

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

July 2019

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**ATTACHMENT G**

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***EDFacts* Data Set for School  
Years 2019-20, 2020-21, and  
2021-22:  
Response to OMB Questions**

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## INTRODUCTION

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This attachment contains the responses to OMB questions on the Annual Mandatory Collection of Elementary and Secondary Education Data through *EDFacts* for School Years 2019-20, 2020-21, and 2021-22 in the following four areas of interest:

1. Enrollment Policies for Charter Schools
2. Pre-Kindergarten (PK) Enrollment and Possible Alternative Sources of Information
3. Perkins Grants, Motivation for Proposing the Move to Reporting in *EDFacts*
4. Sex/gender measurement

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## AREAS OF INTEREST

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### **1. Enrollment Policies for Charter Schools**

The Department asked a directed question regarding the enrollment policies of charter schools; specifically, whether states could distinguish their charter schools based on enrollment policies. Twenty-one State Education Agencies (SEAs) and two associations provided comments. Sixteen SEAs were either not supportive of adding the proposed data group or noted that their state could not report these data. On the other hand, the associations were somewhat supportive but noted that the burden of reporting would outweigh the benefit of collecting these additional data.

The Department concluded that the responses showed that states do not have systematic and accurate data regarding enrollment policies of charter schools. Furthermore, the Department agreed that the burden would outweigh the benefit of these data, especially if inaccurate or incomplete data are provided. Therefore, the Department removed the proposed data group from this collection package.

The Department is still interested in understanding the different enrollment policies of charter schools within each state. The inclusion of a directed question on the topic signaled interest in these data. The Department will work with states, through groups like the National Forum on Education Statistics (Forum), to develop this understanding. The discussion topic regarding enrollment policies of charter schools is on the agenda of all three Forum committees at the July 2019 meeting. The Charter School Program Office will also look at other ways of obtaining this information. The Department will follow up with OMB after the July 2019 Forum meeting to continue the discussion on information about enrollment policies of charter schools.

### **2. Pre-Kindergarten (PK) Enrollment and Possible Alternative Sources of Information**

Ideally, the Department would like to capture enrollment in all publicly-funded PK programs. However, the Department recognizes that reporting of these data can vary from state to state and even between districts within a state. Therefore, to better understand what is being reported, the Department solicited input from states about this issue. Nineteen SEAs and one association responded to the directed question on PK enrollment. The SEAs described a variety of combinations of students included in PK enrollment for *EDFacts* reporting – including differences based on age and program enrollment, for example, some of the states noted that PK enrollment in *EDFacts* include only those students enrolled in Individuals with

Disabilities Education Act (IDEA) programs.

Overall, the majority of responding SEAs reported that their agency's data systems do not include counts for state-funded preschools. All SEAs responding noted that they would not be able to report these data in the 2019-20 school year. The states also commented that due to the service delivery structure in their state, reporting the data would require data sharing agreements that do not currently exist. Finally, many states reported that the service locations (e.g., individual preschools and Head Start centers) are not currently part of the *EDFacts* directory structure.

The Department asked this directed question to learn more about what SEAs do and do not include in their PK reporting to *EDFacts* as well as whether SEAs can access additional data. The Department will not propose a change to PK reporting in this *EDFacts* collection package for SY 2019-20, 2020-21, and 2021-22 because much of these data (i.e., the deliverers of PK services) are beyond the current *EDFacts* universe and unavailable to the SEAs that submit *EDFacts* data. NCES has looked at the Bureau of Labor Statistics (BLS) for employees of PK jobs and found a variety of employer entities. Thus confirming the comments from the SEAs.

The Department understands OMB's interested in collecting these data and will talk with SEAs at the Forum meeting this summer to continue this conversation and gain further understanding of this issue. However, the conversations may need to expand beyond the SEAs. The delivery of PK services in the states are entities associated more with Health and Human Services (HHS).

### **3. Perkins Grants, Motivation for Proposing the Move to Reporting in *EDFacts***

In the 60-day package, the Department proposed to collect both postsecondary and secondary data for Perkins through *EDFacts*, with the goal of subsequently loading those data into the Perkins Consolidated Annual Report (CAR). The assumption was that states were familiar with *EDFacts* and collecting these data through *EDFacts* would provide the states some efficiencies.

A total of 20 states answered the directed question regarding the proposal for Perkins CAR being collected through *EDFacts*, some from the SEAs and others from Career and Technical Offices or the state's postsecondary office. Most respondents commented that they were not supportive of postsecondary CAR data being collected through *EDFacts*, citing issues of data governance with postsecondary data (i.e., the data are owned and reside in different offices within the SEA) and the additional burden they believe moving postsecondary data to *EDFacts* would cause (i.e., they already had a system set up to report through the CAR and therefore they would have to create new files and add in the *EDFacts* Coordinator who does not work with the postsecondary data in most states).

After review of comments, the Department decided not to collect the Perkins V postsecondary enrollment and performance data in *EDFacts*. Eligible agencies will continue to make their submission of postsecondary data through the CAR Portal. Moreover, upon review of input received from eligible agencies regarding ongoing difficulties in submitting data on the secondary core indicators of performance under section 113(b)(2)(A) of Perkins V through the *EDFacts* Submission System (ESS), the Department is providing eligible agencies with the option to submit their secondary CTE data through the *EDFacts* Submission System (ESS) or the CAR Portal.

The Department is going to explore using the Generate Tool (which aggregates data for SEAs to report

some ED*Facts* files and is organized by CEDS) for CAR data. The Department is willing to provide a demonstration or project update on the Generate Tool at OMB's request.

#### **4. Sex/gender measurement**

The Department was interested in ensuring that the definition of sex provided to data users aligns with the definition of the data being submitted by states. Twenty states and three associations responded to this directed question. Fifteen commented on removing the use of "biological traits" from the current definition. Ten states commented that a change in reporting categories (specifically adding a third category) would have no impact. However, they would support the change even if it did have impact on their reporting.

Eighteen states commented on whether the Department should change this data group to "Gender" with more than two categories. Six states supported making this change and five did not, while the others were mixed. States shared their definitions and categories but there was no name, definition, or third category that was consistent among the states that recommended changes.

Based on public comments, states have various ways of collecting and aggregating these data. In response to public comments, the Department has revised the definition to remove reference to "biological traits that distinguish the males and females of a species" to align better with state definitions. Furthermore, the Department acknowledges that current legislation uses the terms sex and gender interchangeably, leading to some confusion. The Department did not propose any other title, category, or definition changes. NCES will continue to consider ways to provide explicit guidance to states on the reporting of these data. For example, the ability to report totals for membership that can be greater than the sum of male/female counts for those states that have a third category. The full set of guidance and outreach on this topic will consider both data submitters and data users.