the data at the LEA level to determine how the program is performing.

NEGLECTED AND DELINQUENT PROGRAM

In this area, ED received comments about the information needs of the Neglected and Delinquent Program and the requirements for zero counts.

Public Comments – Information needs

One commenter stated that data for this area are available from the State's student information system and are necessary for the proper functioning of ED.

ED's Response

No response needed.

Public Comments – Zeros
Another commenter expressed concern about the instructions regarding zero counts.

ED's Response
ED agrees that the instructions can be improved and will do so.

MIGRANT EDUCATION PROGRAM

In this area, ED received a comment about MSIX and several comments about specific data groups.

Public Comments
One SEA stated that the existence of both the migrant student exchange system (MSIX) and the reporting of data to ED*Facts* from data in the State's statewide longitudinal data system (SLDS) has resulted in conflicting data being reported between the two systems.

ED's Response
While, ED understands why confusion over these two systems might exist, the two systems serve distinct purposes. MSIX is for the transfer of student records while the SLDS is for statistical and program reporting. Each State needs to establish data quality control practices so that the data in both systems are accurate and complete.

In addition to the above comment, ED received very specific comments about the data groups for migrant education program. The table below contains the comments and the response.

Data Group	Public Comments	ED's Response
Migrant students eligible 12-month table (DG634)	Why were data aggregated by race ethnicity?	Data are used to obtain a fuller picture of the migrant population.
Migrant students eligible 12-month table (DG634)	Why are data aggregated by the category "mobility status (qualifying moves)"?	Last qualifying move data provide information about the mobility of the migrant population in a particular State, including the number of children who have recently moved (in the last 12 months) and also provide an indication of the number of children who remain in the State past 36 months. This information is also provided to migrant professionals, members of Congress, and in responses to information inquiries.

Data Group	Public Comments	ED's Response
MEP personnel (FTE) table (DG515) and MEP personnel (headcount) table (DG625)	The data are aggregated by the category "Staff Category (MEP)." However, the State has job classifications that fall outside of the permitted values. For example, the State has ID&R recruiters, data coordinators, and regional directors. What is the rationale for collecting MEP funded staff under these classifications only?	The permitted values are based on information obtained from the States. The permitted values are updated when the ED receives information about changes in practices or terminology. For the examples provided, the ID&R recruiter would be reported under recruiters and the data coordinators would be reported under records transfer staff. ED agrees that the current permitted values do not cover a regional director. A permitted value for "administrators" will be added.

NON-FISCAL COMMON CORE OF DATA

ED received one comment regarding the Non-Fiscal Common Core of Data.

Public Comments
One State provided several recommendations for improving the guidance in the Membership file specifications (N/X052, DG039), through providing definitions and clarifications as bulleted, below:

- Provide definitions of "home district," "sending district," "receiving district," and "school of record."
- Provide definitions of grade levels
- Include CCD guidance on counting student membership when a student simultaneously attends more than one school (shared time)
- Provide clarification that file N/X052 collects headcount versus FTE data.

ED's Response
These recommendations will be included in the file specifications guidance prepared for SY 2010-11.

PUBLIC SCHOOL CHOICE AND SUPPLEMENTAL EDUCATIONAL SERVICES

ED received two comments about one of the data groups for public school choice.

Data Group	Public Comments	ED's Response
Public school choice unable to implement (DG701)	A commenter requested clarification because the definition did not seem to be answered by the permitted values	ED agrees that the data group, as constructed, was confusing. The data group has been revised to address the concerns raised by the commenter.

Data Group	Public Comments	ED's Response
Public school choice unable to implement (DG701)	A commenter requested the rationale for collecting choice options by grade levels. States are required to provide an indication of whether an LEA was not able to implement public school choice; the permitted values for this group allow a State to indicate whether an LEA was unable to implement public school choice at one or more grade levels (but not all grade levels) versus at all grade levels.	ED believes that collecting data in this manner will provide States and ED with useful information on the extent to which public school choice is a viable option in LEAs. These data are already required in question 1.4.9.1.4 of the Consolidated State Performance Report (CSPR). The guidance for this question states that States should include in these counts LEAs that are unable to implement public school choice at one or more grade levels or at any grade level.

SAFE, DRUG-FREE AND GUN-FREE SCHOOLS

ED received some general comments about the Safe. Drug-Free and Gun-Free Schools data proposed for collection in this section and some specific comments about two data groups.

Public Comments – Program not funded in FY 2010
Several comments were related to the fact that the Safe and Drug-Free Schools and Communities Act (SDFSCA) State Grants program has been eliminated (not funded in FY 2010); commenters wanted to know if these data would still be collected.

ED's Response
The Consolidated State Performance Report (CSPR) data will continue to be collected while the State Grants funds are still active. ED will be providing additional guidance to states prior to the start of SY 2010-11 regarding expectations related to the submission of these data. Gun-Free Schools Act (GFSA) data will continue to be collected in ED*Facts* since GFSA is authorized under a different section of the SDFSCA, as are data on persistently dangerous schools, which are authorized under the Unsafe School Choice Option (USCO) in a different section of the ESEA.

Public Comments – GFSA never funded
One comment stated that the Gun-Free Schools Act has never been funded.

ED's Response
It is correct that the Gun-Free Schools Act has never been funded. However, the current legislation requires that each State receiving ESEA funds must annually report GFSA data to ED (Section 4141 of the SDFSCA).

In addition to the above comments, we received comments about the data groups for safe, drug-free and gun-free schools. The table below contains the comments and the responses.

Data Groups	Public Comment	ED's Response
Firearm incidents table (DG601) and Students involved with firearms table (DG596)	Why is "MISSING" a permitted value for the "weapon" data element under one data group (DG596) and not another related data group (DG601)?	"Missing" needs to be removed from DG596.
Truants (DG664)	One comment expressed concerns about the inconsistency of the definition of truant among SEAs and LEAs. Another comment recommended that ED should provide a uniform definition of truant for States	It is correct that there is no uniform definition of truancy across States and LEAs; this lack of uniformity makes meaningful comparisons difficult. The SDFSCA requires that States collect and report truancy rates as part of their Uniform Management Information and Reporting System (UMIRS). Although the legislation does not provide a definition for truancy, a recommended definition of truancy is provided in *The Uniform Data Set: A Guide to Measures for the Uniform Management Information and Reporting System*, a draft report that was developed with input from States as guidance for reporting UMIRS information in standardized ways..

SCHOOL IMPROVEMENT GRANTS

In addition to comments on specific metrics, ED received comments on the Attachment B-6 in the following areas:

- Availability of data
- Baseline data
- Reporting period
- Scope of the data collection

The comments on the specific metrics are listed after these more general comments.

