

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

November 2021

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**Attachment D**

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

OMB No. 1850-0925 v.8

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## INTRODUCTION

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This attachment contains specific topics for which ED 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.

## SPECIAL EDUCATION

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1. IDEA Personnel Data: Under the last *EDFacts* Information Collection Package, OSEP revised the Part B Child Count and Educational Environments data collected in FSs 002 and 089 to require reporting children with disabilities who are age 5 and in kindergarten in the school age Part B Child Count and Educational Environments data (FS 002) and reporting children with disabilities age 5 and not in kindergarten in the preschool Part B Child Count and Educational Environments data (FS 089). ED is proposing to change the age groups used in the IDEA Personnel data collected in FSs 070 (special education teachers) and 112 (paraprofessionals) to align with the Part B Child Count and Educational Environments data age groups. This change is also in response to public comments received in the last *EDFacts* package regarding the misalignment between child and staff counts.

- a. ***Can your state report IDEA personnel data in these revised age groups?***
- b. ***What is the impact of this change?***

File Specification	Current Age Group	Proposed Age Group
070	Ages 3-5	Ages 3 – 5 (not in kindergarten)
112	Ages 6-21	Ages 5 (in kindergarten) through 21

2. Maintenance of Effort Reduction and Coordinated Early Intervening Services (CEIS) Data: Historically, SEAs were required to submit the count of children receiving coordinated early intervening services (CEIS) due to the local educational agency (LEA) or educational services agency (ESA) being identified as having significant disproportionality. On December 19, 2016, ED published the Equity in IDEA Regulations on Significant Disproportionality in the Federal Register. On May 20, 2019, ED notified states that they would need to start implementing the new significant disproportionality regulations. Under 34 CFR §300.226(a), CEIS is provided, through funds voluntarily reserved by LEAs/ESAs, to students in kindergarten through grade 12 (with a particular emphasis on students in kindergarten through grade three) who are not currently identified as needing special education or related services, but who need additional academic and behavioral support to succeed in a general education environment. In contrast, under §300.646(d)(2), comprehensive CEIS (CCEIS) is provided, through funds LEAs/ESAs are required to reserve due to being identified as having significant disproportionality, to children from age 3 through grade 12, particularly, but not exclusively, children in those groups that were significantly overidentified under §300.646(a) or (b), including children who are not currently identified as needing special education or related services but who need additional academic and behavioral support to succeed in a general education environment, and children with disabilities. Because CEIS and CCEIS are defined differently, ED determined that the

children receiving CCEIS could no longer be reported under the current MOE Reduction and CEIS data elements and reporting instructions. Beginning with the FFY 2018/ SY 2018-19 MOE Reduction and CEIS data submission, ED collected only the count of children receiving CEIS. ED is now proposing to implement four new data points associated with CCEIS in the MOE & CEIS EMAPS survey.

- a. Does your state collect the data needed to report the number of children receiving comprehensive coordinated early intervening services as defined by 34 C.F.R. §300.646 for each LEA or ESA that receives a Section 611 or Section 619 subgrant from the state in the Maintenance of Effort and Coordinated Early Intervening Services data collection?**
- b. Does your state collect the data needed to report these counts disaggregated by the following age groups: preschool age (ages 3 through 5 not in kindergarten) and school age (ages 5 in kindergarten through 21)?**
- c. Does your state collect the data needed to report these counts disaggregated by disability status: children with disabilities (IDEA) and children without disabilities?**
- d. If states do not collect the needed information at this time, how long would states need to be able to report these data to ED?**
- e. Would this proposed collection create unique challenges that you would like ED to be made aware?**

<b>New MOE &amp; CEIS data items in EMAPS</b>
E1 Number of children receiving CCEIS under IDEA who are between the ages of 3 and 5 (not in kindergarten) (in the reference year).
E2 Number of children receiving CCEIS under IDEA who are between the ages of 5 (in kindergarten) and 21 (in the reference year).
E3 Number of children with disabilities receiving CCEIS under IDEA in the (reference year).
E4 Number of children without disabilities receiving CCEIS under IDEA in (the reference year).

3. IDEA State Supplemental Survey: ED is considering separating the questions in the IDEA State Supplemental Survey into two surveys that align with the submission and resubmission timelines for the associated FSs and EMAPS surveys: one survey associated with those IDEA Section 618 Part B data collections due in November (FSs 005, 006, 007, 088, 143, 144, 009, 070, 099, and 112) and one survey associated with those IDEA Section 618 Part B data collections due in April and May (FSs 002 and 089 and the Maintenance of Effort and Coordinated Early Intervening Services survey in EMAPS). ED expects that this change would provide a positive impact on the efficiency and accuracy of the information provided via the IDEA State Supplemental Survey. ED is not proposing changes to any of the questions currently present in the IDEA State Supplemental Survey.

- a. Can your state report this information split in two different surveys?**
- b. How would splitting this survey impact your state?**

## TITLE I

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4. **Title I School Status:** Title I School Status (DG22) is currently collected in the CCD School file specification (129). ED is proposing to move this data group into the Title I Part A SWP/TAS Participation file specification (037), connecting its collection with other Title I data groups. This would also change the due date of this data group. Currently FS129 is collected in March of the same school year while FS037 is collected the following February. This means there will be at least a year delay in receiving the Title I School Status data group for SY2022-23.

***a. What is the impact on your state associated with reporting Title I school status in February of the following school year rather than in March of the same school year, as currently collected?***

5. **Section 1003 Funds:** ED is proposing to remove the Economically Disadvantaged Students data group (DG56) from the Section 1003 Funds file (FS132) and into its own file specification. This change is being proposed because DG56 is not related to Section 1003 funds and it could cause confusion when reporting this data group.

***a. What is the impact on your state associated with reporting this data group in a separate file?***

6. **Title I Allocations (FS 193):** Most LEAs do not receive a McKinney-Vento subgrant (over 75%) and the mandatory Title I, Part A LEA homeless set-aside under ESSA is the primary Federal education resource to address the unique or specific needs of students experiencing homelessness, who are also automatically eligible for Title I services. Therefore, ED is proposing to add a data group to collect the dollar amount of Title I, Part A allocation reserved by the LEA to serve homeless children and youth.

