

October 2005

EDUCATION'S DATA MANAGEMENT INITIATIVE

Significant Progress
Made, but Better
Planning Needed to
Accomplish Project
Goals





GAO
Accountability Integrity Reliability

Highlights

Highlights of [GAO-06-6](#), a report to congressional committees

Why GAO Did This Study

As a condition of receiving federal funding for elementary and secondary education programs, states each year provide vast amounts of data to Education. While the need for information that informs evaluation is important (particularly with the No Child Left Behind Act), Education's data gathering has heretofore presented some problems. It has been burdensome to states because there are multiple and redundant requests administered by a number of offices. In addition, the resulting data supplied by states has not been accurate, timely, or conducive to assessing program performance. To improve the information by which it evaluates such programs and also to ease states' reporting burden, Education in 2002 initiated an ambitious, multiyear plan to consolidate elementary and secondary data collections into a single, departmentwide system focused on performance. Given its importance, we prepared a study, under the authority of the Comptroller General, to provide Congress with information on its progress.

What GAO Recommends

GAO recommends that Education (1) develop a strategy to help states provide quality data, (2) develop a process within the department to resolve critical, outstanding issues, and (3) develop a clear plan for completing final aspects of PBDMI, including specific time frames and indicators of progress toward the initiative's goals. Education agreed with our recommendations.

www.gao.gov/cgi-bin/getrpt?GAO-06-6.

To view the full product, including the scope and methodology, click on the link above. For more information, contact David Bellis at (415) 904-2272 or bellisd@gao.gov.

EDUCATION'S DATA MANAGEMENT INITIATIVE

Significant Progress Made, but Better Planning Needed to Accomplish Project Goals

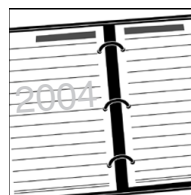
What GAO Found

Through its Performance-Based Data Management Initiative (PBDMI), Education has consolidated and defined much of the data it anticipates collecting under a unified system. Education reports that many data definitions have been agreed-to and data redundancies eliminated. PBDMI officials also said that to date, however, it has not been able to resolve all remaining differences among the program offices that manage many of the different data collections.

PBDMI officials have conducted extensive outreach to the states to advance the initiative. The outreach to states involved regional conferences, two rounds of site visits, and according to officials, \$100,000 in grants to most states to help offset their costs. State data providers responding to our survey expressed general satisfaction with the department's outreach, but some were not optimistic that the initiative would ease their reporting burden or enhance their own analytic capacity. The states were not able to produce enough data during test submissions in 2003 and 2004 to enable data quality verification or phasing out the department's multiple data collections. With regard to the lack of sufficient data from many states, Education officials said some lack the technical capacity needed to produce new performance data requirements. State data providers reported having competing demands for their time and resources, given other federal initiatives.

Education officials have decided to proceed with the undertaking and have developed a draft interim strategy for moving forward. But they currently have no formal plan for how they would overcome obstacles such as the lack of state data and other technical and training delays to the initiative.

Reporting to Education: A Sample of Data Collections Seeking Information on Elementary and Secondary Programs in One State in 2004



By Education's own account, around 200 data collections are administered to states about elementary and secondary programs

- March**
 - Survey of private, not-for profit schools
 - 2 common core of data surveys: schools and state nonfiscal survey
- May**
 - 3 program assessments: Title I, vocational, and special education
 - Private schools participation in Title I
 - Follow-up report on career and technical education completers
- Aug.**
 - Instruction for limited English and immigrant students
 - School and staff administrative report
 - Discipline, crime, and violence report
 - Charter school evaluation report
- Oct.**
 - Instructional personnel report
 - Student enrollment data collection (fall count)
 - Safe and drug free schools report
 - Count of home-schooled children

Source: Virginia State Department of Education.

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Abbreviations

CIO	chief information officer
FAPE	free and appropriate public education
IDEA	Individuals with Disabilities Education Act
IES	Institute for Education Science
IG	Inspector General
NCLBA	No Child Left Behind Act of 2001
OCR	Office for Civil Rights
OELA	Office of English Language Acquisition
OESE	Office of Elementary and Secondary Education
OMB	Office of Management and Budget
OSDFS	Office of Safe and Drug-free Schools
OSERS	Office of Special Education and Rehabilitative Services
OVAE	Office of Vocational and Adult Education
PBDMI	Performance-Based Data Management Initiative
PRA	Paperwork Reduction Act of 1995
SEA	state education agency

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United States Government Accountability Office
Washington, DC 20548

October 28, 2005

The Honorable Michael B. Enzi
Chairman
The Honorable Edward M. Kennedy
Ranking Minority Member
Committee on Health, Education,
Labor, and Pensions
United States Senate

The Honorable John A. Boehner
Chairman
The Honorable George Miller
Ranking Minority Member
Committee on Education and the Workforce
House of Representatives

Each year, state education agencies provide vast amounts of information to the U.S. Department of Education (Education) in order to fulfill reporting requirements for federal programs supporting elementary and secondary education. While this information is important for managing programs, it has been accompanied by some problems. Reporting has been burdensome for the state data providers because the department makes its data requests through multiple, ongoing, and uncoordinated data collections. By Education's own account, there are currently 200 active data collections for elementary and secondary programs—each resulting in approximately 10,000 “person hours” for design, administration, collection, and reporting. From the vantage point of the department and its program offices, the information it receives has customarily been compromised because the schools, districts, and states reporting data employ their own definitions and, in some cases, report data that is inaccurate, incomplete, and not timely. Finally, in terms of program evaluation, much of the data that Education has traditionally requested has not necessarily focused on program performance. Yet the need for evaluative data has grown, particularly with passage of laws such as the No Child Left Behind Act of 2001, which requires states receiving assistance under the act to report on, among other things, the achievement of their students on academic assessments required under that law.

To address these problems and better evaluate its programs, Education in 2002 began an initiative to consolidate and improve the information it

requests from states on elementary and secondary education and to seek more consistency and quality in the data states supply. The Performance Based Data Management Initiative (PBDMI) is a large-scale effort within the department to combine more than a dozen separate data collections into a single collection system, and better focus the information Education requests from states by eliminating duplication, conflicting definitions, and information that is not useful for the evaluation of its programs. The PBDMI represents an important step forward for Education in its efforts to monitor the performance of the nation's elementary and secondary schools. The initiative is also a large-scale undertaking for state education agencies, which are volunteering to help develop uniform data and test the new data collection system while they continue to meet their ongoing reporting requirements. The PBDMI was scheduled to begin phasing out the old data collections by September 2005, following final testing of the new system and training of department staff.

In view of its importance and the inherent challenges, therefore, we have prepared a study under the authority of the Comptroller General to provide Congress with information about Education's progress with the PBDMI. We have examined Education's work to (1) define what performance-related data it will collect from states on behalf of the program offices, (2) assist states in their efforts to submit quality information, and (3) utilize performance-related data to provide enhanced analytic capacity within the program offices.

To address our objectives we reviewed relevant documents, including Education's business plans, information collected by Education on states' capacity to supply data, various contracts for key pieces of the initiative, Education's submissions to the Office of Management and Budget (OMB) justifying the various data collections, the department's concept of operations, and other information related to the development of PBDMI. We also interviewed Education officials overseeing PBDMI, officials from most of the participating program offices, and key stakeholders in PBDMI, including a standards-setting organization, an advocacy group, and contractors, to obtain their perspectives on the progress of the initiative and to verify the information we reviewed. Finally, we surveyed 52 state data coordinators, including the District of Columbia and Puerto Rico, about their experiences with PBDMI, and we received 50 responses. We performed this work between April 2004 and September 2005 in accordance with generally accepted government auditing standards. See appendix I for additional information on our scope and methodology.

Results in Brief

Through its PBDMI, Education officials have said that they have identified and defined much of the data to be collected under a unified data collection system. To determine what data will be collected, project officials have engaged in an ambitious effort with the program offices to identify data needed for program administration and oversight. They also developed performance-related data that would meet those needs, particularly for evaluating the effectiveness of federal programs. They further worked to develop common definitions and eliminate redundancy for data that would be collected through the system. The end result of this work was a body of performance-based data elements designed to better position the department to monitor the performance of its elementary and secondary education programs. However, officials responsible for the initiative told us that they were unable to resolve all data differences among Education's program offices, given the traditional, diffused control of information collected throughout the department. PBDMI officials estimated that the majority of the work to define these data elements had been completed, although we found that they did not develop baseline data which would allow them to track the full extent of their progress. We were also told that these hard to resolve differences that remain would ultimately be settled at higher levels within the department, but the department has no formally agreed upon process for how or when such decisions would occur.

