

EDFacts Data Collection School Years 2022-23, 2023-24, and 2024-25 (with 2021-22 continuation)

Supporting Statement Part A

OMB No. 1850-0925 v.8

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March 2022

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Summary

The National Center for Education Statistics (NCES), within the Institute of Education Sciences (IES), a part of the U.S. Department of Education (ED), seeks approval from OMB for its annual *EDFacts* data collection. Current authorization expires on 8/31/2022 (OMB# 1850-0925). We are requesting a new clearance for the school year (SY) 2022-23, 2023-24, and 2024-25 data collections to enable us to provide *EDFacts* data to ED program offices, as well as SEAs, LEAs, and schools. This collection package will be available for public comment during two open periods, a 60 day and a 30 day, and revisions will be made accordingly. This submission includes proposed changes to the *EDFacts* data collection. Additionally, due to overlap in the timing of data collection activities between consecutive years of the *EDFacts* collection, we are carrying over in this submission the approved SY 2021-22 data collection (as described in the approved clearance documents labeled with the phrase “carried over”), which is scheduled to end in February 2023.

EDFacts is an ED initiative, conducted by NCES, 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 about state level data, local education agencies, and schools, and provides users with the ability to analyze and report on submitted data. In the revised package, there are approximately 170 data groups that states may be required to report on. *EDFacts* data are submitted by States in two ways: upload of files and input into web screens. States interact with two applications: the submission application, used for uploading files and pre-submission data quality of those files and the *EDFacts* Metadata and Process System (*EMAPS*), used to collect supplementary metadata and data from state education agencies and IDEA Part C lead agencies. 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 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 overview of the entire *EDFacts* collection, explanation of the data set and a list of acronyms. This information is intended to assist reviewers.

Additional information can be found in the following Attachments:

- Parts A & B: Supporting Statement
- Attachment A: *EDFacts* Data Groups and Categories
- Attachment B: Directory
- Attachment C: *EMAPS* Collections
- Attachment D: Directed Questions
- Attachment E: Overview and 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. *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 at the quality level specified in the data collection instrument**; 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 programs in policy offices and for statistical surveys in NCES. Each data steward identified in Attachment A is responsible for ensuring that data requirements align with all relevant program statutes, regulations, and program priorities. Authority¹ for the reporting requirements in this Information Collection package is required or allowed by the following statutes:

- Education Sciences Reform Act (ESRA) – survey data to support the Common Core of Data;
- Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA) – data associated with formula and discretionary grants authorized by ESSA;
- Individuals with Disabilities Education Act (IDEA) – data associated with formula and discretionary grants; and
- General Education Provisions Act (GEPA).

¹ Detailed statutory references are in Attachment A.

ED is currently in the process of collecting data for the 2019-20, 2020-21, and 2021-22 school years as approved by OMB (1850-0925 v.4-7). This request is for the 2022-23, 2023-24, and 2024-25 school years, with a carry over of the remaining activities of the approved 2021-22 school year data collection. ED encourages the public to review, at a minimum, all proposed changes, as well as to respond to the directed questions included in Attachment D. 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 E. In Attachment A, 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 A. 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 grant 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

ED plans to use a modernized submission application to collect the data for the school years covered by this request, however, as with previous *EDFacts* collections, SEAs will still submit most of the data in non-proprietary, electronic file formats that can be generated through automated processes within the SEA. The data SEAs submit in files are described in Attachment A *EDFacts* Data Groups and Categories. The data described in Attachment C *EMAPS* is submitted to a different web-based application.

A.4. Efforts to Identify and Avoid Duplication

EDFacts continues to reduce duplication in data collection efforts within ED. 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

A 60-day and 30-day comment period will be provided for this collection. The majority of the data included in Attachment A and C reflect data that have been collected through *EDFacts* for several years. New items proposed for collection are outlined in Attachment A. ED staff meet one to two times a year with SEA and LEA members of the National Forum on Education Statistics to discuss current and upcoming *EDFacts* data collections. ED staff also communicate with SEA data reporters during periodic meetings, as resources allow, but generally annually. Supplemental webinars are held to review data reporting changes, as needed.

A.9. Paying Respondents

These data are collected from grantee SEAs. No remuneration, outside of grant funds allocated to the SEAs through discretionary grants or 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 and a non-fiscal survey for NCES. 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 last 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 \$4,877,267 (126,880 hours multiplied by an average wage of \$38.44² 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

Amending, editing, and developing new routines, even for data already available at the state level, requires some data system development work by the state. The SEA will need to build new data submission routines for data previously submitted to different systems. SEAs may need to modify existing or enter into new data sharing agreements with any non-SEA entity that has source data. We encourage states to use Common Education Data Standards (CEDS) to support interoperability of data for collection and reporting efficiencies.

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 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 2022 is \$13.224 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 A. Although the number of data groups/categories being retired is less than the number of new data groups/categories, we do not anticipate a change in burden due to more robust data collection systems at the SEA level, including more standardization, automation of business rules, and more efficient data processing/review procedures established by SEAs in recent years.

² The May 2020 mean hourly wage for an SEA Data Program Office personnel is estimated at \$38.44 per hour (SOC code 15-1251, Computer Programmer), Bureau of Labor Statistics (BLS) website, <https://www.bls.gov/oes/current/999201.htm>, accessed September 13, 2021.

A.16. Publication Plans/Project Schedule

Below is a high-level schedule of the School Year 2022-23 *EDFacts* Data Collection and Release

Date	<i>EDFacts</i> Milestone
Early Fall 2021	<ul style="list-style-type: none">• Announcement of Final Package to States• Development of Data Collection Documentation
Early Fall 2021	<ul style="list-style-type: none">• <i>EDFacts</i> Coordinator Training
Fall 2022 (rolling release)	<ul style="list-style-type: none">• Release of SY 2022-23 File Documentation (i.e. file specifications and <i>EDFacts</i> Workbook)
January 2023 – February 2024	<ul style="list-style-type: none">• Launch of the modernized submission application• School Year 2022-23 <i>EDFacts</i> 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 2024	<ul style="list-style-type: none">• Program offices begin releasing data collected through <i>EDFacts</i> such as Common Core of Data files, assessment, Special Education data, and Adjusted 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) website and reports, the *EDFacts* website, 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.