MEMORANDUM   August 27, 2015

To:	Shelly Martinez, OMB
From:	Kelly Worthington, Data Governance Team Lead, NCES, Administrative Data Division
Through:	Kashka Kubzdela, NCES
Re:	Response to ED*Facts* Information Collection Terms of Clearance (issued on 2/19/2013, OMB# 1875-0240)

The Terms of Clearance for the *Annual Mandatory Collection of Elementary and Secondary Education Data for ED Facts*, SY 2013-14, 2014-15, and 2015-16 (1875-0240), required that "The Department [of Education] will report back to OMB before their next renewal of this collection about its retrospective review of all essential data currently being collected under ED*Facts* and what can be eliminated or streamlined." This memo provides background on the ED*Facts* data collection, describes the retrospective review process used for ED*Facts*, and lists the changes made to the collection as a result of the review.

It should be noted that when the ED*Facts* collection was approved in February 2013, it was managed by the Performance Information Management Service (PIMS) in the Office of Planning, Evaluation, and Policy Development (OPEPD). Later that year, the National Center for Education Statistics (NCES) created the Administrative Data Division, and PIMS—including all ED*Facts* functions—moved out of OPEPD and into the Administrative Data Division of NCES. For purposes of this memo, staff who managed the retrospective review are referenced as "the ED*Facts* team" whether the actions occurred prior to or after the 2013 reorganization.

The ED*Facts* Collection

The ED*Facts* data collection was created approximately 10 years ago as a way to streamline the Department's K12 data collection activities. Prior to ED*Facts*, individual program offices each collected the data they needed for program management and evaluation purposes. In many cases, multiple offices were collecting the same or similar data elements, causing duplicative reporting for state education agency data providers. The implementation of the ED*Facts* collection resulted in a streamlined data collection that reduced burden for data providers and improved data accuracy for the program offices.

ED*Facts* collects data primarily on behalf of ED formula and discretionary grantees. In order to continuously streamline the ED*Facts* data collection, and to prevent or eliminate duplicative or unnecessary data requests, the ED*Facts* team established the ED*Facts* Data Governance Board (EDGB). All ED program offices that collect data through ED*Facts* are represented on EDGB. The ED*Facts* team also continues to work with state data providers through a special task force of the Education Information Management Advisory Committee (EIMAC) of the Council of Chief State School Officers (CCSSO). These two groups allow for ongoing communications between the data collectors and data providers. This communication is essential in identifying potential areas for streamlining the collection, ultimately reducing the burden on data providers as well as improving the quality and usefulness of the collected data.

EDGB implements a data stewardship model, which is critical to the retrospective review process discussed below. Each program office representative on EDGB is considered the "data steward" for the data collected through ED*Facts* for that program office. That individual works with other data users in the program office to identify data needs for the program and monitor data use. The ED*Facts* data stewards are listed in Attachment A of this memo. ED*Facts* collects the data on behalf of steward offices to standardize data collection decisions and grantee reporting procedures, to improve the consistency of reporting guidance, to support data quality review procedures, to allow more efficient access to the data within ED, and to support the creation of privacy protected files for the public and restricted use files for authorized researchers.

The Retrospective Review Process

The ED*Facts* team, working through EDGB, has been conducting annual reviews of the ED*Facts* collection. Governing and managing the data collection occurs through data governance procedures. This memo is specific to the Terms of Clearance response; reviewing data requirements and data use is a continuous process that is managed by the ED*Facts* team with data stewards in program offices acting as subject matter experts through the data governance board.

A thorough review has been conducted over the past year to prepare the proposed ED*Facts* collection for SY 2016-17, 2017-18, and 2018-19. It is the goal of the ED*Facts* team to keep the ED*Facts* collection as stable as possible in order to reduce burden on respondents and improve data quality. Therefore, additions to the ED*Facts* collection are only made once every three years unless new data elements cannot be delayed due to changes in regulations, statutes, or Administration priorities. In these instances, the ED*Facts* team requests clearance for the new items as a separate collection. During the interim years between the last three-year clearance and the upcoming three-year clearance request, the EDGB data stewards were asked to identify any data elements that were not being used and are no longer needed, as well as any technical changes that were needed to the data collection. These changes, described below, were approved as technical changes.

