



U.S. DEPARTMENT OF EDUCATION
INSTITUTE OF EDUCATION SCIENCES

NATIONAL CENTER FOR EDUCATION STATISTICS

TO: Shelly Martinez, Office of Management and Budget
FROM: Marie Stetser, Program Director, Common Core of Data
THROUGH: Kashka Kubzdela, OMB Liaison, NCES
RE: Common Core of Data National Public Education Financial Survey (NPEFS) 2011
Data Submission Schedule Change Request (OMB# 1850-0067 v.8)
CC: Jeffrey Owings, NCES Associate Commissioner
Stephen Cornman, NPEFS Project Director
DATE: December 9, 2011

The National Public Education Financial Survey, commonly called NPEFS, is an annual collection of state-level finance data that has been included in the NCES Common Core of Data (CCD) since FY 1982 (school year 1981-82). NPEFS provides expenditures by function, including salaries, benefits, purchased services, and supplies. NPEFS also includes federal, state, and local revenues by source. The NPEFS collection includes data on all state-run schools, including for jurisdictions such as Puerto Rico and America Samoa. The NPEFS data are used in calculating several federal program allocations. In addition to utilizing the (State Per Pupil Expenditures) SPPE data as general information on the financing of elementary and secondary education, the Secretary uses these data directly in calculating allocations for certain formula grant programs, including, but not limited to, Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended (ESEA), Impact Aid, and Indian Education programs. Other programs, such as the Educational Technology State Grants program (Title II, Part D of the ESEA), the Education for Homeless Children and Youth Program under Title VII of the McKinney-Vento Homeless Assistance Act, and the Teacher Quality State Grants program (Title II, Part A of the ESEA), make use of SPPE data indirectly because their formulas are based, in whole or in part, on State Title I, Part A allocations. The NPEFS data files are available at the NCES website: <http://nces.ed.gov/ccd/stfis.asp>.

This submission requests a change to the FY 2011 NPEFS data collection schedule and communication materials approved by the Office of Management and Budget in December 2009 (OMB# 1850-0067 v.7). We are making these changes in response to the feedback we received from the States and other Department of Education (ED) officials.

Specifically, we propose an earlier final deadline for reporting FY11 data and any revisions to FY10 data to August 15, 2012. This represents a departure of about 2 1/2 weeks from the deadline that has historically been termed "Labor Tuesday" (day after Labor Day). This earlier deadline will provide NCES, and its data collection agent, the Census Bureau, with more time to meet our deadline to finalize the file on September 4, 2012. States will thus be given the

opportunity to resolve data issues by September 4, 2012, which alleviates the time pressure of an earlier final deadline. We propose these changes for the following reasons:

- ◆ Because we are obligated to report revisions of FY10 data to the ED Office of Elementary and Secondary Education (OESE) by September 14, 2012, if not earlier, NCES needs to have a final revised NPEFS file by September 4, 2012.
- ◆ When the NPEFS data submission deadline has historically been “Labor Tuesday”, NCES and the Census Bureau have discovered a substantial number of data issues that need to be resolved after that submission date. States were resolving data issues and responding to requests for clarification from NCES and Census all the way into mid-September.
- ◆ The resolution of data issues during September has significantly impeded our ability to report data to OESE in a timely manner (OESE utilizes the SPPE data from NPEFS directly in calculating allocations for certain formula grant programs, including, but not limited to, Title I, Part A of the ESEA, Impact Aid, and Indian Education programs).

As part of our on-going communications with the States, NCES shared the proposal to move the deadline for reporting FY11 data and any revisions to FY10 data from September to August 15, 2012 with all 50 states. Twenty nine (29) states and 1 outlying territory indicated that they can meet the August 15th deadline. Three (3) states voiced an opposition to moving the deadline, but their opposition softened when we pointed out that SEAs can resolve data issues up until September 4, 2012 (“Labor Tuesday”). The balance of states did not provide feedback. We assume there is not a problem with these States.

Per the OMB approved NPEFS clearance package (OMB# 1850-0067 v.7), every year, NCES publishes a Federal Register notice announcing the upcoming NPEFS data submission deadlines. The proposed changes to that Federal Register Notice announce the new submission dates of State revenue and expenditure reports for fiscal year FY 2011, revisions to those reports, and revisions to prior fiscal year reports. The following proposed language of the revised Federal Register notice addresses the proposed ability of SEAs to resolve data issues up until “Labor Tuesday”: “Any resubmissions of FY 2010 or FY 2011 data by SEAs in response to requests for clarification, reconciliation or other inquiries by NCES or the Census Bureau must be completed by Tuesday, September 4, 2012. Between August 15, 2012 and September 4, 2012, States may also on their own initiative resubmit data to resolve data issues. All outstanding data issues must be reconciled and/or resolved by the SEAs, NCES, and the Census Bureau prior to September 4, 2012.”

In late October, NCES met with Jane Hess of the ED Office of General Counsel, Paul Brown and Todd Stephenson of the ED Office of Elementary and Secondary Education to discuss the proposed changes. The recommendations made by Jane Hess, Paul Brown, Bill Sonnenberg, and Terri Kennerly of Census have been incorporated into the proposed language of the Federal Register notice. NCES Commissioner Jack Buckley and Associate Commissioner Jeff Owings have approved the proposed change.

The revised respondent communication materials (NPEFS FY11 instruction manual, cover letter, submission letter, and close-out letter) along with the revised Federal Register notice are attached with this change request.

The revised NPEFS timeline is shown below. Note that the data files cannot be closed until the last state is able to report all requested data.

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| January, 2012 | Mail instructions to respondents, open website to receive data. |
| February, 2012 | Training for new NPEFS Coordinators. |
| March 15, 2012 | First reporting date. SEAs are urged to submit accurate and complete data for FY 2010 and FY 2011 |
| July, 2012 | Training for all NPEFS Coordinators |
| August 15, 2012 | Mandatory final submission date for FY 2010 and FY 2011 data |
| September 4, 2012 | Response by SEA's to response to requests for clarification, reconciliation, or other inquiries by NCES or the Census Bureau. All data issues to be resolved. Close NPEFS file. No files are accepted for program funding purposes after close-out. |
| December, 2012 | Preliminary files available for internal use but not publication. |
| February, 2013 | Per-pupil expenditure data for FY 2011 data available. |
| March and April, 2013 | NCES review of files, file documentation, short reports. |
| June, 2013 | Publish First Look Report for FY 2011 data. Data Files for FY 2011 data become public. NCES web database updated |
| July, 2013 | Training for all NPEFS Coordinators |

The data submission schedule change has no impact on the approved estimated respondent burden for this collection and will not incur additional costs to the Federal Government.