

**Campus-Based Program Office Response to Public Comment on Teacher Cancellation Low Income Directory
Docket # ED-2014-ICCD-0160 (OMB 1845-0077)**

In response to the Public Comment Period for the Teacher Cancellation Low Income (TCLI) Directory data collection (OMB 18540077), the Campus-Based programs office provides the following:

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PUBLIC COMMENT

Docket: ED-2014-ICCD-0160
Teacher Cancellation Low Income Directory

Comment On: ED-2014-ICCD-0160-0004
Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and approval; Comment Request; Teacher Cancellation Low Income Directory

Document: ED-2014-ICCD-0160-0007
Comment on FR Doc # 2015-03709

Submitter:

Name: Fawn Dunbar
Submitter's Representative: Fawn Dunbar
Organization: Center for Educational Performance and Information
Government Agency Type: State
Government Agency: Michigan Department of Education

Comment:

The Office of Student Aid is requesting the following information:

- School
- Grades Served
- Count of Special Ed
- Count of Free/Reduced Lunch
- Total Enrollment (in order to calculate % of FRPL)

US Ed, through EDEN ED Facts, already gets school level files from which that information could be pulled.

Specifically, N052 (Headcount)/N039(Grades)/N033(FRPL)/N002(CWD). So, US Ed has this information, but the office of student aid is requesting this from states instead of leveraging data on hand. Even if they are looking for

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current year data rather than prior year, all of those files are due between January and April of the current school year and so would be available in June which is when the data is due.

It is perfectly logical and reasonable for the Office of Student Aid to obtain this data directly from US ED rather than asking for the same data from the states to reduce the burden.

CAMPUS-BASED PROGRAMS OFFICE RESPONSE

The data collected within the TCLI Directory Web application as explained within the application accessed by the State/Territory TCLI contacts, is:

- **School or Educational Service Agency Name** – Cannot be blank and cannot be more than 100 characters.
- **Location** – Cannot be blank and cannot be more than 100 characters. Different states identify locations differently. Most states use either just County or County/District.
- **Grade** – Cannot have single or double quotes and must be a maximum of 25 characters. If you are indicating a single grade range, commas must not be used. Example: K-5 would represent Kindergarten through 5th grade. K,5 would represent Kindergarten and 5th grade. If there are split grade ranges or if text is being entered that would require a comma, provide this information as follows. Example: Pre-K, 2-5, 7-9. Note: if you choose not to submit grade information, a dash will be inserted as the grade range.
- **Percentage** – Must have only digits (no percent signs, for example) and only one digit after the decimal. The value must be greater than 30.0 but less than or equal to 100.0.
- **Year** – Must be four digits. The only acceptable years are 1997 through the current year. Example: When uploading files for the 2015-2016 TCLI Directory, 2014 should be entered. To upload data for the 2014-2015 Directory, 2014 should be entered, etc. Only one year can be uploaded at a time.
- **State** - Two characters. Use the standard US Postal abbreviations for the States and Territories. Example: KY for Kentucky.

As part of the Campus-Based Program office duty to ensure that we are not creating duplicate data collections and increasing the burden on the data providers (States/Territories) we have researched the data collected through ED Facts. This was addressed in the Supporting Statement (Item 4-Describe efforts to identify duplication) submitted with our request for approval of this data collection (OMB 1845-0077).

While we agree that it would remove the burden of reporting TCLI Directory data from the State/Territory contacts if the Campus-Based Programs Office could gather the information directly from ED Facts, there are certain issues presented in the timing of data and updates as well as the flexibility of the State/Territory to decide how to calculate the “measure of poverty” data for the TCLI Directory.

We are in communications with ED Facts staff and investigating opportunities for system updates that would alleviate TCLI Directory data reporting burden from the States and Territories.

In the mean time, these are the issues that remain:

- **Measure of Poverty**
To qualify for inclusion on the Directory of Designated Low Income Schools, a school must be in a school district of a local education agency that is eligible for assistance under Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), and the school must be a school "in which the number of children meeting a measure of poverty under section 1113(a)(5) of the Elementary and Secondary

Education Act of 1965, exceeds 30 percent of the total number of children enrolled in such school" (Section 465(a)(2)(A)(i)(I), Higher Education Act of 1965, as amended). The "measures of poverty," as set out in section 1113(a)(5) of the ESEA, are:

"(5) MEASURES- The local educational agency shall use the same measure of poverty, which measure shall be the number of children ages 5 through 17 in poverty counted in the most recent census data approved by the Secretary, the number of children eligible for free and reduced priced lunches under the Richard B. Russell National School Lunch Act, the number of children in families receiving assistance under the State program funded under part A of title IV of the Social Security Act, or the number of children eligible to receive medical assistance under the Medicaid program, or a composite of such indicators, with respect to all school attendance areas in the local educational agency. . ."

If TCLI Directory data concerning "measure of poverty" were to be extracted from ED Facts reporting, FSA would be violating the ESEA requirements that provide that flexibility to the States/Territories.

- **Private Nonprofit Elementary and Secondary Schools and ESAs**

We have confirmed with ED Facts that it does not collect private school data on an annual basis. Private school information is collected only in odd-numbered years does not include a "measure of poverty."

- **Intent of Most Current Data Availability to the Public**

It is intended that the TCLI Directory contain the most current data available so that current and prospective teachers have the information they need to obtain the benefits of applicable loan forgiveness and validation to maintain their TEACH Grant status for the applicable timeframe. The TCLI Directory is open year-round for data additions and updates from the States/Territories. Data is reported to ED Facts only annually or less.

Unless and until the ED Facts reporting system can meet all of the requirements of the TCLI Directory needs regarding the above items, we will continue to need a separate collection of this material.