EDFacts 3-Year OMB Clearance Package
SY 2019-20, 2020-21, AND 2021-22

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Public Packages

- The information clearance package is the official registration of federal data collections with the Office of Management and Budget (OMB).

- Packages must include information needed to understand the federal request.

- There is a public announcement and a 60-day and a 30-day public comment period.
EDFacts Package

- Every three years EDFacts must go through a clearance process.
- The current data collection expires with the 2018-19 School Year.
- All comments received during the 60- and 30-day public review periods must be recognized and addressed (not necessarily adopted).
- Any changes to the EDFacts data collection package must be presented to OMB, before final clearance can be obtained.
- This process is to be completed by the summer of 2019.
How the EDFacts Package Is Developed

- ED program offices review their data collection needs and submit proposals
  - Legislative requirements
  - Regulatory requirements
  - Program monitoring needs

- Proposals reviewed by EDFacts team
  - duplications, "close" but not equal, reality checks
  - Content is the responsibility of the data stewarding office
  - EDFacts provides the IT system for collecting, securely storing, and accessing the data

- Package is developed from all ED program office proposals
  - new, revised, retired items
Surveys / Programs Represented and the Authority to Collect

- Common Core of Data (Non-Fiscal) – ESRA authority
- OCTAE – in accordance with Perkins requirements
- ESSA Title I, Part B – State Assessment Grants
- ESSA Title I, Part C - Migrant
- ESSA Title I, Part D – Neglected, Delinquent, or At-Risk
- ESSA Title III – Language Instruction for English Learners and Immigrant Students
- ESSA Title IV, GFSA
- ESSA Title IV, Part C - Charter
- IDEA, Part C (infant toddler)
- IDEA Part B (school age – prek-12+)
- ESSA Title V – Rural education (REAP)
- ESSA Title IX – Homeless

Note: Two programs are not in our package, but we use our tools for data collection:
- ESSA, Title II – Principal, Teacher, Leader training funds
- IDEA, Part C (infant toddler)
Schedule Overview i.e., Why does it take so long?

- **May-July 2018**: Preparation and Program Office Work
- **July 31 2018**: Program Offices Submit Proposed Changes to ESB (Spreadsheet and Form)
- **July-Oct 2018**: OMB Package is drafted
- **Oct-Dec 2018**: 60 Day Public Comment Period
- **Jan-Feb 2019**: Package Revised – (inc. Program Offices Review Comments and Make Needed Changes)
- **March-April 2019**: 30 Day Public Comment Period
- **April-June 2019**: Package Revised and Presented to OMB
- **July 2019**: OMB Clearance Received
What Is in the EDFacts OMB Package?

“Attachments”

-Explanatory
-Data Groups and Categories
-Directory
-EMAPS Collections
-Directed Questions
-Response to Comments
Data Governance and the Package

• Internal U.S. Department of Education
  – EDFacts Data Governance Board (EDGB)
    • Members are Program Offices and data users
  – Data Strategy Team

• Package Developed by U.S. Department of Education but Improved by SEAs and LEAs (vertical governance)
  – Directed questions
  – Comments (please provide alternative recommendations)
  – Response to comments
Stay Informed

• Data Conference Session II–F: Engaging in the Public Comment Process and Data Governance: A Federal, State, and Local Perspective

• Federal Register – daily announcements

• Regulations.gov – posting of proposed package

• Emails/Listservs – there will be many announcements with the package comes out
Action Items

• Watch Federal Register and email listservs
• When posted, share link with appropriate staff
• Read directed questions
• Talk with other states and your LEAs
• Review changes:
  – Is the proposed data available in the format required?
  – Does the proposed data capture what ED has intended?
  – Do you have questions about the proposed changes that require further clarification?
  – Are there potential data quality issues that ED should know?
  – Do you have a better idea? Share it!
• Submit comments – we read and consider each idea!!
California Department of Education: Federal Register Review Process
Monitoring Components

1.0 Select Staff to Monitor the Federal Register
2.0 Subscribe to the Federal Register
3.0 Daily Monitoring Process
4.0 Log and Track Proposed Data Collection
5.0 Inform the Program Area
6.0 Comment Process
1.0 Select Staff to Monitor the Federal Register

Select the best staff in the organization to monitor for proposed data collections.