PBDMI officials have conducted extensive outreach to the states to help them meet Education's data request and in some cases upgrade their collection and submission systems; but after 2 years of testing, most states have not, for a variety of reasons, been able to provide Education with enough reliable data to proceed with the initiative. This outreach involved two rounds of site visits to all the participating states to confer about data elements developed with the programs and offer technical assistance, and \$100,000 in grants to most states to help offset their costs. In addition, Education sponsored regional conferences and developed a call center to help states prepare and submit data. The department's activities were focused largely on state-level agencies, but did involve some educational organizations. State data providers responding to our survey expressed general satisfaction with the department's outreach, but about 75 percent nevertheless predicted that the burden of collecting and reporting data would increase or remain the same once PBDMI was completed. Many states also expressed doubts that PBDMI could enhance their analytic abilities. Only about 20 percent of states expected PBDMI to improve or greatly improve their analytic capacity. Despite the extensive outreach, most states were not able to produce enough data during test submissions in 2002-2003 and again in 2003-2004 for the department to validate its

quality and consider phasing out its standing collection systems. Thus, the department has decided to keep the latter collection phase open longer. According to PBDMI officials, some states lack the technical capacity to collect and report the requested data electronically and others need to modify their existing processes to meet the new specifications. Still others wanted clarification from the department for data definitions. State data providers also reported having competing demands for their time and attention, given other federal initiatives.

Education officials have decided to proceed with PBDMI's implementation despite a shortage of data, other delays, and reservations among a few program offices; however, they do not have a specific plan for addressing these obstacles. Currently the department expects to complete its systems development efforts, which includes the full implementation of its data analysis and reporting system by the spring 2006—1 year later than its initial completion date—primarily due to the lack of state data and the failure of some of Education's contractors to meet scheduled delivery dates. To the degree that it has been able to proceed, the department has begun developing a set of quality checks, although a few program offices expressed concern about their adequacy for maintaining the value of the data. Meanwhile, Education officials have said they are developing strategies to address these obstacles, including exempting states from certain reporting requirements, but they had no specific plan for providing further assistance to the states or for meeting state expectations for phasing out multiple data collections.

We are making recommendations to Education to improve its planning and decision-making processes supporting PBDMI. In responding to a draft of this document, Education's Assistant Secretary for the Office of Planning, Evaluation and Policy Development provided written comments on a draft of this report. In its comments, Education agreed with our findings and recommendations. Copies of the written comments are in appendix II.

Background

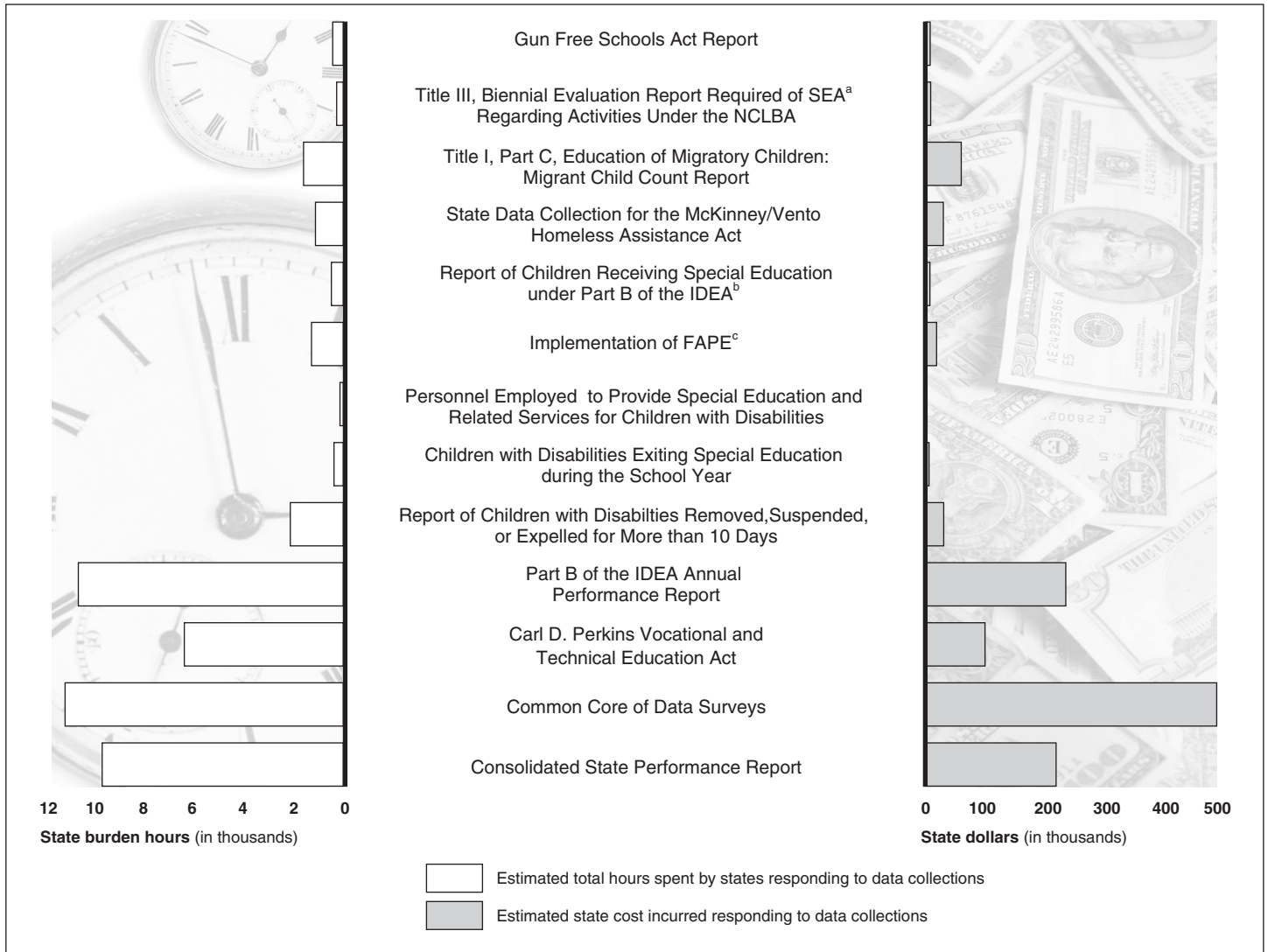
The Department of Education annually administers data collections to gather information from states about elementary and secondary education programs receiving federal assistance. When it administers a data collection, Education, like most federal agencies, is required to follow the

provisions of the Paperwork Reduction Act (PRA)¹ in order to maximize the utility of information to the federal agency and minimize the level of burden incurred by the states and agencies from whom it solicits the information. Traditionally, the department's program offices, which have responsibility for the administration and oversight of federal education programs, have developed and operated similar data collections independent of one another, in a continuous year-round process. In addition, much of the data requested from states has been focused on compliance and procedural matters, and overlooked performance and the impact of programs in the classroom. Moreover, the collection of this data has been complex and prone to error, given that it typically passes from about 94,000 public schools to more than 14,000 school districts and then to state education agencies before Education receives it.

Collecting data can be both time-intensive and costly. Education estimated that in 2004, for example, that states spent approximately 45,000 hours and nearly \$1.2 million responding to the department's requests for certain elementary and secondary education data. (See fig. 1.) Data collections are costly for Education also. Over \$5 million was spent in 2004 administering certain data collections that included allocating federal funds for both the staff to administer the collections and in many instances for contractors to analyze these data.

¹ The PRA was originally enacted in 1980 and most recently reauthorized and amended in 1995 (Pub. L. No. 104-13, May 22, 1995). Generally, the law requires each agency's chief information officer (CIO) to review program offices' proposed collections to ensure that they meet PRA standards before submission to the Office of Management and Budget (OMB) for its approval. See also GAO, *Paperwork Reduction Act: New Approach May be Needed to Reduce Government Burden on Public*, [GAO-05-424](#) (Washington, D.C.: May 20, 2005). The scope of this report did not include a review of Education's compliance with the PRA.

