

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

May 2017

ATTACHMENT F-2

***EDFacts* Data Set
for School Years 2016-17,
2017-18, and 2018-19
Response to 30-Day Public
Comments**

INTRODUCTION

This attachment contains the responses to public comments on the Annual Mandatory Collection of Elementary and Secondary Education Data through *EDFacts*. The 30-day comment period for the *EDFacts* package closed on February 13, 2017. ED received a total of 8 comments covering multiple topics. A total of 16 comment/topic combinations (hereinafter referred to as ‘statements’) were received.

ED appreciates the time and attention the public spent on reviewing the *EDFacts* package and in composing thoughtful comments that shape the final data set, as evidenced in this attachment. ED reviewed, summarized, and documented each statement prior to analyzing all statements. This documentation will aid in the finalization of this data clearance package.

TEACHERS

Public Comments

There were four statements received on teacher elements. Two were in regard to the difference of headcount and FTE in two different data groups. One state noted they do not agree with grouping the emergency and provisional credentials together and another state had a clarification question on the Teachers table.

ED Response

The issue between headcount and FTE is resolved because the Teacher effectiveness table was removed from the package.

Regarding emergency and provisional credentials, ED's reporting requirement is aligned with the reporting requirement in the Every Student Succeeds Act which requires States to report to the Secretary the number and percentage of teachers teaching with emergency or provisional credentials. ED's interpretation of the reporting requirement is that States must report on teachers teaching with emergency or provisional credentials as one combined value.

ED apologizes for the confusion regarding the collection on teachers who are inexperienced, out-of-field, and teaching with an emergency or provisional credential. ED has decided to collect these data as a full-time equivalent. States will not be reporting a percentage to ED. By reporting the FTE values for each category set as well as an education unit total, ED will be able to calculate percentages using the education unit total as the denominator.

ENGLISH LANGUAGE LEARNERS

Public Comments

There were three statements received on English language learners. Two were in regard to the English learners not proficient after five years table and one on Title III English learners exited table.

ED Response

The proposed data group "English learners not proficient after five years table" has been deleted from the final package.

ED will ensure the file specification guidance for “Title III English learners not proficient after five years

table" addresses cases where students test proficient during the 5-year period but then are re-identified as needing further services and so re-enter English Learning programs. ED has revised the definition to clarify what should be reported. The revised definition is: *the number of English learners who have not attained proficiency after five years of identification as an English learner in a district that receives Title III funds*. In other words, if a district receives Title III funds, the district must report on all English learners who have not attained proficiency after five years of identification as an English learner. An English learner must be reported in the count if, as of the reporting year, the student is in his or her 5th year of identification as an English learner and does not attain English language proficiency at the end of the 5th year.

Under Section 3121(a)(4) of the ESEA, as amended by the ESSA, eligible entities receiving a subgrant from the SEA must report "the number and percentage of English learners who exit the language instruction educational programs based on their attainment of English language proficiency." The "Title III English learners exited table" is consistent with what is required under the ESEA, as amended by the ESSA. Please note that each State determines statewide exit criteria, which may include criteria in addition to a score of proficient on the English language proficiency assessment.

YOUNG HOMELESS STUDENTS SERVED

Public Comments

One state noted that many of these children are NOT enrolled in the public school and subgrantees have varying ways of capturing young ones they serve off line (some do a fair job and others have no system to capture it). Since there is no centralized process to collect this information, they do not believe they have the capacity to ensure unduplicated counts.

ED Response

ED appreciates the feedback on this data group. No changes were proposed by ED in this package for the data group. The comment is about state capacity for ensuring an auditable and verifiable record indicating McKinney-Vento eligibility. ED encourages the state to reach out to their federal program office to identify strategies for ensuring unduplicated counts. No changes were proposed in the comment and no changes were made.

GENERAL COMMENTS

Public Comments

If the regulations are changed or eliminated, the U.S. Department of Education (ED) should release another packet for public comment. At this point, given that we have already released the 2016–17 data collections, it is too late to make changes to the SY 2016–17. For the 2017–18 data collections, it is unlikely that states and local educational agencies will be able to make changes to their systems to accommodate additional significant changes to the proposed data groups. To do so at this time would result in incomplete and poor quality data.

ED Response

ED has revised the package to address the fact that regulations are no longer in place. The revisions are primarily deletions of data groups, updates to permitted values to reflect that the state determines the value, and updates to definitions to align with ESSA. We do not believe another public comment period is warranted. Please review the information collection package attachments to see which reporting

requirements have changed. A summary of changes is in Attachment C and detailed changes are in B3 and B4. States should contact the Partner Support Center with any state-specific concerns regarding the reporting of particular data elements.