***a. Can your state report this data group?***

***b. What is the impact with reporting this data group anticipated in your state?***

7. **Title I, Part A Homeless Reservation:** The passage of the Elementary and Secondary Education Act of 1965 (ESEA) requires LEAs to reserve funds from its Title I, Part A allocation to provide services to homeless children. ED is proposing to collect the number of homeless children and youth served by Title I, Part A programs to better understand the numbers of these students being served.

***a. Can your state distinguish homeless children and youth served by Title I, Part A programs under the reservation for homeless children and youth?***

***b. What is the impact with reporting this data group anticipated in your state?***

<b>New DG Name</b>	Title I, Part A homeless reservation
<b>DG Definition</b>	The number of homeless children and youth served by Title I, Part A programs under the reservation for homeless children and youth.

<b>Levels</b>	SEA, LEA
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8. **Students in Foster Care:** The passage of the Elementary and Secondary Education Act of 1965 (ESEA) requires SEAs and LEAs to coordinate with State and local child welfare agencies to ensure the educational stability of children in foster care. ED is proposing to collect the number students who are in foster care and enrolled in a public LEA who are eligible for Title I, Part A services under the reservation for students in foster care to better understand the numbers of these students being served.

- a. Can your state distinguish students who are in foster care for all your LEAs or only those LEAs who are reported in file specification 134 as eligible for Title I, Part A services?*
- b. What is the impact reporting this data group anticipated in your state?*

<b>New DG Name</b>	Title I Part A foster care enrolled
<b>DG Definition</b>	The number of students who are in foster care and enrolled in a public LEA, all of whom are eligible for Title I, Part A services.
<b>Levels</b>	SEA, LEA

9. **Comprehensive Support and Targeted Support Identification (FS212):** Consistent with the ESEA, each State is permitted to create State-specific subgroups. This change is intended to allow States that utilize State-specific subgroups to include those subgroups when reporting the reason for identification for schools identified as additional targeted support and improvement (ATSI) and targeted support and improvement due to consistently underperforming subgroups (TSI).

- a. Will this change support your State in accurately reporting the reason(s) for identification for ATSI and TSI schools?*
- b. If not, what is needed to accurately report the reasons for identification?*

10. ED is proposing adding permitted values to five indicator status file specifications (199, 200, 201, 202, and 205) to allow reporting results in cases where a state has defined more than one measure for the indicator. These changes align with the approach for multiple indicators currently used in FS202. These changes will allow states to report the indicator data in the form they likely have for their uses. This change will have no impact on states that have defined only one indicator measure that is submitted for the file.

- a. Or is this change sufficient to allow complete reporting of the indicators?*
- b. If not, what is needed to allow complete reporting of the indicators?*

## **TITLE I: NEGLECTED OR DELINQUENT**

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11. **N or D Participation - State Agency:** Currently, ED collects data on students participating in neglected programs and those participating in delinquent programs as one count, even though these programs are different (FS119 / DG656). ED is proposing to collect the number of students participating in neglected programs separate from those participating in delinquent

programs to better understand and support these different student populations. In addition, ED is proposing to add an additional disaggregation count by economically disadvantage status to better understand who is served within these two programs. ED is proposing the following changes to have a better understanding of the number of students within each.

- a. Can your state report the number of students participating in neglected programs separate from those participating in delinquent programs?**
- b. Can your state disaggregate these counts by economically disadvantaged status?**
- c. What impacts with reporting this data group are anticipated in your state?**

	<b>New Data Group 1</b>	<b>New Data Group 2</b>
Data Group Name	Neglected programs participation table - state agency	Delinquent programs participation table - state agency
Data Group Definition	The number of students participating in neglected programs under Title I, Part D, Subpart 1 (State Agency) of ESEA as amended.	The number of students participating in delinquent programs under Title I, Part D, Subpart 1 (State Agency) of ESEA as amended.
Disaggregation	<ul style="list-style-type: none"> <li>A. Student Count by Neglected Programs (Subpart 1) by Racial Ethnic</li> <li>B. Student Count by Neglected Programs (Subpart 1) by Sex (Membership)</li> <li>C. Student Count by Neglected Programs (Subpart 1) by Age (All)</li> <li>D. Student Count by Neglected Programs (Subpart 1) by Disability Status (Only)</li> <li>E. Student Count by Neglected Programs (Subpart 1) by English Learner Status (Only)</li> <li>F. Student Count by Neglected Programs (Subpart 1) by Economically Disadvantaged (Only)</li> <li>1) Student Count by Neglected Programs (Subpart 1)</li> </ul>	<ul style="list-style-type: none"> <li>A. Student Count by Delinquent Programs (Subpart 1) by Racial Ethnic</li> <li>B. Student Count by Delinquent Programs (Subpart 1) by Sex (Membership)</li> <li>C. Student Count by Delinquent Programs (Subpart 1) by Age (All)</li> <li>D. Student Count by Delinquent Programs (Subpart 1) by Disability Status (Only)</li> <li>E. Student Count by Delinquent Programs (Subpart 1) by English Learner Status (Only)</li> <li>F. Student Count by Delinquent Programs (Subpart 1) by N or D Long Term Status</li> <li>G. Student Count by Delinquent Programs (Subpart 1) by Economically Disadvantaged (Only)</li> <li>1) Student Count by Delinquent Programs (Subpart 1)</li> </ul>

12. **N or D Participation – LEA:** Currently, ED collects data on students participating in At-risk programs and those participating in delinquent programs as one count, even though these programs are different (FS127 / DG657). ED is proposing to collect the number of students participating in At-risk programs separate from those participating in delinquent programs to better understanding of the number of students within each program and support these different student populations.

- a. Can your state report the number of students participating in delinquent programs separate from those participating in programs for at-risk students?**

**b. What impacts with reporting this data group are anticipated in your state?**

	<b>New Data Group 1</b>	<b>New Data Group 2</b>
Data Group Name	Delinquent programs participation table – LEA	At-risk programs participation table - LEA
Data Group Definition	The number of students participating in programs for delinquent students under Title I, Part D, Subpart 2 (LEA) of ESEA, as amended.	The number of students participating in programs for at-risk students under Title I, Part D, Subpart 2 (LEA) of ESEA, as amended.
Disaggregation	A. Student Count by Delinquent Program (Subpart 2) by Racial Ethnic B. Student Count by Delinquent Program (Subpart 2) by Sex (Membership) C. Student Count by Delinquent Program (Subpart 2) by Age (All) D. Student Count by Delinquent Program (Subpart 2) by Disability Status (Only) E. Student Count by Delinquent Program (Subpart 2) by English Learner Status (Only) F. Student Count by Delinquent Program (Subpart 2) by N or D Long Term Status  1) Student Count by Delinquent Program (Subpart 2)	A. Racial/Ethnic B. Sex (Membership) C. Age (All) D. Disability Status (Only) E. English Learner Status (Only) F. N or D Long Term Status

13. N or D Program Data Categories: Currently, OESE collects data on students participating in neglected, delinquent, and at-risk programs by one set of permitted values, even though the program types vary by program. OESE is proposing to separate out each program to better understand the location of where each program serves their students.

