Consolidated State Performance Report for School Years 2017-18, 2018-19, and 2019-20: Response to 60-day Comments

INTRODUCTION

This attachment contains the responses to public comments on the Consolidated State Performance Report (CSPR). The 60-day comment period for the package closed on January 2, 2018. ED received a total of 12 comment submissions covering multiple topics. A total of 85 individual comments were received from the 12 submissions. All the submissions came from states.

Each section provides either a summary of the public statements received, or the actual text received in a comment, ED's response to those statements, and any resulting changes being made to the proposed data collection package. In addressing the public statements and revising the package, ED focused on recommendations from the public statements that continue to move CSPR forward in achieving the goals of consolidating collections, obtaining high quality data, and reducing burden on data suppliers.

ED appreciates the time and attention the public spent on reviewing the CSPR package and in composing thoughtful comments that shape the final data set, as evidenced in this attachment. ED reviewed, summarized, and documented each individual statement prior to analyzing all statements for common themes. This documentation will aid in the finalization of this data clearance package and will serve to inform future policy decisions regarding CSPR.

DIRECTED QUESTION: CSPR PROCESS

What part of the CSPR process is the most burdensome on your SEA?
   a. Reporting the data into the system
   b. Data quality reviews
   c. EMAPS reporting
   d. Other, please specify

What are ways ED should improve the CSPR process to reduce burden on your SEA?

Public Comment: Data Quality Reviews
A total of 9 individual comments were received from 7 states in response to this directed question. All 7 states indicated that the data quality reviews were the most burdensome part of the CSPR collection, many citing timing as an issue.

Recommendations provided by states:

- Changing the Excel based method of sharing files back and forth into a process where the comments are shared via the CSPR tool itself or some other similar tool (0MB Max, GRADS 360, etc.) that can also accommodate email notifications when a new comment is added.
- SEAs should have the ability to leave comments on any section of the CSPR. Sections that are supported by an ERS report of schools or districts do not currently allow comments.
- Improve cross-referencing to note manual CSPR items in ED*Facts*.
- Remove multiple data quality review processes and replace with one standardized process.
- This could be alleviated if the CSPR asked more prompting questions (such as the questions we get asked in those spreadsheets after submission).
- The amount of effort to interpret and investigate the data quality feedback could be lessened if the Department provided more information in the feedback. Two pieces of information that would be super helpful would be the file specification used to populate the CSPR question and the category set(s) that appear to be problematic.
- Providing the state identifiers for a building or a district would be preferable to the NCES ID which also must be cross-walked to figure out which pieces of information are in question.
- More work needs to be done to share data between EDEN and other program offices to reduce double submissions. For instance, MSIX data could be rolled up to provide EDEN with needed aggregate data.

ED Response

Thank you for the thoughtful feedback in response to the directed questions on the CSPR. The Department is currently developing the requirements for the CSPR tool and associated processes for school year 2017-18. The responses to the directed questions will be used to inform the Department's development and to aid in the identification of enhancements that reduce the burden of the CSPR. In particular, the Department will focus on both technical and procedural enhancements that will reduce the burden of the data verification process. The Department will keep states informed of the CSPR's development and any required changes through the Partner Support Center. Regarding MSIX, the Department is currently studying options based upon prior customer feedback for the inclusion of data available in MSIX in future CSPRs.

Public Comment: EMAPS

A total of 2 individual comments were received from 2 states in response to this directed question. One state noted the difficulty with EMAPS is that, while it can be exported to Excel - which is way more helpful than a PDF file for analysis purposes - the output is not structured in a way that it can be easily used. If the EMAPS data were in a table format so that it could be imported into a software tool as a table to check data files before they are submitted in ED*Facts*, it would be much more useful. The other state noted it might be helpful to have some surveys open earlier than they do. For example, the assessment metadata survey could be completed by many States much earlier in the year as this information tends to be stable, with future year changes typically being known about well in advance.

