

**Annual Mandatory Collection of Elementary and Secondary  
Education Data through *EDFacts***

**February 2013**

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**ATTACHMENT F**

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**Response to Questions  
from the Office of  
Management and Budget  
(OMB)**

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## INTRODUCTION

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This attachment contains the responses to the questions from the Office of Management and Budget (OMB) sent to ED on January 30, 2013.

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## QUESTIONS FROM OMB

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- 1. Why hasn't ED been using the data groups related to charter school openings and closings? Do they provide poor quality data, or not provide the right kind of information? Would the inclusion of new data groups on charter school authorizers make those data more useful?**

Discussions with state educational agencies (SEAs) regarding how we would collect the data groups related to charter school openings and closings resulted in the decision to collect those data from charter authorizers, most of whom are not SEAs. The SEAs that do not serve as charter authorizers in their states would not have these data available to report. Since non-SEA charter authorizers are not EDFacts respondents, the data are now collected from charter authorizers through OII's Charter School Annual Update. See response to #2 for more information on that survey.

- 2. With the new authorizer data groups, we should be examining the connection between authorizers and school closings, so we would like to have some way to gather good data on charter closures. Will there be any way for ED to gather data on charter school closings if EDFacts discontinues the proposed charter data groups? Briefing materials on the changes mention other data sources that can be used to get data on charter school openings/closings, and closure reasons. What are those sources? What is the data quality like and how frequently are they updated?**

As noted above, OII conducts the Charter School Authorizer Annual Update, OMB Control #1855-0023, which includes questions on charter school openings and closings. This survey was first administered in the summer of 2011. Because authorizers do not receive grants through ED's Charter School Program unless they are also SEAs, it is not a mandatory survey. However, the response rate has been strong and is improving (the 2011 survey collected data on 79% of charter schools, and the 2012 survey collected data on 89% of charter schools). OII will continue to work with authorizers to improve the completeness of the data submitted each year.

EDFacts will be adding the authorizer directory to the EDFacts collection beginning in SY 2013-14. Within EDFacts, we will be able to connect charter schools with authorizers, and

look at student performance data by charter school and authorizer. The Charter School Authorizer Annual Update will allow us to see the opening and closing information for charter schools and authorizers.

- 3. As we had discussed during the briefing, we'd like updates on the outcomes of policy committee discussions in two areas: 1) collecting data on military-connected students and 2) whether the additional SIG data elements will be added.**

#### Military Connected Students

ED will work with interested stakeholders, including SEA and LEA data providers, to explore possibilities around improving available information on military-connected students, uses for the data, and the least burdensome methods for making these data available. As noted during the clearance overview presented to OMB on January 17, as part of the formal 60-day comment period, ED received a request from the Military Child Education Coalition that ED incorporate "military-connected students" as a subgroup for required reporting within EDFacts. ED did not add this as a proposed subgroup for collection, but invited states to provide comments on their capacity to report the requested data. During the 30-day public comment period, ED received four responses from SEAs on this topic. One comment indicated that the state is actively researching the issue but currently does not have the data within the state data system. That state is exploring the possibility of data matching routines with their Department of Defense state liaison office. A second comment indicated that the state supported the idea, but needed more details on the data to be collected. The commenter was skeptical that state data systems could be updated in time for collection during the 2013-14 school year. A third commenter asked a number of questions about how the data collection would be defined in order to better assess their capacity to report. The fourth commenter reminded ED those SEAs and LEAs need sufficient time to change their systems and data collection processes in order to collect and report new data.

#### SIG Data Collection

Currently, approximately 1,500 out of 100,000 schools in the nation receive SIG awards. We learned from state comments that most SEAs have not incorporated the collection of the SIG-specific data elements into their state collection systems because of the small number of SIG schools. Thus, expanding the collection of data out to all schools would have significantly increased burden on SEAs and LEAs. That fact, combined with the determination from our Office of General Counsel that there is insufficient legal or regulatory justification at this time for expanding the collection of data for the SIG program from SIG-only schools to all schools, resulted in ED's decision to rescind the proposal to collect data from all schools for the SIG-specific data groups that are currently collected for SIG Tier I and Tier II schools only.

- 4. We also request a detailed timeline and spending plan for how ED will move the IDEA APR into EDFacts.**

The work to move the IDEA APR into EDFacts is tied to ED's FY14 budget request. OPEPD is scheduling a meeting in February with appropriate staff in OSEP to begin

discussions on how this work will be conducted. Beginning with March 2013, ED can provide quarterly updates to OMB on how this work is progressing. Provided that funds required to carry out moving the APR are appropriated to ED, we expect to have a detailed timeline and spending plan by the first quarter of FFY 2014.

5. **Additionally, given the growing nature of this database, there should be strong consideration by the Department to do a more extensive retrospective review of what is being collected currently, what it is being used for (ensuring that its use is critical), and eliminating anything that may not be as relevant. This will likely be part of ED's terms of clearance.**

ED welcomes the opportunity to continue this conversation with OMB as many efforts are already underway in this area. One indication of *EDFacts*' successful coordination and consolidation of ED's data collection processes has been the extent to which legacy collections have been and continue to be absorbed into *EDFacts*. This allows states to develop more consistent reporting routines, resulting in overall reduction of burden. To help manage the integration of legacy collections into *EDFacts*, ED created the *EDFacts* Data Governance Board (EDGB) to allow program offices to jointly manage the *EDFacts* data set. Prior to the submission of the current clearance request for *EDFacts*, through EDGB each program office reviewed its current usage and either proposed deletions or—more commonly—small changes to the data set so that the data would better meet usage needs. We will continue to work through EDGB to annually review actual data usage and identify opportunities for collection consolidations, refinements and reductions.

Additional work is already underway to review and assess the scope of all ED information collections. Over the past two years ED created a Data Strategy Team (DST) composed of all ED offices that work with data collections to coordinate data related policy activities within ED. The DST established a number of working groups pertaining to different data related initiatives within ED, developing or redesigning policy, processes, and/or tools. Among them, DST established the Data Inventory Group (DIG), tasked with developing a database of information about all department-sponsored data collections that can be used to produce education statistics. The primary purpose of the database is to provide a centralized source of background information about ED's collections, with the goal of facilitating awareness of available data, and increasing data use and coordination among current and future data collections, including (but not limited to) *EDFacts*.

DIG members met first as a group and then worked via email to determine the type of background information (metadata) to collect, and to identify the initial scope of the Group's product. DIG members agreed that as a starting point any data collection that has an OMB clearance would be included in the inventory database, encompassing both department sponsored data collections and reporting requirements for department sponsored grants. The database is currently being populated using the electronic OMB clearance packages (i.e., those submitted for clearance since 2005). To-date, metadata for 46 program areas, big and

small (including many NCES studies), have been entered into the DIG database based on 269 OMB clearance packages. Program by program, the metadata are now being prepared for review by their respective program staff, after which their entries will be finalized. As part of ED's Digital Government Strategy work is also underway to supplement the background meta data with detailed variable lists for each data collection and to transport the meta data into an outward facing CKAN based searchable data dictionary to increase public awareness of and access to ED data holdings .