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REPORT TO THE CONGRESS



LM097073

Data-Reporting Requirements For State And Local Educational Agencies

Education Division

Department of Health, Education, and Welfare

**BY THE COMPTROLLER GENERAL
OF THE UNITED STATES**

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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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41 To the President of the Senate and the
Speaker of the House of Representatives

This is our report on data-reporting requirements imposed upon State and local educational agencies. Most of these requirements are generated by the Education Division, Department of Health, Education, and Welfare, in administering Federal education programs.

Our review was made pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

We are sending copies of this report to the Director, Office of Management and Budget, and the Secretary of Health, Education, and Welfare.

A handwritten signature in cursive script that reads "James B. Stacks".

Comptroller General
of the United States

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ABBREVIATIONS

ESEA	Elementary and Secondary Education Act
GAO	General Accounting Office
HEW	Department of Health, Education, and Welfare
LEA	local educational agency
OE	Office of Education
SEA	State educational agency

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

DATA-REPORTING REQUIREMENTS
FOR STATE AND LOCAL
EDUCATIONAL AGENCIES
Education Division
Department of Health, Education,
and Welfare

D I G E S T

WHY THE REVIEW WAS MADE

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The Congress has been concerned about the paperwork requirements placed on State and local educational agencies by the Education Division of the Department of Health, Education, and Welfare (HEW). The Chairman, House Committee on Education and Labor, was especially concerned that the Congress had no studies or other evidence demonstrating the magnitude of these requirements. Because of this, GAO

--reviewed applicable legislation and regulations to determine data-reporting requirements for selected programs administered by the Office of Education, the largest component of the Education Division, and

--discussed Federal education program paperwork requirements with State and local educational agency officials. (See ch. 2.)

FINDING AND CONCLUSIONS

Basic situation

The Elementary and Secondary Education Act of 1965 signified a new era in Federal aid to education.

A significant increase in data-reporting requirements accompanied Federal assistance created by the act.

In fiscal year 1973, the Office of Education administered about \$6.2 billion for 119 categorical contract and grant programs--including 32 with funds allocated to States by mathematical formulas specified in the legislation and 74 awarded on a competitive basis for specific purposes. About 70 programs directly involved local educational agencies.

The Office of Education estimated that for fiscal year 1973 it required all participants to complete 43.4 million data items--discrete pieces of information--and to spend about 2.2 million staff-hours. State and local educational agencies had to supply about 11.2 million data items using about 700,000 staff-hours. (See pp. 1 and 2.)

GAO did not independently evaluate whether the data being gathered was essential because an Office of Education Task Force was charged with considering data needs. (See p. 14.) Instead, GAO evaluated the Task Force's operations as well as the Office of Education and other agencies' attempts to simplify participation in the programs.

The organization which maintained the Task Force--the National Center for Educational Statistics--was moved from the Office of Education in August 1974 to HEW's Office of the Assistant Secretary for Education. Its name was changed to the National Center for Education Statistics. (See p. 17.)

State and local responses

State and local officials perceive serious paperwork problems within Federal education programs, although their measure of the magnitude of the problems varied by size of the local agency. In general, the larger the agency, the more burdensome each program's paperwork was considered. (See p. 6.)

Excessive detail and redundant information requests were identified as the primary causes of paperwork problems. The application process was considered the single most burdensome phase. (See p. 9.)

State and local agency perceptions may or may not be valid, depending upon the need that the Office of Education might have for essential program data. Several of its officials believed that the reporting requirements for their programs were not excessive.

Part of the problem may be that local agencies do not understand the need for certain information. Only 30 percent of all local agen-

cies surveyed received feedback routinely on information submitted to the Office.

Most State and local officials GAO talked with believed that standardizing terminology, reporting requirements, and reporting formats and providing more advance notice of changes in reporting requirements would help alleviate the paperwork burden. (See pp. 13 and 14.)

Attempts at data management

This is a complex process of balancing the needs of the public, the Congress, the President, other Federal users, and Education Division program managers against the efforts of State and local education officials to provide data.

The primary goal is to minimize the burden without impairing either program management or the users' ability to obtain information needed.

The legislative reporting requirements for the major education programs allow the Office of Education discretion in determining data-reporting requirements for State and local agencies.

The Task Force for Planning Acquisition of Data has been the primary activity to coordinate and control data requests, but its effectiveness has been limited. (See pp. 17, 18, and 19.)

Attempts to simplify participation in Federal education programs

Apart from efforts at overall data management, the Office of Education and other Federal agencies have begun several programs to reduce the paperwork and simplify

participation in Federal assistance programs. But Education Division efforts to simplify participation have been fragmented and have met with limited success.

Efforts outside the Division to simplify participation have had and will have only a slight impact in reducing the paperwork. (See p. 26.)

A central focus is needed to insure that these efforts will result in reduced burden and timely data collection and reporting. A properly operating Task Force could provide this focus. (See p. 26.)

RECOMMENDATIONS

The Secretary of HEW should:

- Develop ways to better inform State and local agencies of the intended use of data the Education Division requests, including ways to provide feedback to local agencies.
- Standardize terminology and formats for reporting requirements.
- Provide more advance notice for changes in reporting requirements. (See p. 15.)
- Devote more attention and sufficient resources to data coordination efforts, specifically the Task Force.
- Provide that the Task Force become more in-

involved in reviewing data justifications.

- Give program officials written guidelines and criteria for data collection to help insure adequate data justifications. (See p. 20.)
- Establish an organizational focal point for current and future Education Division efforts to simplify participation in Federal education programs and give such an organization sufficient authority to insure that these efforts (1) are integrated with the overall management of data acquisition and (2) consider State and local needs for data. (See p. 27.)

AGENCY ACTIONS AND UNRESOLVED ISSUES

HEW generally agreed with GAO's recommendations, stated that actions had been or would be taken to implement them, and observed that program evaluations prescribed by law generated a significant part of data required from State and local agencies.

However, HEW stated that the types of standardization GAO recommended should not be done by legislation. Rather, the Congress could designate a legislative staff or agency with which the Education Division could confer on such issues as statistical classification and definition of data requirements.

In the Education Amendments of 1974 (88 Stat. 484), the Congress acted to better specify the kinds of information it needs to evaluate education programs. If HEW develops its data requirements to be responsive to the needs of the

Congress, it should help assure that only the data necessary for program administration and congressional oversight and legislative responsibilities will be requested from State and local educational agencies.

HEW also stated that giving State educational agencies more advance notice of changes in reporting requirements is not practical. HEW will, though, determine whether it can help the State agencies provide such notice to local educational agencies. (See p. 15.)

Current priorities, HEW noted, would not permit re-allocating resources to conduct systematic and comprehensive reviews of data jus-

tifications. HEW stated that, within existing resources, the Education Division would use an automated data catalog and table index to assist requesting offices in their own justification reviews. (See p. 20.)

HEW cautioned that designating a focal point for efforts to simplify participation in Federal education programs should not in any way diminish such responsibility on other Division organizational units. (See p. 27.)

MATTERS FOR CONSIDERATION
BY THE CONGRESS

The Congress should find this report useful in considering new or amendments to existing legislation.

CHAPTER 1

INTRODUCTION

The Department of Health, Education, and Welfare (HEW) administers more domestic programs than any other Federal agency. In recent years one of the fastest growing components of HEW has been the Education Division. The largest part of this Division is the Office of Education (OE), which administers programs designed to promote equal educational opportunity for all children and youth and to encourage changes to improve the Nation's educational system.

From its inception in 1867 until 1950, OE was concerned basically with gathering statistics on the condition and progress of education in the Nation. During that period, relatively small programs were established to deal with land-grant colleges and vocational education and to provide financial relief for school districts affected by Federal activity.