ED Response

Thank you for the thoughtful feedback in response to the directed questions on the CSPR. The Department is currently developing the requirements for the CSPR tool and associated processes for school year 2017-18. The responses to the directed questions will be used to inform the Department's development and to aid in the identification of enhancements that reduce the burden of the CSPR. In particular, the Department will focus on both technical and procedural enhancements that will reduce the burden of the data verification process. The Department will keep states informed of the CSPR's development and any required changes through the Partner Support Center.

Public Comment: Burden (Other)
A total of 5 individual comments were received from 4 states in response to this directed question. Three of the states noted that ED could improve the CSPR process to reduce burden for states by being mindful of the timeliness of the collection in terms of other federal deadlines, or when coordinators are at conferences/meetings, so as not to have multiple items due on or around the same date. Two states noted that changes to data items (adding new items), file specifications, business rules, and processes introduce risk into the timeline and accuracy of initial runs of files.
ED Response
Thank you for the thoughtful feedback in response to the directed questions on the CSPR. The Department is currently developing the requirements for the CSPR tool and associated processes for school year 2017-18. The responses to the directed questions will be used to inform the Department's development and to aid in the identification of enhancements that reduce the burden of the CSPR. In particular, the Department will focus on both technical and procedural enhancements that will reduce the burden of the data verification process. The Department will keep states informed of the CSPR's development and any required changes through the Partner Support Center.

DIRECTED QUESTION: COMBINING CSPR

Currently CSPR is collected in two parts, with separate open and close schedules. Would it be less, more, or the same burden if ED moved to collecting CSPR as one part in the future? Which part of the process would increase or decrease your burden by moving to one part:
  a. Reporting the data into the system
  b. Data quality reviews
  c. EMAPS reporting
  d. Other, please specify

A total of 15 individual comments were received from 9 states in response to this directed question. Six states did not support moving to one part and three states were indifferent or said it

would not increase their burden. The data quality reviews were noted as an area of concern moving to one-part. There were concerns about the timing of the one part and whether deadlines would change or if the reporting timeframe would be increased to accommodate the expanded workload.

Recommendations provided by states:

- Merge the reopen periods together to reduce back and forth sharing of data files between the state education agency and U.S. Department of Education (USDE). If the periods are merged, the re-open period should last one month instead of only two weeks that are given for each individual re-open period under the current schedule.
- Complete a feasibility study to determine if there are ways to submit some CSPR data on more of a rolling basis throughout the year.

ED Response

Thank you for the thoughtful feedback in response to the directed questions on the CSPR. The Department is currently developing the requirements for the CSPR tool and associated processes. The responses to the directed questions will be used to inform the Department's development and to aid in the identification of enhancements that reduce the burden of the CSPR. In particular, the Department will focus on both technical and procedural enhancements that will reduce the burden of the data verification process. Please note that a combined, one-part CSPR will no longer be considered for school year 2017-18. The Department will keep states informed of the CSPR's development and any required changes through the Partner Support Center.

ENGLISH LEARNERS

A total of 26 individual comments from 5 states were received on CSPR items on English Learners. Several states said they couldn't do some of the new items and that additional guidance is needed around reporting of EL students with disabilities. Specific comments are below:

Public Comment: 1.2.4.3

The note in this section says: "For this question only, report on children with disabilities (IDEA) who are also ELs in the U.S. less than 12 months who took the ELP assessment in lieu of the statewide reading/language arts assessment." No student can take the ELP assessment in lieu of the statewide reading assessment.

ED Response

If a state does not have a policy that allows recently arrived Els to take the ELP in lieu of the reading/language arts assessment, then they would not use that field when reporting. However, states that do have a policy that allows for that must use the field in order to report an accurate participation rate for reading/language arts. Please note that those students should not be entirely excluded from the data file.

Public Comment 1.2.5.1.2

We would like further clarification on the definition and reporting for native languages. We have a Spanish and English version of our Math and Science exams and no other languages. We do not have an ELA test in another language so there could be some data issues for student performance if the student would have another language as their native language which is not Spanish.

