

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

March 2022

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**Attachment D-1**

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***EDFacts* Data Set for School  
Years 2022-23, 2023-24, and  
2024-25  
(with 2021-22 continuation):  
Directed Questions for 30-day  
Package**

OMB No. 1850-0925 v.8

## INTRODUCTION

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This attachment contains specific topics for which the Department would like to obtain input from data submitters and stakeholders. Please note that in addition to these specific questions, public comments are encouraged on all the changes proposed. While many of these questions are directed to SEA data submitters, comments from all stakeholders on these topics are welcome.

## DIRECTED QUESTIONS

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1. Assessment: As noted in the 60-day package, the Department is proposing to split the assessment files between lower grades and high school. This split will likely require reprogramming by states. In some states, the assessment results for high schools are collected and processed separate from the assessment results of the lower grades. In addition, if the assessment files are split, then the business rules for lower grades and high school can be tuned towards those grade spans.
  - a. ***Will the long-term benefit of splitting the assessment files between lower grades and high school compensate for the short-term cost of reprogramming?***
2. Assessment – IDEA: The proposal to collect the participation and achievement assessment data on children with disabilities disaggregated by disability category has been withdrawn. The Department is maintaining the proposal to collect the participation and achievement of assessment data on children with disabilities disaggregated by major racial and ethnic group. The Department proposes to include this in the existing assessment files versus submitting this additional data in a separate file.
  - a. ***How would your state be impacted by adding this to the existing files?***
  - b. ***How would your state be impacted by collecting this in a separate file?***
3. Title I, Part D Subpart 1 Neglected Programs: The list of Subpart 1 Neglected Programs has been expanded to include “other.”
  - a. ***Is this addition sufficient to allow for full and complete reporting of Subpart 1 Neglected Programs?***
4. Title I, Part D Academic Achievement: The public comments identified several difficulties in collecting post-test data for students once they have exited Title I, Part D programs. The Department revised the existing data groups (628 and 629) in FS 113 from “both a pre- and post-test” to “initial and follow-up assessment.” In addition, the Department is proposing adding an optional data group to FS113 for state assessment data in mathematics and/or reading. This optional data group would be in addition to reporting the existing data groups 628 and 629.
  - a. ***Does the modification to the existing data groups to “initial and follow-up assessment” address collection concerns with post-test data for students who were served by Title I, Part D programs?***
  - b. ***Do the results from the state assessment for students who have exited Title I, Part D provide useful data on the academic achievement of students served by Title I, Part D programs?***

- c. ***Should states have the option of reporting either “initial and follow-up” or reporting results from the state assessments?***
5. **Title I, Part D Exit Outcomes**: The definition two data groups for academic and career and technical outcomes in FS 181 has been revised to “at the time of exiting from the program and up to 90 calendar days after exiting the program.”
- a. ***What impact does this modification have on your state?***
6. **LEA Reservation to Serve Homeless Children and Youth**: The definition of the data group has been revised to “The initially reserved dollar amount of Title I, Part A allocation reserved by the LEA to serve homeless children and youth.”
- a. ***What impact does this modification have on your state?***
7. **Title I Part A Foster Care Enrolled**: The definition of the data group has been revised to “The number of students who are in foster care and enrolled in a public LEA that receives Title I, Part A services.”
- a. ***What impact does this modification have on your state?***
8. **Chronic Absenteeism**: In addition to the current collection of chronic absenteeism at the school level, the Department is proposing collecting chronic absenteeism for homeless enrolled and economically disadvantaged students at the state and LEA level but not at the school level.
- a. ***Can your state report these students at the state and LEA level?***
- b. ***What impacts with reporting this data are anticipated in your state?***
9. **Indicator Type**: The number of indicators available for reporting in FS 200, 201, 202, 205 has been adjusted:
- School Quality or Student Success Indicator – 12 measures
  - Academic Achievement – 6 measures
  - Other Academic – 6 measures
  - Progress Achieving English Language Proficiency – 2 measures
- a. ***Are the number of measures available sufficient for your state to report its indicators?***
10. **Comprehensive Support and Improvement Identification**: The permitted values have been changed:
- Lowest-performing school
  - Low graduation rate high school
  - CSI school not exiting such status
  - ATSI school not exiting such status
- a. ***What impact does this modification have on your state?***
11. **Reporting Zeros**: Currently *EDFacts* requires states to distinguish between zero, missing, and not applicable.
- o Zero: A count is possible, but none exist.
  - o Missing: A count is possible, but the SEA does not know what the count is.