In the 1950s the financial relief program was expanded and OE's function was broadened considerably with the passage of the National Defense Education Act of 1958 (20 U.S.C. 401). By 1964, OE administered 35 programs funded at about \$702 million. In 1965 the passage of the Elementary and Secondary Education Act (ESEA) (20 U.S.C. 241a) signaled a new era in Federal aid to education, and by fiscal year 1973 OE was administering 119 contract and grant programs funded at over \$6.2 billion.

For the most part, Federal funds for education are made available on a categorical basis, in that funds are awarded for specific purposes rather than for general aid. OE distributes program grant funds either by formula grants to the States using mathematical formulas specified in the legislation or by project grants awarded on a competitive basis. In fiscal year 1973, 32 grant programs were in the former category and 74 were in the latter. The remaining 13 programs involved contract awards. In the case of formula grants, funds are generally allocated to the State educational agencies (SEAs) for further distribution to local educational agencies (LEAs). In all, about 70 programs directly involve LEAs.

Accompanying the new thrust in Federal education assistance was a correspondingly significant increase in data-reporting requirements placed on grant and contract recipients. For fiscal year 1973 OE estimated that it required respondents--the parties ultimately responsible for preparing forms--to furnish about 43.4 million data items which required 2.2 million staff-hours of effort. Of

these totals, SEAs and LEAs were required to directly supply about 11.2 million data items (26 percent of the total) using about 700,000 staff-hours (32 percent of the total). In addition, about 28.3 million data items were required from administrators, principals, teachers, and pupils involving about 1.4 million staff-hours. Although OE did not include these in SEA and LEA estimates, meeting the requirements undoubtedly involved some effort on the part of both.

Included in these requirements are those originated by the National Center for Education Statistics, which routinely gathers information from random samples of SEAs and LEAs on the status of education in the Nation. The Center, formerly known as the National Center for Educational Statistics, was a part of OE until August 1974. Public Law 93-380 established the Center within HEW's Office of the Assistant Secretary for Education. In fiscal year 1973, the Center conducted 24 surveys requiring selected SEAs and LEAs to submit about 1.5 million data items which took about 200,000 staff-hours to gather.

Because the data requirements placed upon SEAs and LEAs have been increasing, we attempted to identify (1) Federal education programs having substantial paperwork requirements, (2) the perceived causes of and suggested solutions to the problem, and (3) the program phase or area which respondents viewed as burdensome. We also examined OE's process for managing paperwork and minimizing respondent burden, including past and current data consolidation efforts.

ORIGIN OF PAPERWORK REQUIREMENTS

OE attempts to gather data to satisfy the needs of all users. Primary users include the Congress; those engaged in planning and managing education programs at the Federal, State, and local levels; persons involved in educational research--either public or private; and others, such as authors and commercial producers of instructional material.

The types of information needed are as diverse as the classes of users. On the basis of discussions an OE consultant had with congressional committee staffs, the Congress needs data which lends itself to analyses directed toward future legislation and policy matters. Examples of congressional data needs include:

- Public and nonpublic school finance problems.
- School attendance figures.
- Income levels of students and attendance patterns.

In addition to these specific needs, the Congress needs general information on program evaluation, civil rights, and higher education.

In contrast to congressional needs, OE program managers need specific data, such as enrollment, age distribution, per pupil expenditure, the number of teachers and administrative staff, and pupil achievement on individual programs they administer.

THE PAPERWORK PROCESS

Once the Congress enacts legislation, OE must determine the data it needs to meet any congressional reporting requirements and to manage the program. Program personnel are responsible for drafting proposed regulations and guidelines, including data requirements for administering the programs. The paperwork process includes the project applications, program and financial reports, and evaluation reports.

In general, the process is as follows. The LEA prepares an application which is reviewed by either or both the SEA and OE depending on the particular program's requirements. Once the LEA receives a grant or contract it must prepare certain reports regarding the program's status. The number and types of reports vary from one program to another, but minimal reporting requirements include periodic financial data and an evaluation or final report upon project completion. For some programs, LEA reports are combined by SEAs into State self-evaluation reports. In addition to requiring the self-evaluation reports, OE performs independent evaluations of most programs. In these instances OE program offices, the National Center for Education Statistics, or OE's contractors often devise questionnaires or other data-gathering instruments to obtain evaluative and statistical information.

Apart from the Federal requirements, SEAs may also impose their own data-reporting requirements upon LEAs.

SCOPE OF REVIEW

Information from the State and local levels was obtained primarily through interviews conducted at 84 LEAs and 10 SEAs. About three-fourths of the LEAs selected were in the Atlantic seaboard region and one-fourth were in the Pacific coast region. On the basis of student enrollment, about 25 percent of the LEAs selected were classified as small (0 to 2,500 pupils), 50 percent as medium (2,501 to 39,999 pupils), and 25 percent as large (over 40,000 pupils). A complete list of LEAs and SEAs visited is shown in appendix I.

We reviewed applicable legislation and regulations to determine data-reporting requirements for selected OE programs. We also held discussions with Federal program administrators at OE headquarters and three HEW regional offices; reviewed policies, procedures, and guidelines regarding paperwork management and control; and inquired into past and current efforts to reduce and/or consolidate educational paperwork requirements.

In addition, we discussed the paperwork problems with officials of the Office of Management and Budget and the Council of Chief State School Officers--a cooperative action group composed of State superintendents and commissioners of education in the 50 States and the territories.

CHAPTER 2

VIEWS OF SEA AND LEA OFFICIALS

We discussed Federal education paperwork requirements with SEA officials in 10 States and officials of 84 LEAs in these States. (See app. I.) We wanted to

- determine their reaction to the types and amount of paperwork associated with federally funded education programs;
- determine what they thought were the causes of paperwork problems and the governmental level responsible for most of the paperwork; and
- explore with them ways in which the paperwork, if considered unnecessarily burdensome, could be reduced and good program management and control maintained.

MOST BURDENSOME PROGRAMS

We asked respondents to classify their perception of the paperwork requirements for various programs as slight, moderate, substantial, or excessive. The majority of respondents classified programs authorized under the following legislation as having substantial or excessive paperwork requirements:

- Title I (20 U.S.C. 241a) and title III (20 U.S.C. 841) of ESEA, as amended, which authorize programs for educationally deprived children and supplementary educational centers and services, respectively.
- The Adult Education Act of 1966, as amended (20 U.S.C. 1201), which authorizes programs enabling adults to complete their secondary education.
- The Vocational Education Act of 1963, as amended (20 U.S.C. 1241), which authorizes programs to assist States to maintain, extend, and improve vocational education.
- School assistance in federally affected areas (20 U.S.C. 236), which provides assistance to LEAs with a financial burden as a result of Federal activities.

Also, although only 34 (40 percent) of 84 LEAs we visited participated in the Emergency School Aid Act (20 U.S.C. 1601),

a majority considered the paperwork requirements related to this legislation to be substantial or excessive.

SEAs and medium and small LEAs perceived ESEA title I to be the most burdensome. Large LEAs viewed the Emergency School Aid Act program as the most burdensome. Vocational education was ranked second by SEAs and large and medium LEAs, whereas small LEAs considered that the Emergency School Aid Act program had the second largest paperwork burden. All respondents except large LEAs ranked ESEA title III's paperwork requirements as the third most troublesome. Among all LEAs, programs for the handicapped presented the fewest paperwork problems.

Analysis of responses indicated that the larger LEAs generally perceived the paperwork requirements for all programs as burdensome. Apparently, the larger staffs at these LEAs did not compensate for what the officials perceived as a paperwork burden.