ED Response

States should report on any languages in which the state offers assessments other than English. Reporting should be consistent with the states approved state plan. In this example, if Spanish is the only other language in which assessments are offered, the state should list Spanish for the math and science assessment, but not include it for reading/language arts. If there are state-specific questions about how to report on this question, the state should feel free to contact the Partner Support Center for further guidance.

Public Comment 1.2.5.3

Additional guidance is needed around exact reporting of EL students with disabilities.

ED Responses

The Department appreciates identification of areas where additional clarification may be needed. If the state provides further context about what is unclear, the Department will consider the state's suggestions.

Public Comment 1.2.5.3.2

"Proficiency within five years" This puts an extreme burden on LEAs to track a student's full enrollment history in order to know how to report. This should only apply to students enrolled for five years in the same LEA.

ED Response

Districts that receive Title III funds must report on all English learners who have not attained proficiency within five years of (1) identification as an English learner and (2) first enrollment in the district. This reporting requirement does not require that a student is enrolled in the same district for all 5 years in order to be included. See file specification 204 for SY 2017-18 for additional guidance: https://www2.ed.gov/about/inits/ed/edfacts/sy-17-18-nonxml.html

Public Comment 1.2.5.3 - 1.5.4.4

If these questions are reporting for ELP accountability & accountability on academic achievement testing for ELs, then why are we looking at whether they receive Title III funds? Shouldn't we be reporting for those that receive Title I funds since that is where accountability for ELs lies?

ED Response

ESEA includes reporting requirements both under Title I and Title III. Some of the requirements apply to the entire EL population, and are included under Title I. Some apply specifically to the Title III served population, and some apply to both. While the requirements fall under different

sections of the statute, they have been presented together in the CSPR in order to allow for ease of reviewing and using related information. The Department carefully reviewed all EL reporting requirements to ensure only elements required under ESEA were included.

Public Comment 1.2.5.4.1
Does this address only students exited from the LIEP in the LEA? Or students who may have moved into the LEA from another US school or district? For example, if a student moves into the LEA three years after exiting the LIEP in another school, are they included here? If so, how does USED recommend we track this effectively? Especially for those coming from out of state?
ED Response
The Department appreciates your questions. Section 3121(a)(5) of the ESEA, as amended, requires reporting on "the number and percentage of English learners meeting challenging State academic standards for each of the 4 years after such children are no longer receiving services." As stated in the answer to question J-1 of the Department's Title III guidance dated September 23, 2016, "The students included in this reporting must include all former ELs served by the LEA who have achieved English language proficiency and therefore no longer receive any EL services." The answer to question J-3 of the guidance also states that, "Under Title VI and the EEOA, States and LEAs have separate obligations to monitor the progress of exited EL students" (https://www2.ed.gov/policy/elsec/leg/essa/essatitleiiiguidenglishlearners92016.pdf). Under the previous iteration of the ESEA, States were required to report this information for each of the 2 years after such children were no longer receiving services, so States likely have an approach that can be revised or expanded. While the Department expects States meet these reporting requirements, it does acknowledge that in some circumstances an LEA may be unable to track students who transfer in and out, especially those coming from out of State. If the reported data are incomplete, the State should notify the Department through the already established procedures. For State specific questions, the State should contact the Partner Support Center.

Public Comment 1.4.2
Definitions needed for the program types being reported. Will ED provide definitions for these LIEPs?
ED Response
The Department appreciates identification of areas where additional clarification may be needed. While these are standard types of LIEPs and should be familiar to Title III staff in your state, if the state provides further context about what is unclear, the Department will consider the state's suggestions for areas where more guidance is needed.

Public Comment 1.4.4
Clarification on "Number of teachers serving in LIEPs (including core content, reading, math, science, social studies) in LEAs receiving Title III funds. Is this licensed teachers? How is ED defining teacher? Clarification on "Number of certified, licensed, or endorse teachers serving in LIEPs in LEAs receiving Title III funds." Does this mean holding an ESL teaching credential?