- a. *Can your state report the number of students participating in these programs?*
- b. *What impacts with reporting these data categories are anticipated in your state?*
- c. *Under Section 1432(4)(A) of the ESEA, a neglected program is defined as a public or private residential facility, other than a foster home, that is operated for the care of children who have been committed to the institution or voluntarily placed in the institution under applicable State law, due to abandonment, neglect, or death of their parents or guardians. Due to this broad definition, neglected programs that could receive Title I, Part D funds would not be limited to the program types currently proposed. Are there any program types missing from the proposed list that would more accurately categorize the neglected programs or congregate care settings in your State?*

New Category Names	Category Definition	Permitted Values
Neglected Programs (Subpart 1)	The types of neglected programs under Title I, Part D, Subpart 1 (State Agency) of ESEA as amended.	<ul style="list-style-type: none"> <li>• Group Homes</li> <li>• Shelters</li> <li>• Community Day Programs</li> <li>• Residential Treatment Home</li> </ul>
Delinquent Programs	The types of delinquent programs under Title I, Part D, Subpart 1 (State Agency) of ESEA as amended or under Title I, Part D, Subpart 2 (LEA) of ESEA, as amended.	<ul style="list-style-type: none"> <li>• Adult correction</li> <li>• Community Day Programs</li> <li>• Juvenile Detention Centers</li> <li>• Shelters</li> <li>• Group Homes</li> <li>• Ranch/Wilderness Camps</li> <li>• Residential treatment centers</li> <li>• Long-term secure juvenile facilities</li> <li>• Other</li> </ul>

14. **N or D In Program Outcomes**: ESEA requires ED to evaluate the program and impact of the program while the students are still enrolled. To reduce burden, ED is proposing to eliminate the disaggregation of program type from the current collection (FS180 / DGs 782 and 783) and replace it with two new data groups.

- a. *Can your state report the number of students participating in neglected AND delinquent programs who attained academic and career and technical outcomes while enrolled in the programs?*
- b. *Can your state report the number of students participating in at-risk AND delinquent programs who attained academic and career and technical outcomes while enrolled in the programs?*
- c. *What impacts with reporting these data groups are anticipated in your state?*
- d. *As defined under Section 1432(2) the ESEA, an at-risk program is a program for a school aged individual who is at-risk of academic failure, dependency adjudication, or delinquency adjudication, has a drug or alcohol problem, is pregnant or is a parent, has come into contact with the juvenile justice system or child welfare system in the past, is at least 1 year behind the expected grade level for the age of the individual, is an English learner, is a gang member, has dropped out of school in the past, or has a high absenteeism rate at school. At-risk programs that are eligible to receive Title I, Part D funds include but are not limited to dropout prevention programs, programs providing mentoring, or curriculum-based entrepreneurship programs. Since at-risk programs could include a wide range of focuses and formats, developing uniform evaluation measures without stakeholder input could impact the ability to effectively report and analyze any data that is collected. Based on the at-risk programs in your State, what student or program outcomes are currently collected to evaluate all at-risk programs upon completion?*

New Data Group Name	Definition
Title I Neglected or Delinquent program academic and career and technical outcomes in programs table - state agency.	The number of students participating in neglected and delinquent programs under Title I, Part D, Subpart 1 (State Agency) of ESEA, as amended, who attained academic and career and technical outcomes while enrolled in the programs.

Title I Delinquent and At-Risk program academic and career and technical outcomes in programs table - LEA.	The number of students participating in at-risk and delinquent programs under Title I, Part D, Subpart 2 (LEA) of ESEA, as amended, who attained academic and career and technical outcomes while enrolled in the programs.
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15. N or D Exited Program Outcomes: ESEA requires ED to evaluate the Title I, Part D, Subpart 1 and 2 programs and outcomes of those students. ED is proposing to remove the 90 day outcome period (FS181 / DGs 785 and 784) and replace it with two new data groups.

- a. ***Can your state report the number of students participating in neglected AND delinquent programs who attained academic and career and technical outcomes at the time of exiting from the program?***
- b. ***Can your state report the number of students participating in at-risk AND delinquent programs who attained academic and career and technical outcomes at the time of exiting from the program?***
- c. ***What impacts with reporting these data groups are anticipated in your state?***
- d. ***With the proposed change of collecting this data within 14 calendar days rather than 90 days after exit, what data quality issues, if any, do you believe will affect your State's ability to report these outcomes?***

<b>New Data Group Name</b>	<b>Definition</b>
Title I Neglected or Delinquent program at exit table - state agency.	The number of students participating in neglected and delinquent programs under Title I, Part D, Subpart 1 (State Agency) of ESEA, as amended, who attained academic and career and technical outcomes at the time of exiting from the program.
Title I Delinquent and At-Risk program at exit table - LEA.	The number of students participating in at-risk and delinquent programs under Title I, Part D, Subpart 2 (Local Agency Programs) of ESEA, as amended, who attained academic and career and technical outcomes at the time of exiting from the program.

16. N or D New Data Groups: OESE is proposing to move the collection of length of stay from the Consolidated State Performance Report to ED*Facts* and is proposing two new data groups to collect information on recidivism of students in delinquent programs since one of the requirements of Title I, Part D is to help students transition back in their local school.

