

**Public Comments Received During the 30-day Comment Period –
May 2018**

State Longitudinal Data System (SLDS) Survey 2018 – 2019

ED-2018-ICCD-0043

Comments on FR Doc # 2018-08068

Document: ED-2018-ICCD-0043-0005

Name: Keric Ashley



**CALIFORNIA DEPARTMENT
OF EDUCATION**

TOM TORLAKSON
STATE SUPERINTENDENT OF
PUBLIC INSTRUCTION

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May 16, 2018

Director of the Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue, SW
LBJ, Room 216-34
Washington, DC 20202-4537

To Whom It May Concern:

Subject: Proposed Statewide Longitudinal Data System Survey 2018-2019 (OMB
Control Number 1850-0933)

The California Department of Education (CDE) appreciates the opportunity to review and comment on the Statewide Longitudinal Data System (SLDS) Survey 2018-2019 as proposed in the Federal Register, Volume 83 on April 18, 2018. Our experience in collecting and responding to the 2017-18 survey was it required significantly more time than is estimated in this proposal. The proposal estimates the Annual Burden Hours at 140 with 112 respondents meaning the average estimated time per respondent is 1.25 hours. We spent at least 10 hours gathering and consolidating responses from various staff involved in our SLDS. We suggest that it be administered less frequently and believe it would still yield useful information.

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If you have any questions regarding this letter, please contact Sonya Edwards, Education Administrator, Education Data Office, by phone at 916-445-9394 or by e-mail at sewards@cde.ca.gov.

Sincerely,

Keric Ashley, Deputy Superintendent
Performance, Planning and Technology Branch

KA:se

Dear Mr. Ashley,

Thank you for your feedback posted on May 17, 2018 responding to a 30-day request for comments on the Statewide Longitudinal Data System (SLDS) Survey 2018-2019. We take the level of burden on the respondent very seriously, and would like to point out numerous factors that were considered when assessing

the current estimated average level of effort for respondents:

- 1) We anticipated that the initial 2017 collection, which has been completed at this point, would take the longest amount of time to complete. The first collection required that State Education Agency (SEA) respondents identify cross-agency contacts, data sources, etc. Now that those informants, data sources, and connections have been identified, the time required to complete subsequent survey collections on an annual basis should decrease.
- 2) Upon approval of this submission, the Survey will be prepopulated with the previous year's collection data to ease the level of burden for respondents. If there have been no changes or enhancements to capacity, the respondent can simply review unchanged sections without having to input responses.
- 3) The Survey is being administered annually to most accurately track movement in the field. While administering the Survey less frequently would provide us with a snapshot or glimpse of state's data capacity, we would lose information about annual advances in a field that is continually evolving due to a variety of desires for increased functionality and external pressures and developments. Understanding changes in state capacity are critical as we currently annually use data collected from states to craft SLDS technical assistance plans and to guide changes to the SLDS program as a whole. Annual data will also inform development in other USED programs, including, for example, the Common Education Data Standards (CEDs).

The burden times presented in this submission are estimates based on our best understanding of how long review and completion of the survey in Year 2 should take on average across all SEAs. However, if you find that the Year 2 survey completion takes significantly longer than our estimate, please contact us again and let us know.

Sincerely Yours,

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