Figure 1: Time and Money—Estimated Annual State Burden Hours and Costs for Select Elementary and Secondary Education Data Collections



Source: Department of Education.

^aState Education Agencies (SEA).

^bIndividuals with Disabilities Education Act (IDEA).

^cFree and appropriate public education (FAPE).

Note: Figure includes burden estimates for ongoing collections for which data were available.

Initiated in 2002, the Education's PBDMI has four goals: to improve the quality of the data Education collects about elementary and secondary education in terms of accuracy, consistency, and timeliness; to reduce the burden that states incur in reporting data to the department; to improve the focus of data analysis on program performance; and to improve Education's data-sharing relationship with the states. While this initiative is not the department's first attempt to overhaul the way it collects data, it nonetheless represents a fundamental change to its data management in that it is agencywide as opposed to program specific.² As envisioned, the new collection would consolidate 16 separate collections heretofore conducted by seven program offices.³ Given the additional reporting effort that development and testing of the system would require of states, Education sought and received OMB approval to collect data from the states through PBDMI.⁴ (See table 1 for a list of the separate collections the PBDMI is designed to supplant.)

² One earlier attempt, known as the Integrated Performance Benchmarking System, was a two-state demonstration project designed to consolidate department reporting requirements, but was terminated in 2000 without an assessment of its feasibility.

³ Two collections that were formerly administered by the offices for Civil Rights and Special Education and Rehabilitative Services have already been subsumed into PBDMI.

⁴ This approval will expire on September 30, 2005. Currently, Education is seeking approval for further PBDMI data collections beginning in 2006 through 2008. OMB's approval of this extension of PBDMI data collection efforts was pending as of the end of August 2005. Additionally, any subsequent data collections would also be subject to the PRA process, including CIO review and OMB approval.

Table 1: Data Collections That Could Be Reduced or Eliminated as a Result of PBDMI

Program office	Data collections
Office of Elementary and Secondary Education (OESE)	<ol style="list-style-type: none"> 1. Consolidated State Performance Report 2. State Data Collection for the McKinney-Vento Homeless Assistance Act 3. Elementary and Secondary Education Act Title I, Part C Migrant Child Count Report
Institute of Education Science (IES)	<ol style="list-style-type: none"> 4. Common Core of Data Surveys
Office of English Language Acquisition (OELA)	<ol style="list-style-type: none"> 5. Title III Biennial Evaluation Report Required of State Education Agencies Regarding Activities under the No Child Left Behind Act of 2001 6. Biennial Report Form for the Emergency Immigration Education Program
Office of Special Education and Rehabilitative Services (OSERS)	<ol style="list-style-type: none"> 7. Report of Children with Disabilities Receiving Special Education under Part B of the Individuals with Disabilities Education Act 8. Part B, Individuals with Disabilities Act Implementation of “Free and Appropriate Public Education” (FAPE) Requirements 9. Personnel Employed to Provide Special Education and Related Services for Children with Disabilities 10. Report of Children with Disabilities Exiting Special Education During the School Year 11. Report of Children with Disabilities Unilaterally Removed or Suspended/Expelled for More than 10 Days 12. Part B of the Individuals with Disabilities Education Act Annual Performance Report 13. Consolidated Data Collection on Students with Disabilities ^a
Office of Safe and Drug-free Schools (OSDFS)	<ol style="list-style-type: none"> 14. Gun-Free Schools Act Report
Office for Civil Rights (OCR)	<ol style="list-style-type: none"> 15. Elementary and Secondary School Civil Rights Compliance Report ^a
Office of Vocational and Adult Education (OVAE)	<ol style="list-style-type: none"> 16. Carl D. Perkins Vocational and Technical Act Annual Performance Report

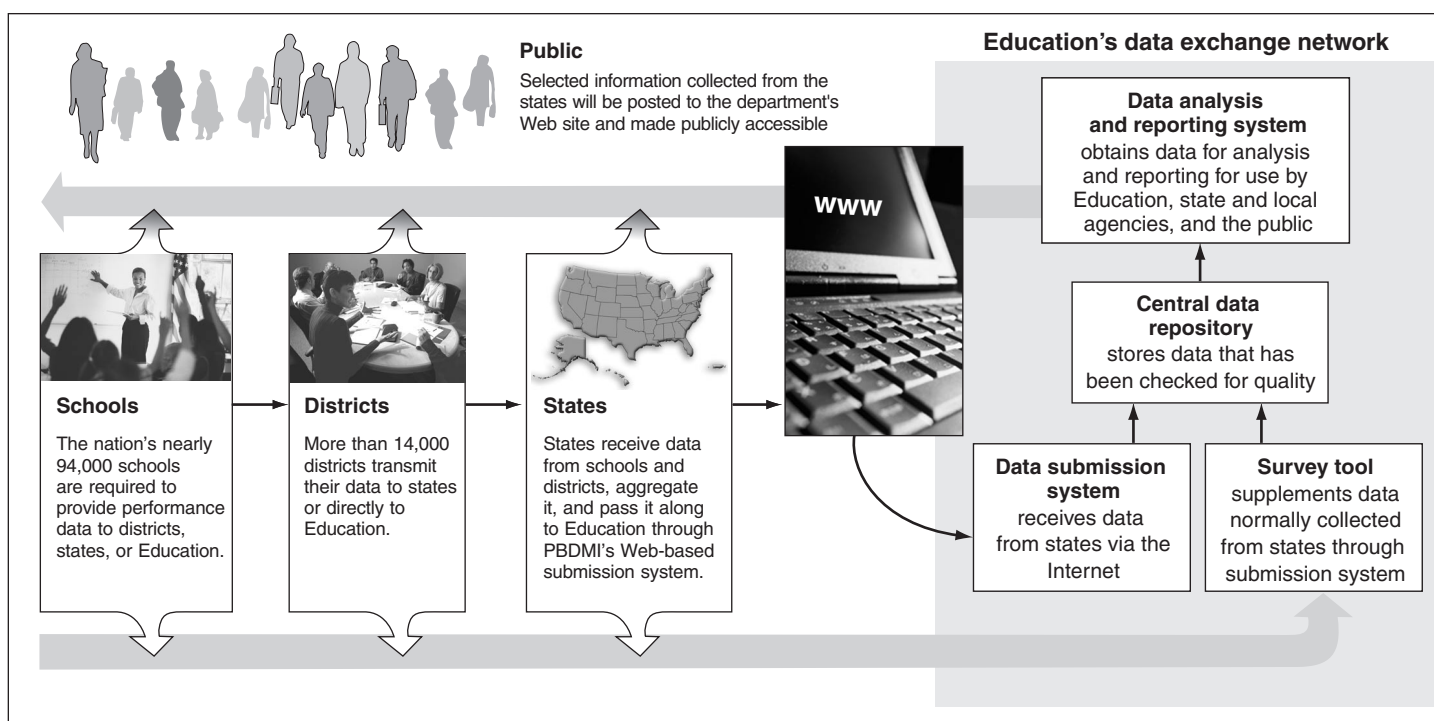
Source: GAO analysis of Department of Education documents.

^aCollections that have been replaced by PBDMI.

In addition to defining the information to be collected, the initiative involves the development of a Web-based, data exchange network that will provide states and others with the ability to submit school-based data into one unified system to be stored in a data repository. The network will comprise three separate, but interrelated systems—the first system, the submission system, developed in late 2004, is used to collect data from states, check data for quality, and store the data in the data repository. The second system, the survey tool, which was also developed in 2004, enables

Education to collect supplemental data from states and others that is also stored in the data repository. The third system, the data analysis and reporting system, which is not yet operational, will allow users (i.e., program office staff and the public) to among other things, query the data repository to analyze retrieved data and generate ad hoc reports. Education envisions that states and school districts would be able to use the data to assess their own program performance while also providing an opportunity for them to verify the quality of data submitted through the system. Figure 2 depicts the system design for the data network.