- a. ***Does your state collect these data to be able to disaggregate these counts out by program type?***
- b. ***If states do not collect the needed information at this time, how long would states need to be able to report these data to ED?***
- c. ***What impacts are associated with reporting these data to ED?***

<b>New Data Group Name</b>	Title I Delinquent program length of stay - state agency
<b>Definition</b>	The average length of stay in number of days of students in delinquent programs under Title I, Part D, Subpart 1 (State Agency) of ESEA, as amended.
<b>Category Set</b>	Delinquent Programs

<b>Programs</b>	<ul style="list-style-type: none"> <li>• Adult correction</li> <li>• Community Day Programs</li> <li>• Juvenile Detention Centers</li> <li>• Shelters</li> <li>• Group Homes</li> <li>• Ranch/Wilderness Camps</li> <li>• Residential treatment centers</li> <li>• Long-term secure juvenile facilities</li> <li>• Other</li> </ul>
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<b>New Data group name</b>	Title I Delinquent program recidivism- state agency
<b>Definition</b>	The number of students who previously exited a delinquent program under Title I, Part D, Subpart 1 (State Agency) of ESEA, as amended, and returned to the delinquent program during the reporting period.
<b>Category Set</b>	Delinquent Programs
<b>Programs</b>	<ul style="list-style-type: none"> <li>• Adult correction</li> <li>• Community Day Programs</li> <li>• Juvenile Detention Centers</li> <li>• Shelters</li> <li>• Group Homes</li> <li>• Ranch/Wilderness Camps</li> <li>• Residential treatment centers</li> <li>• Long-term secure juvenile facilities</li> <li>• Other</li> </ul>

<b>New Data group name</b>	Title I Delinquent program length of stay - LEA.
<b>Definition</b>	The average length of stay in number of days of students in delinquent programs under Title I, Part D, Subpart 2 (Local Agency Programs) of ESEA, as amended.
<b>Category Set</b>	Delinquent Programs
<b>Programs</b>	<ul style="list-style-type: none"> <li>• Adult correction</li> <li>• Community Day Programs</li> <li>• Juvenile Detention Centers</li> <li>• Shelters</li> <li>• Group Homes</li> <li>• Ranch/Wilderness Camps</li> <li>• Residential treatment centers</li> <li>• Long-term secure juvenile facilities</li> <li>• Other</li> </ul>

<b>New Data group name</b>	Title I Delinquent program recidivism- LEA.
<b>Definition</b>	The number of students who previously exited a delinquent program under Title I, Part D, Subpart 2 (Local Agency Programs) of ESEA, as amended, and returned to the delinquent program during the reporting period.
<b>Category Set</b>	Delinquent Programs
<b>Programs</b>	<ul style="list-style-type: none"> <li>• Adult correction</li> <li>• Community Day Programs</li> <li>• Juvenile Detention Centers</li> </ul>

	<ul style="list-style-type: none"> <li>• Shelters</li> <li>• Group Homes</li> <li>• Ranch/Wilderness Camps</li> <li>• Residential treatment centers</li> <li>• Long-term secure juvenile facilities</li> <li>• Other</li> </ul>
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17. N or D Academic Achievement: ED is proposing to remove program type as a category in both the State and LEA level files. However, in order to fulfill the program evaluation requirement under Section 1431(a)(1) of the ESEA, the current proposed ED Facts package will continue to collect pre- and post-testing data to determine improvement in student academic performance. Across the nation, less than 25% of the students served by Title I, Part D complete pre and posttest as reported by State educational agencies.

- a. How can data quality for this item be improved in your State?  
What academic performance data outside or in lieu of pre and post-test does your State currently collect?*

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### TITLE III

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18. Title III Students Served: In the Fiscal Year 2020 appropriations bill, the Department received report language encouraging the disaggregated data to present a more complete picture of academic achievement for the diverse population. ED is proposing to add the racial/ethnic data category to the two Title III Students Served (FS116) data group 648 (Title III Students Served Table). ED is also proposing to change the reporting period for DG849 from “October 1 (or closest school day)” to “School Year - Any 12-month period” to match the reported period of other Title III data groups (648, 864, and 865).

- a. Can your state report these data groups by racial/ethnic data of the Title III students served?*
- b. What impacts with reporting this data category are anticipated in your state?*
- c. Will the change in reporting period for DG648 change the number of students reported or increase the reporting burden for your state?*

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### STUDENTS

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19. Dropouts and Graduates: For Dropouts (FS032 / DG326) and Graduates/Completers (FS040 / DG306), the language in the reporting guidance and dropout definition will be updated to reflect all high school equivalencies. More specifically, every reference to “GED” will be changed to “High School Equivalency Diploma (HSED)” allowing for states to include all high school equivalencies and not just GEDs.

- a. Will this change impact your agency’s reporting of these items?*
- b. If so, how will it increase or decrease your burden?*

20. Free and Reduced-Price Lunch: The reporting period for the Free and Reduced-Price Lunch (FS033 / DG565) will be updated to align with the reporting period for Direct Certification (DG813), changing it to “October 1 or the date that aligns with the reporting period for USDA.”

- a. Will this change impact your agency’s reporting of this item?*
- b. If so, how will it increase or decrease your burden?*

21. Chronic Absenteeism/Economically Disadvantaged: ED is proposing to add in the economically disadvantaged data category, by sex, to the Data Group 814 (Chronic absenteeism table). This added category would allow ED to determine the impact of students being economically disadvantaged on their chronic absenteeism status.

- a. Can your state report the unduplicated number of students absent 10% or more school days during the school year by economically disadvantaged status and sex?*
- b. What impact with reporting this data group are anticipated in your state?*
- c. The existing data categories used with this data group are collected by sex, would it add burden to collect economically disadvantaged without sex? Would important data points be missed by taking out sex in this data category?*

22. Chronic Absenteeism Unduplicated: ED currently collects Data Group 814 (Chronic absenteeism table) at the school level by sex and racial/ethnic, disability, 504, English learner, homeless, and the proposed economic disadvantaged. ED would like to understand if states can provide unduplicated counts of this data group and categories at the LEA and SEA levels.

- a. Can your state report the unduplicated number of students absent 10% or more school days during the school year at the LEA and SEA level?*
- b. Can your state report these unduplicated LEA and SEA counts by the existing data categories and the one proposed category (economically disadvantaged)?*
- c. What impacts are anticipated with reporting these unduplicated counts at the LEA and SEA level?*

## **ASSESSMENTS**

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ED is proposing to make changes to the assessment files that include allowing for multiple assessments to be reported, the collection of the different assessment types, and disaggregating data on children with disabilities. However, due to the nature of the changes, the resulting files would be too large and complex. Therefore, the proposal includes retiring all existing assessment files and data categories and replacing them with new ones. Please read the details of the changes and the associated questions below.