1. For the SY 2013-14 collection: Permitted values were added to certain assessment categories/data groups to allow states to identify students participating in field tests in lieu of taking the state test, as allowed by the Department.
2. One-time SY 2013-14 collection: The Fiscal Year 2013 Continuing Resolution (CR) directed the Department of Education (ED) to submit a report to Congress by December 31, 2013, on the extent to which students with disabilities, English Learners, students in rural areas, and students from low-income families are taught by teachers who are deemed to be Highly Qualified Teachers (HQT) while currently enrolled in an alternative route to certification program. A new file was added for this one-time collection.
3. For the SY 2014-15 collection: The reporting period was revised for two data groups related to Limited English Proficient students and two additional categories were added (racial ethnic status and disability status). These changes were made, in part, to prepare for discontinuing a data group in SY 2015-16.

As another means to streamlining the ED*Facts* collection, the ED*Facts* team also works with program offices requesting new data items to determine the best technical tool to collect the data. Most of the ED*Facts* data are submitted by states through the ED*Facts* Submission System, an electronic system that accepts a variety of standard flat files. However, some data are more easily reported through a simple form made available electronically through the ED*Facts* Metadata and Process System (EMAPS). EMAPS is a Web-based tool used to provide state education agencies (SEAs) with an easy method of reporting and maintaining information on state policies, plans, and metadata to aid in the analysis of data collected. For example, when the Office of Special Education Programs (OSEP) decided to collect its Maintenance of Effort data through ED*Facts*, a new EMAPS form was developed to collect the data because it would be less burdensome to both the Department and the data providers to collect the data using EMAPs.

In preparation for the current three-year clearance request, EDGB established a formal goal to review and identify data groups for elimination. A process was established through which the ED*Facts* team worked with program office data stewards from November 2014 through June 2015 to review the data groups assigned to them, discuss how the data are being used in order to determine which data groups might be no longer needed, and identify new data requirements based on regulatory or program management changes. The process used is outlined in the following table.

MONTH	ACTION
November 2014	EDGB members discussed the goal of reviewing the ED*Facts* collection for the purpose of streamlining and updating the collection, and eliminating any data groups no longer required or used.
January 2015 – April 2015	The ED*Facts* team met individually with data stewards and other program office representatives to discuss the data needs of each program office. See Attachment B for the agenda used for these meetings.
April	An EIMAC meeting was held and proposed data changes were discussed with data providers.
May 2015	All program offices were required to submit a completed "Program Office Amendment Request Form," which outlined the requested changes. The form included sign-off from senior program office staff as well as the appropriate representative from the Office of the General Counsel (OGC). OGC sign-off was used to confirm that the data request was valid under the regulations governing the program (the request form can be found in Attachment C to this memo).
June 2015	Data Stewards reviewed the final package before it was released for public comment.
July 2015	The proposed Three-Year ED*Facts* Collection was posted for public comment.

A list of all changes proposed for the ED*Facts* collection as a result of the retrospective review are included in the Attachment C of the *Annual Mandatory Collection of Elementary and Secondary Education Data for EDFacts of the current* clearance package (see http://www.regulations.gov/#!documentDetail;D=ED-2015-ICCD-0090-0003). These changes are also listed in Attachment C of this memo.

Other than eliminating unnecessary data groups, a data collection can also be streamlined by:
- standardizing language and reporting guidance,
- employing technical features to auto-calculate subtotals and totals,
- using grand totals to infer zeros, and
- using metadata to infer "not applicable."

Many of these types of changes have been made since the last three-year clearance approved in February 2013.