Figure 2: Proposed Design for PBDMI's Web-based Network

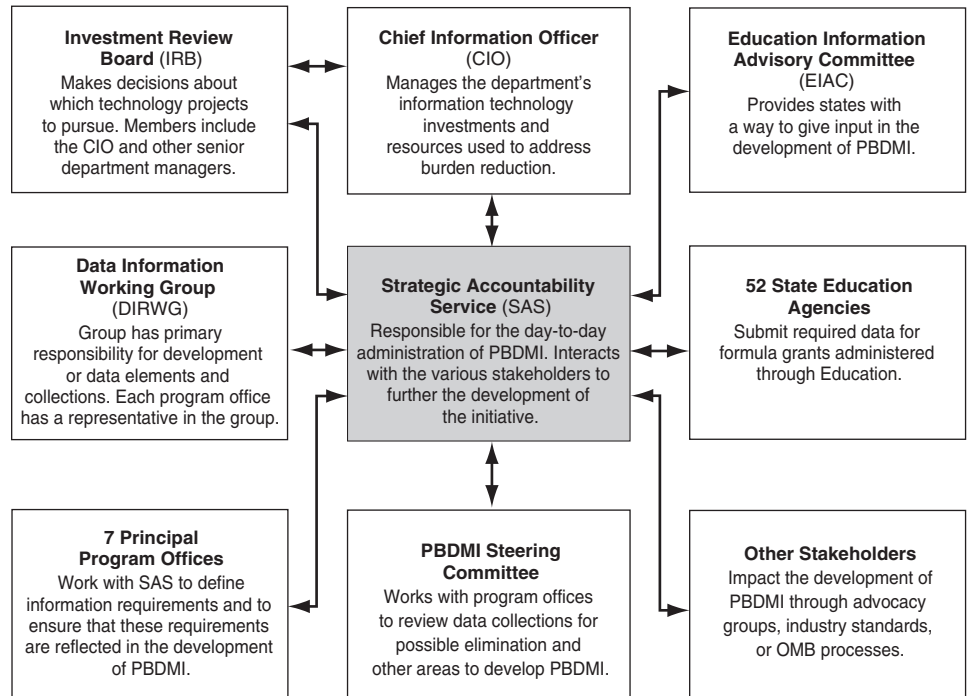


Source: Adapted from Department of Education materials; graphics by Digital Vision, PhotoDisc, and Art Explosion.

Education had originally planned to have all components of the data exchange network fully operational in the spring of 2005 following the completion of key activities, such as (1) defining the data to be collected through in-depth consultations with department program offices and with state data providers, (2) populating the database with school-based data submitted by the states so that the quality of the stored data can be checked, and (3) training program staff on how to use the new network.

PBDMI's efforts to define what data were to be collected included forging agreements among Education's individual program offices about which data would be essential to administration and oversight, particularly as performance indicators, and also developing common definitions for those elements that had been redundant. As a collaborative project, this involved developing consensus and receiving feedback from many parties—program offices, state policymakers and data providers, and organizations that develop data standards in the field of Education. Within the department, the office responsible for the day-to-day work of the project and for ensuring its success is the Strategic Accountability Service, which also has responsibility for developing and disseminating agencywide performance indicators. However, a number of other offices and boards within the department have been charged with providing oversight and guidance: a steering committee convened to share information on the development of the initiative consisting of the PBDMI managers and other senior officials within the participating program offices, the Chief Information Officer (CIO), a data information working group, and Education's investment review board. The data information working group, which is headed by Education's CIO, has responsibility for ensuring the consistency and quality of new data collections and for facilitating the integration and sharing of information between program offices. The department's investment review board has overall responsibility for reviewing and approving and prioritizing department investments in technology, including the new network. As voluntary participants, stakeholders such as data coordinators from each of the 50 state education agencies, the District of Columbia, and Puerto Rico were provided with opportunities to give their input and feedback on the development of the initiative. The Education Information Advisory Committee established by Council for Chief State School Officers facilitates this exchange. Figure 3 depicts the various groups involved in the initiative.

Figure 3: Illustration of Key Actors Involved in Development of the PBDMI



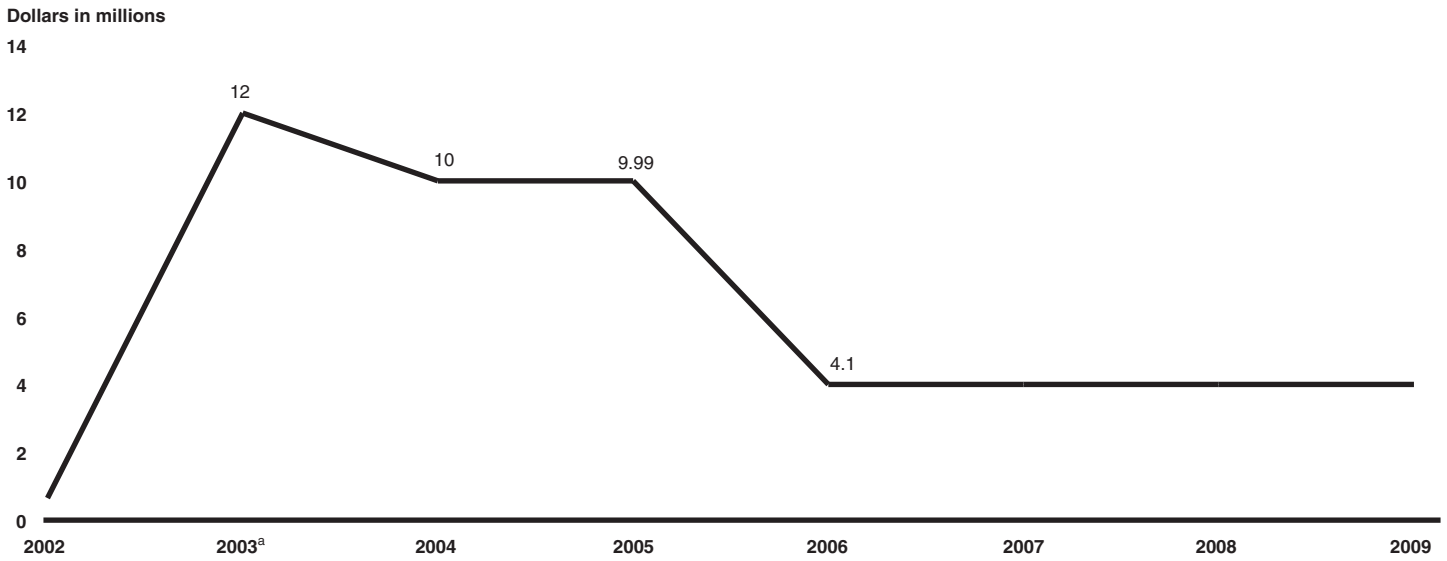
Source: GAO analysis.

Once departmental data requirements were identified, Education planned a series of data collections to be followed by extensive testing of the quality of that data by the program offices. Specifically, Education planned to have states submit the newly defined data for the 2002-2003 and 2003-2004 school years. (States would voluntarily make these submissions to PBDMI while also maintaining their current multiple reporting obligations under Education's program offices.) In conjunction with the program offices, PBDMI officials then anticipated validating and verifying the quality of the new data submitted using a number of checks and evaluations. Also at this time the development of the system that staff would use to analyze data and generate reports was to be finalized. Once these activities were completed, the program offices were to assess whether the new system would be an adequate substitute for their existing data collections.

Education has projected that it would spend just over \$30 million through 2005 and initial estimates indicate that the data network will cost—

beginning in 2006—just over \$4 million annually to maintain. See figure 4 for project time frames and projected costs through 2009.

Figure 4: Fiscal Year 2002-2009 Funding for Education’s Data Management Initiative, including Key Activities Planned for Project Initiation through Implementation



Design and proposal	Initial test of transmission and data collection from states	Data collected and stored in system	Data users given access to demonstration systems, data quality assessed	2006-2009 (projected funding for annual operating costs)
<ul style="list-style-type: none"> Education submits business case for PBDMI OMB provides \$650,000 in funding for initiative 	<ul style="list-style-type: none"> PBDMI staff conducts site visits to assess technical capabilities of states and collect data PBDMI provides \$50,000 grant to states submitting test data 	<ul style="list-style-type: none"> PBDMI staff conducts additional site visits to prepare states for data collection Second data collection to be undertaken in November Each state to be awarded another \$50,000 for participation Survey tool developed 	<ul style="list-style-type: none"> Data analysis tools made available to Education’s program offices Training for program offices and states on system use Department to decide (by end of September) whether to proceed with initiative 	<ul style="list-style-type: none"> Projected annual operating costs of system

Source: Department of Education.

^aIncludes \$2 million to develop a Web-based survey tool designed to collect supplemental data from schools, districts, and states.