For purposes of ESEA section 1111(b)(2), for high school assessments a State administers either End-of-Grade or End-of Course assessments in each subject. A State is only required to administer one assessment per subject in the high school grade span. However, some States have

opted to administer more than one assessment. Some States also administer high school assessments in mathematics, reading/language arts and/or science but do not administer these assessments for purposes of ESEA section 1111(b)(2). For monitoring purposes, ED needs to distinguish the different End-of-Grade or End-of Course assessments administered in the State. Meaning, those States that administer more than one assessment in any, or all, of the subjects will need to report the participation and achievement files for EACH of the assessments.

23. In order to collect data for multiple assessments the assessment files will need to be split into 12 new file specifications. This will result in retiring (replacing) the existing 6 data groups and 6 file specifications:

<b>Retired (and Replaced) File Specifications and Data Groups</b>			
<b>FS</b>	<b>File Specification Name</b>	<b>DG</b>	<b>Data Group Name</b>
175	Academic Achievement in Mathematics	583	Academic achievement in mathematics table
178	Academic Achievement in Reading/Language Arts	584	Academic achievement in reading/language arts table
179	Academic Achievement in Science	585	Academic achievement in science table
185	Assessment Participation in Mathematics	588	Assessment participation in mathematics table
188	Assessment Participation in Reading/Language Arts	589	Assessment participation in reading/language arts table
189	Assessment Participation in Science	590	Assessment participation in science table

In place of the existing 6 data groups and 6 file specifications ED is proposing 12 new data groups/file specifications. These new data groups/file specifications will be collected at the same levels: State, LEA and school.

<b>Six new data groups/files for participation:</b>	
<b>Lower grade levels:</b>	<b>High school:</b>
Assessment participation in mathematics grades 3-8 table	Assessment participation in mathematics HS table
Assessment participation in reading/language arts grades 3-8 table	Assessment participation in reading/language arts HS table
Assessment participation in science grades 3-9 table	Assessment participation in science HS table

<b>Six new data groups/files for academic achievement:</b>	
<b>Lower grade levels:</b>	<b>High school:</b>
Academic achievement in mathematics grades 3-8 table	Academic achievement in mathematics HS table
Academic achievement in reading/language arts grades 3-8 table	Academic achievement in reading/language arts HS table
Academic achievement in science grades 3-9	Academic achievement in science HS table

table	
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Instead of allowing the option for states to report high school counts by discrete grades, the new files will capture high school data disaggregated by assessment types specific to the assessments as either End-of-Grade or End-of-Course e.g., mathematic assessment in algebra or mathematic assessment in grade 11. The mathematics and reading data will be split using grades 3 to 8 as the lower grades. Science will be split using grades 3 to 9 as the lower grades.

To make this change, the current category of Grade Level (Assessment) will be retired and replaced with the following for the lower grades only:

Category Name	Definition	Permitted Values
Grade Level (Assessment)	The grade level assigned by the school system in which the students are enrolled.	Grade 3, 4, 5, 6, 7, and 8
Grade Level (Assessment Science)	The grade level assigned by the school system in which the students are enrolled.	Grade 3, 4, 5, 6, 7, 8, and 9

The new data groups outlined will have the same category sets and subtotals as they exist with the current data groups to collect data on student demographics and subpopulations.

Aggregation Short Name	Student demographic or subpopulation
EUT and Subtotal	All Students
A	Major Racial and Ethnic Groups
B	Sex (Membership)
C	Disability Status (Only)
D	English Learner Status (Only) or (RLA)
E	Economically Disadvantaged Status
F	Migratory Status
G	Homeless Enrolled Status
H	Foster Care Status
I	Military Connected Student Status

- a. ***Does your state currently administer more than one assessment for any subject for any grade? If yes,***
  - i. ***Can students be reported more than once in a single year in the assessment participation and the assessment achievement data when more than one assessment is used? If so, how do you handle these duplicates when you aggregate into one assessment result, as you current do for reporting the assessment participation and achievement data?***
- b. ***If your state does not currently administer more than one assessment for any subject for any grade, is your state planning to expand the assessments? If yes,***
  - i. ***Can students be reported more than once in a single year in the assessment participation and the assessment achievement data when more than one assessment is used? If so, how do you handle these duplicates when you***

*aggregate into one assessment result, as you current do for reporting the assessment participation and achievement data?*

*c. What impacts from proposed change are anticipated in your state?*

24. ED is also proposing to revise the permitted values regarding assessment types to support States reporting assessment data on the Innovative Assessment Demonstration Authority, Advanced Assessments, and locally-selected nationally recognized high school assessments. If a State does not administer these assessments, there will be no change in the permitted values that a State uses. The assessment types vary by grade span and by academic subject. Each grade span and academic subject will have its own list of assessment types. The data are disaggregated for both the participation data and the academic assessment data. For the participation data, all subjects will include the following two options.

<b>Description</b>	<b>Comments</b>
Did not participate	Did not participate in an assessment.
Medical exemption	Each state determines what constitutes a significant medical emergency

Mathematics Assessment Types

<b>Applicability</b>	<b>Options for grades 3 to 8</b>	<b>Options for HS</b>
All states	Regular assessment without accommodations	
All states	Regular assessment with accommodations	
All states	Alternate assessment	Alternate assessment
All states		High school regular assessment in mathematics I, without accommodations
All states		High school regular assessment in mathematics I, with accommodations
All states, where applicable		High school regular assessment in mathematics II, without accommodations
All states, where applicable		High school regular assessment in mathematics II, with accommodations
All states, where applicable		High school regular assessment in mathematics III, without accommodations
All states, where applicable		High school regular assessment in mathematics III, with accommodations
Any state for grade 8 and other grades when approved	Advanced Assessment without accommodations – middle school	
Any state for grade 8 and other grades when approved	Advanced Assessment with accommodations – middle school	
Any state that used an		Advanced Assessment without

<b>Applicability</b>	<b>Options for grades 3 to 8</b>	<b>Options for HS</b>
Advanced Assessment for high school approved		accommodations – high school
Any state that used an Advanced Assessment for high school when approved		Advanced Assessment with accommodations – high school
When approved	Innovative Assessment Demonstration Authority (IADA) pilot assessment without accommodations	Innovative Assessment Demonstration Authority (IADA) pilot assessment without accommodations
When approved	Innovative Assessment Demonstration Authority (IADA) pilot assessment with accommodations	Innovative Assessment Demonstration Authority (IADA) pilot assessment with accommodations
When approved		Locally-selected nationally recognized high school assessment without accommodations
When approved		Locally-selected nationally recognized high school assessment with accommodations

### Reading/Language Arts Assessment Types

The option for English language proficiency assessment is only used for the participation data and only for recently arrived English learners who take an English language proficiency assessment in lieu of the grade-level academic assessment for the grade in which the student is enrolled. Students who participated using the English language proficiency assessment are not included in the academic achievement data.

