#### Paperwork Reduction Act Submission Supporting Statement

**Annual Mandatory Collection of Elementary and Secondary**

**Education Data through ED*Facts***

**February 2016**

Attachment F-3

**ED*Facts* Data Set** **for School Years 2016-17, 2017-18, and 2018-19:**

**Response to OMB Questions**

Introduction

This attachment contains the responses to OMB questions on the Annual Mandatory Collection of Elementary and Secondary Education Data through ED*Facts*.

Questions from OMB

1. **How will States identify the bottom 5% of schools – just list or tag those schools? Categorize them in any other way?**

States identify schools using policy guidance from the grant program office. States submit the list of schools to ED.

The Office of Elementary and Secondary Education (OESE) is evaluating the new Every Student Succeeds Act (ESSA) for impact on current reporting guidance. As those decisions are made, file specifications will be updated to incorporate new technical reporting guidance. New ESSA guidance is being posted at: <http://www2.ed.gov/policy/elsec/leg/essa/index.html>.

1. **If a school is closed, can ED*Facts* collect data on the students that go to another school? We know they don’t collect individual student data, so we’re not quite sure how that would be possible.**

That is correct; ED*Facts* does not collect data about individual students, we do not collect data on closed schools, nor do we have any means of identifying where the disposed population went or what their outcomes were after the closure.

1. **On charter schools, will it be possible to sort schools by CMO?**

Yes.  The clearance package includes both data on the Charter Management Organizations (CMOs) operating in the state and which charter schools are using those CMOs.  After the data are submitted, ED would be able to identify the charter schools using each CMO.  Not all charter schools have CMOs.

1. **In general, what changes will be made to reflect ESSA, including any new data requirements in the statute?**

The U.S. Department of Education (ED) is currently reviewing the new legislation to determine impact on data collections. At this point, OESE has not notified the National Center for Education Statistics (NCES) of decisions about additions associated with SY 2016-17 data reporting. OESE has indicated that they anticipate additions for SY 2017-18. OESE has also indicated that they are reviewing the new legislation for deletions to the package. If it is determined that changes are needed as a result of ESSA that are technical clarifications or terminology changes (e.g., eliminating files; replacing “Limited English Proficient” with “English Learners”), those changes will be made through a technical amendment to this package.

If it is determined that there are additional data requirements as a result of ESSA, NCES will consult with OMB to determine the next appropriate steps. We will use our ED*Facts* Data Governance Board (EDGB) to continually monitor any new or changing needs based on ESSA.

1. **Can ED expand the justification for collecting scale score beyond comparing SIG schools with other schools in the State? Something like: “Collecting scale scores would allow the Department to compare schools that receive federal funds with other schools in their States?” Especially since SIG no longer being funded it might not make sense to use SIG as a justification for collecting scale scores.**

As a result of the elimination of funds for the School Improvement Grant (SIG) program, ED is eliminating the two proposed data groups (DG816 and 817) from the collection package.

1. **Please describe any plans that ED has to continue or modify efforts to identify unnecessary items initiated by the previous terms of clearance.**

Please also refer to the “*EDFacts 2013 Terms of Clearance Memo*”document, dated August 27, 2015 and included in this clearance request package.

ED uses multiple strategies to identify unnecessary items and eliminate those from the collection package. First, file specifications are generated by the ED*Facts* program office in NCES and reviewed by the ED data stewards. During this annual process, ED data stewards are able to clarify when files, data groups, or category sets are no longer needed. When data are no longer needed, they are no longer collected (see example in response to question 5, above). Several examples from that review are eliminated in this package. In addition, liaisons from the ED*Facts* program office in NCES are assigned to each stewarding office. Liaisons are responsible for having basic knowledge about new policies and grant priorities that might impact data collections, including identifying and proposing efficiencies (e.g., pre-populating or providing an extract of a data file, for use in annual performance reports).

The ED*Facts* Data Governance Board, consisting of representatives from each data stewarding office and stakeholders within ED that use ED*Facts* data, reviews new and existing ED*Facts* data requests to prevent duplicative collections. In addition, ED staff meet regularly with representatives of SEA data submitters to discuss current and upcoming ED*Facts* data collections, monitor questions that come in through our Partners Support Center (PSC), and monitor community discussions between states on our ED*Facts* Community Website. All questions from States that are submitted through PSC or the Community Website are tracked and escalated to the appropriate ED Program Office for response, including those regarding the need for and use of the data being collected.

1. **Can ED please explain in some detail the rationale for deleting DG 491: Children with disabilities (IDEA) not participating in assessments table? In addition, please specify for each of the remaining deleted or dropped items in Attachment D of the response to terms of clearance memo whether the items were removed because the resulting information was redundant or available elsewhere, or if collection of the information was deemed unnecessary.**

ED offices are commited to collecting only data that are required by statute or needed to adequately monitor a current and funded formula or discretionary grant programs and only at the levels necessary. Explanations for each of the deletions listed in Attachment D of the Response to Terms of Clearance memo follow:

|  |  |  |
| --- | --- | --- |
| **DG** | **DG Name** | **Rationale for deleting** |
| 491 | Children with disabilities (IDEA) not participating in assessments | Unnecessary and some redundancy. Participation and non-participation counts are collected in other files; DG491 added detailed information about nonparticipants. No ongoing, systemic problems were evident in the data and the steward determined the information no longer justified the burden.  |
| 664 | Truants | Deemed unnecessary for an active and funded grant program. |

The Office of Career and Technical Education (OCTAE) is proposing to stop collecting data at the LEA level for the File Specifications listed below, as OCTAE does not use the data and does not anticipate needing them at any time in the future. Reducing the LEA level collection for these File Specifications will also ease the burden on States and on ED.

* DG320, CTE concentrators graduates tables
* DG521, CTE concentrators exiting table
* DG681, CTE concentrators academic achievement table
* DG702, CTE concentrators in graduate rate table
* DG703, CTE participants in programs for non-traditional table
* DG704, CTE concentrators in programs for non-traditional table
* DG705, CTE concentrators technical skills table
* DG736, CTE concentrators placement table

The Office of Migrant Education (OME) is proposing to stop collecting data at the LEA level for the File Specifications listed below, as OME does not use the data and does not anticipate needing them at any time in the future. Reducing the LEA level collection for these Files Specifications will also ease the burden on States and on ED.

* DG102, MEP students served 12-month table
* DG515, MEP Personnel (FTE) table
* DG625, MEP personnel (headcount) table
* DG634, Migrant students eligible 12-month table:
* DG635, MEP students eligible and served:
* DG684, MEP services table:
* DG796, MEP students priority for services table