How specifically are you defining this differently than the previous question asked in 1.4.4? We have been collecting/reporting the # of teachers needed in the next 5 years for several years now. What is the purpose of collecting this? It's not like states receive additional funds to support this need we are reporting.

ED Response

In the first column of question 1.4.4, the number of teachers reported would include those who were not certified, licensed, or endorsed. In the second column of the question, the number of teachers reported would include only those who were certified, licensed, or endorsed. The purpose of this question is to contrast the overall teacher count with the count of those who hold certification, licensure, or endorsement. The ESEA does not dictate specific qualifications for teachers of ELs (please refer to D-3 of the Title III guidance dated September 23, 2016 for more information: https://www2.ed.gov/policy/elsec/leg/essa/essatitleiiiguidenglishlearners92016.pdf).

Public Comment 1.4.5 and 1.4.6

This section is difficult to track and report with fidelity. Clear definitions of each are needed. This does not seem like essential information that is likely to produce high quality, valid, and consistent data, and will create additional burden on the part of the SEA and LEA.

ED Response

These reporting categories are required by statute under section 3121(a)(1) of the ESEA (for more information about these activities please refer to section 3115 of the ESEA). Additionally, under Title VI and the EEOA, LEAs must provide a language assistance program that is effective —educationally sound and proven successful. Further, how LEAs use funds and assistance provided to LEAs are important pieces of information about the fidelity of implementation of these programs and provide context to use during program monitoring. Activities are written to be limited to allowable uses of funds, but also sufficiently broad to allow for differences in state implementation of Title III programs.

MIGRANT STUDENTS

A total of 7 individual comments from 2 states were received on CSPR items on Migrant students.

Public Comment 2.4

Regarding "… the majority of their time while residing in the State during the performance period." -- What does this mean? How is this determined? Does the child also get counted in the sending/receiving state? What if a student spends 3 months in State A, 3 months in State B, 4 months in State C and 2 months in State D, where would that child be counted? How would we know which states that child traveled to and for how long he/she was there?

ED Response

Children who meet the requirements for program eligibility may be counted in any State in which they resided for one day. States are directed to report a child in the age/grade category in which s/he spent the majority of his/her time while residing in the State during the performance period. Therefore, in the example you've provided, each State would count the child in the data it reports in this table. If the child spent 2 months in State A in grade 9 and one month in State A in grade 10 (total of 3 months), State A would report the child in grade 9 in this table because children are to be counted in the age/grade category in which they spent the majority of their time in the State. Similarly, if the child spent 1 month in State C in grade 9 and 3 months in State C in grade 10, State C would report the child in grade 10 in this table.

Public Comment 2.4.1
Regarding FAQs on Child Count: "… youth who are 'here-to-work' only." -- Could this be a student that was going to school in the sending state in the spring, then moved to the receiving state and only worked and did not attend school, then went back to the receiving state after the school year started (November?) and went back to school in the sending state? Could you define "here to work"?
ED Response
Migratory Out-Of-School Youth who are "here-to-work" only are not enrolled in K-12, and do not experience a temporary absence from school such as the one described in the comment.

Public Comment 2.4.1
Regarding "… only if the child's residency in the state was verified after the child turned 3." -- How is verification determined? Regarding FAQs on Child Count: "… youth who are 'here-to-work' only." -- Could this be a student that was going to school in the sending state in the spring, then moved to the receiving state and only worked and did not attend school, then went back to the receiving state after the school year started (November?) and went back to school in the sending state? Could you define "here to work"?
ED Response
Verification of residency is customarily obtained through face-to-face interviews or phone interviews.

