

EDFacts Data Collection School Years 2016-17, 2017-18, and 2018-19

Supporting Statement Part A

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Summary

The National Center for Education Statistics (NCES), within the Institute of Education Sciences (IES), part of the U.S. Department of Education (ED), seeks approval from OMB to revise its *EDFacts* data collection. Current authorization expires 2/28/2019 (OMB# 1850-0925 v.1). We are requesting a revised clearance for the 2016-17, 2017-18, and 2018-19 data collections to enable us to support ED offices with data reporting requirements that align with the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA), which was signed into law in December, 2015. The law provides Federal funds to improve elementary and secondary education in the Nation's public schools. This revised collection will enable us to provide *EDFacts* data to ED program offices, as well as SEAs, LEAs, and schools. This revised collection package was available for public comment during two open periods, a 60-day and a 30-day, and revisions were made accordingly. The revised and new items associated with ESEA, as amended by ESSA, will begin with the 2017-18 data collection, although some new items will not begin until the 2018-19 data collection and are noted so in the package.

EDFacts is an ED initiative to collect, analyze, report on, and promote the use of high-quality, pre-kindergarten through grade 12 (pre-K–12) performance data. *EDFacts* centralizes data provided by state education agencies, local education agencies, and schools, and provides users with the ability to easily analyze and report on submitted data. In the revised package, there are approximately 130 data groups that states may be required to report on. *EDFacts* data are submitted by States and school districts in two ways: the web-based *EDFacts* Submission System (ESS), which collects a core set of key, pre-K–12 performance data from state education agencies annually and the *EDFacts* Metadata and Process System (EMAPS), which collects supplementary metadata and information from state education agencies and IDEA Part C lead agencies, as needed. All 50 states, Washington DC, Puerto Rico, and outlying areas and freely associated states (American Samoa, Federated States of Micronesia, Guam, Marshall Islands, Commonwealth of the Northern Mariana Islands, Republic of Palau, and the U.S. Virgin Islands), the Department of Defense Education Activity (DoDEA), and the Bureau of Indian Education (BIE) are required to report data through at least one of the two reporting avenues.

This clearance package includes a number of proposed changes to the data collection.

Proposed Changes

For more information about *EDFacts* for data submitters and the proposed changes, please refer to Attachment E, which contains an explanation of the data set and a list of acronyms, and Attachment B-1, which is an overview of the entire *EDFacts* collection. This information is intended to assist reviewers.

Additional Information can be found in the following Attachments:

Parts A & B: Supporting Statement

Attachment B-1: Overview

Attachment B-2: Directory (no changes from approved package)

Attachment B-3: Data Groups

Attachment B-4: Categories

Attachment B-5: IDEA Part B Data Collections through EMAPS (no changes from approved package)

Attachment C: Changes

Attachment D: Directed Questions

Attachment E: Explanation

Section A. Justification

A.1. Purpose of this Submission

The collection, use, and reporting of education data is an integral component of the mission of the U.S. Department of Education (ED). *EDFacts* is a centralized collection and reporting system designed to put performance data at the center of ED's policy, management, and budget decision-making processes for all pre-K-12 educational programs. *EDFacts* provides an electronic submission system for state education agencies (SEAs), and centralizes within ED the availability of the performance data supplied by SEAs to enable better analysis and use in policy development, planning, and management. ED has designed the *EDFacts* collection to obtain the most commonly collected data elements so that states need only report these data elements once.

In order to facilitate the use of ED's electronic *EDFacts* data management system for submission of certain data, the Secretary of Education amended the regulations in 34 CFR part 76 governing State reporting requirements. In *Final Regulations* published in the Federal Register on January 25, 2007, the Secretary required that States submit their performance reports, financial reports, and any other required reports, in the manner prescribed by the Secretary, including through electronic submission, if the Secretary has obtained approval from the Office of Management and Budget (OMB) under the *Paperwork Reduction Act of 1995 (PRA)*. The regulations provide that:

- (1) failure to submit these reports in the manner prescribed by the Secretary constitutes a failure, under section 454 of the General Education Provisions Act (GEPA), 20 U.S.C. 1234c, to comply substantially with a requirement of law applicable to the funds made available under the program for which the reports are submitted; and
- (2) if the Secretary chooses to require submission of information electronically, the Secretary may establish a transition period during which a state would not be required to submit such information electronically in the format prescribed by the Secretary, if the State meets certain requirements.

The Secretary made these changes to the regulations in 34 CFR part 76 to highlight that ED may require, through the *PRA* clearance process, that states report certain information electronically; and to establish that ED may take administrative action against a state for failure to submit reports in the manner prescribed by the Secretary.