Public Comments – Availability of data
Several SEAs noted that they would have to implement new data collections to capture some of the new SIG items and one commenter indicated that the data could not reasonably be collected until school year 2011-2012.

ED's Response

ED recognizes that it is possible an SEA will have to implement new data collections to capture some of the new SIG items. ED believes, however, that the collection of these items is important to being able to evaluate the effectiveness of the school intervention models required by the SIG program. Given the advance notice that was given regarding the reporting requirements for Tier I and Tier II schools served with SIG funds (December 2009), ED expects each SEA to report this information for these schools from their first year of SIG implementation (encompassing school year 2010-2011) during school year 2011-2012 (in accordance with EDF*acts* reporting timelines) and subsequent years, as well as report available baseline data from the year prior to SIG implementation following the timeline presented in the SIG section of EDF*acts*.

Public Comments – Baseline data
One SEA stated that baseline data should not have to be reported for a school that closed (closure model).

ED's Response
ED agrees. We have modified the reporting instructions to exclude collecting baseline data (from the year prior to SIG implementation) for a school that implements the closure model. We also changed the instructions to indicate that, among the new SIG items, the only data group for a school closure school that must be reported is "Intervention used."

Public Comments – Reporting period
Several SEAs asked for clarification of the reporting period.

ED's Response
The reporting period is generally the regular school year. In some cases, the reporting period is the regular school year plus the summer session. The reporting periods for the SIG data groups have been clarified.

Public Comments – Scope of data collection
Is the SIG data for all Tier I and Tier II schools or only Tier I and Tier II schools served with SIG funds?

ED's Response
Consistent with K-3 in ED's SIG guidance and with the purpose of the reporting requirements to inform and evaluate the effectiveness of the school intervention models (*see* section III.A. of the final requirements for SIG), ED is requesting the reporting of SIG data only for Tier I and Tier II schools served with SIG funds during the school year for which a State reports. We have clarified the reporting metrics to indicate that the data must be reported only for Tier I and Tier II schools served with SIG funds.

Metric 5 – Number of minutes within the school year

The table below contains the comments on metric 5.

Public Comment	ED's Response
An SEA asked whether minutes from "increased learning time" should be included in the total number of minutes it reports for each school.	Yes, the "number of minutes" reporting indicator includes the total number of minutes within the school year, including the minutes added due to the increased learning time. We note that, to satisfy the requirements of the turnaround model and the transformation model for providing increased learning time, a before- or after-school or weekend instructional program must be available to all students in the school.
An SEA asked whether minutes for an activity that was not available to all students should be excluded.	Yes.

Metric 8 - Average scale scores on State assessments in reading/language arts and in mathematics, by grade, for the "all students" group, for each achievement quartile, and for each subgroup

The table below contains the comments on metric 8.

Public Comment	ED's Response
Two SEAs noted that including results from alternate assessments in "average scale scores" may not be possible when an alternate assessment does not produce a scale score or when including the results would not be statistically valid, such as in the case of averaging a scale score from the general assessment with that of the alternate assessment.	ED agrees. ED has modified the instructions to this item to specify that the average scale scores for the general assessments and alternate assessments, if scale scores are available for the alternate assessments, will be reported separately. ED understands that because only a small number of States use alternate assessments that produce scale scores, most SEAs will report scale scores only for their general assessments. ED also notes that this is not the only item that captures student performance data. Through a separate item, SEAs report the number of students taking the State assessments and the number proficient, including for students with disabilities.
One SEA indicated that some schools may have too few students in each grade for the average scale scores by grade to be meaningful.	ED agrees that a small cell size may limit the usefulness of certain data. Through another ED*Facts* file specification, ED collects the number of students assessed. This information will be considered in terms of how to analyze the average scale score data.

Public Comment	ED's Response
An SEA asked whether ED is requesting the scale score for the 25th, 50th, and 75th percentiles or the average scale score for students in each of the four equal ranges (e.g., the average scale score for students in the 1st to 25th percentile, etc.).	ED is requesting the scale scores at the 25th, 50th, and 75th percentiles.

Metric 9 - Percentage of limited English proficient students who attain English language proficiency

The table below contains the comments on metric 9.

Public Comment	ED's Response
One SEA requested that ED not add school level to N/X137 to collect the data for this metric because the data are required for only Tier I and Tier II schools and not all schools. Instead the SEA recommended that the data be collected with other SIG data.	Regardless of which file the school level data are submitted through, only the data for Tier I and II schools that implemented the restart, transformation, or turnaround model and were served with SIG funds will be required.

Metric 11 – Dropout rate

The table below contains the comments on metric 11.

Public Comment	ED's Response
Unlike the cohort graduation rate utilized for Metric #10, the dropout rate does not account for mobility. Using a point estimate for the denominator and not taking into consideration the mobility of students (transfers in and out), the numerator could be inflated.	ED agrees that the dropout rate as proposed does not account for mobility. However, the burden to collect data that would account for mobility would be significant. Therefore, ED will use these data with the caution that they do not account for mobility.

Metric 13 - Number and percentage of students completing advanced coursework (e.g., AP/IB) and/or dual enrollment classes

The table below contains the comments on metric 13.

Public Comment	ED's Response
Two SEAs asked for further clarification on the term "course completion," and whether courses should be counted by semester or number of hours.	"Course completion" means that a student finished an advanced coursework class for which he or she received credit in accordance with State or local requirements
An SEA asked if the count of students taking advanced coursework is duplicated.	An SEA should report a student only once if he or she completed more than one advanced course. This is consistent with the fact that the relevant counts for this reporting metric are the number and percentage of students completing advanced coursework, not the number of courses completed.

Metric 16 - Truants

The table below contains the comments on metric 16.

Public Comment	ED's Response
The quality of data on truant is inconsistent because each SEA and LEA have their own policy on truancy. Therefore, the use of these data is questionable.	ED agrees that definitions of truant vary. However, the data are still useful.

Metric 17 - Distribution of teachers by performance level on LEA's teacher evaluation system

The table below contains the comments on metric 17.

Public Comment	ED's Response
The meaning of this data may vary by districts for the simple reason that districts may evaluate teachers differently.	ED agrees that definitions vary. However, the data are still useful.

Metric 18 Teacher Attendance Rate

The table below contains the comments on metric 18.