Public Comment 2.4.1.1
Category 1 Child Count (Eligible Migratory Children): This section lists the current year Eligible Migratory Children from FS121 by Age/Grade and the following section 2.4.1.2 Category 1 Child Count Increases/Decreases requires a comment if there were any increases or decreases of greater than 10 percent. The CSPR application should display the data from the prior year and calculate the 10 percent change on the SEAs behalf. The same comment would apply to 2.4.2 and 2.4.2.1 for the Category 2 Child Count.
ED Response
ED's Office of Migrant Education currently provides an individualized data check sheet tool that contains the SEA's previous year Category 1 and Category 2 data. Once SEA staff enter data for

the current year in the data check sheet, the spreadsheet displays to the SEA if any increase or decrease exceeds 10%. The Office of Elementary and Secondary Education will consider your suggestion for future CSPR data collections.

Public Comment 2.4.1.3

Regarding "In the table below, enter the unduplicated statewide number of eligible migratory children from birth through age 2 who, within 3 years of making a qualifying move, resided in your State for one or more days during the performance period of September 1, 2017 through August 31, 2018." -- Please clarify: If a child is residing in our state during the performance period and has a QAD within 36 months of any date within the performance period and is age birth to age 2, would they be in this count? Please clarify this count. Also, if the child is birth to 2, they wouldn't have been born 3 years ago…

ED Response

Yes, this count includes children who reside in your State during the performance period, have a QAD within 36 months, and who are age birth through 2. You would include the child in the birth through 2 section of the table.

Public Comment 2.4.3.3

MEP Quality Control Processes: This section includes many tables. It may be better to split this up into separate sections such as one section per table or comment pair or independent comment box.

ED Response

In the CSPR Part II document submitted as part of the 30-day public comment period, ED will be recommending removal of a large portion of the table questions in 2.4.3.3, and to retain only those that relate to the topic of re-interviewing.

Public Comment 2.4.7

Regarding these points: "1) Children who continued to receive MEP-funded services during the term their eligibility ended. 2) Migratory children who are not included in your State's Category I or Category II child counts because they did not reside in your State for at least one day during the performance period (e.g., interstate collaboration), but who were eligible in another State and received instructional services funded in whole or in part with MEP funds in your State. If you report such children, please provide an explanatory comment in the comment box for each relevant CSPR question." -- 1) Please confirm that this is Continuation of Services (COS). 2) Could you please provide a realistic example of a situation where this would occur?

ED Response

Point #1, "Children who continued to receive MEP-funded services during the term their eligibility ended;" reflects a subgroup of COS children who may be counted in CSPR section 2.4.7. To be clear, Questions 2.4.7.1 and 2.4.7.2 do NOT collect COS data, as COS data are collected in 2.4.8.2. Point #2, an example of this situation would be a child who resides in the State of Kansas, is eligible for the MEP in Kansas, but may receive MEP services in nearby Colorado, in an LEA that may have a MEP subgrant.

OTHER COMMENTS

States submitted 19 individual comments on other topics including accountability, the CSPR tool, foster care, state report cards, teachers, homeless, REAP, and waivers.

Public Comment - Accountability
Part II, section 2.1 Accountability, under question 2.1.1 - School Performance on Accountability Indicators, there are 6 file specifications that are to be compiled into a report. The fields listed for that report include the NCES IDs and building names, but the NCES IDs are not helpful to us nor is the name of the building or district; if Michigan is expected to use this report, it should include state building and district codes. Further, it is not clear how the "compiling" will happen but we have a concern that not all schools in Michigan will be in each file and depending on how the files are compiled, some that should be there might not be. For example, not all schools have EL students and according to the file spec 2015, only operational schools that have English learners enrolled as of the reporting year are to be included. Presumably, since FS129 contains all schools, all schools in that file will be included in the report and any information from the other files that matches one of those schools will be displayed (left join versus inner join). We just want to make sure the Department is aware of this. In that same section, questions 2.1.2 and 2.1.3 indicate the file spec is to be determined and since we don't have information on the file spec, we are unable to provide any input.

ED Response
The State LEA and State School ID provided to ED*Facts* by the SEA will be added to this report. ED will consider the compiling issues for this report and will document all decisions with the release of the report.

The data items in questions 2.1.2 and 2.1.3 were approved in the ED*Facts* OMB Collection Package (1850-0925) and haven't been assigned a file specification yet.

