

ED Response to Comments During the 60-day Comment Period for OMB #: 1810-0060

The Department received two substantive comments during the 60-day comment period. Both commenters agreed with the need for the Department to collect the information and with the Department's estimated burden.

The commenters also suggested that the Department provide an online platform in which the Department could collect data from local and State institutions for neglected or delinquent children directly from these institutions rather than from State educational agencies (SEAs). Although the Department appreciates that the intent of the suggestions is to improve the efficiency of the collection, changing to this approach would likely make the process more burdensome, particularly for an SEA. If a local or State institution were to submit the data to the Department directly, it would still be necessary for the SEA, as the Department's grantee of the Title I, Part A and Title I, Part D programs, to verify and certify the data reported by the institutions in its State, which would mean that the Department would have to send the data back to the SEA for verification, making for a more complex process. In addition, contact information for institutions and information on changes to the list of institutions in a State from one year to the next are available to the SEA and its local educational agencies (LEAs), not to the Department. Thus, if the Department were to attempt to collect data from institutions directly, this would necessitate an additional information collection to obtain the institution contact information and information on changes, which would increase the burden on SEAs and LEAs. Consequently, the Department will continue to collect the data from SEAs directly.