ESEA title I

According to interview responses, 74 (89 percent) of the 83 LEAs participating in the ESEA title I program and 7 of 10 participating SEAs thought that the paperwork requirements involved were substantial or excessive. The aspects which most respondents considered burdensome were the application, comparability, and evaluation processes. The application and evaluation processes were described in chapter 1. The comparability process requires that all LEAs having more than \$50,000 in title I funds or more than one school providing title I services determine and demonstrate to the SEA that the services provided to title I schools with State and local funds are equal or nearly equal to the services provided to non-title-I schools. The process is aimed at insuring that ESEA title I funds are used to supplement rather than supplant existing services as required by law.

State and local officials' comments concerning the problems experienced with title I application and evaluation phases included the following:

"The information required must be quite detailed * * *. Monitoring of the program forces one to pay excessive attention to very specific program objectives. In addition virtually every action, purchase, or decision must be specifically documented."

"Too many reports are due [there is no] complete understanding on what is to be measured * * *."

Typical of the comments from LEA officials regarding difficulties in gathering comparability data for the program were:

"Many school systems lacking a computerized process for obtaining necessary information are required to spend hours analyzing information * * *. An example is the data required on the Title I Comparability Report * * *."

"Comparability * * * for a large school system involves an astronomical amount of detailed information * * *."

"Excessive detail [is] required for comparability reporting * * * [much] work [is] involved in determining * * * and maintaining eligibility."

The number of forms and reports completed by SEAs and LEAs varies. The following table shows the volume of ESEA title I forms and reports prepared by two SEAs and four LEAs during fiscal year 1973.

	<u>Forms</u>		<u>Reports</u>	
	<u>Number</u>	<u>Total pages</u>	<u>Number</u>	<u>Total pages</u>
Maryland:				
SEA	30	150	3	383
LEA 1	9	150	5	47
LEA 2	9	122	5	48
Virginia:				
SEA	13	118	5	99
LEA 1	10	281	11	350
LEA 2	10	289	2	92

The majority of these forms and reports were prepared to meet both OE and SEA requirements. We could not determine, however, how many of the SEA requirements were established to meet OE data needs.

Programs in adult, vocational,
and technical education

Operation of these programs involved substantial or excessive paperwork for 51 (70 percent) of the 72 participating LEAs and 6 of 10 participating SEAs. Respondents viewed the application and financial reporting phases as most burdensome. Most respondents attributed the paperwork problems associated with vocational education programs to the fact that information requirements were redundant and required excessive detail.

ESEA title III

Officials of 31 (65 percent) of the 48 participating LEAs and 5 of 9 participating SEAs believed that ESEA title III involved substantial or excessive paperwork requirements. Large LEAs in particular viewed the program's paperwork requirements as troublesome. The application and evaluation processes were the most frequently mentioned problems by all respondents. Officials from over 50 percent of the SEAs and nearly 50 percent of the medium LEAs stated that this program required too much detail.

School assistance in federally affected areas

Responses from officials of 32 (53 percent) of the 60 participating LEAs and 4 of 9 participating SEAs indicated that this program involved substantial or excessive paperwork requirements. Most SEAs considered the program's application process burdensome while LEAs believed collecting required student data from parents was the greatest problem. Respondents stated:

"For [this program] pupil data must be collected from every student in the county; data collection of this nature is automatically classified as excessive."

"* * * often parents do not want to cooperate or do not read instructions which results in the problem of verifying information that is omitted or incorrect."

Emergency School Aid Act

About 25 (74 percent) of the 34 LEAs participating in the program and 3 of the 9 participating SEAs believed that the programs' paperwork requirements were substantial or excessive. The application process was considered the most burdensome at both the State and local levels. Difficulties also were reported with reapplication, financial reporting, and evaluation processes. Problems mentioned frequently by LEAs included excessive detail, redundancy, and complex instructions. Many respondents considered data requirements for program objectives and descriptions to be excessively detailed. The following comments by LEA and SEA officials provide some insight into the program's paperwork problems:

"Under [this program we] have to report by categories other than the way in which records are maintained."

It appears [OE is] more concerned with minute detail rather than the values of the program."

"There is duplication and excessive detail in the application of * * * Emergency School Aid Act."

"[This program] requires a tremendous amount of data in the application procedure, much of which has already been reported to USOE in one form or another."

CAUSES OF PAPERWORK BURDEN

For most programs, SEAs and LEAs considered the major paperwork problems to be the excessive detail required within reports and redundant information requests. These problems were noted most frequently in ESEA title I reporting requirements. The Emergency School Aid Act, vocational education, and ESEA title III programs also were classified as requiring excessive detail and redundant information.

Other problems noted by SEAs and LEAs included the number of required reports, complex instructions, and unobtainable data.

Excessive detail

The most often mentioned paperwork problem was excessive detail required on forms and reports. The ESEA title III State plan was often cited as an example. According to State officials, the plan must be completely rewritten each year even though some sections do not change. These officials said that OE has required them to address the assessment of state-wide educational needs in each year's plan since the late 1960s. While State officials agree with the needs assessment concept, they said it has been discussed in sufficient detail and over an adequate time period. In their opinion, OE continues to demand from SEAs excessively detailed data in these assessments without considering what will be achieved by its collection. In their view it is time to move on to how these needs will be met.

The OE title III program director, in recognition of the problems cited by SEA officials, has proposed that, beginning with fiscal year 1975, States be allowed to submit amendments for required sections of the plans--instead of completely rewritten plans--and assurances that other sections are still in effect.

Officials from large LEAs and some States noted that excessive detail in financial reports also poses a problem. One SEA official stated that under the letter of credit

system, OE uses a nine-digit Federal grant numbering code to account for funds. The SEA also uses this code to account for its funds and make periodic financial reports to OE. The grant number changes each fiscal year; therefore, programs or projects of a continuing nature must be monitored through several codes. An SEA financial official said some of the reporting burden would be alleviated if States were permitted to account for funds on a program basis in lieu of the Federal grant basis.

Another SEA official believed that the amount of detail in required reports is the result of OE's interpretation of legislative intent and the increased emphasis on audits. She pointed out that ESEA title I illustrates the excessive detail required for program application purposes. She told us that OE previously requested overall information on educational deprivation, such as the number of children in the schools that are behind grade level in achievement, but OE now requires the information to be subdivided by grade and extent of deprivation.

Title I program officials at OE did not believe that reporting requirements for the program were excessive.

Redundant information requests

SEAs and LEAs considered redundancy to be the second major cause of paperwork problems. Some problems previously discussed, such as OE's requirement that certain State plans be rewritten every year, may require LEAs to supply data that has been submitted previously. Several State and local officials cited other examples of this problem.

For instance, an SEA official said the State's annual ESEA title III report, required by OE, showed the dates on which the title III advisory council met. Sometime after the report was submitted, OE requested information concerning the number of council meetings held even though this could have been computed using the information already reported. The OE official said the information was not provided correctly at first.

According to an SEA official, one section of the 1974 State plan for vocational education required information already published in the Federal Register. Also, two sections of the plan included enrollment data which had already been submitted to OE on other forms. An OE official stated that the information and enrollment data were slightly duplicative, but added that the plan and forms were used for different purposes.

Number of required reports and scheduled submission dates

Many LEAs cited the number of required reports and the scheduled submission dates as problems in meeting data-reporting requirements. Numerous medium-size LEAs complained about the number of required reports for adult, vocational, and technical education programs. OE requires eight separate reports in addition to the State plan and application for programs authorized by the Vocational Education Act, as amended. However, an OE program official did not believe that reporting requirements were excessive, and only the minimum amount of data needed to manage the program was collected.