Consider these:

- EDFacts Coordinator
- CSPR (Consolidated State Performance Report) Coordinator
To subscribe to the electronic mailing list, visit the Federal Register Table of Contents Subscription Page - https://public.govdelivery.com/accounts/USGPOOFR/subscriber/new and enter your email address. Then follow the instructions to join, leave, or manage your subscription.
3.0 Daily Monitoring Process

From the daily Federal Registry email notification:
• Review proposed regulations and related documents published from ED
• Access the Federal Register notice by clicking on the text or PDF link
Excerpt of Federal Register – Initial Review

Important information to look at when reviewing the federal register:

**DATES:** Interested persons are invited to submit comments on or before December 31, 2015.

**Type of Review:** A revised information collection.

**Total Estimated Number of Annual Burden Hours:** 26,880

**Abstract:** EDFacts is a U.S. Department of Education (ED) initiative to collect, analyze, report on and respond to data in a timely and useful manner for the Department of Education and the general public. The revised information collection request (ICR) that is described below is a revised information collection request.

**PROJECT NO.:** ED-D-2015-0099

**Title of Collection:** Data Challenges and Appeal Solution (DCAS). Title of Proposed Collection: ED 320-2015. Title of Revision: An extension of an existing information collection.

**Type of Respondents:** Affected Public: Private Sector, Ie., Local and Tribal Governments.

**Total Annual Amount of Ancestral Annual:** $16,995,889

**ADDITIONS and REMOVALS:**

- **ADDITIONS:** Comments submitted in response to this notice will be considered public records.
- **REMOVALS:** All personal identifiers contained in the comments submitted after this notice will be removed from the comments.

**FURTHER INFORMATION CONTACT:** For further information contact Kosha K. Fleenor, at 202-475-3623 or by email at Kosha.K.Fleenor@ed.gov.

**DEPARTMENT OF EDUCATION**

**AGENCY:** Information Collection Action Comment Request.

**Oglesby:** Internal Control No. 44 U.S.C. 671


**Type of Respondents:** Affected Public: Private Sector, Ie., Local and Tribal Governments.

**Total Estimated Number of Annual Burden:** 2,461,400

**ADDITIONS and REMOVALS:**

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- **REMOVALS:** All personal identifiers contained in the comments submitted after this notice will be removed from the comments.

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Additional Information

- Visit the Regulations.gov website.
- Enter the Docket ID number in the search button.
- Click the Open Docket Folder.
Docket Folder

- It contains rulemaking materials, supporting documents, studies and other references, all public comments, and other relevant documents.
- Save materials by clicking on the links.
4.0 Log and Track Proposed Data Collection

- Create a system for logging/tracking proposed collections.
- Create a new folder to track the proposed data collection.
- Save all supporting documents or related documents from Regulations.gov to the new folder.
5.0 Inform the Program Area

Email the appropriate program staff about reviewing proposed regulations and related published document.

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Today, the proposed federal data collection, **Statewide Longitudinal Data System Survey 2018-19** (see below), showed up on our radar, which we believe impact your office and other educational stakeholders. More information can also be found on the Regulations.gov website under docket # **ED-2018-ICCD-0043**. **The 30-day comment window closes May 18.**

As you may know, the Education Data Office (EDO) and the Educational Data Governance Program (EDGOI) are always on the lookout for data collections (including changes and new) that will impact education agencies (local and state). We then try to identify and engage stakeholders in a formal review of the proposed collection. To the extent the collection contains anything that would pose a challenge to making progress towards our goals, we strive to prepare and submit public comments. EDO has helped program offices prepare and submit many comment letters over the years. We are here to guide and support you through the process. We have also built a network with other states such that if they agree with our comments, they will submit similar comments.

Being on the lookout for proposed collections helps the Department make progress towards our overarching goals to: (1) Minimize data reporting burden; (2) Enhance Data Quality; (3) Be Transparent About the data we collect/use/report; and (4) Enhance Data Privacy and Security (see [http://intrnet.cde.ca.gov/da/eg/edgocharter.aspx](http://intrnet.cde.ca.gov/da/eg/edgocharter.aspx) for more information on these goals).