Data are collected through *EDFacts* on behalf of approximately 15 ED discretionary and formula grant program and policy offices. Each data steward identified in B-3 is responsible for ensuring that data requirements align with all relevant program statutes, regulations, and program priorities.

ED is currently in the process of collecting data for the 2016-17, 2017-18, and 2018-19 school years as approved by OMB (1850-0925 v.1). ED seeks to revise this collection to align with requirements in the new statute. Some elements were proposed and aligned with ESSA regulations that were under development when this package was submitted. Regulations are no longer in effect and proposed changes associated with regulations were removed from this package. ED encourages the public to review, at a minimum, all proposed changes outlined in Attachment C. To the extent that any of these proposed data are not available in the coming school year, ED seeks to know if those data will be available in future years. As part of this approval, it needs to be understood that ED is authorized to collect the data about these school years over whatever time is required to secure these data from each state, district, or school.

ED seeks OMB approval under the *Paperwork Reduction Act* to collect the elementary and secondary education data on schools, school districts, and SEAs as described in the Attachment B. In Attachment C,

ED explains the changes between the data groups ED intends to collect and those data groups currently cleared for collection under OMB# 1850-0925. Those persons who are familiar with the current *EDFacts* collections may want to start by first reviewing Attachment C. Those persons who are not familiar with *EDFacts* may want to start by reviewing Attachment E, which presents a technical explanation of the *EDFacts* data collection.

A.2. Purpose and Use of *EDFacts* Information

The primary customers for these education data will be the program managers and policy analysts at ED. These data will be used to evaluate in an integrated way the effectiveness and efficiency of federal education programs, with the intent to improve program management and focus budget resources on those federal education programs that provide the best educational outcomes for the nation's students and their families. We believe these data may also be useful in future statutory reauthorizations. We believe that SEAs and districts use many of the data collected through *EDFacts* in managing education programs at those levels.

A.3. Use of Technology and Other Technological Collection Techniques

As with previous *EDFacts* collections, SEAs submit data electronically through the *EDFacts* Submission System, which is an established submission system that SEAs have been using for several years. The *EDFacts* Submission System allows each SEA to provide the *EDFacts* data in non-proprietary, electronic formats that can be generated through automated processes within the SEA. The data SEAs submit to ESS are described in Attachments B-3 (Data Groups), and B-4 (Categories) in data dictionary format.

A.4. Efforts to Identify and Avoid Duplication

EDFacts continues to reduce duplication in data collection efforts within ED. Attachment B-1 explains how legacy data collections have been discontinued or transformed with the increasing use of *EDFacts* data and/or the *EDFacts* submissions systems. The new data groups proposed for collection are not currently collected within ED. The *EDFacts* Data Governance Board, consisting of representatives from each pre-K-12 program office, reviews new and existing *EDFacts* data requests from all program office data stewards to prevent duplicative collections.

A.5. Methods Used to Minimize Burden on Small Businesses/Entities

This collection will not impact small businesses or other small entities.

A.6. Frequency of Data Collection

Public education accountability is on an annual cycle where success and failure are measured and reported annually. If ED collected this information less frequently than annually, it would greatly diminish the ability of program managers and analysts to use the information to measure education progress in support of federal legislation.

A.7. Special Circumstances

None of the special circumstances apply to this collection.

A.8. Consultations Outside the Agency

The original 60-day Federal Register notice for the approved *EDFacts* 2016-17 through 2018-19 was

published on July 9, 2015 (80 FR, No. 131, p. 39421), in response to which ED received comments from 49 commenters. The 30-day Federal Register notice for this request was published on December 1, 2015 (80 FR, No. 230, p. 75077), in response to which ED received 18 comments from 17 commenters. The 60-day FR notice for the revised *EDFacts* 2016-17 through 2018-19 request, as described in this submission, was published on August 24, 2016 (81 FR, No. 164, p. 57895), in response to which ED received comments from 27 commenters. The 30-day Federal Register notice for this request was published on January 13, 2017 (82 FR, No. 9, p. 4,332), in response to which ED received comments from 8 commenters. The majority of the data included in Attachments B-1, B-3, and B-4 reflect data that have been collected through *EDFacts* for several years. New items proposed for collection are outlined in Attachment C. ED staff met regularly with representatives of SEA data submitters through the Education Information Management Advisory Consortium, organized by the Council of Chief State School Officers, and discussed current and upcoming *EDFacts* data collections.

A.9. Paying Respondents

These data are collected from grantee SEAs. No remuneration, outside of grant funds allocated to the SEAs by formula, is made.

A.10. Assurance of Confidentiality

There has been no assurance of confidentiality provided to the respondents beyond the agreement to protect personally identifiable information in students' education records under the *Federal Educational Rights and Privacy Act* (FERPA). The data collected are aggregate, and not at a level that contains direct PII about individual students or teachers. ED is committed to protecting individual student privacy and will apply disclosure avoidance techniques prior to publishing any data, in accordance with FERPA. *EDFacts* collects data on behalf of ED program offices. When providing access to the data, *EDFacts* works through the program office that owns the data and continuously emphasizes adherence to Internal Data Use standards.