In one case, LEA officials said data requirements were excessive because program planners and evaluators have differing philosophies regarding program operation and therefore require different documentation. One respondent said the LEA often participates in more than one program and the reporting requirements of these programs overlap.

Ambiguous terms and complex instructions

A number of SEA and LEA officials said that ambiguous terms and complex instructions for data reporting increased the burden on their staffs. Examples of ambiguous terms cited by respondents include: "fiscal year," "disadvantaged," "handicapped," and "full-time equivalent." The ambiguity of terms and lack of standard terminology led to differing interpretations and caused problems, such as

- redundant requests for the same data by different sources;
- additional work to supply data which had been requested before but, because of lack of clarity in the request, was not provided; and
- confusion, and perhaps nonresponse, by data request recipients.

An LEA official said that minor differences in interpretation often require additional work for the LEA because the data submitted initially did not meet OE's interpretation. For example, one LEA official stated:

"[LEA] interpretation of Federal guidelines differ with those held by the State Department of Education. The result is a revision of proposals and excessive detail."

A State official cited confusing definitions of operational periods for the Consolidated Program Information Report. (See ch. 4.) For example, fiscal year data is requested for numerous programs, yet ESEA title III operates on a different fiscal year basis than other programs included in the report. The official stated that the report also requests data on programs for the disadvantaged and the handicapped and on vocational education programs but permits a student to be counted only once. Therefore a handicapped student from a low income family, enrolled in a vocational education course, would be counted as one student even though he might participate in three programs.

National Center for Education Statistics officials told us, however, that the Center accumulates that data in two ways to avoid duplicate counting. First, the LEAs are instructed to assign each program participant to all pupil groups under which he or she might fall. The LEAs are also instructed to assign each participant to the one group under which he or she received the most significant treatment with Federal funds.

Unobtainable data

Several SEA officials mentioned that OE requires data for various programs that cannot be obtained at the time it is requested. For example, OE requires actual financial data for the ESEA title III State plan as of a submission date which precedes the end of several States' fiscal years. In this case the States can provide only estimated data. In most instances OE has accepted the estimates but has delayed approving the plans until the States supplied the actual figures--in essence causing duplicate reporting for that part of the State plan.

One SEA official said that, although OE requires the SEA to obtain ethnic group data for certain programs, under existing civil rights legislation the SEA cannot legally ask this question of individual program participants. Therefore, the data provided are aggregate estimates. OE uses this data to report the impact of program activity on various minority groups. An OE official said that he was aware that much of the data reported by States was estimated, but that this was better than no data at all for his purposes.

OE also requires followup data on former program participants. One SEA official said actual data is difficult to obtain once the student leaves the program; most of the information provided in this section consists of estimates.

In some instances unexpected reporting format changes result in requests for data which is not readily obtainable. For example, a State official said that several years ago

the ESEA title I reporting format was changed. Since the State did not receive either advance notice of the revised format or the new form until after the data required under the old format had been collected from LEAs, the State was unable to provide certain data required on the revised form. To complete the new report, the SEA had to request additional information from the LEAs. Respondents mentioned several other examples of changed reporting requirements which necessitated additional SEA or LEA effort.

SUGGESTIONS FOR REDUCING THE BURDEN

Most of the SEAs and LEAs we visited suggested similar ways to ease the existing burden caused by OE's data reporting requirements, including:

- Standardizing terminology for all programs, including instructions for planning, implementing, and reporting.
- Standardizing reporting requirements and formats.
- Providing the States more advance notice of contemplated changes in applications and reporting requirements.

Many officials thought that consolidating programs with similar objectives and providing advance funding would allow for better planning and hence reduce the need to rewrite applications. In addition, several officials suggested that consolidated applications for programs with a similar purpose, such as aiding educationally disadvantaged children, would reduce the burden considerably.

OTHER COMMENTS

Almost all SEAs and LEAs surveyed indicated a desire to receive program, financial, and evaluation information from higher levels. The LEAs said they would use such feedback for (1) program budget and evaluation comparisons with other LEAs, (2) project descriptions, and (3) budget and program planning. SEAs want feedback, primarily from OE, for similar purposes.

Most LEA respondents said they could not evaluate the usefulness of data collected by OE because they receive either no feedback or inadequate feedback on the information they furnish. Respondents frequently questioned whether the data they provided was used and, if so, how and by whom.

Only one-third of the LEAs said that they routinely received feedback from OE, whereas all SEAs said they had received such information. About 70 percent of the LEAs we visited had routinely received feedback from SEAs on information submitted for Federal programs, but many said it was

not adequate. Nearly all LEAs that requested specific information from OE and from SEAs received it. One OE official told us that the lack of greater routine feedback to LEAs could result from some SEAs' failure to transmit the information to them after it had been received from OE.

According to HEW officials, a management bulletin regarding the fiscal year 1972 Consolidated Program Information Report was released in July 1974 and eight other bulletins on the same report were in progress. They are exploring other mechanisms to provide feedback to SEAs and LEAs.

CONCLUSIONS

The responses that we received from SEAs and LEAs indicate that they perceive serious paperwork problems in connection with Federal education programs. On the other hand, several OE officials said reporting requirements were not excessive. The perceptions of SEAs and LEAs may or may not be valid considering the need that OE might have for essential program data. We did not attempt to make such a judgment. Rather, we evaluated the operation of the OE Task Force for Planning Acquisition of Data which was supposed to determine data needs and insure proper justifications for data obtained from State and local respondents. (See ch. 3.)

Most LEAs apparently did not understand the need for the data that they were requested to provide, and this may have influenced their views. One way for the Education Division to increase LEAs' understanding is to improve the feedback of data collected. It seems likely that improved feedback will foster improved compliance with OE data requests. The respondents can also use this feedback for their own purposes, such as planning and evaluation.

Most LEA and SEA officials we talked with believed that standardizing terminology, reporting requirements, and formats and providing more advance notice of changes in reporting requirements would help alleviate what they perceived as the paperwork burden.

RECOMMENDATIONS TO THE SECRETARY OF HEW

We recommend that the Secretary:

- Develop ways to better inform respondents of the intended use of data the Education Division requests, including ways to meet the feedback needs of LEAs.

- Standardize terminology and formats for reporting requirements as much as possible.
- Provide more advance notice for changes in reporting requirements.

AGENCY COMMENTS AND GAO EVALUATION

HEW generally concurred in our recommendations and made the following statements:

- The Education Division will review the adequacy of explanations currently furnished LEAs regarding the intended uses of data and will, if necessary, place increased emphasis on definitive transmittal letters. The Division will also consider current methods of reports distribution and the availability of data on computer tapes that may interest LEAs. Based on this appraisal and if feasible, the Education Division will develop specialized feedback.
- The types of standardization we recommended should not be done by legislation. Rather, the Congress could designate a legislative staff or agency with which the Division could confer on such issues as statistical classification and definition of data requirements.
- The recommendation concerning standardizing terminology will reinforce ongoing practices and activities in the Education Division. The Division will strongly reemphasize the need to adhere to standard terminology.
- Giving SEAs more advance notice of changes in reporting requirements is not practical, but the Division will determine whether it can help SEAs provide such notice to LEAs.

In commenting generally on the report, HEW stated:

- Federal financial assistance programs of the magnitude of those in education may reasonably be expected to involve "substantial" paperwork, simply to protect the public interest.
- Program evaluations required by education statutes generate a significant part of the data required from SEAs and LEAs.

--HEW would continue efforts to delete unnecessary paperwork, and it believes the steps taken thus far constitute a positive program for data management.

In the Education Amendments of 1974 (88 Stat. 484), the Congress acted to better specify the kinds of information it needs to evaluate education programs. If HEW develops its data requirements to be responsive to the needs of the Congress, it should help assure that only the data necessary for program administration and congressional oversight and legislative responsibilities will be requested from SEAs and LEAs.