Additional Considerations

In addition to the specific steps taken by the ED*Facts* team to conduct a retrospective review and streamline the ED*Facts* collection, the Department as a whole is also taking steps to continuously review and streamline all Departmental data collections. The Data Strategy Team coordinates activities among all Department offices that work with data collections to coordinate data-related policy activities. In 2013, the DST established the Data Inventory Group (DIG), which was tasked with developing a database of information about all department-sponsored data collections that can be used to generate education statistics. The primary purpose of the database is to provide a centralized source of information about ED's data collections with the goal of facilitating awareness of available data to increase their utility and avoid potentially duplicative data collections.

The EDFacts team participates in all Departmental efforts to coordinate data collection activities. Our major challenge to continuing efforts to streamline the ED*Facts* collection and reduce burden are unanticipated new data collections that leave states with less than 1.5 years to secure contracts, develop and implement training for all data collectors and submitters at school and districts, develop data quality review procedures, implement data quality procedures (based on ED's planned use of the data) prior to the due date. An example of this is the 2013 request from Congress for the Highly Qualified Teacher collection discussed earlier. We also anticipate a reauthorization of the Elementary and Secondary Education Act, which may have impact on the data collected through ED*Facts*. The exact impact is yet to be determined, depending on which version of the bill is ultimately adopted. The reauthorization may result in reduced reporting or additional reporting requirements.

The ED*Facts* team welcomes the opportunity to continue to discuss with OMB our retrospective review process and our methods for streamlining the ED*Facts* collection.

Attachment A. ED*Facts* Collection Areas and Program Office Stewards

Collection Areas (in alphabetical order)	Data Steward
Accountability and Reporting Provisions of ESEA	OESE/OSS
Career and Technical Education	OCTAE
Department Priorities	OESE
Funding Flexibility (REAP)	OESE/SSTP
General Education Provisions Act	OCFO
Individuals with Disabilities Education Act	OSERS/OSEP
Limited English Proficient Students and Title III of ESEA	OESE/OSS/Title III
McKinney-Vento Homeless Program	OESE/OSHS/Homeless
Migrant Education Program	OESE/OME
Neglected or Delinquent Program	OESE/OSHS/N or D
Non-Fiscal Common Core of Data	NCES
Public School Choice and Supplemental Educational Services	OII/SES-Choice and OESE/OSS
Safe, Drug-Free and Gun-Free Schools	OESE/OSHS
Title I Program (Non-Accountability Provisions)	OESE/OSS/Title I

Attachment B. Agenda Questions Used with Data Stewards in the ED*Facts* Retrospective Review Meetings

Meeting Purpose: To discuss the OMB package for SY 2016-17, 2017-18, 2018-19 and any changes that will be made to the existing data collection, quality, or use for these years.

- o What are the data needs for the three school years
    - ▪ Any legislative or regulatory changes since last OMB packet
    - ▪ Does the program office collect additional data not currently in ED*Facts*
- o Feedback from the program office on ED*Facts* processes in the prior year
    - ▪ Any training needs of the program office staff
- o Data Quality
    - ▪ What data quality checks occur by the program office and/or their contract staff
    - ▪ What data quality work or improvements would the office like to see in the next year, in the next five years
- o Data Use
    - ▪ What is the first use of each data group
    - ▪ How does the program office provide the data to be used
    - ▪ Who else uses the data (other program offices, outside ED, etc.)
- o Any other comments or suggestions about ED*Facts* support, etc.

Attachment C. Program Office Amendment Request Form

DATE:
TO:
FROM:
SUBJECT:

An amendment is any modification to the SY 2016-17 EDFacts data set, including modifications to the file specification, category sets, permitted values, file specification guidance, formatting changes, as well as newly proposed data collection to EDFacts.

Amendments to EDFacts must be for one of the following two types:
(1) New data group or category set due to new statutory or regulatory requirements.
(2) Technical amendments to an existing data groups for the purpose of improving data quality (includes minor modifications, clarifying guidance, deletions).