Education Has Made Progress Defining Data to Be Collected under a Consolidated System, but Project Officials are Unable to Reconcile All Differences

Education officials spearheading PBDMI told us they have made progress defining the data to be collected. To do this, project officials worked with the program offices to identify their existing data needs. They also worked with program offices to translate these needs into performance-related data, such as math and reading achievement scores for different groups of students. Officials told us they had eliminated data elements collected by the program offices that are more indicative of process than performance. PBDMI officials encouraged program offices to identify performance-related data by using requirements specified in laws such as the No Child Left Behind Act and using the goals in the department's strategic plans.

PBDMI officials also worked with the program offices to reach agreement on common definitions for the data elements selected and to eliminate redundancy. For example, some programs needed information on charter schools, and PBDMI officials coordinated efforts within the department to develop one standard definition for them. The end result of these efforts is a unified body of data elements that includes definitions for each of the data elements and identifies the program with primary stewardship over decisions about that element. According to one department official managing the initiative, this collection will improve the quality of the data by assuring more consistency in what states provide.

Although PBDMI officials reported progress in identifying performance-related data and establishing common data definitions, project officials have not fully documented these achievements by establishing a baseline and thus cannot be certain of the full extent of the progress made toward achieving their goal to enhance the department's focus on outcomes and accountability. For example, while PBDMI officials were able to provide a list of 161 data elements focused on performance they were unable to provide us with a comprehensive list of "process-oriented" elements that had been eliminated. Similarly, while PBDMI managers reported that the program offices had agreed to definitions for the bulk of the data elements—one official estimated that they reached agreement for about 90 percent of the data—they could not provide us with a complete list of redundant elements that had been eliminated or those that remain because they had not tracked them.

While PBDMI officials could not provide a full list of disputed data elements, they reported that some differences still remain among program offices. Although PBDMI officials encouraged the use of strategic plans and statutory requirements to justify the selection of performance-based data, they told us that program offices had final say over what data to collect. For example, one office uses similar although somewhat broader

criteria that allow it to collect “data that can be reliably obtained from states or that Education has a documented need for.”⁵ Additionally, according to initiative officials, some differences remain due to differences in legislative requirements for the particular programs, while others resulted from preferences of some offices to continue using the same definitions as in the past.

Officials responsible for carrying out the PBDMI told us they were unable to reconcile all differences. Officials told us they were working with the program offices to reach agreements, but said the programs maintain primary control for defining their data needs and would make final decisions. Additionally, we were told by Education’s CIO, who is required to review all data collections and who has a primary role within the Data Information Working Group, that this office does not have a role in resolving data disputes between program offices in order to ensure uniformity. However, an official also said that any differences that could not be resolved between the program offices would ultimately be arbitrated at the assistant secretary level within Education.

PBDMI Officials Have Worked Extensively with States on Data Preparation and Submissions, but Most States Cannot Produce the Requested Data

PBDMI officials have conducted extensive outreach to the states to help unify their data definitions and upgrade their collection and submission systems. State data providers responding to our survey expressed general satisfaction with the department’s outreach. However, the majority thought that the burden of data collection and reporting would either increase or remain the same with implementation of the PBDMI. In addition, less than half expected the initiative to improve their ability to conduct their own in-state analyses only somewhat. Despite the extensive outreach, the states were not able to produce enough data during test submissions in 2002-2003 and again in 2003-2004 for the department to validate its quality and consider phasing out its standing collection systems.

⁵ Office of Elementary and Secondary Education, “Criteria for Inclusion of Data Elements in the Consolidated State Report,” 2005.

Education Has Conducted Extensive Outreach to States to Improve Data Quality

In order to ensure that states could meet Education's requests for quality data required as part of PBDMI, officials conducted extensive outreach to state agencies, their data providers, and to data standards organizations. After Education developed its body of data elements, it consulted in 2002 with a task force consisting of a small number of state data providers to advise the department on the availability of the data it intended to collect. The department then conducted site visits beginning in April 2003 to 50 states, the District of Columbia, and Puerto Rico to obtain feedback on the ability of states to provide needed data and to prepare for testing the states' ability to submit data. Education officials said they also made \$50,000 grants to all 52 states to offset costs of overhauling information systems or obtaining additional staff. At the culmination of these visits, Education originally planned for states to transmit 2002-2003 school year data that could be tested for quality.

However, Education scaled back the scope of this first data collection after recognizing that states would not, as yet, be able to offer certain types of data, such as data needed to meet requirements of the NCLBA. Consequently, Education delayed its plans to assess the quality of the data states submitted and focused instead on the ability of states to electronically transmit as much PBDMI data as they could to the department. Also, Education decided to remove from PBDMI's prospective collection some data elements that states reported were not available at that time. Under this transmission pilot test, 50 states, including the District of Columbia and Puerto Rico, were able to submit some data to Education demonstrating that PBDMI was technically feasible.

After establishing this technical feasibility, Education began preparing in 2004 for its data collection of 2003-2004 school year by providing additional outreach to the states. Project officials conducted a second round of site visits beginning in April and provided further guidance to help states align their data definitions with PBDMI standards. By aligning definitions with PBDMI, Education attempted to minimize possible confusion about what data to submit and when, further assisting the department's efforts to improve data quality. Department officials have said that establishing a unified body of data elements across the department and states—so that all involved parties use the same

“language” when analyzing and sharing data⁶—is a priority. Education officials attribute the lack of quality in the data it currently collects from states and others to a variety of reasons, such as the lack of common data definitions that developed over time in response to the specific information needs of the program offices and data requirements arising at the state level.

Officials with the initiative also conducted a limited number of quality assessments of state information systems to identify better ways of collecting and reporting data to the department. To serve states on a broader scale, Education conducted regional meetings, providing them with updates and feedback on the progress of the initiative. Officials also established a call center to answer states’ questions about the data to be submitted. Most states also received another \$50,000 in grants for their continued participation in the initiative.⁷ Education began collecting 2003-2004 school year data in November 2004.

To increase the likelihood that its definitions would be adopted by states and other data providers, PBDMI officials also collaborated with advocacy groups that establish data and influence the development of technical standards. For example, PBDMI officials contracted with the Council of Chief State School Officers to coordinate PBDMI conferences, help states prepare and submit data, and provide feedback as PBDMI developed data definitions. Education also collaborated with the Schools Interoperability Framework, a group that develops data-sharing standards and software primarily designed for schools and districts. By working with the Schools Framework, Education officials said they could improve data quality by increasing the likelihood that departmental definitions and other standards would be incorporated into software used by schools and districts. This interaction with the Schools Framework is Education’s primary attempt to deal with the long-standing problem of poor data

⁶ Some of the work to establish a consistent standard has been ongoing throughout the department prior to the development and implementation of PBDMI such as the work undertaken by Education’s National Center on Education Statistics to establish a departmentwide data dictionary. PBDMI has a role in contributing to some of these other efforts.

⁷ According to department officials, all 50 states, the District of Columbia, and Puerto Rico accepted grants in 2003; and in 2004, 46 states acquired another \$50,000. The grants were awarded solely on the basis of state participation in PBDMI, and states were allowed wide latitude in their usage.

provided by schools and districts.⁸ (See table 2 for a list of some of Education’s outreach activities.)

Table 2: Education’s Outreach Activities to Improve Data Quality under the PBDMI

Activity	Description	Purpose
Site visits (1st round)	Met with states in summer 2003 to discuss data definitions and availability for test data collection in November 2003.	To introduce standards, encourage consistency, and assess data availability and technical capacity of state information systems.
Site visits (2nd round)	Met with states in spring 2004 to confirm data definitions and availability for initial data collection in November 2004.	
\$50,000 PBDMI Participation Grants	Officials report awarding 52 state education agencies with funds in 2003-2004; and grants to 46 states received funds in 2004-2005.	To obtain state buy-in and offset costs.
State taskforce	This advisory group, made up of a small number of states, has provided input concerning available data that can be submitted by states and how collections could yield better quality data.	To solicit initial state input on data issues such as availability and capacity.
Technical assistance	Call center available to all states, meetings, conferences, and data quality assessments provided to 10 volunteer states.	To provide states with answers to questions, updates on the status of the initiative, and information to help improve data systems.
Outreach to software vendors	Education coordinates with key standard setting organizations such as the Schools Framework.	To work collaboratively to develop educational data standards.

Source: Department of Education.