CHAPTER 3

NEED FOR IMPROVED MANAGEMENT AND CONTROL OF PAPERWORK

Management of the paperwork involved in data reporting is a complex process which involves balancing the needs of the public, the Congress, the President, other Federal users, and the Education Division's program managers against the efforts by State and local education officials to provide this information. The primary goal is to minimize respondent burden without impairing either program management or the external users' ability to obtain the needed information.

Past efforts at managing data requirements placed on SEAS and LEAS have not been fully effective.

OE'S DATA MANAGEMENT PROCESS

Before 1971 no entity existed within OE to coordinate data acquisition. In January 1971 the Commissioner of Education established the Task Force for Planning Acquisition of Data--within the National Center for Educational Statistics. Since 1971, the Task Force has been the primary entity for coordinating data requests.

The Task Force's objective is to collect information from the various bureaus in OE as to their data needs, review the information, and develop it into an annual data plan. This plan is designed to

- minimize total respondent burden;
- eliminate duplicative information requests; and
- insure orderly, time-phased data collections.

The annual data plan has been the primary mechanism to achieve data request coordination. The creation of the Task Force was prompted by a letter written to the Commissioner of Education by the Council of Chief State School Officers. The letter requested a moratorium on further data-gathering surveys and reports until OE established a mechanism to coordinate data requests. The Council was concerned with excessive respondent burden, redundancy of data reporting requirements, awkward timing, and other poor data management practices in OE.

The Administrator, National Center for Education Statistics (formerly the Assistant Commissioner, National Center for Educational Statistics), chairs the Task Force and directs its daily operations. A working group composed of program officers and a policymaking group consisting

of office and bureau directors provide assistance in developing the annual data plan. An operating group has the primary responsibility for reviewing data acquisition proposals. The Task Force is assisted in its operations by a group of State school officials.

In 1972 the Council formed the Committee on Evaluation and Information Systems to monitor, evaluate, and coordinate educational data acquisition of the Federal Government. Committee representatives review the annual data plan developed by the Task Force and make recommendations to the Council, which in turn provides them to OE. After OE and the Council approve the plan, it is sent to all States as a guide to Federal data-collection efforts. Fiscal year 1974 was the first year the plan was distributed, as originally intended, to all State committee representatives. Earlier plans were distributed to a limited number of committee representatives.

For fiscal year 1974, the approved annual data plan contained 275 separate forms. Each form was designed by the cognizant program office after a review of legislation to identify the data to be collected.

The legislative requirements governing reporting for the major education programs provide OE program offices with discretion in establishing data requirements. For example, ESEA title I requires LEAs to make an annual report and such other reports to the SEAs as may be reasonably necessary to enable the SEAs to discharge their duties. The SEAs are required to make periodic evaluation reports and other such reports to the Commissioner of Education as he deems reasonably necessary to perform his duties.

Task Force accomplishments

The Task Force has fostered better communication between Education Division program officials and SEA officials and has helped to coordinate data collections using the annual data plan. It has also developed a calendar of report submission dates to show seasonal overloads and to enable SEAs and LEAs to schedule their required data submissions. Although the calendar is an initial step toward insuring orderly time-phased collections, the Task Force has not tried to balance respondent workload. According to a Task Force member, a rescheduling of due dates will begin in the near future. In addition, the Task Force has agreed to provide 9 months' leadtime for all data collections affecting SEAs and LEAs.

Task Force shortcomings

Although the Task Force efforts are a first step toward improved data coordination, the Task Force has not been fully effective. Due to Education Division reorganizations, the Task Force's policy group has been inactive for nearly 2 years. However, the Task Force Chairman, in an April 1974 memorandum, requested the appointment of new members to the policy group. According to HEW officials the working group will be convened in early 1975 to review the fiscal year 1976 data plan.

The operating group has only two people who are responsible for reviewing the proposed forms. One is a Center employee who devoted 75 percent of her time to the Task Force; the other is a State liaison representative whose salary is paid jointly by the Education Division and the Council of Chief State School Officers. Several HEW and Council officials said that additional personnel are needed to effectively accomplish Task Force efforts.

The Task Force has not devoted sufficient attention to the justification of data requirements. In a 1971 report assessing its own operations, Task Force members expressed concern about the program offices' marginal justifications for data collections and recommended that the Task Force study further the actual use of data collected. Such a study has not been performed. According to a Task Force official, in-depth justification analyses have not yet been performed mainly due to lack of personnel. Under the present system, program offices have no written guidelines for preparing the justification and the Task Force does not review the justifications.

On the data survey form used to compile the 1975 data plan, the Task Force added an analysis section to determine the program offices' intended use for the data to be collected. This represents an initial step toward greater emphasis on justification analysis. In addition the Task Force is developing a separate and more comprehensive justification form to be prepared by the program offices.

HEW and State officials said a computerized data element file, consisting of standardized data items, is the key to thorough data justification and coordination. HEW officials advised us that such a file became operational in June 1974. The ultimate goal is a computerized data base which, if used effectively, should help eliminate duplicative data requests, insure usefulness of the data collected, and permit a determination of whether data proposed for collection is already being collected. This data base would be an integral part of the Common Core Data Program discussed in chapter 4.

CONCLUSIONS

The legislative reporting requirements for major education programs allow OE discretion in determining data requirements to be placed on SEAs and LEAs. Program offices are responsible for making these determinations and preparing justifications for the data to be collected.

OE established the Task Force--now located in the Office of the Assistant Secretary for Education--to coordinate and control data requests, but its small size and relative inactivity have limited its effectiveness. Further, the annual data plan, which has been the Task Force's major tool to achieve coordination and control, has been used to inventory data-gathering instruments rather than to thoroughly review the justification for the data. A computerized data base could help the Task Force review data justification through an analysis of data already collected to identify duplication.

RECOMMENDATIONS TO THE SECRETARY OF HEW

To help minimize respondent burden without impairing either program management or external users' ability to obtain needed information, we recommend that the Secretary:

- Devote more attention and sufficient resources to data coordination efforts, specifically the Task Force.
- Provide that the Task Force become more involved in reviewing data justifications.
- Give program officials written guidelines and criteria for data collection to help insure adequate data justifications.

AGENCY COMMENTS

HEW agreed with the intent of the first two recommendations, but stated that current priorities would not permit reallocating resources necessary to conduct systematic and comprehensive reviews of data justifications. HEW added that, within existing resources, the Education Division would use an automated data catalog and table index to assist requesting offices in their own justification review.

HEW concurred in our recommendation concerning written guidelines and criteria for data collection.

CHAPTER 4

SIMPLIFYING PARTICIPATION IN

FEDERAL EDUCATION PROGRAMS

Apart from efforts directed toward the management of the overall data-acquisition problem, OE and others have begun several projects to simplify participation in Federal educational assistance programs. These projects have had only limited success thus far; however, some are still in their initial stages. These projects are described more fully below.

GOVERNMENT-WIDE PROJECTS

Two projects affecting educational assistance programs were begun several years ago--the Federal Assistance Review Program and the establishment of uniform administrative requirements by the Office of Management and Budget under Circular A-102.

Federal Assistance Review Program

In March 1969 the President directed 10 agencies and the Office of Management and Budget to conduct a 3-year Government-wide review of the operation of Federal domestic assistance programs. To implement the Federal Assistance Review Program objectives, the Secretary of HEW established a 40-member team of reviewers that conducted analyses of HEW grant programs in the field and at HEW headquarters. The review concentrated on (1) reducing red tape and grant processing time, (2) placing more emphasis on State and local governments in operating HEW programs, and (3) simplifying agency procedures. Although the review achieved some progress in reducing paperwork, problems apparently still exist.