Just in case you’re not familiar with the Paperwork Reduction process, here’s a little background. When a federal agency proposes a new data collection, the agency is required to post it for public comment. Typically, there are two comment periods. The first period is a 60-day comment window. The agency must publish the proposed collection and estimate burden on Regulations.gov and respond to all comments. Sometimes, the agency will revise the proposed data collection based on comments. Then, there is another window for 30 days where the federal agency responds to comments made during the initial 60-day period.

We look forward to collaborating with you to forward the Department’s progress towards realizing our goals.

*Niki Yang*

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Key Areas to Consider

Program staff are asked to examine the proposed data collection and consider these questions:

• Are the proposed data appropriate to the stated purpose?
• Does the department already have this data available in its existing data resource?
• If the proposed collection would require collecting new data from LEAs or other local entities, are the LEAs being provided with enough lead time to modify whatever local information systems they have, such that they can submit the data with minimal effort?
• Are the estimated hours of burden for our department (an SEA) and local agencies realistic? If not, what would be a realistic estimate?
• Any other thoughts regarding the proposed collection?
Provide estimates of the hour burden of the collection of information.

- Indicate # of respondents by affected public type
- Frequency of response
- Annual hour burden
- Explanation of how burden is estimated
6.0 Comment Process

- Comments are uploaded through Regulations.gov.
- Comments not considered if reported incorrectly or after due date.
- No standard format
  - Formal letters
  - Single documents
  - E-mails
Submitting Comments Online

1. **Your Information**
   - Delete any text that is not relevant to the instructions.

2. **Your Preview**
   - This is a preview of the submitted comment.

3. **Your Receipt**
   - Your Comment Tracking Number: 1k2-83pz-4xn9
   - Your comment may be viewable on Regulations.gov once the agency has reviewed it. This process is dependent on agency public submission policies/procedures and processing times. Use your tracking number to find out the status of your comment.

- **First Name**: Anonymous
- **Last Name**: Anonymous

- **Comment**: Testing
- **Uploaded File(s)** (Optional): No files uploaded

- **This information will appear on Regulations.gov**:
  - First Name: Anonymous
  - Last Name: Anonymous

- **This information will not appear on Regulations.gov**:
  - All information will be displayed on Regulations.gov
Why California Participates in This Process

• Data Management Improvement Program
  – Major goal: Minimize reporting burden on LEAs

• Educational Data Governance (EDGO) program
  – See https://www.cde.ca.gov/ds/ed/

• Since 2004, 101 collections reviewed; 9 in 2017
CSPR sections 1.3.1, 1.3.2, and 1.3.3
“...will also be populated by EDFacts file specification 103 which collects data group 699 State poverty designation. Regarding the school levels, the Department has decided to no longer disaggregate CSPR section 1.3 by elementary and secondary schools.”

EDFacts Data Group 699
“Each school is designated as either an elementary or a secondary school. The quartiles are determined as two distinct calculations. One calculation includes all elementary schools in the state and the other includes all the secondary schools in the state. DG699 collects information that is the result of each of these two calculations.”
| Consolidated State Performance Report  
(OMB Control Number 1810-0724) |
|---------------------------------|

<table>
<thead>
<tr>
<th>30-Day Comment Window</th>
<th>60-Day Comment Window</th>
</tr>
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<tbody>
<tr>
<td>5 Comments Received</td>
<td>12 Comments Received</td>
</tr>
<tr>
<td>– 3 from SEAs</td>
<td>– 12 from SEAs</td>
</tr>
<tr>
<td>– 1 from LEAs</td>
<td></td>
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<tr>
<td>– 1 unknown</td>
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Why All States Should Participate

• U.S. Department of Education needs feedback on reality of data management at state and local levels
• If more states comment, message has more weight
• Proactive (avoid surprises)
• Cooperative/collaborative
Comments Influence Requirements

• Last EDFacts package (SYs 2016-17 to 2018-19): There was a proposal to collect chronic absenteeism for neglected and delinquent students. SEA respondents overwhelmingly reported that they could not collect or report this data. The U.S. Department of Education withdrew their proposal for this information.

• Revised ESSA EDFacts package (SYs 2016-17 to 2018-19): There was a proposal for a new collection of teachers and U.S. Department of Education asked respondents if the number of teachers should be a headcount or FTE. SEA respondents overwhelmingly answered FTE and that is what is collected today.