Public Comment	ED's Response
A commenter indicated that ED needs to provide a definition of teacher attendance.	A definition is provided under "comment" in the file spec for this item. ED also intends to issue SIG reporting guidance that will provide additional information on this and other SIG items.
A commenter stated that there is a contradiction between the SIG program's focus on professional development and the definition of teacher attendance that counts a teacher as absent if he or she is participating in professional development.	ED appreciates the point made by the commenter and has modified the definition accordingly. ED has modified the definition so that a teacher participating in professional development while school is in session is not counted as absent.
A commenter asked whether the teacher attendance percentage should be determined based on whole numbers or on fractions.	An SEA should calculate the attendance percentage using full-time-equivalent (FTE) number of days that teachers worked and the maximum number of FTE teacher working days. ED has modified the instructions to make this clearer.
One commenter recommended deleting this item because it had previously collected the data but determined that the data were not useful nor of the highest data quality.	It is crucial for teachers to be in the classroom on a regular and consistent basis to provide instruction to their students. Effective teachers and high quality instruction are essential in order to help turn around low-achieving schools. ED will collect this information on teacher attendance in the persistently low-achieving Tier I and Tier II schools served with SIG funds.

STATE FISCAL STABLIZATION FUND

The comments submitted regarding the collection of data for SFSF as laid out in Attachment B7 included general comments and questions as well as specific questions tied to an SFSF indicator. General comments or those related to data groups listed in Attachment B7 are summarized below along with ED's response to the comments.

Public Comments – Collection of New Items

Three States commented that the teacher and principal evaluation information is to be collected via the ARRA 1512 quarterly reporting.

ED's Response

Data for the SFSF metrics will not be collected via the 1512 quarterly reporting. Decisions on the specific method to collect new items for SFSF have not been finalized, which is why these proposals have been added to the ED*Facts* information clearance package.

Public Comments – Confidentiality
Many States commented that they were concerned about maintaining the confidentiality of individuals who have been evaluated, and wanted further guidance from ED on how they should report the data, and how ED would ensure confidentiality protection when using and releasing the data.

ED's Response
 ED shares the States' concern on this issue. In the last month, ED announced the creation of the Privacy Technology Assistance Center. Further guidance on proper practices which SEAs and LEAs should use when publicly reporting student data and data on teacher and principal evaluations will be forthcoming.   The guidance put out by ED for States and districts will be implemented as appropriate within ED when making public any information submitted to ED*Facts*. ED is in agreement that student achievement data and data on teacher and principal evaluations are especially sensitive.   While ED has many years of experience in collecting and safeguarding the privacy of sensitive student data, the 2010-11 school year marks the first year in which ED will be collecting data on the evaluation of teacher and principal performance. For this reason, in contrast to other data reported to ED*Facts*, ED is modifying these two new, proposed data groups at this time to collect the data as posted by the SEA on its website. This would mean that data submitted to ED*Facts* for these two data groups for school year 2010-11 would be suppressed for privacy by the State before submission. For all other data groups within ED, the Information Quality Guidelines require that data are submitted in their unsuppressed form.   ED implements procedures to protect the privacy of individuals before publishing any data submitted to ED*Facts*.

Public Comments – Burden
The addition of DG741 (persistently lowest achieving) will lead to increased data collection burden.

ED's Response
The burden for collecting data regarding the identification of PLA was covered in Fall 2009 SFSF clearance. See Docket ID ED-2009-OESE-007.

Several of the comments submitted related directly to an SFSF indicator. These comments and ED's response are listed by indicator in the following table.

SFSF Indicator	Public Comments	ED's Response
(a)(4) and (a)(7)	The most commonly reported concerns around the new data elements proposed to address these indicators had to do with the need to map performance levels used in LEAs across the State. There was concern that reporting data by level would be meaningless since many districts (and in one case, individual schools within a district) would use different evaluation levels. Commenters were concerned that there would be no way to reliably use the data without collecting added metadata about what the reported levels meant. Some States expressed concern that this would require a second collection from each LEA, in addition to the count of teachers and principals in each performance level, to get some data on the names, meanings and implications of each level being reported.	The need for the SEA to collect and manage data on teacher and principal evaluations, along with any associated "metadata" on the meaning of individual levels, was discussed during the clearance of the SFSF metrics and the Phase 2 application in the fall of 2009. ED agrees that data in addition to the groups proposed in the original Attachment B-7, additional data will be necessary to maximize the use of this data. For this reason, this revised package contains two new data groups, proposed at the LEA level, to gather information on each of the performance levels (up to 6) used at specific LEAs.
(c)(11) and (c)(12)	Do students attending institutions of higher education (IHEs) outside of the State where they graduated from public high school need to be included in the counts for (c)(11) and (c)(12)?	As discussed during the SFSF metrics comment period, students attending IHEs outside of the State where they graduated from high school would need to be included in data for (c)(11) and would not need to be included in data for (c)(12).

SFSF Indicator	Public Comments	ED's Response
(c)(11) and (c)(12)	Four States commented on a reliance on the National Student Clearinghouse (NSC) to be able to report this information. They expressed concern that (c)(12) cannot be addressed with data currently collected at NSC, and States were not clear regarding how they would be able to report this information.	ED recognizes that current State data capabilities largely do not meet the needs of the (c)(12) metric. ED is working with States through the Statewide Longitudinal Data System grants program to improve the States' ability to address this metric. ED understands that the National Student Clearinghouse has some solutions which may help States in preparing data for (c)(11) and (c)(12). However, ED is concerned with the State developing the capability to address issues such as those outlined in (c)(12). For this reason, and has been discussed in the SFSF Phase 2 applications, it is important for each State to develop the capability to report on metric (c)(12).
	(c)(11) describes "an institution of higher education (IHE) (as defined….)" and (c)(12) describes "a public IHE (as defined….)" Are private IHEs not to be included when determining counts for (c)(11) but are to be included in (c)(12)?	Correct. Students attending private IHEs within the same State where they graduated from high school do not need to be included in the credit earning counts for (c)(12), but would be included in the enrollment counts reported for (c)(11)
	"within 16 months" - is that within 16 months of actual graduation, or 'expected graduation'	Actual graduation.
	"one year's worth of college credit" - Is more guidance coming out on this? States asked about Carnegie unit counts, etc.	States define what constitutes one year's worth of college credits.
	How is "enrollment" defined?	States define what constitutes "enrollment."

SFSF Indicator	Public Comments	ED's Response
(d)(1), (d)(2), (d)(9) and (d)(10)	Will the guidance on the inclusion of LEP students in the SFSF guidance ("as under section 1111(b)(2)(c)(v) of ESEA") and guidance in the existing ED*Facts* File Specifications be aligned to ensure that existing data groups can indeed be used for (d)(1), (d)(2), (d)(9), and d(10)?	The guidance for reporting LEP student data on SFSF indicators aligns with the guidance used for other ED*Facts* data groups and file specifications. While some States choose to count formerly LEP students in the LEP student subgroup for calculating accountability, formerly LEP students may not be included in the LEP student subgroup for reporting purposes.
	Are there established guidelines for a minimum group size when determining if "progress" was made "across all subgroups at the school?" Must a subgroup within a school meet that minimum size for both years when determining "progress?"	Yes, a State is to use the minimum group size defined in its approved accountability workbook when determining academic progress made across all subgroups and across multiple years.
	Clarify the comparisons between statewide average school gains and progress based upon ED*Facts* data groups to ensure that those comparisons which would utilize ED*Facts* data are in line with published SFSF guidance. Issued SFSF guidance promised future guidance related to determining progress across multiple grade levels. The proposals in the ED*Facts* package did not address this issue at all. Would weighting across grades be used?	No additional guidance on this issue is forthcoming. States have flexibility in determining how best to consistently measure progress across multiple grade levels.