Circular A-102 Program

In October 1971 the Office of Management and Budget issued Circular A-102 to simplify the administration of grant programs and to put more responsibility for the administration on the grantee. The circular established uniform administrative requirements in 15 subject areas for grants-in-aid to State and local governments. These areas included financial reporting and application forms. Office of Management and Budget officials told us that the circular was supposed to reduce the State and local paperwork burden by using standard formats which replaced the multitude of conflicting Federal requirements.

In the April 26, 1973, Federal Register, OE published a notice of proposed rulemaking which set forth general provisions for the implementation of Circular A-102 for OE programs. After a public hearing was conducted and written comments were received, OE expanded the general provisions and published them in the November 6, 1973, Federal Register.

An HEW official said the objectives of Circular A-102 were worthwhile and that any data that would be lost would not have a serious impact on program management. He added that it was too soon to fully evaluate the circular's impact. OE officials, however, informed us that, although compliance with the circular would slightly reduce the paperwork burden, it might cause the loss of specific program information.

OE EFFORTS

OE has started a number of projects to simplify participation in its programs and to reduce the paperwork burden placed on participating SEAs and LEAs.

Consolidated Program Information Report

The Consolidated Program Information Report is a major effort begun by OE to reduce evaluative data-reporting requirements placed on SEAs and LEAs. In June 1969, the Council of Chief State School Officers and OE representatives signed a joint work plan aimed at reducing overlap in Federal reporting requirements and increasing the usefulness of data collected for planning and evaluation purposes. The report was to meet this objective by annually collecting basic statistical information on participation, staffing, and expenditures for several Federal assistance programs.

The National Center for Educational Statistics' Division of Intergovernmental Statistics, which assumed the responsibility for the report in 1971, annually collects and analyzes data from a national and State sample. For the 1973 data collection, 2,800 LEAs were requested to provide about 1.5 million data items. Center officials estimated that this task required all LEAs to expend a total of 48,000 man-hours.

Although data for the report has been collected annually since 1969, the report has never been published as intended by OE. Center officials said the delay in publishing the report is caused primarily by the need for extensive data editing due to inaccurate and incomplete information contained in initial responses from LEAs.

SEA and LEA officials said that many problems are encountered in preparing the report. One problem cited was the size of the data-gathering instrument; another, the time it takes to complete the report. For example, the 1971 instrument--45 pages combined with a 66-page instruction manual--constituted an imposing package for the respondent. The following comments illustrate other problems voiced by SEAs and LEAs:

- "The report does not condense the paperwork from various programs, rather, it merely collects all the information in one document."
- "There is considerable redundancy both within the report and between the report and other data collection efforts."
- "The report form is frustrating to fill out and provides data which has no real usefulness or validity."
- "The report is filled with 'ambiguous terminology' and instructions."
- "The report asks for data which is not readily available so respondents sometimes use estimates rather than actual figures."

According to a Center official, although the report has not been published, preliminary data is available to report users in OE. Most OE program officials we contacted, however, questioned the reliability of the data and said they did not use it.

Officials of both OE and the Council of Chief State School Officers stated that the effort was not nearly as effective as initially envisioned. They told us that, instead of becoming a vehicle for consolidating reporting requirements and eliminating duplication, the report merely combined existing required reports into a single report.

Center officials said they have recognized the need for substantial redesign of the report for some time, and they would not collect data for future reports pending completion of this effort.

Consolidated Grants Management Program

OE's Multi-State Projects Branch in the Bureau of School Systems manages 26 special projects designed to seek managerial improvements in education. One such project is the Consolidated Grants Management Program. Since March 1972,

representatives of eight SEAs have participated in the project. According to a project status report, the project was funded out of a recognition that the current method for allocating Federal funds for education has disbursed aid through an increasing number of administrative levels and procedures. It also has caused paperwork and communication problems which frequently discourage school districts from trying to get the Federal aid they need.

The project has two major objectives:

- To study and develop demonstration models for consolidated grants management of federally funded programs.
- To study and simulate alternative models for allocating Federal funds for elementary and secondary education.

The eight participating States have explored aspects of a consolidated application, including development and use of consolidated forms with a limited number of LEAs.

We reviewed project efforts in California, Delaware, and Florida designed to lessen paperwork and communication problems. California developed a consolidated application form which 17 school districts agreed to use on a trial basis for fiscal year 1972 compensatory education programs. Project participants considered the initial test phase successful, and nearly all California districts are now using the consolidated application for categorical aid programs which total about \$275 million. Efforts are also underway in California to consolidate all regulations, guidelines, and administrative directives for those programs.

The Delaware Department of Education has contracted for the development of a consolidated application form for selected programs. A grants management procedure and handbook for processing a consolidated application have been developed. LEAs have participated in developing the application and procedures but have not elected to employ them as yet. LEAs are analyzing needs on a comprehensive basis and the Delaware Department of Education will collect and analyze the results.

The Florida Department of Education has concentrated on assisting LEAs in their comprehensive planning efforts by helping them with needs assessment and program development. An official told us there has been no real accomplishment by the program because it is still in the experimental stage. The official had no conclusion regarding the continuing use of the project to lessen the administrative burden on LEAs.

Representatives from the eight participating States have concluded that a consolidated application is feasible under existing legislative and regulative constraints and would lead to improved management and use of funds and services for their priority needs. Coordination of the views of various program officers in LEA, SEA, and OE offices has been a problem in using a consolidated application. Participants believed the project merited continuation and emphasized that comprehensive planning and improved management of scarce educational resources require coordination at Federal, State, and local levels.

An OE official stated the project would reduce paperwork but would create administrative problems for OE program officials. The official added that the project's main thrust was successful in forcing LEAs to plan comprehensively, but paperwork reduction was a secondary consideration.

Common Core Data Program

The Common Core Data Program is a long-term project of the National Center for Education Statistics. The program's basic mission is to provide necessary statistical information on education in the Nation to meet the Federal, State, local, and institutional planning and management needs. The program is currently in its first phase which is expected to deliver some short-term products and provide the basis for long-term program development and implementation.

The program primarily addresses two weaknesses in the present data-collection system:

- The failure to gather all the educational statistics to meet users' needs.
- The lack of a common core of data and the resultant uncoordinated, duplicative data requests by various OE activities which place an administrative burden on respondents.

OE envisions that the Common Core Data Program will be its major data source in the next few years. A Center official said the program is expected to be an all-inclusive, statistical, data-gathering vehicle to eventually replace all recurring program reports.

OE personnel said State and local officials have not yet had a great deal of input into planning the program. OE has elected to concentrate in this phase on data to meet the Federal needs with little or no SEA or LEA participation.

Officials of the Council of Chief State School Officers told us that this will adversely affect the objective of the program to achieve a common core of data because determination of Federal data needs cannot be separated from the determination of SEA and LEA needs.

According to HEW officials, the planning for the program called for limited SEA and LEA involvement initially, to be followed by more extensive involvement. This involvement peaked during the summer of 1974--after the completion of our fieldwork--with participation in workshops by all 50 States and representatives from a few LEAs from every State.

CONCLUSIONS

Efforts outside OE to simplify participation in Federal education programs--the Federal Assistance Review Program and the implementation of Circular A-102--have had and will have only a slight impact in reducing the paperwork required of participants. OE efforts to simplify participation have been fragmented and have met with limited success.

The Consolidated Program Information Report was one of the first consolidation efforts but, instead of consolidating numerous program data requests, it merely combined them into a single instrument. The form is cumbersome and requires a great deal of time to complete, which places a burden on State and local respondents. When we completed our fieldwork, OE had neither published any report from this data nor provided adequate feedback to State and local officials concerning the use of the required data.

