

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL UNDER THE  
PAPERWORK REDUCTION ACT**

A. JUSTIFICATION

1. Circumstances necessitating information collection.

Public Law 108-446 directs the Secretary of Education to obtain data on: (1) the number and percentage of infants and toddlers with disabilities, by race and ethnicity and gender, who are receiving early intervention services; (2) the number of infants and toddlers, by race and ethnicity, who are at risk of having substantial developmental delays (as described in Section 632), and who are receiving early intervention services under Part C; and (3) the number and percentage of children with disabilities, by race and ethnicity and gender, who, from birth through age 2, stopped receiving early intervention services because of program completion or for other reasons. The specific legislative authority for this data collection may be found in Section 618(a)(1)(B), Section 618(a)(1)(C), Section 618(a)(2) and Section 618(a)(3). The purposes of such data are: (1) to assess the progress, impact, and effectiveness of State and local efforts to implement the legislation and (2) to provide Congress and Federal, State, and local educational agencies with relevant information. OSEP also uses these data for monitoring activities, for planning purposes, for congressional reporting requirements, and for dissemination of data to individuals and groups.

Legislative authority requires that:

"(a) IN GENERAL- Each State that receives assistance under this part, and the Secretary of the Interior, shall provide data each year to the Secretary and the public on the following:

(1)(B) The number and percentage of children with disabilities, by race, gender, and ethnicity, who are receiving early intervention services.

(C) The number and percentage of children with disabilities, by race, gender, and ethnicity, who, from birth through age 2, stopped receiving early intervention services because of program completion or for other reasons.

(2) The number and percentage of infants and toddlers, by race, and ethnicity, who are at risk of having substantial developmental delays (as defined in Section 635), and who are receiving early intervention services under part C.

(3) Any other information that may be required by the Secretary" (P.L. 108-446, Section 618).

In addition to the specific data requirements described in Section 618, other provisions of IDEA address the need to examine where services are provided for infants and toddlers with disabilities. Section 635(a) specifies that:

“(a) IN GENERAL - A statewide system described in section 633 shall include, at a minimum, the following components:

(16) Policies and procedures to ensure that, consistent with section 636(d)(5)--

(A) to the maximum extent appropriate, early intervention services are provided in natural environments;”

An additional provision of IDEA addresses the flexibility of serving children 3 years of age until entrance into elementary school. Section 635(c) specifies that:

“(1) IN GENERAL- A statewide system described in section 633 may include a State policy, developed and implemented jointly by the lead agency and the State educational agency, under which parents of children with disabilities who are eligible for services under section 619 and previously received services under this part, may choose the continuation of early intervention services (which shall include an educational component that promotes school readiness and incorporates preliteracy, language, and numeracy skills) for such children under this part until such children enter, or are eligible under State law to enter, kindergarten.”

This clearance package includes three data collection forms. Each form provides instructions and information for States when submitting their data. Table 1 provides the data required by Section 618(a)(1)(B) and Section 618(a)(2).

- Section A collects the number children with disabilities by the child’s age and race/ethnicity.
- Section B collects the number of children with disabilities by the child’s gender.
- Section C collects the number of infants and toddlers who are at risk of having substantial developmental disabilities, by the child's age and race/ethnicity. This count is a subset of the children reported in Section A and is only completed by States that serve at-risk infants and toddlers.
- Section D is an optional cumulative count of the number of infants and toddlers with disabilities who received early intervention services during the most recent 12-month period.

Because IDEA 2004 requires each State to report the percentage of children with disabilities, by race, gender, and ethnicity and the percentage of at-risk infants and toddlers by race and ethnicity, Table 1 also includes cells for these percentages. However, to assure cross-state comparability and minimize State burden, these percentages will be calculated by the data collection software. To accommodate the flexibility of Section 635(c), additional data collection elements have been added to table 1 (child count) to collect counts of children age 3 and older, by age, race/ethnicity, and gender. See sections A2 and B2 of Table 1.

Table 2 collects information about early intervention service settings of the children reported on Table 1.

- Section A collects primary setting of infants and toddlers according to the child's age.
- Section B collects the primary setting according to the child's race/ethnicity.

Each child reported in Table 2 is reported in only one setting.—To accommodate the flexibility of Section 635(c), additional data collection elements have been added to table 2 (settings) to collect counts of children age 3 and older according to their primary service setting, by age and race/ethnicity. See sections A2 and B2 of Table 2

Table 3 provides the data required by Section 618(a)(C), the number and percentage of infants and toddlers with disabilities who, from birth through age 2 stopped receiving early intervention services.

- Section A collects the reason for exiting according to the child's race/ethnicity.
- Section B collects the reason for exiting according to the child's gender.

As in Table 1, while Table 3 includes cells for percentages, the percentages will be calculated by the data collection software. To accommodate the flexibility of Section 635(c), additional data collection elements have been added to collect counts of the number of families of children who chose to take advantage of the new flexibility, by race/ethnicity. See row 3 of Sections A and B of Table 3.

For all of these data collection forms, the race/ethnicity categories are the categories defined by OMB in 1997. However, children can only be reported in a single racial/ethnic category. OSEP is actively working with other offices within the Department of Education (ED) to determine what categories will be used for reporting aggregated data and anticipates that final decisions on reporting these data will be made soon. A draft approach to reporting these data has already been circulated. Once final decisions are made, the final draft will be circulated Department wide. After that, the approach will be sent to OMB for clearance. Until aggregate reporting categories are implemented, States will continue to report data using the current racial/ethnic categories.