A.11. Justification for Sensitive Questions

This collection contains no questions of a sensitive nature.

A.12. Estimate of Burden

Sixty-one respondents report data to *EDFacts*. The list of respondents includes: 50 states, District of Columbia (DC), Puerto Rico (PR), Bureau of Indian Education (BIE), Department of Defense Education Activity (DoDEA), and seven outlying areas and freely associated states (American Samoa, Federated States of Micronesia, Guam, Marshall Islands, Commonwealth of Northern Mariana Islands, Republic of Palau, US Virgin Islands). DoDEA and some of the outlying areas act as both a state and district and do not report all data elements at all three levels. The burden differences across reporting entities are limited, so all entities are assigned the same estimated reporting burden of one full-time equivalent (FTE) per reporting entity.

The estimate of one FTE per reporting entity is based on conversations with states over the years and was confirmed in January of 2015 when the state coordinator from Florida asked the other state coordinators via the *EDFacts* listserv about the burden of *EDFacts* on their state. Fifteen states sent in a text response, the majority noting they have one full-time-equivalent staff person in their state to work on *EDFacts* but at certain times of the year it is more than full-time work. The revised collection includes both new and retired data groups and is estimated to the same level of effort as the approved collection.

Collection	Respondents	Responses	Hours per Respondent (52 weeks/year; 40 hours/week)	Total Hours
EDFacts Annual Data Collection	61	61	2,080	126,880

The annualized cost related to the respondent burden time is estimated to be \$6,344,000 (126,880 hours multiplied by an average wage of \$50 per hour). There is a wide range of hourly salaries associated with the professionals that provide EDFacts data, making this estimation approximate.

A.13. Estimate of Cost Burden

The collection of EDFacts data for the foreseeable future will require no additional systems development efforts by SEAs. SEAs are currently involved in the development of State education information systems for their own use and for reports in response to education legislation. The guidance, standards, and best practices developed by EDFacts have been noted by the SEAs as helping them reduce the total costs associated with those systems development activities by providing cost effective common education information management solutions to SEAs and LEAs. Some of this work is being done under the Institute of Education Sciences (IES) discretionary grants made available to help SEAs develop longitudinal statewide education data systems.

There are no capital or startup costs associated with this data collection.

A.14. Cost to the Federal Government

EDFacts collects data through the use of either the EDFacts Submission System and the EDFacts Metadata and Process System, and is made available to licensed users through the EDFacts Reporting System. The current budget to support the collection of EDFacts data for FY 2016 is \$10.451 million.

A.15. Reasons for Change in Burden

EDFacts is not requesting a Change in Burden hours. This is a request for clearance for a currently approved collection with revisions. The revisions are described in Attachment C. Many files are being retired at the same time that a smaller number of files are being added. We are not decreasing burden because the new data files will be as challenging to build as the files that are being retired.

A.16. Publication Plans/Project Schedule

Below is a high-level schedule of the School Year 2017-18 EDFacts Data Collection and Release

Date	EDFacts Milestone
February 2017	<ul style="list-style-type: none"> Announcement of Final Package to States
Spring/Summer 2017	<ul style="list-style-type: none"> Development of Data Collection Documentation Collection System Changes
July 2017	<ul style="list-style-type: none"> EDFacts Coordinator Training
Summer 2017 (rolling release)	<ul style="list-style-type: none"> Release of SY 2017-18 File Documentation (i.e. file specifications and EDFacts Workbook)
January 2018 – February 2019	<ul style="list-style-type: none"> School Year 2017-18 EDFacts files are submitted by states. For a full schedule of file due dates, go to:

	https://edfacts.grads360.org/#program/data-submission-organizer
Spring/Summer 2019	<ul style="list-style-type: none"> • Program offices begin releasing data collected through EDFacts such as Common Core of Data files, assessment, Special Education data, and Average Cohort Graduation Rate

Data collected through *EDFacts* are published in a number of places, including various reports to Congress, the Consolidated State Performance Report, the IDEA Annual Performance Report, the Common Core of Data (non-fiscal), and EDDataExpress.ed.gov. Performance data are generally published at the SEA level. Prior to publishing any data, ED will apply disclosure avoidance techniques approved by ED’s Disclosure Review Board (DRB) and in accordance with FERPA.

A.17. Request to Not Display Expiration Date

The OMB number for the *EDFacts* collection will be properly displayed on Web forms used by *EDFacts* and included in user guides.

A.18. Exceptions to the Certification

There are no exceptions to the certification statement.