SFSF Indicator	Public Comments	ED's Response
(d)(1), (d)(2), (d)(9) and (d)(10)	When determinations of progress are being made, and therefore 2 years of data are being used, which year of status data would be considered? For example, if a school was identified for improvement in 2009-10, made progress and was not identified for improvement in 2010-11, would its results be included when reporting on (d)(1) or (d)(2) for the 2010-11 school year?	Yes. The schools to be included in measures of progress for indicators (d)(1) and (d)(2) are those schools that were identified as schools in need of improvement, corrective action, or restructuring for the year prior to the reporting year for these indicators. For example, when reporting on these indicators for the 2010-2011 school year, an SEA would report on the progress of all Title I schools in 2009-10 school year identified as in improvement, corrective action, or restructuring. A change in the school's Title I status or improvement status in the reporting year, in this case the 2010-2011school year, would not exclude a school from being included in the progress measurements. The school in need of improvement that moved out of improvement as referenced in the commenter's example would be included when reporting on the progress measurements for indicators (d)(1) and (d)(2).
d(12)	Consider adding three additional permitted values: • Governance/Management • Facility Issues • Compliance Issues	While ED will not add these three additional permitted values, an SEA may choose to use the 'Comments' space to provide further detail to data it reports under the 'other' permitted value.
	It is recommended that the data steward for submitting the data for this indicator is from the charter school office.	ED encourages data stewards in the education program offices at the SEA and ED*Facts* Coordinators to work together closely in submitting federal education program data.

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TECHNOLOGY
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ED received comments on all four data groups listed in the technology section of Attachment B3. Other than the two comments listed below, the rest of the comments are organized in this section by data group.

Public Comments – Information need
One commenter noted that LEAs have difficulty reporting the Computer table (DG525) and it would be useful if the States had a better understanding of how the data are used so that the States could provide the most accurate information.

ED's Response
Rather than respond specifically about the Computer table (DG525), it would be more helpful to explain the collection of all the data groups in the section Technology. These data groups are collected for multiple purposes including:

- To track progress nationally on the use of technology to support education and student achievement
- To assess performance of the Title II, Part D Enhancing Education Through Technology (EETT) Program and improve program management
- To identify areas that need to be addressed through targeted monitoring and technical assistance to EETT grantees
- To plan EETT National Activities technical assistance
- To prepare budgets and Congressional Budget Justifications
- To inform reauthorization
- To report progress to the Office of Management and Budget (OMB) and to Congress on EETT Government Performance and Results Act (GPRA) measures
- To carry out the OMB Program Assessment Rating Tool (PART) improvement plan by collecting data on EETT performance measures and establishing baselines and targets; making program performance information available to the public in a transparent manner; and working with States to ensure that program goals and purposes are understood, data reporting is accurate, and stakeholders are constantly working to improve program performance

As explained below, the data collected are used for all four GPRA objectives and performance measures:

GPRA Objective 1: Fully integrate technology into the curricula and instruction in all schools to enhance teaching and learning
GPRA Measure 1.1**:** The percentage of districts receiving Educational Technology State Grants funds that have effectively and fully integrated technology.

GPRA Objective 2: To help ensure that students and teachers in high-poverty, high-need schools have access to educational technology comparable to that of students and teachers in other schools
> GPRA Measure 2.1: The percentage point difference in Internet access between classrooms in high- and low-poverty schools

GPRA Objective 3: To provide professional development opportunities for teachers, principals and school administrators to develop capacity to effectively integrate technology into teaching and learning
> GPRA Measure 3.1: The percentage of teachers who meet their State technology standards

GPRA Objective 4: The percentage of students who meet State technology standards by the end of the eighth grade
> GPRA Measure 4.1: The percentage of students who meet State technology standards by the end of the eighth grade

Public Comments – National Educational Technology Plan
Overall, revised educational technology indicators should align to the new National Educational Technology Plan (NETP) to effectively measure progress. Meaningful reporting should be directed toward the goals of the NETP. The current indicators are reflective of the 1998 National Technology Plan and have not been revised since that time.

ED's Response
The current measures were developed under the Elementary and Secondary Education Act (ESEA), as amended January 8, 2002, Title II, Part D (Public Law 107-110). After ESEA reauthorization, ED will work with OMB to ensure that the technology measures reflect the goals of the new legislation. To the extent that the National Educational Technology Plan (NETP) is reflected in the new legislation, it will provide statutory justification for ED to ask for data to address the NETP goals and related issues.

The rest of the public comments are organized by data group.

8th grade technology literacy table (DG650)

The table below contains the comments received related to "8th grade technology literacy table (DG650)." No changes were made to this data group.

Public Comments	ED's Response
Growth - The performance metric is a binary distinction applied to each student (i.e., each student is "technologically literate" or not) and therefore this indicator does not provide an opportunity to show growth over time. States should be encouraged to use pre- and post-assessments so that collection of data on growth can replace the current collection of data.	ED agrees that data on growth is useful but the burden of collecting such data is significant.
Scope – Collection of these data should be limited to LEAs that receive a minimum level of funding, for example, at least $25,000.	Data are collected from all LEAs because of the emphasis in the legislation on all students: "…ensuring that every student is technologically literate by the time the student finishes the eighth grade…" (Elementary and Secondary Education Act, as amended January 8, 2002, Title II, Part D, Section 2402(b)(2)(A) (Public Law 107-110)).
State-defined - The performance metric is not meaningful in the aggregate given differences in State and/or local definitions. Consequently, there is no ability to conduct State comparative analyses or to provide a meaningful national snapshot of progress in technology literacy for students. The data group could be improved if a minimum definition was set for technology literacy.	Under ESEA, the States set their own definitions of technology literacy.

Computer table (DG525)

The table below contains the comments received related to "Computer table (DG525)."

Based on the comments received, ED is deleting the current data group and replacing it with a new data group that collects the count of other devices and discontinue counting computers that are not connected to the internet or that are used primarily for student testing. The new data group will have a reporting period of "October 1" so that a student to computer ratio can be calculated.

