

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

February 2016

ATTACHMENT D

***EDFacts* Data Set for School
Years 2016-17, 2017-18, and
2018-19:
Directed Questions
(60 and 30 day Comment
Periods)**

60-DAY COMMENT PERIOD

INTRODUCTION

This attachment contains specific topics for which ED would like to obtain input from data submitters and stakeholders. Please note that in addition to these specific questions, public comments are encouraged on all parts of the EDFacts clearance package, and particularly the changes proposed in Attachment C. ED is interested in knowing the extent to which all proposed new data groups in Attachment C are currently available from existing data systems within the SEA.

When providing responses to the directed questions in this Attachment, please include the question number. References in this document to “FS” followed by three digits indicate the number of an EDFacts file specification. “DG” followed by two or three digits is the identification number of an EDFacts data group.

DIRECTED QUESTIONS

DIRECTORY

The directory is explained in detail in Attachment B-2.

1. LEA File – The approach to explaining what education units are reported in the LEA file has been changed from focusing on a definition of LEA to focusing on the various types of LEAs. Will this approach assist SEAs in capturing all the education units that should be reported in the LEA file? Are the expected reporting for each LEA type consistent with the definitions? Are the restrictions on reporting schools for Supervisory Unions, RESAs, and other LEAs consistent with the definitions?
2. LEA File – The role of regional education service agencies (RESAs) (DG 453 LEA type when code or type is “4”) and focused school districts (DG 453 LEA type when code or type is ‘9’) within states is not always evident from the information available in the directory file. As part of the fiscal Common Core of Data, NCES calculates per student expenses. In particular, this means that expenses incurred by these LEAs *cannot be attributed* to the student populations they serve.
 - a. Can these regional education service agencies and focused school districts be linked to specific regular public school districts (DG 453 LEA type when code or type is “1” or “2”)?

- b. Currently, the supervisory union ID (DG 551) is used to link supervisory unions (DG 453 LEA type when code or type is '3') with the member LEAs they serve (DG 453 LEA type when code or type is '2'). Could this same data group also be used to link the regional education service agencies in your state with the LEAs they serve? Or is a new ID needed to link these entities?
 - c. Do any of these regional education service agencies serve the entire state? If so, would a reserve "ID" (e.g., '999') to indicate a RESA with state-wide scope be needed?
3. School File – The definition of a public school has been changed. Will this approach assist SEAs in capturing all the education units that should be reported in the school file?
4. Metadata on the Directory – The approach to the directory includes a metadata survey to capture information about the scope of the education units submitted by the SEAs. Are the proposed questions understandable? Will the proposed questions capture the information needed to correctly interpret each SEA's directory?
5. Names and Addresses – Names of education units are used to confirm mapping to other data sets. Addresses are used to assign locale codes. The data historically submitted has had errors in names and addresses. What changes can be made to improve the quality of these data?
6. Entity management system – Does the SEA have an entity management system?
7. Virtual Schools – In order to be of more use as a sampling frame, an expanded set of permitted values is being proposed, moving from yes/no to full/partial/not. Can your state distinguish between these values; do you have other suggestions for permitted values based on your own collections and work in this area?

FREE AND REDUCED PRICE LUNCH AND DIRECT CERTIFICATION

8. The count of students eligible for free and reduced-price lunches (FRPL) has long been used as a proxy indicator for poverty at the school level. However, the ways schools certify their eligibility for the NSLP have changed substantially in recent years and made these data less reliable. In particular, the Community Eligibility Option (CEO) eliminates the requirement for individual eligibility information once a school has determined a baseline percentage of FRPL-eligible students. Under CEO, schools must serve all students free lunch and breakfast. All students in a school are therefore eligible for free lunches and there is no count of reduced-price lunch students. This has led to substantial fluctuations in the reporting of these counts in recent years. A new data group is being proposed that counts the total of students in membership at the school whose National School Lunch Program (NSLP) eligibility has been determined through direct certification. States would report either FRPL counts and/or counts of directly-certified

students and to distinguish between the two. Will your state utilize the new direct certification data group? Why or why not?

CHRONIC ABSENTEEISM

9. Several ED program offices requested that the data group measuring chronic absenteeism be moved from CRDC to EDFacts with a definitional change (it is currently included in the CRDC 2015-16 Information Clearance Package). Can your state provide the following *school* level data with the current definition, “The unduplicated number of students absent 10% or more school days during the school year” in the five different category sets (listed below)?

