



April 28, 2022

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Dear Ms. Valentine:

The Wisconsin Department of Public Instruction (WDPI) appreciates the opportunity to provide feedback on the request for comment by the Institute of Education Sciences, United States Department of Education (USED) regarding the EDFacts Data Collection for School Years 2022-23, 2023-24, and 2024-25. The WDPI's comments follow below.

Directed Question 11- Reporting Zeros:

Currently, when "zero records" are created, they are created for any agency or demographics combination for which the file specification expects it. Therefore, the absence of these records means the same thing as reporting zeros. The additional burden is extra coding and processing for producing the file and quality assuring the file. In addition, the WDPI is curious as to why some files require zeroes right now and some do not. If USED wants to know if missing LEAs and schools are actually zero, missing or NA, perhaps a summary of the LEAs or schools that weren't included in the file could be presented during the Data Quality process so that SEAs can then indicate which scenario applies. This should only be presented if data was supplied for the LEA or school in prior years.

Directed Question 15 - Sex (Membership):

The WDPI is continuing to gather information about current state practices around reporting sex (membership) data. The WDPI is interested in answers to the following question:

- a. If your SEA data collection includes data beyond male and female permitted values, do you publish the data for the additional permitted values?***

The WDPI will begin collecting gender beyond male and female, to include non-binary in the 2022-2023 school year. The WDPI will publish gender as a sensitive student group; the data for the two smallest gender groups will be redacted if five or less students are identified in any gender

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category at the state, LEA or school level.

Thank you for the opportunity to comment. If you have any questions, please contact Yvette Johanson, WDPI EDFacts Coordinator at [yvette.johanson@dpi.wi.gov](mailto:yvette.johanson@dpi.wi.gov).

Sincerely,

A handwritten signature in black ink that reads "Carl J. Bryan". The signature is written in a cursive style with a large, stylized "C" and "B".

Carl Bryan  
Administrative Rules Coordinator

CB:yj