

**Consolidated State
Performance Report for
School Years 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 June 24, 2019. ED received a total of 3 comment submissions making up 5 individual comments. All three of the submissions were from states.

Each section below provides the text received in a comment and ED's response to those statements. 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.

TITLE IV, PART A REPORTING

Three of the five individual comments were received on CSPR items on the newly added section on Title IV, Part A. Specific comments are below:

Public Comment

Two states asked for clarification on what to report in the "Any" category in section 2.6.2 LEAs Who Spent Funds Under Title IV, Part A.

ED Responses

For the "Any" category, states should report the number of LEAs that spent funds in any of the following three content areas: (1) Well-Rounded, (2) Safe and Healthy Students, and (3) Effective Use of Technology. This guidance has been added to the CSPR Part II document.

Public Comment

One state indicated that they are unable to report on Title IV, Part A in SY2018-19.

ED Response

ED acknowledges that states require adequate time to prepare for new and revised reporting requirements. In circumstances where a state is unable to report data, they should notify the Department according to the established communication protocols.

OTHER COMMENTS

Public Comment

One state asked for clarification about section 2.4.3.1 Methods Used to Count Children and the reference to the Office of Migrant Education's CSPR Rating Instrument. Specifically, the state

asked if the CSPR Rating Instrument is different from the Office of Migrant Education's Data Quality Check Sheet.

ED Response

The CSPR Rating Instrument and the Data Quality Check Sheet are two different documents. The CSPR Rating Instrument is the document the Office of Migrant Education uses to evaluate grantee responses while the Data Quality Check Sheet is a tool for grantees that allows them to compare their previous year's CSPR data with the current year of data.

Public Comment

One state asked for clarification on how to report data in section 1.4.1.2 Number of ELs in LEAs receiving Title III funds. The proposed CSPR states on page 22, "If pre-K programs are part of the public school program, include grades pre-K – 12, otherwise include grades K-12 for this reporting year.." The state requested that ED define "part of public school program" and indicated that the *EDFacts* file specification, FS116, which populates this section in the CSPR, does not collect pre-K counts.

ED Response

Thank you for highlighting the misalignment between the reporting guidance in CSPR section 1.4.1.2 and the corresponding *EDFacts* file specification FS116. After reviewing the guidance, ED is revising the reporting instructions in the CSPR to remove the pre-K reporting in this particular section. States should only report the grade-levels that are allowable permitted values within *EDFacts* FS116. The reporting guidance in CSPR section 1.4.1.2 has been updated accordingly.