Short name	A	B	C	D	E
Type	Category set	Category set	Category set	Category set	Category set
Categories	Racial ethnic, Sex (membership)	Disability Status (Only), Sex (membership)	Disability Status (504), Sex (Membership)	LEP Status (only), sex (membership)	Homeless enrolled (status), Sex (membership)

10. The Neglected or Delinquent Program proposes to also collect data on chronic absenteeism with a different definition “The unduplicated number of students who have participated in programs for neglected or delinquent students (N or D) under Title I, Part D, Subpart 1 (State Agency) or Subpart 2 (LEAs) of ESEA for 60 calendar days or more and who have missed 10% or more days of instructions whether the absence was excused or not.” Can your state provide this information at the SEA level?

ASSESSMENT

11. There are two new data groups proposed to collect information on the mean scale scores and the standard deviation by three categories (Academic Subject (No Science), Assessment Administered (Scale Score), and Grade Level (Assessment)) at the SEA level. Without these data, the academic growth of schools with School Improvement Grants (SIG) cannot be interpreted. Should this data be collected as part of EMAPS or in a submitted file format?

KINDERGARTEN ENTRY ASSESSMENTS

12. The Department of Education has three grant programs that support or incentivize State-wide implementation of Kindergarten Entry Assessments (KEA): Race to the Top –Early Learning Challenge, Enhanced Assessment Grants, and Preschool Development Grants. The Agency Priority Goal is “By September 30, 2015, at least 9 states will be collecting

and reporting disaggregated data on the status of children at kindergarten entry using a common measure.” The only data source is through these programs and does not capture the expansion of KEAs across the nation. The Department of Education is requesting policy information that is readily available to a State Education Agency about KEAs and a data file only in states with a KEA and only on the domains used within the KEA. Can your states provide this information? Did we capture the correct data to measure the program and its impact?

HOMELESS CATEGORY IN COHORT GRADUATION RATE

13. Field recommendations have suggested the addition of a secondary education Government Performance and Results Act (GPRA) measure that requires longitudinal tracking of homeless students within States and LEAs over their four or more years of high school. Some states are already calculating and reporting such rates, the addition of a homeless category in the cohort graduation rate data groups would standardize measuring and reporting. Does the homeless status of students get moved with the students between districts and states? Are there other ways to get this information?

GENERAL EDUCATION PROVISIONS ACT

State educational agencies are required to submit data about subgrants and subcontracts for federally funded program areas on two different federal collections each year. The General Education Provisions Act (GEPA), Section 424, has required States to provide a list of grantees and contractors who receive federal funds from the State education agency for many years. Since 2006 this data, which pertains to a reporting requirement that is specific to ED and does not apply to other federal agencies, has been collected via *EDFacts*. The GEPA collection is undertaken after the period for allowable expenditures has elapsed. Traditionally this is 27 months after the initial grant award from ED. The Federal Funding Accountability and Transparency Act (FFATA) was passed in 2006 to increase transparency of all federal spending and accountability with the goal of reducing wasteful government spending. A reporting system, USASpending.gov was established for use by all federal agencies that require all prime grantees and contractors to report all first-tier sub awards within 30 days of award.

In light of the high degree of alignment between the content of these two collections and the expected high degree of correlation between submitted data, ED is investigating the possibility of retiring DG547, Federal Programs Funding Allocation Table (see Attachment B3 for details on this data group), and instead relying on the more timely data collected by FSRS and published on USASpending.gov to meet the Department’s Congressional reporting requirements under Section 424 of the General Education Provision Act.

Answers from SEAs to the following questions would be helpful in determining whether ED would continue to have access to the data required by GEPA if the *EDFacts* collection were to be discontinued, and FSRS data were used to meet ED’s reporting requirements under GEPA.

14. Does your SEA currently report awards of less than \$25,000 through the FSRS? If not, would there be any barriers to reporting these awards through FSRS if FSRS became the sole collection vehicle for data required under GEPA?
15. Are you aware of other differences in how your SEA reports subgrant data to FSRS vs. EDFacts that would impact the quality and completeness of the data available to ED to meet its statutory obligations under GEPA?
16. Do you anticipate any negative impact on your SEA's collection and use of these subaward data if ED were to eliminate the EDFacts reporting requirement and fulfill its GEPA Section 424 obligations through data reported to FSRS?
17. Would you be supportive of ED eliminating the EDFacts reporting requirement (FS035, DG547) in lieu of relying on the FSRS data to fulfill its GEPA Section 424 requirements? If so, please describe the extent to which this change would result in a burden reduction for your SEA.

30-DAY COMMENT PERIOD

INTRODUCTION

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DIRECTED QUESTIONS

Based on comments received, ED revised the data about charter schools being requested. The revised data request is in attachment B-3. For states that have charter schools:

1. Will the SEA be able to submit the information requested for the roster of management organizations?
2. Will the SEA be able to link these management organizations to charter schools using the EIN?
3. If the EIN won't work, what identifier should be used to link the management organizations to charter schools?
4. Will the SEA be able to submit the information requested on charter contracts?