- o Not Applicable: A count is not possible.

There are some very important differences to the Department when reviewing SEA data between the three, especially when assessing data quality and compliance with terms of the grant award. Some states have noted that reporting zero counts (versus just leaving blank) is a burden.

- a. ***How does reporting zero counts impact your state's burden?***
- b. ***Are there certain files where this burden is more pronounced?***
- c. ***If the requirement to report zeros is removed from the LEA and School levels how can the Department be assured that blank counts are zero?***
- d. ***Do you have technical solutions you use, or propose the Department consider, to efficiently distinguish between zero counts, missing, and not applicable?***

12. Migrant Education Program (MEP) Continuation: The definition of students that have continuation of services has been changes to “An indication that formerly eligible migratory children received MEP-funded services under the continuation of services authority in section 1304(e)(1-3) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended.”

- a. ***What impact does this modification have on your state?***

13. Migrant Education Program (MEP) Racial Ethnic: The Department is requesting input to better understand the impact to states of reporting race/ethnicity for migratory children in Category Set A, Data Group 634, File Specification 121. The Department is interested in answers to the following questions:

- a. ***Does your state use these data (migratory children by race/ethnicity)? If so, how and for what purpose(s)?***
- b. ***Please describe any challenges your state has experienced in reporting data for migratory children by race/ethnicity.***
- c. ***Would your state continue to collect race/ethnicity for migratory children if you were not required to report it to ED?***
- d. ***Does your state have additional comments and/or recommendations regarding how race/ethnicity for migratory children are used at the Federal level?***

14. EDFacts Modernization:

The comments on the 60-day package around modernization raised concerns about the accuracy and completeness of the guidance and instructions provided in file specifications.

- a. ***What types of problems has your state identified with the file specification instructions? Please provide specific examples.***
- b. ***How can the file specification be improved? Please consider structure and/or content.***

The comments on the 60-day package raised concerns about the difficulty in understanding the business rules in the [Business Rule Single Inventory](#) (BRSI).

- c. ***What types of problems has your state identified with the BRSI?***
- d. ***How can the Department improve the BRSI?***
- e. ***If specific rule logic is problematic, what are your recommended changes?***

The comments on the 60-day package suggested consolidating data groups (DGs) into fewer file specifications (FS) as part of modernization. Specifically, combining DGs in FS052 Membership (DG 039) with FS033 Free and Reduced-Price Lunch (DG 565), and Direct Certification (DG 813) with FS141 EL Enrolled (DG 678). Also combining DGs in FS165 Migratory Students Eligible Regular School Year (DG 110) with FS118 Homeless Students Enrolled Table (DG 655).

***f. How would consolidating data groups into fewer file specifications during modernization reduce your state's burden?***

15. Sex (Membership): The Department is continuing to gather information about current state practices around reporting sex (membership) data. The Department is interested in answers to the following questions:

- a. If your SEA data collection includes data beyond male and female permitted values, do you publish the data for the additional permitted values?***
- b. If your SEA does not publish the data, how is your state using the data?***

16. Common Data Quality Issues and Modernization: As part of the responses to the 60-day package, one state recommended expanding metadata questions so that metadata could be used to resolve common data quality issues (e.g., discrepancies between subtotals and totals). The Department is interested in answers to the following questions:

- a. Do you have specific recommendations for the Department about additional metadata questions that could be used to address data quality issues observed at the due date?***
- b. Do you have a recommendation for other data quality solutions that the Department should consider as process improvements? For example, business rules that should be added, revised, or eliminated? See [Business Rules Single Inventory](#) for a list of current business rules.***