Most States Expressed Satisfaction with Education’s Outreach, but Had Mixed Views on PBDMI’s Potential Benefits

States were generally satisfied with Education’s outreach activities. (See table 3.) Most state data providers—72 percent—rated Education’s site visits effective in improving the partnership with the states. One state data provider characterized his exchanges with the department as open and non-defensive, and further reported that the department had been responsive. More than half rated as effective or very effective Education’s technical assistance (57 percent) and regional meetings (52 percent).

⁸ Past reports issued by GAO (published jointly with other education agencies) and Education’s Inspector General (IG) document that inadequate data quality practices by schools and districts have adversely affected the states’ ability to produce quality data. In 2002, GAO and Education’s IG reported that states had problems entering accurate data and lacked sufficient supervisory review procedures to check data received from schools and districts. GAO et al., *A Joint Audit Report on the Status of State Student Assessment Systems and the Quality of Title I Accountability Data*, SAO-02-064, (Austin, Tex.: 2002). OIG, Department of Education, *Improving Title I Data Integrity for Schools Identified for Improvement*, ED-OIG/A03-B0025 (Philadelphia, Pa.) March, 2002.

While most states thought Education’s activities to improve its partnership with states were effective, some suggested areas for improvements. For example, 72 percent thought the site visits provided only some or little information on successes achieved in other states.

Table 3: State Survey Responses on Education’s Outreach Activities through PBDMI

How effective has Education been in its goal to improve coordination with states?		
	Very effective/effective	Ineffective/very ineffective
Site visits	72%	8%
Technical assistance	57	4
Regional meetings	52	6
To what extent did the 2004 site visits provide the following benefits?		
	Very great/great extent	Little to no extent/some extent
Opportunity to share information	50%	24%
Opportunity to provide feedback	44	20
Obtained information about successes in other states	6	72
Obtained a better understanding of the benefits to states	30	34

Source: GAO, Survey of States on the Department of Education’s Performance Based Data Management Initiative (PBDMI).

In their survey responses half of the states expressed the view that reducing their reporting burden was the most important PBDMI goal; however, fewer than a third of the states said they believe the initiative will do so. (See table 4.) Some states emphasized their burden had increased in the short term as they continued dual reporting in order to meet the still ongoing data collection requirements of the program offices. Three states reported to us their cost estimates of systems development projects needed to support PBDMI, which ranged from approximately \$120,000 to as much as \$5 million. Moreover, about 75 percent of the states reported that they thought the burden to collect data would remain the same or increase once PBDMI was implemented. Some state respondents expressed the opinion that until there is a firm commitment by Education to halt multiple data collections their reporting burden would not likely lessen. “We are asked from the federal government for more and more information.... [which] opens the flood gate for more and more reporting,” noted one official, adding that it is currently “hard to see the benefit at this time.”

Table 4: Percentage of States Reporting Which Goals Were Most Important, Attainable, and Difficult to Achieve

PBDMI goals	Most important goal	Most attainable goal	Most difficult goal to achieve
Reducing collecting and reporting burden	50%	30%	36%
Improving data quality	26	16	30
Improving the partnership with states based on common data standards	12	24	14
Focusing on outcomes	0	16	8
Not sure	12	14	12

Source: GAO, Survey of States on the Department of Education’s Performance Based Data Management Initiative (PBDMI).

Some states also had reservations about the benefits of PBDMI for evaluation. One respondent cautioned, for example, that support within his state had weakened because of the lack of perceived benefits. Only about 20 percent of states expected PBDMI to improve or greatly improve their analytic capacity—that is the ability to meet their own state reporting requirements, analyze program effectiveness, analyze student outcomes, and to compare outcomes within states. Their reasons varied. For example, five states reported that they would continue to use their own systems. A few elaborated that their own information systems allow more detailed analyses of state performance than the information to be collected through PBDMI. Additionally, an almost equal number of states saw PBDMI as an effective tool to inform stakeholders as not. Table 5 lists the extent to which state data providers expect PBDMI to enhance their analytical capacity in a variety of areas.

Table 5: Percentage of States Reporting the Extent to Which PBDMI Would Improve Their Analytical Capacity

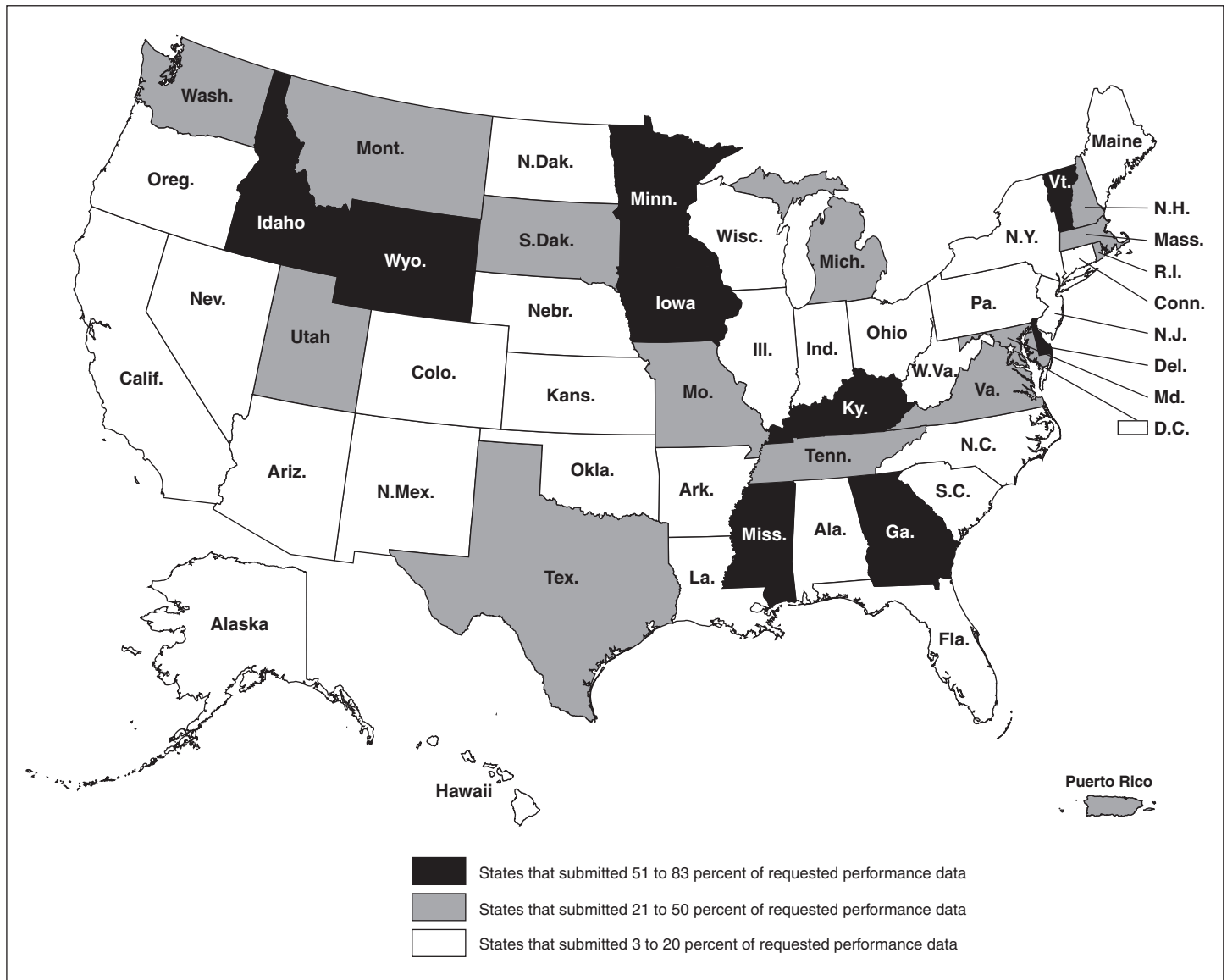
	Very great/great extent	Little to no/some extent
Inform stakeholders	35%	33%
Meet state reporting requirements	22	59
Analyze student outcomes	22	53
Make budgetary decisions	16	61
Analyze program effectiveness	20	45
Compare outcomes within states	20	51

Source: GAO, Survey of States on the Department of Education’s Performance Based Data Management Initiative (PBDMI).