Public Comments	ED's Response
Configuration of computer – The number of computers by itself is not useful data. The more important data are the configuration of the computers (e.g. multiple programs open, run graphical and video-based learning objects). Computers should meet minimum criteria to be counted. For example, standards could be set for the type of processor and the amount of memory.	Beyond discontinuing the collection of computers not connected to the internet, ED is not adding criteria on the configuration of the computer.
Connectivity – The permitted values for the category "internet access" of high speed connectivity, less than high speed connectivity, and no connectivity used for this data group are inadequate. Instead the data group should collect data on access to the end user (e.g. 10 mb, 40 mb). LEAs can often determine the amount of bandwidth available for specific online activities.	Because of burden, ED is not changing the category "internet access" to collect more detailed data.
Evaluation of Title II D – This data group is more a measure of the e-rate telecommunications program and is not reflective or a good measure of the Title II Part D program. Also, this data group should not be used in an evaluation of ESEA Title II Part D because it is not specific to Title II Part D eligible districts.	Reports will note that these data include all districts regardless of whether the district received funds under Title II Part D.
Non-testing computers – Only computers that are available apart from on-line testing should be counted.	ED agrees. The definition will be modified from "for instruction" to "for instruction other than primarily on-line testing."
Other devices – The increasing number of digital devices including smartphones, netbooks, wireless word processing devices, eBook tools and interactive tablets can cause additional areas of confusion related to reporting.	ED agrees. The data group will be modified to collect the count of other devices.
Student – computer ratio – The student to computer ratio should be calculated.	ED agrees. ED is changing the reporting period from "beginning of the school year" to "October 1" so that the data from the Membership table (DG039) can be used to calculate the student to computer ratio.
Wireless access – How should wireless access be reported?	Wireless access would be included with "high-speed connectivity. This guidance will be added to the file specification.

Integrated technology status (DG524)

Based on the comments received, ED added a requirement that the data are collected only from LEAs that received at least $25,000 in EETT funds. ED also changed from the binary yes/no to a method that allows States to report the percentage of technology integration. LEAs will be classified as one of the following:

- Developing - Limited use of technology; a few applications are used by staff and students; those who do use technology are experimenting and using it mostly for automation; student technology integration elements and or district goals for technology integration are largely unmet.
- Approaching - Moderate use of technology by a fair number of staff and students; most teachers and students are learning how to integrate technology and a few staff and students are at a high level of practice and integration; some technology integration elements and/or district goals for technology are being met.
- Meets - Many staff and students make use of a number of different technologies and applications and some are at a high level of integration; the minimum elements of integration and minimum goals for curricular integration and staff development are being met.
- Fully integrates - Most staff and students are at a high level of understanding and practice; most of the goals for curricular integration and most elements for student integration are being exceeded.

The table below contains the comments received related to "Integrated technology status (DG524)."

Public Comments	ED's Response
Continuous improvement – The data are a binary distinction where as integration is an on-going process. Schools and districts move along a continuum of technology integration. Therefore, the data group should be changed to collect the percentage of technology integration for each district. In addition, data should be collected at the lower levels of school and classroom.	ED agrees the binary distinction is insufficient. ED is changing from the binary metric to an approach that allows districts to indicate the extent of their technology integration.

Because of burden, ED will not be expanding the collection of data beyond the LEA. |
| Definition – There is not a commonly accepted, research-based definition of technology integration or an instrument to assess it. Data on personnel skilled and technology literacy assessments could be used for a common definition and basis of assessment. | Under ESEA, the States set their own definitions of technology integration. |

Public Comments	ED's Response
Scope – Collection of these data should be limited to LEAs that receive a minimum level of funding, for example, at least $25,000.	ED agrees. We are limiting required reporting to LEAs that receive at least $25,000 in EETT funds.

Personnel skilled in technology (headcount) table (DG526)

The table below contains the comments received related to "Personnel skilled in technology (headcount) table (DG526)."

Based on the comments received, ED added a requirement that the data are collected only from LEAs that received at least $25,000 in EETT funds. ED also changed the permitted values of the data category Technology Skills from "achieve acceptable performance" and "does not achieve acceptable performance" to "met standards" and "did not meet standards."

Public Comments	ED's Response
Learning process – Self-reporting or documented teacher ability in using technology does not provide data on what is happening in the classroom. It does not necessarily reflect educators' ability to effectively integrate technology into instruction. Instead, data should be collected on how technology is integrated into the learning process and the types of opportunities teachers provide students to use technology as part of the students' learning.	ED will take this under advisement.
Metric – This performance metric is a binary distinction applied to each educator (achieve acceptable performance, or does not achieve acceptable performance) and therefore does not provide an opportunity to show growth. Consider revising to include standards based "increases in proficiency levels of technology user skills" as defined by the State.	ED agrees that data on growth is useful but the burden of collecting such data is significant. ED will change the permitted values of the data category "technology skills" so that they focus more on technology standards.
Scope – Collection of these data should be limited to LEAs that receive a minimum level of funding, for example, at least $25,000.	ED agrees. ED will limit required reporting to LEAs that receive at least $25,000 in EETT funds.
State defined – The metric is not meaningful in aggregate given differences in State and LEA definitions. Consequently, there is no ability to conduct State comparative analyses or provide a meaningful national snapshot of progress in teacher technology skills.	ED will take this under advisement.

GENERAL POLICIES AND PROCEDURES

In addition to public comments to directed questions and comments about specific data, there were comments related to overall policies and procedures of ED*Facts*:

- Aggregation of data
- Burden and scope of the collection
- Consolidated State Performance Report
- Definition of LEP Students
- Documentation
- ED*Facts* Task Order
- Data and File structure
- Format of the Package
- Reauthorization of ESEA and new data requests
- Zero counts

AGGREGATION OF DATA

ED received some comments on aggregation of data.

Public Comments
Two SEAs suggested that the subtotals and totals should not be submitted as these numbers could be calculated from the category set.

ED's Response
ED has reviewed the data submitted by the States and the data submitted as the category sets do not always sum to data submitted as subtotals and totals. In some cases, this is caused by the States missing some data on some students. ED has attempted to balance the burden to the States in supplying subtotals and totals against the risk of inaccurate and incomplete data. As a result, for SY 2009-10 less than 40% of the files required a grand total and less than 30% of the files required subtotals.

BURDEN AND SCOPE OF THE COLLECTION

ED received several comments related to the burden and scope of the collection.