Public Comments

One state noted their support of the federal requirement that states collect this data [Chronic Absenteeism] to help school personnel identify students who are at risk of academic failure (particularly those students who are transferring to another school or district). Given that this is the first year states will be collecting these data under the *EDFacts* data definition, they caution the comparison of the chronic absenteeism data collected in the Civil Rights Data Collection to the chronic absenteeism data collected in *EDFacts*.

ED Response

ED appreciates the support for the chronic absenteeism collection which has been added to *EDFacts* beginning with school year 2016-17. ED acknowledges that the definition of chronic absenteeism in *EDFacts* is different than the definition previously used in the Civil Rights Data Collection. ED will take this difference into account when reviewing and using the data.

Public Comments

One state asked for a very clear definition of how to define a student in "foster care." This state also would like to propose that a student in a 5 year high school program resulting in the award of an Associates from a Community College or University be considered successful completion of the cohort.

ED Response

ED appreciates the comments. Foster care is not specifically defined in the package; language in the package aligns with ESSA. ED will consider both suggestions for future guidance.

Public Comments

The Graduation Rate Indicator Status Table is a new table that will require clear reporting directions. One area of concern is the requirement specifying the inclusion/exclusion of students with most significant cognitive disabilities (SCD). The ESSA graduation rate guidance indicates students that fit the definition of SCD that have graduated or dropped out are included in the cohort results of their originally assigned cohorts. It could be very challenging to identify the small group of SCD still enrolled/continuing and determine what cohort the enrolled district has assigned. We would also have to track these students and insert them into the appropriate cohort at a later date.

ED Response

ED appreciates the comment. It appears that the comment is not specific to the reporting requirements of the Graduation Rate Indicator Status Table, but instead more generally addresses requirements regarding the inclusion of students with the most significant cognitive disabilities in the adjusted cohort graduation rate (ACGR) under section 8101(23) and (25) of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA). Please note these requirements only apply in States that adopt a State-defined alternate diploma in accordance with section 8101(23)(A)(ii)(I)(bb) and (25)(A)(ii)(I)(bb) of the ESEA, as amended by the ESSA. If a State does not adopt a State-defined alternate diploma, students with the most significant cognitive disabilities must be treated the same as all other students with regard to cohort assignment and the calculation of the ACGR.

Public Comments

The regulations indicate disaggregation by gender rather than sex. In existing file specifications, the disaggregation is by sex which is defined as, “The concept describing the biological traits that distinguish the males and females of a species.” No definition of gender could be found on the Department’s website. Can the department please provide a definition of gender and explain the anticipated impact to the data because of this change?

ED Response

ED appreciates the comment and question. Regarding the disaggregation of certain data by sex in the *EDFacts* information collection, the Department has made no changes to this definition from prior *EDFacts* information collections. The *EDFacts* information collection does not include a specific definition of gender. Thus, States should report the information reported in a student’s record regarding the student’s sex.

Public Comments

A proposed file specification for “Targeted support identification” states the definition is “The reason for identification for targeted support.”; the permitted values are YES/NO; the category sets are supposed to be Identification Type and Identification Subgroup. The permitted values do not seem to fit as answers for reason for identification or for identification type or subgroup. If this is not a typographical error by the Department, then there should be sufficient guidance in the final file specifications so it is clearer how to assign YES/NO values to those elements.

ED Response

Thank you for the comment; the permitted values were in error. For each school identified for targeted support and improvement, the SEA will report the identification type (consistently low-performing subgroups or lowest-performing subgroups) and one or more identification subgroups (e.g., economically disadvantaged students).

Public Comments

Regarding the use of EMAPS for metadata surveys, since the Department uses the information submitted in EMAPS as a data quality check, it would be more helpful for the metadata information to be submitted in a file specification than in EMAPS. In order to incorporate the metadata into a tool for pulling and validating the data to be submitted that must align with EMAPS information, the data needs to be in a CSV or other spreadsheet format for easiest use in assuring data meets minimum requirements. Please reconsider using EMAPS for metadata and instead replace with a file specification for utility purposes.

ED Response

Due to the respondent groups using EMAPS and limited ED resources for system changes, ED will maintain the use of EMAPS to collect metadata associated with this package. For future collections, we will consider all submission methods. We agree that alternative methods may be appropriate.

ADDITIONAL CHANGE: KINDERGARTEN ENTRY ASSESSMENT (EMAPS)

The Department of Education is discontinuing the plans to start the new collection on Kindergarten Entry Assessment (Attachment B-6 in 60- and 30-day packages) due to resource limitations and because the RTT-ELC grant programs are going to be ending.