Draft (12/7/20)

	Elementary and Secondary Emergency Education Relief (ESSER) Fund Recipient Reporting Data Collection Form			
	Response to 30-Day Public Comments			
Document	Contact information	Comment		Response and Notes
ED-2020-SCC-0124-0026	Mississippi Department of Education	The following comments from the 60-day public comment period submitted by South Carolina Department of Education continue to be a concern for our state as well. This new collection of data for LEAs will require a significant investment of local resources to gather and track these new data elements during an unprecedented, ongoing emergency when local resources are already under stress and when LEAs are attempting to educate their students under multiple delivery models. The data request appears to increase the burden of data collection, rather than the Department's purported interest in reducing the burden of data collection. This estimate of burden is not accurate as it wrongly assumes that a data collection system is in place thus failing to account for the time and money to be expended at the local levels by SEAs, LEAs, and private schools to establish and deploy new data collection systems to compile the newly requested data elements. In addition, the estimate of burden does not take into consideration organizational structures of both LEAs and the SEAs to collect, consolidate, review, verify accuracy, and submit the data. Given that the data on the requested form includes not only financial data, but programmatic data, multiple staff, departments, and units within LEAs and the SEA will have to collaborate for the information being requested.		ED acknowledges the concern about burden, and the time needed to collect, consolidate, review, verify and submit the data. The reporting requirements, however, are necessary to ensure public transparency and inform program operations for the significant investment in resources provided through the ESSER program. Note that the burden estimate was increased in response to feedback during the 60-day public comment period.