Public Comments – Calculation of burden
With the proposed addition of both the School Improvement Grant (SIG) and State Fiscal Stabilization Fund (SFSF) data elements, an SEA expressed concern that the burden for providing the additional elements through ED*Facts* is underestimated by ED at both the State and LEA levels. Per Att-2010 ED*Facts* Supporting Statement Part A. doc, page 8, the burden for the EDEN portion of the collection is stated at 1,827.7 hours. This is only an additional 35 hours from the stated burden of 1,792.0 hours from the 2007 ED*Facts* 3-yr clearance. At the LEA

level, there will be a significant investment in time and money to begin collecting and reporting data elements that have not been collected electronically before, or at an individual record level rather than in the aggregate. The SEA estimates that the burden for the EDEN portion at the SEA-level will exceed 1.5 FTE (3,120 hrs) for the first year of implementation, this does not include the additional burden at the LEA level

ED's Response
The burden calculation is an average burden. Only one SEA specifically commented on the calculation of burden. The burden calculation is not being changed

Public Comments – Needs and financial restraints of State agencies
One SEA requested that ED be sensitive to the needs and financial restraints of State agencies.

ED's Response
ED considers the burden to SEAs, LEAs and schools when making decisions about data collections.

Public Comments – GEAR UP
One SEA noted that data in the GEAR UP Annual Performance Report for the Office of Postsecondary Education in ED is identical to data submitted by the SEA to ED*Facts*.

ED's Response
ED continues to explore ways to transform legacy collections and take advantage of the consolidated ED*Facts* collection.

Public Comments - Inclusion of data
One SEA noted that the inclusion of data merely to establish a State's qualifications to apply for certain federal stimulus funds, such as RTTT, is questionable.

ED's Response
The commenter did not identify the specific data that the commenter believed was solely to establish the State's qualifications for federal stimulus funds. The data included in ED*Facts* are there because the data meet data collection requirements.

Public Comments – Inclusion of data
One SEA noted that data should be included in ED*Facts* only if the data are required by law or useful indicators for program evaluation

ED's Response
There are a few more reasons why data are collected such as monitoring compliance. The supporting statement explains more about why data are collected.

Public Comments – Data on young children
One SEA noted that collection of data on young children who are served by Title I or Migrant Education Program but who are not being served by an LEA and are therefore not in the statewide longitudinal data system is burdensome.

ED's Response
In designing the State information systems, SEAs will need to account for these children.

CONSOLIDATED STATE PERFORMANCE REPORT

ED received two public comments about the CSPR and its relationship to ED*Facts.*

Public Comments - Documentation
Two SEAs requested more documentation about how data from the ED*Facts* files populate CSPR questions. Such documentation would make it easier for the program offices in the SEAs to complete the CSPR, particularly when an SEA is reporting data from multiple information systems. In addition, one of the two SEAs requested that the questions for the prefilled portions of the CSPR be reworded to indicate that ED*Facts* data are being used to provide the answer, and to specify the files used to do so. For example, the CSPR question could be reworded to say, "The table below shows the unduplicated number of eligible migrant students who dropped out of school, as reported through ED*Facts* file N/X032," instead of, "In the table below, please provide the unduplicated number of eligible migrant students who dropped out of school."

ED's Response
ED will explore the feasibility in terms of staff resources to develop a word document that contains all CSPR items and: (1) indicates for each item whether the item is pre-filled by ED*Facts*, and (2) maps ED*Facts* file specifications to each CSPR item.

Public Comments – Reopen period
One SEA noted that the two week reopen period was not a sufficient amount of time to make updates and revisions to the questions especially for the questions that are populated through ED*Facts* files. In addition, the reopen period should not occur during the annual MIS conference which is attended by many ED*Facts* and CSPR coordinators.

ED's Response:
ED will try to work within the current contracted schedule to develop a timeline that is responsive to this request.

DEFINITION OF LEP STUDENTS

There were two comments related to the definition of limited English proficient (LEP) students.

Public Comments – Multiple definitions
One SEA pointed out that the category "LEP Status (Only)" has multiple definitions. The SEA stated that other data categories could have multiple definitions.

ED's Response
The category "LEP Status (Only)" is used in "DG584 Academic achievement in reading/language arts table." This data group collects the results of statewide assessments in reading/language arts. States are allowed to exclude the results of recently arrived limited English proficient students (LEP students who have attended schools in the U.S. for less than 12 months). The category is also used in "DG552 AMO reading/language arts status table" and "DG554 AMO mathematics status table." These data groups collect data indicating whether or not the education unit met the annual measurable objective (AMO). States are allowed to include the results of former LEP students (students who achieved proficiency in the last two school years) when determining whether the LEP subgroup met AMOs.

The use of the category "LEP Status (Only)" for multiple purposes prevents SEAs from establishing a standard consistent crosswalk, which increases burden. To address this burden, ED has added two categories:

- "LEP Status (RLA)" which will be used for DG584
- "LEP Status (Accountability)" which will be used for DGs 552 and 554

ED reviewed the data categories to determine if the incidence of multiple definitions occurs in other data categories. ED identified a multiple definition with disability status (only). ED created an additional category. This approach will result in each category having a single definition.

Public Comments – Common definition
One change to the data set was replacing LEP status (only) in the CTE data groups with LEP status (Perkins). One State commented that a common definition for identifying LEP students would ensure continuity and consistency when reporting LEP students among multiple federal program accountability reporting requirements.

ED's Response
ED agrees that a common definition provides continuity and consistency. However, in this particular case, the definitions are statutory.

DOCUMENTATION

There were three comments related to the documentation.

Public Comments – Use of tables

Several SEAs stated that the core requirements table and other tables in the file specifications are useful. One SEA suggested including the core requirements table into every file specification. Tables and diagrams are effective ways to explain the requirements for files, especially when several permitted value combinations are possible. The guidance should include actual codes used in the files instead of the descriptions of the codes.

ED's Response

ED agrees that tables and diagrams can be used effectively to explain some requirements. When preparing the file specifications, ED looks for the most effective means of explaining the information. ED will revise all file specifications to include a core requirements table. Instead of replacing the descriptions of the codes which are used by the program offices, the actual codes will be included beside the descriptions of the codes.

Public Comment – Purpose section

One SEA requested that all file specifications include in the purpose section the federal law(s), policies and other reasons that the data are collected.

ED's Response

Most file specifications already have this information. When the file specifications are updated for SY 2010-11, ED will pay special attention to ensure that the information in the purpose section is complete.

Public Comments – Referencing files

One commenter asked why some files are referred to as N/X while others are noted as X/N.

ED's Response

The use of X/N in file names comes from a legacy data system. ED may choose to change the X/N file names to N/X file names sometime in the future.

ED*FACTS* TASK ORDER

ED received several comments related to a task order provided to SEAs.

Public Comments

ED will issue the last task order grant for State ED*Facts* improvements in 2010-11. These funds have been useful in improving the quality of our data submitted through ESS. The absence of these funds may make it impossible for States to comply with the proposed changes to the ED*Facts* collection through 2013, and the changes to the ED*Facts* collection that will result from ESEA reauthorization.