**Many States Are Not
Prepared to Meet
Education's Data Requests**

As of June 3, 2005, only 9 states had submitted more than half of the requested 2003-2004 school year data, while 29 states had submitted less than 20 percent (see fig. 5). Although PBDMI officials said they will wait until August 2005 for states to submit the 2003-2004 data, they also acknowledged that many states would not be able to provide significant portions. The lack of state data is particularly acute in some programmatic areas. For example, many states have been unable to provide data on homeless and migrant students or students with limited English proficiency. States told Education officials early in the process that changes to state data collection processes, systems, and definitions would be needed to provide these types of information.

Figure 5: School Year 2003-2004 Performance Data Submitted by States to PBDMI as of June 3, 2005



Source: Department of Education.

We found that there were various reasons why states could not provide data. Some states reported that they wanted better documentation from the department in areas such as clarifying established data definitions and file format specifications needed to transmit data. States needed to make major modifications to their existing data collection and reporting

processes in order to provide new information required by PBDMI. States also reported that they would not provide certain data elements that were inapplicable, hard to collect, or available elsewhere. Some also reported that there was still some confusion over multiple or unclear definitions. Department officials said that many states had initially overestimated their capabilities and that the data states said would be available differed greatly from what they have produced thus far. States have also noted competing demands for their time and resources stemming from NCLBA. Some states reported they lacked resources, such as staff and money, to implement changes specific to the initiative. Specifically, 56 percent of the state survey respondents said that all or a portion of the \$50,000 in grants they received from Education were used to contract for additional personnel, a quarter of the states said that these funds were used to improve their information systems. Some states noted, however, that these funds were insufficient to make changes necessary for their participation in PBDMI.

Recognizing that obtaining state data has been problematic, Education has recently developed a preliminary strategy for working more closely with states to ensure that it obtains 100 percent of data from all the states. While not finalized, Education is currently considering actions such as issuing regulations requiring states to submit PBDMI data and allowing those states that provide acceptable amounts of “high quality” data under PBDMI to be exempt from existing data collections. For example, states that submit data to PBDMI that are also currently collected through the Consolidated State Report—one of many data collections required under the NCLBA—would not have to submit the same data under this data collection. Officials have also tentatively proposed collecting data of lesser quality that are readily available and obtaining data through other systems to supplement what has been provided thus far. It is not clear the extent to which this proposal would undermine efforts to improve data quality and maintain program office buy-in. Another option under consideration at Education is to target departmental resources, such as \$25 million in grants for system improvements from the Institute of Education Sciences, at states that actively participate in PBDMI.

Education Is Proceeding with Implementation despite the Data Shortage and without a Detailed Plan of Action

Education is proceeding with efforts toward full implementation of PBDMI—using the data for analysis and reporting—despite the limited amount of data collected. To do so, program offices decide whether the quality of the data (in terms of accuracy, consistency, timeliness, and utility) collected through PBDMI meets their needs. Once program offices validate the quality of the data, Education would begin to phase out existing data collections. Additionally staff will be trained on how to access and use the data collected to date. Originally Education expected to complete all of these activities by the spring of 2004. To the degree that it has been able to proceed, the department has developed a set of quality checks designed to ensure the accuracy and completeness of the data states submit.

Nevertheless, two program offices, which as members of the seven principle offices included in the initiative and have a role in determining whether the data are accurate and complete for their purposes, expressed concern that PBDMI's procedures to ensure data quality may not be adequate. An official in the Office of Special Education and Rehabilitative Services (OSERS), which has collected almost 30 years of longitudinal data about the effectiveness of the nation's special education programs, told us that PBDMI had been provided with information about the nearly 200 data quality checks used in special education collections, but was not sure that PBDMI adopted them all. PBDMI officials said they adopted those that were universally relevant. Further, this official expressed concern that PBDMI would not meet its special needs. Specifically, unlike other program offices, OSERS programs bases student assessment on age as opposed to grade level attained. Additionally, this official was concerned about the timeliness of the data collected through PBDMI because that office generated a number of congressionally mandated reports at specific times of the year. Consequently, this office plans to compare the quality of its own data with the data collected through PBDMI. Officials in the Office for Civil Rights also expressed similar reservations with PBDMI's administration of its large elementary and secondary survey of schools and districts used to assess compliance with civil rights laws and identify trends. Historically, district superintendents have responded to this survey in large enough numbers allowing Education to generalize on any findings with a high degree of confidence.⁹ However, when PBDMI administered the survey, fewer superintendents

⁹ Officials have told us that historically 97 percent or more of randomly selected school districts have responded to this survey.

responded and, according to the Office for Civil Rights, PBDMI did not have a readily available plan that adequately outlined steps needed to raise the response rate. As of June 10, 2005, the response rate for this survey was lower than previous surveys.

Final implementation has also been hampered by delays in training and delivery of the analysis and reporting system. Both are more than a year behind schedule. An official responsible for overseeing the training efforts told us they could not focus on the delays because considerable time was spent addressing state problems submitting data through PBDMI. The data analysis and reporting system is more than a year behind scheduled due to the lack of data and the failure of Education's contractor to meet its scheduled delivery of the system. Education officials now expect to fully implement the system by March 31, 2006. In lieu of developing its data analysis and reporting system and training, PBDMI has offered presentations of these tools as a preview for staff to see the new system's capabilities and to keep them apprised of the initiative's progress.

Despite the many obstacles confronting the PBDMI, Education officials said they expect to proceed with implementation of the initiative, albeit with some activities postponed. In August, project officials developed a preliminary strategy designed to address the problem of collecting data from the states, such as providing exemptions from certain reporting requirements for some states. However, this strategy has not been finalized, and Education has not developed a specific plan of action for how they might (1) help states that are deficient, (2) deal with state expectations for phasing out the multiple data collections, or (3) meet the expectations of their own program offices.

Conclusions

The PBDMI represents an important step forward for the Department of Education in its efforts to monitor the performance of the nation's elementary and secondary schools. By developing the ability to collect data that are more accurate, timely, consistent, and focused on key national performance indicators, Education will be much better informed to make its many policy and programmatic decisions. The initiative, by asking for a clearly defined set of information that is to be submitted only one time, has the potential to substantially reduce state reporting burden for elementary and secondary programs as well as to help states to develop better data systems. However, PBDMI is an ambitious and risky undertaking that requires the continued cooperation of a number of internal and external stakeholders.

In order for PBDMI to be successful, the department must rely on states to provide new information at a time when they are busy implementing large new federal initiatives, such as the No Child Left Behind Act. While some states have been able to provide significant amounts of data, others continue to lag far behind. In order for PBDMI to be successful, it is important for all states to submit timely, reliable, accurate, and consistent data. Consequently, it is important for the department to have a clear plan for addressing states with problems providing data and to continue to provide a proper combination of support and incentives for states to participate. By having worked closely with the states on their collection systems, PBDMI officials have the information they would need to develop a plan of action to help move them forward.

Because PBDMI represents a significant change in the way the Department of Education conducts business, it can only be accompanied effectively and efficiently by a change in management practices. However, program offices still retain much discretion over what data they will collect, how they will define it, and whether or not PBDMI's data will meet their needs. While it is the initiative's responsibility to make sure it collects data that meets the program offices' requirements, PBDMI is also responsible for developing a data collection system focused on program performance and quality data. To the extent that programmatic differences, such as those over data definitions, inhibit PBDMI's goals there should be a clear process for reconciling those differences. If PBDMI truly represents a new way of doing business, Education should be able to ensure that its organizational units go along. It is difficult to see PBDMI achieving its full potential without a clear process for furthering the initiative's goals.

Fundamental to any large, complex effort's success is a well thought out plan that tracks its progress against a set of clearly defined and measurable goals. PBDMI has not put in place such a planning and tracking system. State governments and Education's program offices have devoted much time, effort, and money participating in PBDMI with the idea that they would see benefits as a result. A lack of demonstrated progress and benefits potentially erodes state support, undermining the viability of this important initiative. Some states are already beginning to lose sight of the potential benefits of PBDMI. As the department goes past its original completion deadline, it is important for it to lay out a clear plan for how it will now proceed.

Recommendations for Executive Action

To address the issues we have identified with regard to planning, decision-making, and improving data quality, we recommend that the Secretary of Education develop

- a strategy to help states improve their ability to provide quality data given the challenges that many states face in providing data;
- a clear process for reconciling differences between the program offices and the PBDMI oversight office to ensure that decisions critical to the success of PBDMI are made; and
- a clear plan for completing final aspects of PBDMI, including specific time frames and indicators of progress toward the initiative's goals.

