

NASDME

National Association of State Directors of Migrant Education

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December 27, 2010

IC Docket Manager
U. S. Department of Education
400 Maryland Avenue, S.W.
Washington, DC 20202-6135

Re: Migrant Education (MEP) Migrant Student Information Exchange (MSIX) and Minimum Data Elements, OMB Control Number 1810-0683 (Federal Register, August 20, 2010 and November 24, 2010)

Dear IC Docket Manager:

Please find comments regarding the revision of the Minimum Data Elements (MDE) for the Migrant Student Information Exchange (MSIX).

With respect to the first proposed new Data Element, School District ID, while we have no problem with this being added for school year programs, this requirement presents a very significant problem for summer programs which are not held in school district property or with the assistance or support of local districts. What are states to do in that kind of situation? Further, what are states to do when services are provided by a non-profit entity to serve pre-school and out-of-school youth, even during the time when school is in session? Out-of-school youth are a growing and important component of the migrant education student community and it would be helpful for states to know how to populate this data element in the aforementioned non-school year or non-school based situations. We are concerned about how helpful this proposed data element, as currently explained, would be for a large number of migrant students whose records are found in MSIX.

With respect to the second proposed new Data Element, District of Residence, we do not understand what this means. Each time a migrant student is provided services, the student, under law, "resides" in that district. We do not think that is likely what the Department intends to find out with this new element. If it is, this information is not particularly helpful or necessary, given the rationale for the first proposed MDE above. In addition, where services are provided on a regional basis, this element has little or no meaning. The two first elements would also appear to be contradictory, one with the other. Further, we do not understand how this information is

helpful to a "receiving" district if the child is not attending school, when the student is out-of-school youth or a pre-school child.

With respect to the third proposed new Data Element, School Type, at what juncture does the state make this determination? What if the child is enrolled in a summer program that does not use school or district facilities, as often happens? How is this to be answered? We are aware that EDfacts has definitions that would be helpful here and these explanation should probably be incorporated by reference.

With respect to all three proposed Data Elements listed above, greater thought needs to be placed on how states with summer and non-school based programs would respond to these Elements and more specific explanations of the elements would be extremely helpful.

Finally, with respect to the request for SAT or ACT scores, this is not information that most states and even most school districts have for individual students. How is this to be collected? We are concerned about how helpful this information would be to plan instruction or to indicate college readiness. Many low income children or children of color do not perform well on these tests and yet may have mastered curriculum or be college ready. We are concerned that this data could be used to the student's detriment, especially by non-migrant personnel.

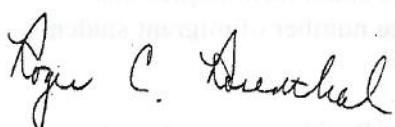
Would any of the above be required elements? That would pose an extraordinary problem for many states.

In our view, one of the most important pieces of information would be performance on school/state assessment tests. We urge the Department to make populating those Data Elements which treat data regarding Assessments, a high priority for states. This is information which would be enormously helpful in guiding students with respect to remedial work, curricular choices, and college readiness.

Because of the issues raised above, these proposed new data elements do not appear to meet the criteria set forth in the December 9, 2010 memorandum to the state migrant education directors from Lisa Ramirez. We do not understand how these elements (1) allow greater ability to share migrant student records where there are intrastate moves; (2) determine student progress towards meeting college readiness; and (3) would be that helpful in many situations to determine the type of school attended.

We would be happy to supplement this written response to the Proposal, if needed.

Sincerely,



Roger Rosenthal
NASDME Executive Consultant

cc: Lisa Ramirez, Office of Migrant Education

Illinois Migrant Council

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December 22, 2010

Dr. Lisa Ramirez
Director, Office of Migrant Education
Office of Elementary and Secondary Education
400 Maryland Ave., SW
Washington, DC 20202

Dear Dr. Ramirez:

We appreciated the opportunity to review and comment on the renewal of the Migrant Student Information Exchange (MSIX) Minimum Data Elements (MDE). Our comments follow:

1. School District ID—*If an EDfacts-assigned school district identification number is required, there must be a process in place to ensure that all MEP-funded LOAs that are not school districts can obtain an NCES code.*

For EDEN submissions, States may already be matching Edfacts data to their codes for the school districts that serve migrant students, so this may not be a problem. The real issue is making certain that States are aware of the process by which a code can be requested for entities providing MEP services that are not school districts. Summer MEPs as well as programs operating through non-profit organizations, often to serve pre-school children or out-of-school youth (OSY), may not have an Edfacts-assigned school district identification. With the growing population of OSY in the MEP and, hopefully, the increase in services provided to them, it is essential that we make adequate provision in MSIX for all institutions of MEP service delivery.

2. District of Residence—*District of Residence should not be required.*

The District of Residence has little relevance for many Summer MEPs. A project may operate in a particular school district building during children's time of residence in the community, but the local school district may or may not be administering the project. In any case, students are not "enrolled" in the district during the summer program; therefore neither the State nor the district maintains data on students' participation. Data are maintained by the MEP.