ED's Response
The ED*Facts* Data Coordination Task Orders have been awarded to States over a three-year period (2008-2010) to help with transition activities for meeting full ED*Facts* reporting requirements. The majority of the data collected through ED*Facts* are needed to meet grant reporting requirements. Grant awards to States typically include a certain amount of administrative funds. Collecting data that are needed for reports to the grant-making office at ED has traditionally been a grant administration task. Now that most of the required data are being reported through ED*Facts*, States should investigate how grant administration funds may be used to support State ED*Facts* reporting.

DATA AND FILE STRUCTURE

There were three comments in this area.

Public Comments – New data groups and categories
One SEA asked what the policy was for when new data groups or categories are created and when existing data groups and categories are modified.

ED's Response
A new data group or category is created when the change is so substantial that the data should not be used with data from prior years.

Public Comments – Combining files
Some SEAs suggested combining data groups that collect tables of data (e.g. Free and reduced price lunch table (DG565)) and data groups that are single numbers (e.g. Economically disadvantaged students (DG56)) or are statuses (e.g. School poverty designation (DG699)). Several SEAs recommended breaking up files that contain disparate data. Several SEAs mentioned that files that contain overlapping data make it difficult to meet deadlines. One SEA cautioned that each file requires additional burden to submit.

ED's Response
ED will continue to work with the SEAs to organize the data collected into files. ED will be implementing many of the suggestions provided by the SEAs in response to directed question 14 on the composition of the status files. The changes to the status files should address the concerns about files that contain overlapping data and thus address the concern of meeting deadlines. At this time, the technology does not allow data groups that collect tables of data to be combined with data groups that are single numbers or statuses. ED will take this requirement into consideration when ED*Facts* technology is further advanced.

Public Comments – Use of NA
One SEA stated that "NA" should not be used to mean something other than "not applicable" and, when needed, the permitted values should be expanded.

ED's Response

not all of the data groups. Each data group has a predefined set of permitted values. Obtaining more detail of why an LEA or school is not reporting data using the predefined set of permitted values adds burden to the SEAs with little benefit to ED.

FORMAT OF THE PACKAGE

There were three comments related to the format of the package.

Public Comments	ED's Response
The changes need to be identified in each attachment instead of just being listed in Attachment C.	ED will take this suggestion under advisement prior to developing future clearance packages. In this package, ED has identified changes to the documents since the package used for the 60 day public comment period.
How many new file specifications will result from the proposed collection?	This information has been added to Attachment C.
How many file specifications are changed as a result of the proposed collection?	This information has been added to Attachment C.

REAUTHORIZATION OF ESEA AND NEW DATA REQUESTS

ED received comments about changes and additions to the data collected including those changes and additions related to the reauthorization of the *Elementary and Secondary Education Act* (ESEA).

Public Comments – Reauthorization of ESEA
Several SEAs expressed concern about changes to the ED*Facts* data set because of the reauthorization of the ESEA. The SEAs expressed the need to have adequate time publicly review and comment on data collection changes that result from ESEA reauthorization and to implement those changes in their data collection systems.

ED's Response
ED understands that SEAs need time to implement changes to their data collections. Any changes or additions to the ED*Facts* data set will go through the standard approval processes, which include the OMB paperwork clearance process and public comment period. ED will work with SEAs to provide timely and useful guidance to assist SEAs in complying with any new reporting requirements.

Public Comments – Compliance with new data requirements
Three SEAs mentioned that they might not be able to comply with the new data requirements. One SEA mentioned that it typically takes two years to effect a change through the LEAs. Another SEA mentioned that State law requires the SEA to post data collection requirements by April 1 of the school year preceding the collection.

ED's Response
ED understands that changes to data requirements require some time to implement, and will keep this in mind as file specifications are developed. ED will work with SEAs so that the SEAs can be compliant with State and federal laws.

ZERO COUNTS

There were three comments related to zero counts.

Public Comments	ED's Response
Current guidance on exceptions to zero counts is not always clear.	ED agrees that the guidance could be better. In developing the file specifications for SY 2010-11, ED will pay specific attention to the guidance on zero count exemptions.
The files should have a consistent approach to zero counts.	ED will review the file specifications to ensure that they comply with the zero count requirements. The zero count requirements are that zeros are required in the State level file unless the count is not applicable. Zero counts are required in LEA and school level files when the data are used for statistical purposes.
In some files the requirements for zero counts in the CSPR are different than the requirements for zeros in the file specifications.	The zero requirements were not aligned for some data. The zero requirements for the CSPR will be aligned with the policy mentioned above.

CHANGES TO THE ED*FACTS* DATA SET

This section summarizes changes to the ED*Facts* data set as a result of the public comments. Attachment C explains the changes from the data set used for SY 2010-11. This section summarizes the changes made to the ED*Facts* data set that was proposed for the 60-day public comment period to this package. This section provides readers with a list of the changes and is not intended to be a comprehensive explanation of those changes.

ATTACHMENT B-1 OVERVIEW

The table below summarizes the changes to Attachment B-1.

Section of B-1	Change	Explained in Attachment E
Directory Records	Added explanation to the definition of SEA	Directory and GEPA
Directory Records	Changed definition of and comment to Reconstituted status (DG743)	Directory
Reporting Periods	Added new section that explains the reporting periods	NA
Standard Definitions	Added CTE participant	NA
Summary of ED*Facts*	Changed the explanation of ED*Facts*	NA

ATTACHMENT B-2 EXPLANATION OF ED*FACTS*

There were no changes to Attachment B-2.

ATTACHMENT B-3 DATA GROUPS

Listed below are the changes to this attachment. The changes are organized by the sections in the attachment.

Non-Fiscal Common Core of Data

DG	File	Change	Explained in Attachment E
306	040	Changed from "homeless students served" to "homeless students enrolled."	Directed question 7
326	032	Changed from "homeless students served" to "homeless students enrolled."	Directed question 7

General Education Provisions Act
There were no changes to this section.

Limited English Proficient Students and Title III of ESEA
There were editorial changes to the definitions of DG151, 422, 648, and 675:
- Changed "education" to "educational"
- Changed "under Title III of ESEA" to "supported with Title III of ESEA funds"

Accountability and Reporting Provisions of ESEA
The table below lists the changes to this section.

