

Rural Education Achievement Program: Small, Rural School Achievement Program and Rural and Low-Income School Program Application

Summary

The U.S. Department of Education (Department) solicited comments on a proposed revision to *Rural Education Achievement Program: Small, Rural School Achievement Program and Rural and Low-Income School Program Application*, an existing information collection, in a notice published in the **Federal Register** on May 11, 2022 (87 FR 28820). The Department received a total of three public comment submissions. Of those, two submissions provided specific substantive comments regarding the Information Collection, including feedback regarding the data collection process and timeline. Both of these commenters identified themselves as representatives from State educational agencies (SEAs). We describe and respond to these two comments below. The third comment was unrelated to the information collection and therefore is not addressed.

Background

The Department administers two grant programs under Title V, Part B (Rural Education Achievement Program (REAP)) of the Elementary and Secondary Education Act of 1965 (ESEA): The Small, Rural School Achievement (SRSA) program (administered by the Department, which makes awards directly to local educational agencies (LEAs)) and the Rural and Low-Income School (RLIS) program (awarded by the Department to SEAs, which then make awards to and administer the program for LEAs, except that the Department may also make RLIS awards directly to LEAs in States that do not submit an approvable RLIS application to the Department. The LEAs that apply directly to the Department under RLIS are known as Specially Qualified Agencies (SQAs)).

The information shared with the Department under the Information Collection enables the Department to make eligibility determinations for LEAs and to calculate formula allocations for each eligible LEA. Form 1 consists of the REAP Eligibility Spreadsheet through which SEAs provide to the Department eligibility and allocation data for both the RLIS and SRSA programs. Form 2 consists of the application package for LEAs under the SRSA program. Form 3 consists of the application package for SQAs under the RLIS program. The proposed application package on which the commenters commented was a revision of current information collection package (OMB #1810-0646), updated to include process improvements and enhance consistency across Forms 1,2, and 3. Updates included clarifications to data collection processes (e.g., which year data is requested), improved question structure, and process improvements related to LEA eligibility (e.g., clarifying virtual and operational status).

Comment #1: Collection Process

Comment

One commenter, who is a representative from an SEA, suggested that the information supplied by the SEA on the REAP Eligibility Spreadsheet (Form 1) could also be collected directly from LEAs.

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The commenter also suggested changing the SRSA application (Form 2) to collect data directly from LEAs, which would then be used to calculate eligibility, to make the process more efficient. Finally, the commenter stated that the SRSA application period in April results in changes in contact information for LEAs since administrator turnover usually happens at the end of June.

Discussion:

We appreciate the commenter's suggestion to collect data from LEAs directly. The Department collects data for individual LEAs (e.g., average daily attendance) from SEAs to maintain the highest possible quality of data and consistency across all LEAs within a State. Collecting data from SEAs also decreases the burden on individual LEAs and increases the Department's ability to efficiently review data across each State to ensure data quality and consistency. Although collecting data directly from the LEAs would decrease burden on the SEA, the resulting data would not be as consistent across the State, would increase LEA burden, and would likely prolong the process given the large number of LEAs that the Department would need to work with to collect the required data.

Further, the Department collects information prior to the SRSA application process because the Department uses the data to determine which LEAs are SRSA-eligible and will receive an invitation to apply for SRSA program, as well as to provide technical assistance to LEAs that are eligible for both SRSA and RLIS. Requiring an LEA to submit the necessary eligibility data within the SRSA application would eliminate the Department's ability to determine LEA eligibility prior to the application process, which could result in a delayed award process. It would also reduce time that the Department has to review the data for quality and consistency, which may create errors or inefficiencies.

Regarding the timeline for the data collection process and the impact on LEA contact information, the Department collects contact information from SEAs in October in order to contact SRSA-eligible LEAs directly once the SRSA application is available. Between October and February (i.e., when the SRSA application opens), an LEA may change its contact information by notifying the Department directly. An LEA may also change its contact information on the SRSA application, or by notifying the Department after submitting its application. In order to award SRSA funds beginning July 1, the Department must collect contact information before June of each fiscal year.

Change:

None.

Comment #2: WI

Comment

One commenter, who is a representative from an SEA, indicated that the SEA does not have the specific information about how the SRSA program functions on an LEA-level to comment on implementation challenges or what is working well. The commenter noted that it is difficult to coordinate with the Department when messaging to LEAs since the SEA is not informed when the Department reaches out to LEAs. The commenter noted that it does have sufficient information regarding the RLIS program.

Discussion

We appreciate the commenter identifying that the SEA does not have sufficient information to coordinate effectively with LEAs regarding implementation of the SRSA program. The Department will utilize this feedback to improve communication and coordination with SEAs in order to improve the implementation of SRSA.

Change:

None.