In addition, states like Illinois operate summer MEPs on a regional basis, so one project may serve children from a variety of different school districts. In many cases, these children are pre-school, out-of-school or in residence for such a short period of time that the local school district is not aware of their presence and never enrolls them. MEP recruiters are familiar with their recruiting region; they are not necessarily aware of school district boundaries for each of the districts included in that region. Adding this element to their workload would be very burdensome, while its benefits would be extremely limited.

3) School Type—*The addition of school type is not a problem but is likely to have little impact on purposes of school enrollment.*

Illinois has no issue with this item, although the number of private schools in which migrant students enroll is few.

4) SAT Score—*If the SAT score is included as an added data element value, there should be no expectation that it must be reported for secondary students.*

The SAT is a voluntary test that students elect to take; students send their scores to the institutions of their choice. Therefore, the high school that the student attends does not necessarily get this information. How would the MEP collect it? This would be extremely burdensome.

5) ACT Composite Score—*If the ACT Composite score is included as an added data element value, there should be no expectation that it must be reported for secondary students.*

In most states, the same issues regarding the SAT listed above would apply. In Illinois, since the ACT is part of the State's 11th grade test, the Prairie State Achievement Examination, the score is stored in the State database and could be retrieved for transfer to MSIX. That would certainly not be the case in many other states.

While SAT and ACT scores are "nice to have", they do not seem to meet the standard that was set for determination of other MSIX minimum data elements in that they go beyond ensuring that a student graduate from high school, one of the main purposes for which MSIX was developed.

Suggestions for Additional Data Elements

We respectfully request consideration of the following two data elements as additions to the MDE:

- 1) **Date of Residence:** Rather than District of Residence as indicated above, it would be far more helpful to have the Date of Residence as a data element on MSIX in order to have information on children's moves and lengths of residence. Currently, MSIX includes only the QAD and "to and from moves" associated with that QAD.
- 2) **Qualifying Activity:** This information is an essential part of QAD information and eligibility determination and should be included in MSIX.

If additional information is needed, please contact me at 312-663-1522 ext 233 or brenda_pessin@msn.com. Thank you.

Sincerely,



Brenda Pessin, Director
Migrant Education Services

Cc: Robin Lisboa
 Beth Robinson

Memorandum

To: *oira_submission@omb.eop.gov*

CC: *ICDocketMgr@ed.gov*

From: **Vaughn A. Murray**

Date: **Wednesday -- December 23, 2010**

Reference: **Comments on the proposed changes to the MSIX MDE.**

After reviewing the proposed changes to the MSIX Minimum Data Elements, I have the following comments and suggestions:

- General Revisions Comment – I appreciate the comments and the revisions made since the original submission. This certainly makes revisions to the MDE much better than originally proposed and I appreciate the Departments willingness to accept these suggestions.
- Need for Enrollment Comment or Flag – For anyone who works with migrant students, they know that much of the data is simply not “cut and dry” when dealing with this population. There are various nuances that simply can’t always be described via existing fields and those reviewing the records may not even know there are special circumstances. For this reason, I believe that there should be a method to provide comments, per enrollment record. This could be used to supply comments on the enrollment itself, but more likely dealing with associated course and/or assessments. It might need to be made clear in the instructions that things such as protected health (or other personal) information should not be included. If the addition of a comment is not possible or there is concern as to what may be inappropriately included, then a field with a flag “Enrollment Special Conditions” (Y/N) should be created and this would at least alert the viewer that they should contact the school or project for more information. If the “flag only” option is used, there should be a field for “Special Condition Contact” to contain the name and number (or email) of who to contact for more information. This could probably be obtained by delving into other resources but would be much easier if provided along with the flag.

The above comments are my personal observations, based on nearly 20 years of Migrant Data experience and being a part of the development of MSIX, prior to it even being called MSIX. My comments do not necessarily reflect those of my employer, CSIU or those of the Pennsylvania Migrant Education program. Thank you for the opportunity to allow me to provide my comments on this important data collection.

STATE OF ALASKA

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December 23, 2010

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Office of Management and Budget
725 17th Street, NW. Room 10222, New Executive Office Building
Washington, DC 20503

Re: Migrant Education Program (MEP) Migrant Student Information Exchange (MSIX) and Minimum Data Elements, OMB Control Number 1810-0683

Dear Officer,

Please accept these comments regarding the proposed changes to the MSIX Minimum Data Elements.

- School District ID – the description should be changed from the “EDfacts-assigned school district identification number” to “the NCES district identification number.” Also, the description of the School District Name and School District ID should clearly state that this is the district of enrollment, not residence. Our state supports use of this new data element.
- District of Residence – It is unclear if this would be one field with a district of residence name. Similarly for the school district of enrollment, there should be a name field and an NCES identification number field for the district of residence.
- SAT score – it will be important to define exactly what SAT score should be reported. The current SAT Reasoning Test has 3 scores reported – Critical Reading, Mathematics, and Writing. The maximum score for each is 800, with a combined total maximum of 2400. Will there be an expectation that these three subject scores be totaled for one combined score? Also, some students take additional SAT subject tests. Collecting and reporting additional optional SAT scores would be an additional data burden that would not provide meaningful data for all migrant students.

Sincerely,



Margaret MacKinnon
Title I/NCLB Administrator