For each proposal:

1. Indicate the type of data change being proposed:
    ☒ New Data Item
    ☒ Technical Amendment to existing data item

2. Detail the proposal:

3. Give the Justification or Rationale.

4. Describe burden change on the SEA

5. Obtain approvals

PROGRAM OFFICE REVIEW/APPROVAL
The program director and program attorney must review and approve (by signature) proposal before any changes to the ED*Facts* data set will be considered.

_____   _____
Program Director/Assistant Secretary   Date

_____   _____
Program Legal Counsel   Date

AMENDMENT REVIEW/APPROVAL

ED*Facts* Team Review:

Comments:

Reviewer: _____ Date: _____

....

Data Governance Determination:

_____ Approved _____ Approved w/ modifications _____Disapproved _____Date

Comments:

....

Data Strategy Team Review (as appropriate):
Comments:

Reviewer: _____ Date: _____

Attachment D. Summary of Changes Planned Based on Retrospective Review

The following changes are included in the package for the 60 day comment period.

Data Steward	File Specification/Data Group/Category Set	Description
OCTAE	FS 083- CTE Concentrators Graduates FS 142-CTE Concentrators Academic Achievement FS 154- CTE Concentrators Graduation Rate FS 155- CTE Participants in Programs for Non-Traditional FS 156- CTE Concentrators in Programs for Non-Traditional FS 157- CTE Concentrators Technical Skills FS 158- CTE Concentrators Placement FS 169- CTE Type of Placement	Drop LEA level collection
OESE/ Early Learning	EMAPS Collection	New data groups on Kindergarten Entry Assessment
OESE/OSS	DG 695- Regulatory four-year adjusted-cohort graduation rate table DG 696- Cohorts for regulatory four-year adjusted-cohort graduation rate table DG 697- Regulatory five-year adjusted-cohort graduation rate table DG 698- Cohorts for regulatory five-year adjusted-cohort graduation rate table DG 755- Regulatory six-year adjusted-cohort graduation rate table DG 756- Cohorts for regulatory six-year adjusted-cohort graduation rate table	Addition of Homeless enrolled category set to ACGR data groups
OESE/OSHS /Neglected or Delinquent	FS 119- N or D participation, State Agency FS 127- N or D Participation - LEA	New data groups on chronic absenteeism added
OME	FS 054- MEP Students Served - 12 Months FS 065- Federally Funded Staff FS 121- Migrant Students Eligible - 12 Months FS 122- MEP Students Eligible and Served - Summer/Intersession FS 145- MEP Services FS 192- MEP Students Priority for Services	Drop LEA level collection
OESE/OSHS/GFSA	DG 664- Truants	Deletion
OSERS/OSEP	FS 004- Children with Disabilities (IDEA) Not Participating in Assessments	Deletion
OSERS/OSEP	LEA maintenance of effort (MOE) provisions of IDEA in the MOE Reduction and CEIS Data Collection (via EMAPS)	New metadata added
OII/Charter School Programs	TBD	New data groups and file specification Charter Management Organizations added
NCES/CCD	FS 033- Free & Reduced-Price Lunch	New direct certification data group added

OESE/OSS /School Improvement Grants	FS 159- Average Scale Scores	New mean scale scores and standard deviation scale scores data groups added
OESE/OSS /School Improvement Grants	DG 752- Baseline indicator status	Change permitted values
OESE/OSS /School Improvement Grants	TBD	New data groups on chronic absenteeism added, transition of the data group from the Office of Civil Rights (OCR) Civil Rights Data Collection (CRDC) survey to ED*Facts*
NCES/CCD	DG 453- Education agency type	Name, definition, and permitted value change
NCES/CCD	DG 21- School type	Definition and permitted value change
NCES/CCD	DG 16- LEA operational status	Permitted value change
NCES/CCD	DG 531- School operational status	Permitted value change
NCES/CCD	DG 803- Virtual school status	Definition and permitted value change