Public Comment - CSPR Tool
Three states provided comments on the CSPR Tool. One state noted that if CSPR could eventually be tailored to a place where absolutely all info needed could be obtained from EDFacts and manual entries were eliminated, that would be great. Another state asked if a platform where LEAs can report data directly into the system could be created.

A third state had the following suggestions about the errors that pop up within the system:
- The print is much too small and there is no easy way to export them into a more user-friendly format.

- The way they are displayed makes navigating through screens slow and painful. Users must click "OK" multiple times in order to move to another screen or section.
- It takes a lot of cross-referencing to the edit checks document to understand the methodology used to fire edits.
- The edit checks document does not contain rationale for why methodology is used for each error. For example, some errors compare a current year count to a prior year count while others take a percentage of the percentage point change from the prior year to the current year. It would be helpful to know why different methodology is applied to different data.
- States are asked to provide a response to an error that will be publicly viewable when the public does not see the error that is being responded to. In addition, some of the edit check calculations are far more sophisticated and granular than the average public viewer would apply when looking at the data. This could lead to confusion and creates burden for States to provide comments that satisfy USED but are also user friendly.

ED Response

The Department is currently developing the requirements for the CSPR tool and associated processes for school year 2017-18. The responses to the directed questions will be used to inform the Department's development and to aid in the identification of enhancements that reduce the burden of the CSPR. In particular, the Department will focus on both technical and procedural enhancements that will reduce the burden of the data verification process. The Department will keep states informed of the CSPR's development and any required changes through the Partner Support Center.

Public Comment – Foster Care

We do not currently provide data on students in foster care so we would have to determine the best definition and sources for this data. How would we classify a student if the student was only in foster care or staying with a relative due to a family emergency?

ED Response

Please see any of the following file specifications for guidance on reporting on students in foster care: FS175, 178, 179, 185, 188, 189. For questions involving state specific context, please feel free to contact the Partner Support Center for further guidance.

Public Comment – Retired Items

The CSPR Part I item 4 and 5 in the list of retired items (Percentages of Funds Used for Standards and Assessment Development and Other Purposes; Uses of Funds for Purposes Other than Standards and Assessment Development) are not actually retired.

ED Response

You are correct, items 4 and 5 will be removed from the list of CSPR Part I retired items.

Public Comment - State Report Cards

The Every Student Succeeds Act does not require a December 31 deadline. That date was part of the regulations surrounding Title I, which were rescinded. As such, the USDE should allow this

section to be blank with a comment upon initial submission of CSPR I, which is typically due mid December. You should allow SEAs to leave this section blank (with comment) upon the initial due date of the CSPR.

ED Response

While we understand that not all states will have posted their report cards by the CSPR Part I deadline, many states will have done so, since the purpose of report cards is to make information available to parents as soon as possible after the preceding school year. As such, we wanted to ensure that we are getting links to where that information can be found as soon as possible in our collection cycle in order to use it for program monitoring and other purposes. Further, while states may not have posted report cards by the deadline, we expect that the web address where they can be found will remain relatively stable, so states should still know where they intend to post report cards. As with any required data element, if states are unable to meet the required deadline, they can contact PSC for guidance on how to respond to that particular question.

Public Comment 1.1.1

We are seeking clarification on the section related to review procedures. While you are requesting a brief statement here, there are many review procedures for our assessment and other data which would make this section quite cumbersome.

ED Response

After additional consideration, the Department has decided to remove question 1.1.1 from the CSPR. This change will be reflected in the 30 day public comment information collection package.

Public Comments - Teachers

Section 1.3.1 - Inexperienced Teachers in high- and low-poverty schools: It shows FS 203 will populate this question; however, the file spec does not collect either the poverty quartile nor the school types and so either that data will be pulled from another file spec that needs to be added to this document or those data elements need to be moved to file spec 203. How will USED crosswalk each of the data elements for this question into the appropriate categories? We advise a technical correction to the package to indicate that this section is also based upon ED*Facts* file FS103 -Accountability (DG 699 - Poverty Quartiles).