<b>Applicability</b>	<b>Options for grades 3 to 8</b>	<b>Options for HS</b>
All states	Regular assessment without accommodations	
All states	Regular assessment with accommodations	
All states	Alternate assessment	Alternate assessment
All states		High school regular assessment in reading/language arts I, without accommodations
All states		High school regular assessment in reading/language arts I, with accommodations
All states, where applicable		High school regular assessment in reading/language arts II, without accommodations
All states		High school regular assessment in reading/language arts II, with accommodations
All states, where		High school regular assessment in

<b>Applicability</b>	<b>Options for grades 3 to 8</b>	<b>Options for HS</b>
applicable		reading/language arts III, without accommodations
All states, where applicable		High school regular assessment in reading/language arts III, with accommodations
Any state (participation data only)	English language proficiency assessment	English language proficiency assessment
Any state when approved	Advanced Assessment without accommodations – middle school	
Any state when approved	Advanced Assessment with accommodations – middle school	
Any state that used an Advanced Assessment for high school I when approved		Advanced Assessment without accommodations – high school
Any state that used an Advanced Assessment for high school, when approved		Advanced Assessment with accommodations – high school
When approved	Innovative Assessment Demonstration Authority (IADA) pilot assessment without accommodations	Innovative Assessment Demonstration Authority (IADA) pilot assessment without accommodations
When approved	Innovative Assessment Demonstration Authority (IADA) pilot assessment with accommodations	Innovative Assessment Demonstration Authority (IADA) pilot assessment with accommodations
When approved		Locally-selected nationally recognized high school assessment without accommodations
When approved		Locally-selected nationally recognized high school assessment with accommodations

### Science Assessment Types

<b>Applicability</b>	<b>Options for grades 3 to 9</b>	<b>Options for HS</b>
All states	Regular assessment without accommodations	
All states	Regular assessment with accommodations	
All states	Alternate assessment	Alternate assessment
All states		High school assessment in science I, without accommodations
All states		High school assessment in science I, with accommodations
All states, where		High school assessment in science

Applicability	Options for grades 3 to 9	Options for HS
applicable		II, without accommodations
All states, where applicable		High school assessment in science II, with accommodations
All states, where applicable		High school assessment in science III, without accommodations
All states, where applicable		High school assessment in science III, with accommodations
Any state when approved	Advanced Assessment without accommodations – middle school	
Any state when approved	Advanced Assessment with accommodations – middle school	
Any state that used an Advanced Assessment for high school, when approved		Advanced Assessment without accommodations – high school
Any state that used an Advanced Assessment for high school, when approved		Advanced Assessment with accommodations – high school
When approved	Innovative Assessment Demonstration Authority (IADA) pilot assessment without accommodations	Innovative Assessment Demonstration Authority (IADA) pilot assessment without accommodations
When approved	Innovative Assessment Demonstration Authority (IADA) pilot assessment with accommodations	Innovative Assessment Demonstration Authority (IADA) pilot assessment with accommodations
When approved		Locally-selected nationally recognized high school assessment without accommodations
When approved		Locally-selected nationally recognized high school assessment with accommodations

- a. ***Can the State report the counts of students disaggregated by certain assessment types now while the State needs more time to be able to report the counts of students disaggregated by other assessment types? If so, please explain which assessment types your State needs more time to report?***
- b. ***What impact from reporting the count of students disaggregated by the new proposed assessment types (if applicable) are anticipated in your state?***

25. States will continue to report on the assessment data on children with disabilities (IDEA) under the Disability Status (IDEA) category set C in the above data groups. In addition, new file specifications and data groups will be added to collect further disaggregated data on the subpopulation children with disabilities (IDEA). The counts in these files will be expected to equal the aggregated counts of children with disabilities (IDEA), as reported in category set C in the files containing all students. States would report the assessment data on children

with disabilities (IDEA) disaggregated by Major Racial and Ethnic Groups and by Disability Category.

**Participation:** Four data groups will be added for participation. The data groups will be divided by grades (lower levels and high school) and by academic subject (mathematics and reading/language arts). These data groups/file specifications will be collected at the State and LEA level but not the school level.

Mathematics

<b>New data groups</b>	Assessment participation in mathematics children with disabilities (IDEA) grades 3-8 table	Assessment participation in mathematics children with disabilities (IDEA) HS table
<b>Definition</b>	The unduplicated number of children with disabilities (IDEA) who were enrolled in grades 3 through 8 during the period of state assessment(s) in mathematics.	The unduplicated number of children with disabilities (IDEA) who were expected to participate in an end-of-grade or end-of-course assessment during the period of the state assessment(s) in mathematics.
<b>Reporting period</b>	Testing Window	Testing Window
<b>Cat Set A</b>	<ul style="list-style-type: none"> <li>• Participation Status (M)</li> <li>• Grade Level (Assessment)</li> <li>• Major Racial and Ethnic Groups</li> </ul>	<ul style="list-style-type: none"> <li>• Participation Status (M HS)</li> <li>• Major Racial and Ethnic Groups</li> </ul>
<b>Cat Set B</b>	<ul style="list-style-type: none"> <li>• Participation Status (M)</li> <li>• Grade Level (Assessment)</li> <li>• Disability Category (IDEA)</li> </ul>	<ul style="list-style-type: none"> <li>• Participation Status (M HS)</li> <li>• Disability Category (IDEA)</li> </ul>

Reading/language arts

<b>New data groups</b>	Assessment participation in reading/language arts children with disabilities (IDEA) grades 3-8 table	Assessment participation in reading/language arts children with disabilities (IDEA) HS table
<b>Definition</b>	The unduplicated number of children with disabilities (IDEA) who were enrolled in grades 3 through 8 during the period of state assessment(s) in reading/language arts.	The unduplicated number of children with disabilities (IDEA) who were expected to participate in an end-of-grade or end-of-course assessment during the period of the state assessment(s) in reading/language arts.
<b>Reporting period</b>	Testing Window	Testing Window
<b>Cat Set A</b>	<ul style="list-style-type: none"> <li>• Participation Status (RLA)</li> <li>• Grade Level (Assessment)</li> <li>• Major Racial and Ethnic Groups</li> </ul>	<ul style="list-style-type: none"> <li>• Participation Status (RLA HS)</li> <li>• Major Racial and Ethnic Groups</li> </ul>
<b>Cat Set B</b>	<ul style="list-style-type: none"> <li>• Participation Status (RLA)</li> <li>• Grade Level (Assessment)</li> <li>• Disability Category (IDEA)</li> </ul>	<ul style="list-style-type: none"> <li>• Participation Status (RLA HS)</li> <li>• Disability Category (IDEA)</li> </ul>

**Academic Achievement:** Likewise, four data groups will be added for academic achievement. The data groups will be divided by grades (lower levels and high school) and

by academic subject (mathematics and Reading/language arts). We would recommend including all four data groups in a single file.