Agency Comments and Our Evaluation

We received written comments on a draft of this report from the Department of Education. Education agreed with our findings and recommendations and stated that it has devoted additional resources to the initiative and plan to issue a detailed project plan that outlines the steps needed to complete the initiative. These comments are reprinted in appendix II.

Education also provided technical corrections and comments that we incorporated where appropriate.

We are sending copies of this report to the Secretary of Education, the Office of Strategic Accountability Services, the Director of the Office of Management and Budget, and appropriate congressional committees. Copies will also be made available to other interested parties upon request. Additional copies can be obtained at no cost from our Web site at www.gao.gov.

If you or your staff should have any questions, please call me at 415-904-2272 or bellisd@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report.

GAO staff who made major contributions to this report are listed in appendix III.

A handwritten signature in black ink that reads "David L. Bellis". The signature is written in a cursive style with a large, looped 'D' and 'B'.

David Bellis
Director, Education, Workforce
and Income Security Issues

Appendix I: Scope and Methodology

The objective of our review of the Performance Based Data Management Initiative (PBDMI) was to assess the progress Education has made in its implementation of the initiative, particularly with regard to (1) defining what performance-related data it will collect from states on behalf of the program offices, (2) assisting states in their efforts to submit quality information, and (3) utilizing performance-related data to provide enhanced analytic capacity within the program offices. We conducted our review between April 2004 and September 2005 in accordance with generally accepted government auditing standards.

Overall Approach

To assess the department's progress in each of these areas, we reviewed documents relating to the implementation of the initiative, relevant laws, and information provided by the office responsible for PBDMI—the Strategic Accountability Service (SAS) and others. We interviewed key staff responsible for the initiative as well as officials in each of the offices that are participating in PBDMI. We also interviewed senior-level Education officials to determine their role in the implementation of PBDMI. To gain insight into state perspectives on the initiative, we administered a Web-based survey to state officials responsible for providing these data to Education. We received responses from 50 states including Puerto Rico. We also interviewed a variety of external stakeholders, a data standards organization, and three contractors involved in the initiative, including an official from the Council of Chief State School Officers. We also reviewed previously issued reports by Education's Office of the Inspector General (IG) as well as GAO reports and testimonies.

In addition to interviewing departmental officials, we also reviewed documentation on the initiative to gain a better understanding of what actions Education was undertaking to implement the goals of the initiative, including its data quality contract, data dictionary, its business plans as well as justification reports to the Office of Management and Budget (OMB) required under the Paperwork Reduction Act to collect data. We also reviewed summary information about state performance data that was obtained as a result of site visits to states conducted in 2004 in order to analyze what data was obtained from states as a result of their efforts.

Education provided information on states' submission of requested data elements to PBDMI as of June 3, 2005. States were expected to provide data for 64 data elements ranging from dropout rates, student performance on reading, science, and writing assessments, teacher certification, and

many others. For each of these elements, Education determined whether each state had submitted the information, had not submitted the data, or did not collect the information. We incorporated into our report Education's calculated percentages of elements submitted for each state. We determined that these data were sufficient for the purposes of this engagement.

In order to document the burden hours associated with certain elementary and secondary data collections, we accessed 14 data collection justifications authored by each of the department's program offices and submitted to the chief information officer. These reports had received OMB approval or were seeking approval to collect data from states and others. We talked with an official responsible for maintaining these documents at the department's Web site to verify that these were the most recent data available for analysis. From each document we obtained the estimated state burden hours and costs and federal administrative costs associated with each data collection. Each estimate was based on a formula that we adjusted to reflect these costs for the 52 states participating in the initiative. In some instances where an average was used, we assumed that the 52 states were similar in characteristics to the overall population of states included in Education's estimates. However, we did not find it feasible to prorate the formulas for the federal administrative costs (based on 52 states) for each of the collections. A statistician verified each of the calculated estimates for accuracy.

We also surveyed all 52 state data coordinators using a Web-based survey instrument in order to obtain their perspectives on various aspects of the initiative. Our survey instrument was developed based on information obtained during interviews with state data coordinators in Pennsylvania, Virginia, Washington, and Oregon. Additionally, other internal stakeholders specializing in technology and education were asked to review and comment on our draft survey instrument. The survey was pre-tested with Wyoming, North Carolina, and Illinois to determine if the questions were clear and unbiased and whether the terms were accurate and precise. We included these three states in our pretests because they varied in size and technical capacity for data transmission as determined by an earlier Education survey. Based on their comments, we refined the questionnaire as appropriate.

Our final survey instrument asked a combination of questions that allowed for closed-ended as well as open-ended responses and included questions about state perspectives on PBDMI's ability to achieve its goals. The survey was conducted using self-administered electronic questionnaire

posted on the Internet. We sent e-mail notifications about the upcoming survey to all 52 state data coordinators (50 states, the District of Columbia, and Puerto Rico) on November 15, 2004, and activated the survey shortly thereafter. Each potential respondent was provided a unique password and username by e-mail to limit participation to members of the target population. To encourage respondents to complete the questionnaire, we sent an e-mail message to prompt each non-respondent approximately 2 weeks after the survey was activated and followed up by e-mail or phone with each non-respondent several times thereafter. We closed the survey on January 21, 2005, after the 50th respondent had replied.

Because this was not a sample survey, there are no sampling errors. However, the practical difficulties of conducting any survey may introduce errors, commonly referred to as non-sampling errors. For example, difficulties in how a particular question is interpreted, in the sources of information that are available to respondents, or in how the data are entered into a database or were analyzed can introduce unwanted variability into the survey results. We took steps in the development of the survey instrument, the data collection, and the data analysis to minimize these non-sampling errors. For example, a survey specialist designed the survey instrument in collaboration with GAO staff with subject matter expertise. Then, as stated earlier, it was pre-tested to ensure that the questions were clear, unbiased, and accurate. When the data were analyzed, a second, independent analyst checked all computer programs. Because this was a Web-based survey, respondents entered their answers directly into the electronic questionnaire, eliminating the need to have the data keyed into a database, thus removing an additional source of error.¹

¹Source: GAO Intranet, ARM Guidance, "Evaluating and Reporting of Non-sampling Errors in Surveys."

Appendix II: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF PLANNING, EVALUATION AND POLICY DEVELOPMENT
October 17, 2005

ASSISTANT SECRETARY

David D. Bellis
Director, Education, Workforce, and Income Security Issues
United States Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Bellis:

Thank you for providing the Department of Education with a draft copy of the U.S. Government Accountability Office's report entitled, "Education's Data Management Initiative: Significant Progress Made but Better Planning Needed to Accomplish Project Goals" (GAO-06-6). We agree with your recommendations and value your observations on this continuing initiative.

The Department's performance-based data management initiative is essential to the Department's efforts to improve the use of data to inform policy making and program management, to increase the focus on student achievement outcomes rather than on process, to reduce the burden on States of reporting data to the Department, and to improve the accuracy, timeliness, and utility of data collected. As you note in the report, the initiative is an ambitious undertaking, and we recognize the important challenges to achieving our goals.

You recommend that the Department develop 1) a strategy to help States improve their capability to provide quality data, 2) a process within the Department to resolve critical, outstanding issues, and 3) a clear plan for completing final aspects of the initiative. We have also identified these as priority focus areas and began to address them shortly after I joined the Department this summer. Since that time, we have committed additional leadership and financial resources to the initiative, among other actions, and have begun developing the detailed project plan needed to successfully complete the initiative. We will include a full description of planned actions in our corrective action plan.

Sincerely,

A handwritten signature in cursive script that reads "Tom Luce".

Tom Luce

400 MARYLAND AVE., SW, WASHINGTON, DC 20202-1200
www.ed.gov

Our mission is to ensure equal access to education and to promote educational excellence throughout the nation.

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

David Bellis (415) 904-2272

Acknowledgments

In addition to the contact named above the following individuals made important contributions to this report: Bryon Gordon, Assistant Director; Carla Craddock, Analyst-in-Charge; Susan Bernstein; David Dornisch; Mary Dorsey; Kimberly Gianopoulos; Brandon Haller; Stuart Kaufman; Jonathan McMurray; Valerie Melvin; James Rebbe; Gloria Hernandez Saunders; Kimberly Siegel; Michelle Verbrugge; and Elias Walsh.

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