ED Response

CSPR sections 1.3.1, 1.3.2, and 1.3.3 will also be populated by ED*Facts* file specification 103 which collects data group 699 State poverty designation. Regarding the school levels, the Department has decided to no longer disaggregate CSPR section 1.3 by elementary and secondary schools. This change will be reflected in the 30 day public comment information collection package.

Public Comments - Homeless

Section 1.6.1.3 Subgroups of Homeless Students Enrolled: Since the total of Unaccompanied Youth by primary nighttime residence is already incorporated into section 1.6.1.2, remove the

total from section 1.6.1.3 for the subgroups of homeless students enrolled. This is a duplication of data collected elsewhere.

ED Response

After considering your suggestion to remove the total of unaccompanied homeless youth from section 1.6.1.3, the Department has decided to maintain the total in both sections 1.6.1.2 and 1.6.1.3. Sections 1.6.1.2 and 1.6.1.3 are populated with ED*Facts* file specification 118. However, the total in 1.6.1.2 is populated by a different category set than 1.6.1.3. It is possible that the two totals may not equal each other. Maintaining the totals in both sections serves as a data quality check to ensure the Department is receiving complete data from SEAs. In addition, the total of unaccompanied homeless youth in 1.6.1.3 allows the public to compare this population with the other subgroups reported in the same table.

Public Comments - REAP

Section 2.1.4.1 - Section 1003 of the ESEA Allocations to Local Education Agencies (LEAs): If CSPR reporting from EDFacts file FS132 will be moved from the CSPR I to the CSPR II, then the due date for FS132 should also be moved from mid-December to mid-February, in line with all other files that are due according to which CSPR Part they are used in.

ED Response

The Department will move the due date of ED*Facts* file specification 132 to align with CSPR Part II.

Section 2.6.6 - Rural Low-Income Schools Program (RLSI) LEAs Awarded Funds: WDPI questions what tool will be used to collect this information since the instruction in the CSPR II attachment indicates that the information will be collected from SEAs outside of the CSPR collection tool. WDPI currently has 34 eligible districts that would be reported in this section.

ED Response

Generally, States collect LEA award information as part of their own State consolidated applications for LEAs. For reporting to the Department, a process is being developed similar to the Title I district collection. The Partner Support Center (PSC) will send each State an Excel spreadsheet with a list of NCES ID's and district names of all RLIS-eligible LEAs. The State will need only to include the RLIS allocation amounts for each LEA as appropriate and return the file to PSC. The Department is also considering creating an EDFacts file specification to collect this information in the future. More detailed instructions will be distributed to States closer to the due date of the CSPR.

Section 2.6.7 - SRSA awards are federal direct grants to LEAs. LEAs work directly with federal staff, the state is not involved in the grant cycle and would not have information to report AFUA.

ED Response

ED*Facts* file specification 131 is the collection vehicle for State education agencies (SEAs) to provide the Department with AFUA data. SEAs have as a matter of course provided AFUA participation data to the Department pursuant to Section 5211(a)(2) of the REAP statute. While

the Minnesota SEA is correct in that SRSA grants are awarded directly from the Department to eligible LEAs, the SEAs have a significant role in providing SRSA-related data annually to the Department (such as the list of LEAs in their respective States who have opted to make use of AFUA.)

Public Comment – Waivers
Items 1.2.4.2.1, 1.2.4.4.1, 1.2.4.6.1: "While the Every Student Succeeds Act (ESSA) continues to require that statewide participation in alternate assessments stay under 1 percent, it no longer requires a local cap. As a result, some states will no longer be conducting the waiver process. While reporting the percentage of students assessed using the alternate assessments still makes sense, specific language referencing a 'waiver' will no longer be applicable to some states."
ED Response
The CSPR question applies to the waiver that is required if a state wants to exceed the 1% cap at the SEA level. If the state does not have a waiver, the state would respond "no" to that question.