## Mathematics

<b>New data groups</b>	Academic achievement in mathematics children with disabilities (IDEA) grades 3-8 table	Academic achievement in mathematics children with disabilities (IDEA) HS table
<b>Definition</b>	The unduplicated number of children with disabilities (IDEA) enrolled in grades 3 through 8 who completed the state assessment(s) in mathematics and received a valid score.	The unduplicated number of children with disabilities (IDEA) in high school who completed the state assessment(s) in mathematics and received a valid score.
<b>Reporting period</b>	Testing Window	Testing Window
<b>Cat Set A</b>	<ul style="list-style-type: none"> <li>• Assessment Administered (M)</li> <li>• Proficiency Status</li> <li>• Grade Level (Assessment)</li> <li>• Major Racial and Ethnic Groups</li> </ul>	<ul style="list-style-type: none"> <li>• Assessment Administered (M HS)</li> <li>• Proficiency Status</li> <li>• Major Racial and Ethnic Groups</li> </ul>
<b>Cat Set B</b>	<ul style="list-style-type: none"> <li>• Assessment Administered (M)</li> <li>• Proficiency Status</li> <li>• Grade Level (Assessment)</li> <li>• Disability Category (IDEA)</li> </ul>	<ul style="list-style-type: none"> <li>• Assessment Administered (M HS)</li> <li>• Proficiency Status</li> <li>• Disability Category (IDEA)</li> </ul>

## Reading/language arts

<b>New data groups</b>	Academic achievement in reading/language arts children with disabilities (IDEA) grades 3-8 table	Academic achievement in reading/language arts children with disabilities (IDEA) HS table
<b>Definition</b>	The unduplicated number of children with disabilities (IDEA) enrolled in grades 3 through 8 who completed the state assessment(s) in reading/language arts and received a valid score.	The unduplicated number of children with disabilities (IDEA) in high school who completed the state assessment(s) in reading/language arts and received a valid score.
<b>Reporting period</b>	Testing Window	Testing Window
<b>Cat Set A</b>	<ul style="list-style-type: none"> <li>• Assessment Administered (RLA)</li> <li>• Proficiency Status</li> <li>• Grade Level (Assessment)</li> <li>• Major Racial and Ethnic Groups</li> </ul>	<ul style="list-style-type: none"> <li>• Assessment Administered (RLA HS)</li> <li>• Proficiency Status</li> <li>• Major Racial and Ethnic Groups</li> </ul>
<b>Cat Set B</b>	<ul style="list-style-type: none"> <li>• Assessment Administered (RLA)</li> <li>• Proficiency Status</li> <li>• Grade Level (Assessment)</li> <li>• Disability Category (IDEA)</li> </ul>	<ul style="list-style-type: none"> <li>• Assessment Administered (RLA HS)</li> <li>• Proficiency Status</li> <li>• Disability Category (IDEA)</li> </ul>

- a. Does your state collect the data needed to report the assessment data on children with disabilities by major racial/ethnic groups?**
- i. If your state does not collect the needed information at this time, how long would states need to be able to report the assessment data on children with disabilities by this disaggregation to ED?**
  - ii. What impacts are anticipated with reporting these data to ED?**

- b. Does your state collect the data needed to report the assessment data on children with disabilities by disability category?**
  - i. If your state does not collect the needed information at this time, how long would states need to be able to report the assessment data on children with disabilities by this disaggregation to ED?**
  - ii. What impacts are anticipated with reporting these data to ED?**

26. Assessment Metadata: To support the revised assessment collection, a new metadata collection is being proposed, see Attachment C EMAPS Collections for the list of questions.

- a. Will your state have any issues responding to these assessment metadata questions?**
- b. Are there questions that are missing but needed for ED to understand your state’s assessment data?**

## **STAFF**

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27. Staff FTE/Ungraded Teachers: During recent data reviews, several questions have come up regarding reporting of ungraded teachers. The definition of ungraded teachers in the FS059 reporting guidance is “Teachers of a group or class that is not organized on the basis of grade grouping and has no standard grade designation” and in EMAPS is “Are any teachers identified as teachers for ungraded classes?” ED is not currently suggesting a change to the definition used in FS059 or in EMAPS but would like to better understand how SEAs report data in this permitted value.

- a. How do States report teachers (including special education teachers) who provide instruction to students in more than one grade – do SEAs assign them to a specific grade or are they reported as ungraded?**
- b. What impacts are anticipated with the ungraded teachers permitted value?**

28. Staff FTE/Health Professionals: COVID-19 brought a renewed focus on student access to qualified health professionals, specifically school nurses. The information reported in ED*Facts* is variable over the years for health professionals. Beginning with the 2019-20 school year, school psychologists are now being reported as a separate permitted value. Currently health professionals like Nurses and other Health Specialists are included in the Student Support Services Staff permitted value.

Student Support Services Staff (STUSUPWOPSYCH): Professional staff members whose activities are concerned with the direct support of students and who nurture, but do not instruct students. (INCLUDE attendance officers; staff providing health, speech pathology, audiology, or social services; and supervisors of the preceding staff; coaches, athletic advisors, and athletic trainers if position does not require teaching credentials.)

ED is interested in understanding if SEAs already collect Health Specialists separate from Student Support Services Staff (Staff FTE DG528). Common Education Data Standards

defines Health Specialists as “Professional staff members or supervisors assigned specific duties related to providing any health services that are not specific to mental health.”

