



STATE OF VERMONT
DEPARTMENT OF EDUCATION
120 State Street
Montpelier, VT 05620-2501

September 6, 2006

Office of Information and Regulatory Affairs
Attention: Rachel Potter
Office of Management and Budget
725 17th Street, NW, Room 10222
New Executive Office Building
Washington, DC 20503

Re: Annual Mandatory Collection of Elementary and Secondary Education Data for the Education Data Exchange Network (EDEN)

Dear Ms. Potter,

I am writing with Vermont's response to our review of the Education Data Exchange Network (EDEN) collection, OMB number 1875-0240-v.1. In my comments to The U.S. Department of Education I stated the USED has not met its responsibility to prove that these data, requested at the school, local and state level, are necessary for the USED to function properly. Making this data collection mandatory forces states to collect unnecessary information from schools with no explanation of why it needs or wants the data. USED's response to comments, located in Attachment E provides little insight as to why the additional data are required, other than to say that The Secretary is empowered by Congress to request it.

USED's current request is now adding to the states' burden by moving the Civil Rights Survey, currently collected from selected districts, to the EDEN system, and making submission mandatory. In Vermont 119 of 284 districts have been selected to participate in the Civil Rights Survey for the 2006-2007 school year. Very little of the data requested in the Survey is presently collected by the State of Vermont. To quote from Attachment B-4,

"Although the Department proposes collecting these data groups directly from the LEAs in 2006 (and has historically collected similar data directly from LEAs for the purpose of Civil Rights collection), it is our intent to move this collection

to the EDEN Submission System in the future and ask state education agencies to submit the data for their LEAs. We plan to specify in our 2007-08 paperwork submission request that all Civil Rights data groups and categories be included in the EDEN Submission System beginning with 2007-08."

USED's proposal is shifting this burden from the school districts to the state. The SEAs would have to develop and build the capacity to collect these data at the state level, simply because USED says that we must, with the added implication that the state would also be accountable for the quality of the data. It is further implied that we must do so without additional funding.

The Vermont Department of Education would only be able to accommodate this added requirement if the USED provided grants to develop and build the required system, as well as to waive the data requirements until the system is built, tested and implemented.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard H. Cate". The signature is fluid and cursive, with the first name "Richard" being the most prominent part.

Richard H. Cate
Commissioner