**April 27th, 2022**

**U.S. Department of Education**

**400 Maryland Avenue, SW**

**Washington, D.C. 20202**

Dear U.S. Department of Education,

The Oregon Department of Education (ODE) would like to thank the U.S. Department of Education (DoED) for the opportunity to comment on the OMB EDFacts package for the School Years 2022-23, 2023-24 and 2024-25.

**Assessment**

Oregon would like to note that splitting the assessment files between lower grades and high school will bring no additional benefit to how Oregon’s assessment results are collected and processed. There is no compensation for the cost of reprogramming for Oregon.

Oregon is supportive of the decision to collect the participation and achievement of assessment data on children with disabilities disaggregated by major racial and ethnic group. Oregon would not be significantly impacted by adding this to the existing files or collecting this in a separate file. The only impacts would include the time and cost to program the changes.

**Title I, Part D Subpart 1 Neglected Programs**

Oregon agrees the addition of “other” to the list of Subpart 1 Neglected programs will allow for full and complete reporting. However, Oregon would like DoED to consider that the term “Neglected” to label residential and community day programs has many negative connotations. Oregon recommends that DoED should consider changing the federal term “neglected” facilities to a term with more positive connotations.

**Title I, Part D Academic Achievement**

The modification of the existing data groups to “initial and follow-up assessment” do not address collection concerns with post-test data for students who were served by Title I Part D programs for Oregon. Barriers still exist to collect assessment data upon release.

State assessment data for students who have exited Title I, Part D programs will provide no useful data on the academic achievement of students served by Title I, Part D programs for Oregon. This is because Oregon currently only requires students in grades 3-8 and grade 11 to complete the statewide assessment. Attaining statewide assessment data for all students that have exited a program would be nearly impossible for Oregon. Oregon would like to note that asking current educational institutions for statewide assessment data for Title I, Part D programs could expose and over-identify students as previously being in a program. Additionally, creating a “Title I, Part D” flag to electronically track students in the statewide assessment databases could violate the student’s privacy. Creating additional tracking mechanisms for this population would only contribute to the stigma that already exists with students in Title I, Part D programs. Oregon believes reporting statewide assessment data for Title I, Par D students should not be an option for any state.

**Title I, Part D Exit Outcomes**

There will be no impact for Oregon with regards to the proposed revision to “at the time of exiting from the program and up to 90 calendar days after exiting the program.”

**LEA Reservation to Serve Homeless Children and Youth**

Oregon is supportive of the decision to revise the data group to “the initially reserved dollar amount of Title I, Part A allocation reserved by the LEA to serve homeless children and youth”. This change will help show how the LEA collaborated with community and local resources as well as how McKinney-Vento youth are being served in comparison to their housed peers.

**Title I, Part A Foster Care Enrolled**

Oregon is supportive of the decision to revise the data group to “the number of students who are in foster care and enrolled in a public LEA that receives Title I, Part A services.” The only impacts for Oregon are minimal time and cost to program the changes.

**Chronic Absenteeism**

Oregon will be able to report chronic absenteeism for homeless enrolled and economically disadvantaged students at the state and LEA level. The impacts would be minimal would require minor programming changes.

**Indicator Type**

The number of measures available are sufficient for Oregon to report its indicators.

**Comprehensive Support and Improvement Identification**

The proposed changes to the permitted values will have little to no impact on Oregon. Only minor programming changes would be needed.

**Reporting Zeros**

Reporting zero counts as required in the current file specifications does not impact Oregon’s burden. If the requirement to report zeros is removed from the LEA and SCH levels, Oregon would follow the guidelines set forth from USED in the file specifications and blank counts would be considered as zeros, per the file specification guidelines.

**Migrant Education Program (MEP) Continuation**

Oregon would like DoED to clarify if this revision is proposing to eliminate the following codes: 01 End of Term, 02 Additional Year, 03 Credit Accrual. If not, Oregon would like additional language clarifying If DoED is proposing to include all COS code 1 students under COS. If DoED is proposing to include all COS code 1 in the COS count, then these modifications would impact Oregon. Oregon’s MEP would need to change the practice of withdrawing children. Instead of withdrawing at the end of term, Oregon would need to withdraw the child as soon as the child reaches their end of eligibility.

**Migrant Education Program (MEP) Racial Ethnic**

Oregon uses these data for demographic purposes and for state reporting. Oregon has not had any challenges in reporting data for migratory children by race/ethnicity, and would continue to report race/ethnicity even if not required to report these data to DoED.

**EDFacts Modernization**

Oregon does not agree that consolidating data groups into fewer file specifications would reduce reporting burdens. Many of the proposed data group consolidations are collected at different times during the year. Changing the current reporting structure to combine files with data collections that collected at separate points of the year would incur not only time and costs to reprogram reports, but would also require Oregon to change collection reporting periods.

**Sex (Membership)**

Oregon collects a third gender permitted value, “X”. Oregon does publish the data for the additional permitted value, but only at the state level. LEA and school counts are suppressed to ensure student safety and privacy.

Again, thank you for allowing the Oregon Department of Education to provide comment on this OMB EDFacts package.

Sincerely,

Lauren Holstien

EDFacts Coordinator/

 CCD Non Fiscal Coordinator