- a. *Does your state data collection differentiate Health Specialists separately from other Student Support Staff?*
- b. *If so, how does your state define Health Specialists?*
- c. *If not, what would be the burden to differentiate Health Specialists from other student support staff?*
- d. *Are nurses the main component of your Health Specialists?*
- e. *Does your state data collection collect Nurses separately from Health Specialists AND other Student Support Staff?*
- f. *If so, how does your state define Nurses?*
- g. *Are there other issues with these health staff that should be considered?*

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## **RETIRED DATA GROUPS**

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29. DG 24 Magnet Status (FS129 CCD School): A detailed review of the SY2017-18 CCD and CRDC data files shows that the magnet data collected in the CRDC is more reliable than the data collected for CCD. The proposal is for CRDC to continue to collect and release Magnet School Status every two years (or the frequency of the CRDC) and to retire DG24 Magnet Status from ED Facts/CCD.

- a. *What use cases of CCD are impacted if Magnet Status is not released in the CCD public data files?*

30. DG 458 Chief State School Officer (FS029 Directory): ED is proposing to retire this data group as it is not currently used.

- a. *What information for ED and the public is lost if this data group is retired?*

31. DG 699 State poverty designation (FS103 Poverty Quartile): ED is proposing to retire this data group and use data from FS203 and LEA SAIPE poverty data obtained from the Census.

- a. *What information for ED and the public is lost if this data group is retired?*

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## **TECHNICAL CORRECTIONS**

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32. Migratory Files: Change “students” to “children” to match legislative language in all file names; data group names and definitions; data category names and definitions; permitted values; and file specification language.

- a. *Are there other issues with this change that should be considered?*

33. LEA Subgrant Status (FS170): ED proposes to drop the No permitted value so that only those LEAs that received a McKinney-Vento subgrant would be reported. This would allow

ED to only collect those needed LEAs and would cut down on needless data quality checks on this item.

- a. Does your state agree that this change would reduce time spent on needless data quality checks?*
- b. Are there other issues with this change that should be considered?*

34. Consolidated MEP funds status (FS165): ED proposes to drop the Not Applicable permitted value so that only those schools that have a schoolwide program and/or receive federal migrant education funds under ESEA Title I, Part C would be reported. This would allow ED to only collect those needed schools and would cut down on unnecessary data quality checks on this item.

- a. Does your state agree that this change would reduce time spent on unnecessary data quality checks?*
- b. Are there other issues with this change that should be considered?*

35. Adjusted Cohort Graduation Rate: ED is proposing to change the education unit totals from “operational schools with a 12th grade” to “LEAs/Schools with a 12th grade that have at least one student in the cohort.” This will match the data states are already reporting and better aligns to program implementation in states.

- a. Will this change impact your state’s reporting of this item?*
- b. If so, how will it increase or decrease your burden?*

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## **SEX PERMITTED VALUES**

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36. The last ED*Facts* information collection package included directed questions about changing the definition of Sex/Gender to remove references to biological traits (note that sex/gender were terms used synonymously in historical ED documents). ED also requested information about how states collect and report sex and gender. Based on responses to those directed questions, ED did not consider additional changes. In preparing this package, ED data stewards considered reporting requirements in existing statutes, data privacy implications, and data release plans. ED is not proposing a change to the reporting of sex permitted values in data files in this package.

ED is proposing new **metadata** questions to ask states to annually report the permitted values the state uses. This will provide context about discrepancies between subtotals by Sex and totals of all students and inform future data collection proposals.

- a. Would the proposed metadata questions achieve the goal of providing context about discrepancies between subtotals by Sex and totals of all students?*
- b. Are there other ways of providing context about these discrepancies?*
- c. If you are in a state, do you have a preferred method for responding to the questions (e.g., in the State Submission Plan)?*

## EDFACTS DATA SYSTEM AND PROCESSES

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37. The current *EDFacts* collection system is almost 20 years old, and ED has been considering ways to modernize how the data are collected, conducts data quality review, and uses data reported by states. ED has a responsibility to collect and release administrative and survey data so that all stakeholders know the state of education in the country, information about individual grant programs (e.g., who is participating, how are they participating, are all eligible participants being identified and served, what are major indicators of grant impact, what are the differences by school/district/state, do we have observed trends that are concerning in particular places or for subgroups of students). In the last 20 years, states and ED worked hard to improve data quality (including completeness, accuracy, and timeliness of submissions), the volume of data releases, the timeliness of data releases, and the comprehensiveness of the data documentation for robust data use.

In spite of improvements, ED has identified several key issues with the current tools and processes: 1) the majority of data, as submitted by the states, are not of sufficient quality to be usable when ED receives it, 2) the data errors contribute to months of delays in the use and release of the data, 3) the data review process occurs on an ED timeline and is impacted by ED staff resources instead of when states are ready to take action; the result is an unsustainable and inefficient process, 4) business rules are now published by ED and available to states, but often are not released until too close to the due date, 5) the submission system does not allow states to provide known and helpful context to explain data anomalies, 6) ED feedback is not always of sufficient detail for quick state use and data corrections (or data notes) during a defined resubmission window, and 7) the volume and sensitivity level of business rules results in false-positives that are frequently ignored and lead to no action by ED or the state.

The planned future state of the *EDFacts* collection system and process will operate as follows: technical reporting requirements and business rules for the data will be available to states prior to the start of the school year, ED will publish business rules so that states know ED's expectations for data quality, states will evaluate data against all published business rules prior to submission to ED, states will address or explain data quality issues by the due date, and ED will use the data at the due date (including for monitoring and publications). Note: this is limited to the *EDFacts* technical processes and does not change the grant making office monitoring function.

In the next three years, ED has identified two main priorities for modernizing the system: 1) fix the business rules process to ensure states can comprehensively check data prior to submission to ED and 2) use community defined CEDS methodologies to explain *EDFacts* data groups so that states can gather and aggregate the required data accurately in order to report better quality data at the due date. States would continue to submit aggregate data and retain complete control over when aggregate data are submitted to ED.

The Department has several directed questions to gather comments and input from states as ED considers modernization.

- a. Do you agree with ED's assessment of the current issues? If not, what improvements would most effectively contribute to improving data quality so that data are usable at the due date?**
- b. Do you agree with ED's priorities for modernizing the collection system? If not, what would you change?**
- c. If ED provided a CEDS-based tool that allowed states to run pre-submission business rules to review both unit- and aggregate-level data quality, could your state use that tool? What would be the barriers to using this tool in your state?**
- d. To what extent is CEDS currently used in your state (e.g., using CEDS elements, using CEDS tools, implementing a CEDS solution for state use and/or federal reporting)?**