The Consolidated Grants Management Program represents an ongoing effort to, among other things, consolidate paperwork requirements and simplify and improve program administration. Although the experimental efforts appear to have been promising, they will have to be implemented on a broader scale to demonstrate project effectiveness.

The Common Core Data Program is a major effort to meet the educational statistics needs at the Federal, State, and local levels. It requires active State and local input and participation in issue analyses and implementation, but such participation has been limited.

In our view, a central focus for these efforts is needed to insure reduced respondent burden and timely data collection and reporting. The Task Force for Planning Acquisition of Data, if operating properly, could provide this central focus.

RECOMMENDATION TO THE SECRETARY OF HEW

We recommend that the Secretary establish an organizational focal point for current and future Education Division efforts to simplify participation in Federal education programs and give such an organization sufficient authority to insure that these efforts (1) are integrated with the overall management of data acquisition and (2) consider State and local needs for data.

AGENCY COMMENTS

HEW concurred in our recommendation, but pointed out that designating a focal point should not in any way diminish such responsibility in other Division organizational units.

STATE AND LOCAL EDUCATIONAL AGENCIES VISITED

LEAS

Alachua County, Fla.	John Sweet Unified, Calif.
Alameda City Unified, Calif.	Leon County, Fla.
Amelia County, Va.	Liberty County, Fla.
Anne Arundel County, Md.	Livermore Valley Joint Uni- fied, Calif.
Antietam, Pa.	Loudon County, Va.
Appoquinimink, Del.	Middlesex County, Va.
Arlington County, Va.	Montgomery, Ala.
Atlanta City, Ga.	Montgomery County, Md.
Atlantic City, N.J.	Mt. Diablo Unified, Calif.
Attalla City, Ala.	Muscogee County, Ga.
Baltimore City, Md.	Newark, Del.
Baltimore County, Md.	Newark, N.J.
Bay County, Fla.	New Kent County, Va.
Berkeley Unified, Calif.	Norristown Area, Pa.
Birmingham City, Ala.	Navato Unified, Calif.
Bridgeton, N.J.	Oakland City Unified, Calif.
Camden City, N.J.	Philadelphia City, Pa.
Carson City, Nev.	Powhatan County, Va.
Charles City County, Va.	Prince Georges County, Md.
Chattahoochee County, Ga.	Prince William County, Va.
Chester Upland, Pa.	Putnam County, Fla.
Clarke County, Va.	Queen Annes County, Md.
Clay County, Fla.	Ravenswood Elementary, Calif.
Clayton County, Ga.	Reading City, Pa.
Coatesville Area, Pa.	Richmond Unified, Calif.
Cobb County, Ga.	Richmond City, Va.
DeKalb County, Ga.	Sacramento City Unified, Calif.
Duval County, Fla.	San Francisco Unified, Calif.
Essex County, Va.	San Juan Unified, Calif.
Fairfax County, Va.	Shoreline Joint Unified, Calif.
Fairfax Elementary, Calif.	Talbot County, Md.
Fort Payne City, Ala.	Travis Unified, Calif.
Frederick County, Md.	Trenton, N.J.
Frederick County, Va.	Upper Darby, Pa.
Fulton County, Ga.	Vallejo City Unified, Calif.
Gadsden City, Ala.	Vineland City, N.J.
Garnet Valley, Pa.	Washington, D.C.
Hammonton, N.J.	Washoe County, Nev.
Hayward Unified, Calif.	West Chester Area, Pa.
Healdsburg Elementary, Calif.	Willingboro Township, N.J.
Howard County, Md.	Wilmington, Del.
Jefferson County, Ala.	Winchester City, Va.

SEAS

Alabama
California
Delaware
Florida
Georgia

Maryland
Nevada
New Jersey
Pennsylvania
Virginia



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D. C. 20201

JAN 13 1975

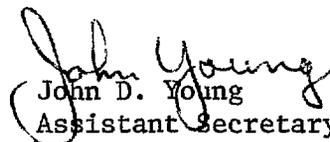
Mr. Gregory J. Ahart
Director
Manpower and Welfare Division
General Accounting Office
Washington, D. C. 20548

Dear Mr. Ahart:

The Secretary asked that I respond to your request for our comments on your draft report to the Congress entitled, "Data Reporting Requirements Placed on State and Local Agencies", B-164031(1). They are enclosed.

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,


John D. Young
Assistant Secretary, Comptroller

Enclosures

Department of Health, Education, and Welfare Comments on the Draft Report to the Congress of the United States Entitled, "Data Reporting Requirements Placed on State and Local Education Agencies"

GAO Recommendation

We recommend that the Secretary of Health, Education, and Welfare (HEW):

-- Develop ways to better inform respondents of the intended use of data the Education Division requests including the development of a mechanism to meet the feedback needs of LEAs;

-- Standardize terminology within reporting requirements as much as possible; and

-- Provide more advance notice for changes in reporting requirements.

Department Comment

We concur with the intent of the first sub-recommendation. The Education Division will review the adequacy of explanations furnished LEAs re the intended uses for data, at the time it is requested. If found necessary, we will direct Statistical Projects Clearance Officers to place increased emphasis on developing more definitive letters when requesting data. With respect to feedback -- we will look into the reports now being distributed, and into information available on computer tapes of possible interest and concern to LEAs. Based on this appraisal, and if feasible, we will inaugurate tailored feedback.

We concur also in the second recommendation since it reinforces our on-going practices and activities. The long and well established Educational Data Standards program develops standard terminology, with extensive State and local participation, publishes handbooks, and to the extent permitted by budget resources conducts technical assistance on terminology and recordkeeping procedures. The Common Core of Data program is directed at standardizing reporting requirements not only among Federal programs and data users but also with State and other users. Finally, the need for adherence to established standard terminology will be re-emphasized in strong terms to all concerned.

We do not believe it would be practical to provide States with more advance notice of changes in reporting requirements. Since 1971, we have provided nine months lead time to SEAs for requests for data from SEAs and LEAs. This is adhered to except in cases of the highest priority such as Congressionally mandated data collections under P.L. 93-380. We will, however, see whether we can assist the States to provide LEAs with more advance notice.

GAO Recommendation

To help minimize respondent burden without impairing either OE program management or external users' ability to obtain needed information, we recommend that the Secretary of HEW:

-- Devote increased attention and sufficient resources to data coordination efforts, specifically the re-vitalization of the Task Force.

-- Provide that the Task Force become more involved in the review of data justifications.

-- Provide program officials with written guidelines and criteria for data collection to help insure adequate data justifications.

Department Comment

The Task Force, composed of representatives of all offices within the Education Division which initiate data collections, has been active as needed to review annual data acquisition plans, and supplements, for coordination. NCES staff support to the Task Force has included development of a computerized means for screening the existing data collections for particular data elements as an aid to coordination. The Task Force will meet with CEIS representatives in mid-January 1975, to review the data acquisition plan for FY 1976.

Additional resources would be necessary in order to conduct systematic and comprehensive review of data justifications. Current priorities do not permit reallocation of resources for this purpose. We will, however, within existing resources, utilize an automated data element catalog and table index to assist sponsoring offices in conducting their own review process. Justification of need is not only the responsibility of the sponsoring offices, but is already subject to review under the Federal Reports Act by the Office of Management and Budget.

The third sub-recommendation is one which the Education Division will carry out in written form, to supplement the oral discussion of criteria in Task Force meetings as in the past. Task Force criteria applied in reviewing proposed data collections include: assessment of respondent burden, inspection for possible redundancy, and examination into data utilization.