DG	File	Change	Explained in Attachment E
557	107	Changed permitted values and add comment about when submission of category sets is required	Accountability and Reporting Provision of ESEA
584	078	Changed to "LEP status (RLA)	Definition of LEP students
693	Revising	Changed permitted values and reporting period	Accountability and Reporting Provision of ESEA

DG	File	Change	Explained in Attachment E
694	Revising	Changed reporting period	Accountability and Reporting Provision of ESEA
552 and 554	109, 111	Changed to "LEP Status (Accountability)	Definition of LEP students
552 and 554	109, 111	Changed to "Disability Status (Accountability)	Definition of LEP students
695, 696, 697, 698	150, 151	Changed names and definitions to use the phrase "regulatory four-year (extended time) adjusted –cohort graduation rate"	NA
583, 584, 585	075, 078, 079	Changed category set to collect achievement data by assessment administered	Directed questions12 and 13
588, 589, 590	081	Changed category set to collect participation data by assessment administered	Directed questions 12 and 13
583, 584, 585, 588, 589, 590	075, 078, 079, 081	Changed from "homeless students served" to "homeless students enrolled."	Directed question 7

McKinney-Vento Homeless Program
The reporting period and the category set for age/grade were changed for both data groups in this section.

Neglected or Delinquent Program
The reporting periods for DG657 and 656 were changed.

Migrant Education Program
The reporting periods for DG635 and 636 were changed.

Technology
The table below lists the changes to this section.

DG	File	Change	Explained in Attachment E
524	Revising	Changed comments and permitted values	Technology
525	028	Deleted data group and replaced with DG744	Technology
526	071	Changed comments	Technology
650	117	Changed reporting period	NA
744	New	Added Computer equipment table	Technology

Funding Flexibility (REAP)
There were no changes to this section.

Title I Program (Non-Accountability Provisions)
There were no changes to this section.

Public School Choice and Supplemental Educational Services
The table below lists the changes to this section.

DG	File	Change	Explained in Attachment E
701	Revising	Restructured data group and changing name to	Public School Choice and

		"Public school choice implementation"	Supplemental Educational Services.

Charter Schools and Districts

The table below lists the changes to this section.

DG	File	Change	Explained in Attachment E
594	New	Changed definition and added permitted value	Charter schools and districts
654	New	Changed definition	Charter schools and districts
594, 605, 606, 654	New	Changed reporting period	Charter schools and districts

Safe, Drug-Free and Gun-Free Schools

There were no changes to this section.

Individuals with Disabilities Education Act

The table below lists the changes to this section.

DG	File	Change	Explained in Attachment E
618	093	Deleted, merged into DGs 588, 589, and 590	Directed question 12 and 13
447	003	Deleted, merged into DGs 583, 584, and 585	Directed question 12 and 13

Career and Technical Education

The collection of metadata on the availability of data was added as explained under Career and Technical Education. The table below lists other changes to this section.

DG	File	Change	Explained in Attachment E
681, 702, 703, 704, 705, 736	142, 154, 155, 156, 157, 158,	Added "unduplicated" to definitions or comment	Career and Technical Education
All	All	Changed reporting period	Career and Technical Education
All	All	Added comment	Career and Technical Education

ATTACHMENT B-4 DATA CATEGORIES

The table below summarizes the changes to Attachment B-4.

Section	Category	Change	Explained in Attachment E
Accountability	Disability status (accountability)	Added	NA
Accountability	LEP status (accountability)	Added	Definition of LEP students
Accountability	LEP status (RLA)	Added	Definition of LEP students
CTE	Diploma/credential	Added comment and corrected permitted value	NA
CTE	Non-traditional	Changed definition	NA

Section	Category	Change	Explained in Attachment E
	enrollees		
CTE	Single parent status	Changed name from "single parent / pregnant status"	Career and Technical Education
CTE	Tech prep	Changed definition	
Data set	Assessment administered	Move from IDEA section	Directed question 12 and 13
Data set	Grade Level or Grade/Age	Added definition of grade level (assessment)	NA
Data set	Homeless enrolled status	Added	Directed question 7
Data set	Homeless served status	Deleted	Directed question 7
Data set	LEP status (both)	Changed definition	NA
Data set	LEP status (only)	Deleted reference to data groups	Definition of LEP students
Data set	LEP status (only)	Changed definition	NA
Data set	Participation (MS)	Added	Directed question 12 and 13
Data set	Participation (RLA)	Added	Directed question 12 and 13
Data set	Racial ethnic	Corrected permitted values	NA
IDEA	Education environment (IDEA) EC	Changed permitted values	Individuals with Disabilities Education Act
LEP	Assess first time	Changed name from "first assessment" and changed definition	NA
MEP	MEP Staff	Changed permitted values"	Directed question 6 and Migrant Education Program
PSC/SES	Choice options	Deleted	NA
Technology	Internet access	Changed permitted values	NA
Technology	Technology skills	Changed permitted values	Technology

ATTACHMENT B-5 CIVIL RIGHTS DATA COLLLECTION

As explained in the section on CRDC, a data group is being added to collect discipline data on pre-kindergarten students. In addition, the section on the plan for CRDC is modified to indicated that the CRDC for SY 2011-12 will be a of CRDC data from all LEAs. The reporting periods of some data groups have been clarified.

ATTACHMENT B-6 SCHOOL IMPROVEMENT GRANTS

The table below summarizes the significant changes to Attachment B-6. These changes are explained in the section on the data for SIG.

Section	Change
Introduction	Specified that an SEA will report the data only for Tier and Tier II schools served with SIG funds
New data groups	Indicated that, for a school implementing the closure model, an SEA must only complete the metric, "Intervention used."
New data groups	Revised the timeline for when an SEA will report baseline data.
All metrics	Clarified reporting periods
Metric 5	Split into 5a (number of minutes) and 5b(types of increased learning time) which results in a new data group
Metric 8	Indicated that an SEA reporting scale scores for its general assessment and alternate assessment(s) should report each assessment separately by adding "assessment administered" to the category sets of DG730
Metric 8	Changed the category "achievement quartile" to "achievement percentile."
Metric 18	Modified the definition of teacher absence so that professional development during the school day is not counted as an absence

ATTACHMENT B-7 STATE FISCAL STABILIZATION FUNDS

The table below summarizes the changes to Attachment B-7.

Change	Explained in Attachment E
Addition of DG747: Teacher performance level names	State Fiscal Stabilization Funds
Addition of DG748: Principal performance level names	State Fiscal Stabilization Funds

ATTACHMENT B-8 DISPUTE RESOLUTION

As explained under directed question 4, the collection of table for Table 7 Report of Dispute Resolution under Part B of the Individuals with Disabilities Education Act is being added to the ED*Facts* Data Set. This attachment explains the data requirements.

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
Directed question 14 Status Files	Changed placement of DG699 School poverty designation	Changed decision about this data group based on comments during the 30-day public comment period
Directory	Corrected ED's response	The response had indicated that the data group name was changed which was not done. Instead, the definition was revised and comments were added to the data group.
Burden and scope of collection	Corrected ED's response	The response had indicated that reasons for collecting the data were added to Attachment B-1. This was not done. Instead, reference the explanation for the collection in the supporting statement.