GAO Recommendation

We recommend that the Secretary of HEW establish an organizational focal point for current and future Education Division efforts to simplify participation in Federal education programs and provide such organization with sufficient authority to insure that the efforts (1) are integrated with the overall management of data acquisition, and (2) consider State and local needs for data.

Department Comment

We concur that such a focal point could serve a valid and useful role, and will work towards setting it up. Conversely, we believe that once established, it cannot diminish or assume the responsibility of individual components of the Education Division to continually seek ways to simplify participation in Federal education programs. Thus, we will need to reach decisions -- not only on the proper placement of such a focal point within the Division -- but on how best to provide judicious assignments and delegations of authorities and responsibilities, in order to properly carry out the concept.

General Comments of the Department

The report indicates that SEA and LEA officials perceive serious paperwork problems. Paperwork requirements are said to be either "substantial" or "excessive". We believe that financial assistance of the magnitude of Federal education programs may reasonably be expected to involve "substantial" paperwork, simply to protect the public interest. Further, program evaluations prescribed by the statutes establishing the programs, generate a significant part of the data required from SEAs and LEAs.

We will continue our efforts to delete unnecessary paperwork. The Data Acquisition Task Force activity for coordinating Education Division needs for data, the well established ongoing practice of joint advance review of data collection proposals with technically knowledgeable representatives of SEAs, and developmental activities toward a common core of data, constitute positive program for data management.

We feel these constructive steps taken over a sustained period to rationalize the collection of essential data for guidance of Federal education policy and program judgments should be recognized as an advanced approach to a pervasive management problem, in which the Department incorporates State and local participation in planning to a substantial degree.

[See GAO note,]

Department Comment

Incorporating data requirements and standardizing terms specifically by statute seems likely to be counterproductive. Statistical classification and definition of data requirements are issues which appropriately involve extensive professional consultation and deliberation of numerous considerations. These are the appropriate responsibility of professional education statisticians, with the benefit of information from the legislative branch, and others.

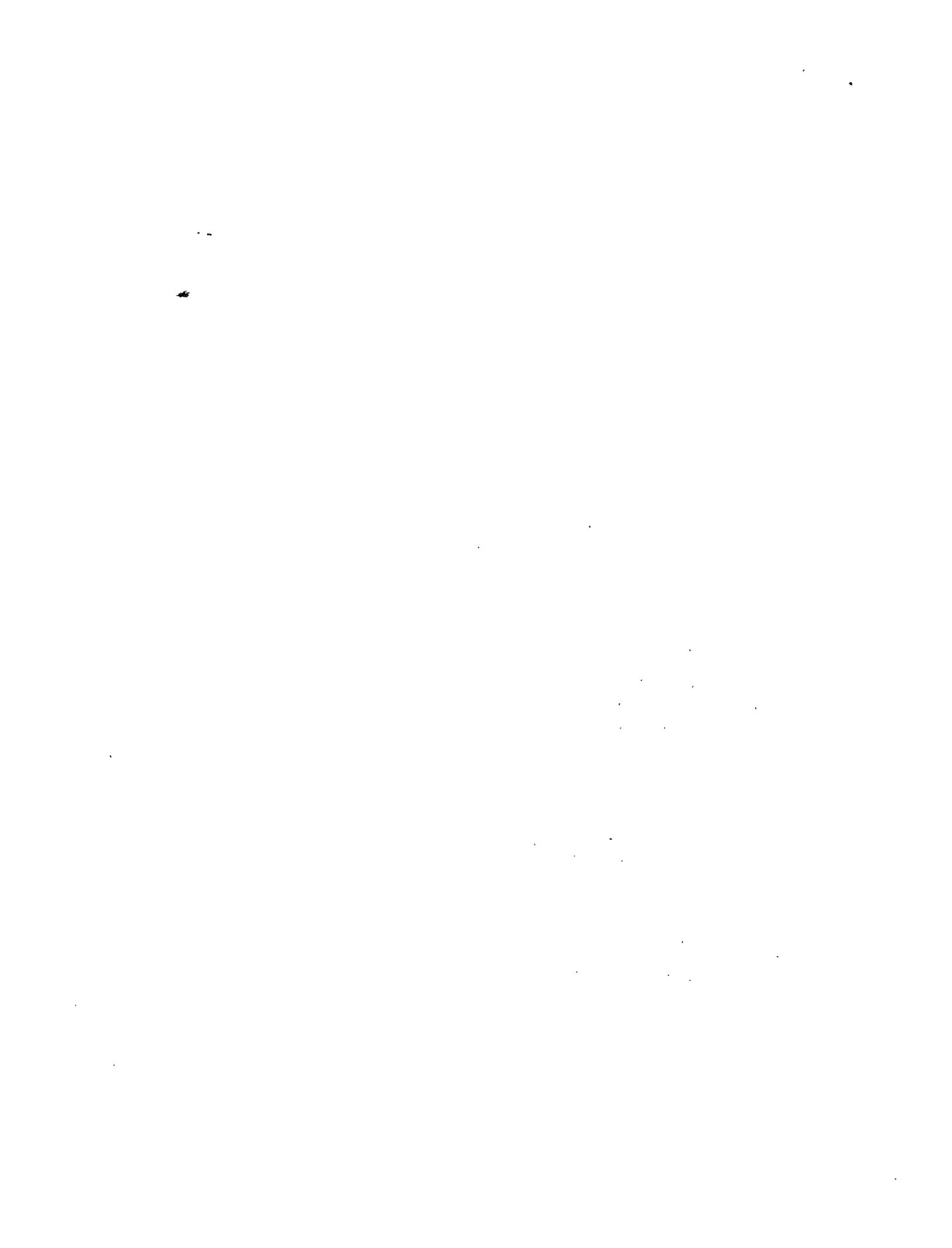
To the end desired, a more appropriate suggestion might be that the Congress designate a legislative agency or staff with which professional staff of this Department could confer on such issues.

GAO note: Material deleted pertains to a GAO proposal included in the draft report but removed from the final report.

PRINCIPAL HEW OFFICIALS
RESPONSIBLE FOR ACTIVITIES
DISCUSSED IN THIS REPORT

	<u>Tenure of office</u>	
	<u>From</u>	<u>To</u>
SECRETARY OF HEW:		
Caspar W. Weinberger	Feb. 1973	Present
Elliot L. Richardson	June 1970	Jan. 1973
Robert H. Finch	Jan. 1969	June 1970
ASSISTANT SECRETARY (EDUCATION):		
Virginia Y. Trotter	June 1974	Present
Charles B. Saunders, Jr. (acting)	Nov. 1973	June 1974
Sidney P. Marland, Jr.	Nov. 1972	Nov. 1973
COMMISSIONER OF EDUCATION:		
Terrell H. Bell	June 1974	Present
John R. Ottina	Aug. 1973	June 1974
John R. Ottina (acting)	Nov. 1972	Aug. 1973
Sidney P. Marland, Jr.	Dec. 1970	Nov. 1972
Terrell H. Bell (acting)	June 1970	Dec. 1970
James E. Allen, Jr.	May 1969	June 1970
ASSISTANT COMMISSIONER, NATIONAL CENTER FOR EDUCATIONAL STATISTICS:		
Dorothy M. Gilford	May 1968	Aug. 1974
Francis C. Nassetta	Jan. 1968	May 1968
Alexander M. Mood	Jan. 1965	Jan. 1968
ADMINISTRATOR, NATIONAL CENTER FOR EDUCATION STATISTICS (note a):		
Francis C. Nassetta (acting)	Dec. 1974	Present
Dorothy M. Gilford (acting)	Aug. 1974	Dec. 1974

a/ As of August 1974, the responsibility for administering activities relating to education statistics was transferred from the Office of Education to the Office of the Assistant Secretary for Education, HEW.



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