2. Use for which the information is gathered.

OSEP uses the information collected on this form to assist in establishing programmatic priorities (such as promoting services in the natural environment), to monitor States to ensure compliance with the Federal statute and regulations, and to disseminate data to Congress and the public.

These data are also used to measure progress under the performance indicators established by OSEP under the Government Performance and Results Act (P.L. 103-62) for early intervention services. For up-to-date objectives and indicators according to the Fiscal Year 2006 Performance Plan, please visit <http://www.ed.gov/about/reports/annual/2006plan/edlite-g2ideagrantsforinfants.html>.

3. Use of improved information technology.

OSEP provides States with an electronic (Excel spreadsheet) version of the data collection form to use when submitting data. States can receive and send the form via e-mail, diskette, or paper. The spreadsheet includes a number of data edits to improve data entry validity. For example, as States enter their data, the edits flag totals that do not equal the sum of the disaggregated counts. The use of the spreadsheet with built-in edits reduces the number of follow-up contacts with the States after the data reach Washington. The spreadsheet also provides space for States to comment on their data, such as reporting that they changed the way the State collects the data, noting changes in policy or legislation that may affect the data, or sharing information about other issues the State believes are applicable to the data collection. At the time of the most recent data collection, approximately 96 percent of States submitted the data electronically.

4. Efforts to identify duplication.

Information in the forms does not represent any duplication of paperwork, content, reporting, or performance requirement beyond that imposed under the statute. This information is only available from State agencies. There is currently no other source of national information on the number of infants and toddlers receiving early intervention services, on the settings in which they receive services, or on infants and toddlers who exit Part C services.

5. Small businesses.

The information requested does not involve the collection of information from entities classified as small organizations.

6. Consequence of less frequent collection.

P.L. 108-446, Section 618(a) requires: "Each State that receives assistance under this part, and the Secretary of the Interior, shall provide data each year to the Secretary of Education and the public..."

7. Special circumstances.

There are no special circumstances associated with this data collection.

8. Federal Register notice/consultation outside the agency.

ED's notice of this proposed information collection request was published in the *Federal Register* on \_\_\_\_\_ on page \_\_\_\_\_. A copy of this notice is attached.

OSEP normally consults with representatives of the National Association of State Directors of Special Education, the National Early Childhood Technical Assistance Center, Part C Coordinators, State Part C data managers, early intervention researchers, and early intervention advocates about changes to the data collections. OSEP also receives feedback on existing and revised data collections during the annual Part C data

managers meeting. This year, however, the timing of the new data requirements did not permit OSEP to consult with its usual stakeholders about the revisions to these forms (revisions are highlighted in bold in the instructions for each form). However, unlike most of the changes, the 3 new settings categories that replace the 7<sup>1</sup> more detailed categories were presented at the 2003 and 2004 Part C data meetings. However, based on the input received from data managers at the 2004 meeting, OSEP decided to continue to collect primary setting rather than to change and require states to report children according to all of the settings (including combination settings) they receives services. This change in plans was not shared with the data managers until their 2005 meeting. However, OSEP believes that the old categories can be directly cross-walked into the new reporting categories.

### OSEP's Responses to Comments

#### Report of Children Receiving Early Intervention Services in Accordance With Part C (Table 1)

1. *OSEP should clarify the percentages that will be calculated by the data collection software. (Comment: kleitch1)*

No change was made to the data collection form or instructions. The percentages calculated by the data collection software are based on the data available within the table. The cells showing 100% indicate the source of the denominator. If the 100% appears in the row total, then each of the cells in the row are divided by the row total to calculate the percent. If the 100% appears in the column total, then each of the cells in the column are divided by the column total to calculate the percent. The percentages calculated are the race/ethnicity and gender distribution of the child count table. The numerator is the number of children in the race/ethnicity or gender category. The denominator is the total number of children reported.

2. *OSEP should increase the estimated number of burden hours. It was too low to begin with and there is a cost associated with changing the data collection. (Comment:kleitch1)*

OSEP increased the estimated burden hours by approximately 25 percent.

3. *OSEP should delay implementation of the revised data collection until 2006. Changing data collection system to collect new data requirements is a burden on states. (Commenst: kleitch1, agomm1)*

OSEP cannot delay implementation of the requirements of IDEA 2004. The law specifies that these requirements must be in place by July 1, 2005.

4. *OSEP should add a race/ethnicity category for multiracial. (Comments: kleitch1, agomm1)*

Once the Department of Education (ED) determines what race/ethnicity categories will be used throughout the department for aggregated data reporting, OSEP will revise this data collection to include those categories.

5. *OSEP should add a gender category for unknown. (Comment: kleitch1)*

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<sup>1</sup> The 7 categories were: Program designed for children with developmental delays or disabilities, program designed for typically developing children, home, hospital, residential facility, service provider location, and other.

OSEP does not plan to add an unknown gender category. Section 618(a)(1)(B) of IDEA requires that states report all children with disabilities by gender.

6. *OSEP should continue to require states to use December 1 as the count date. If states use different count dates, the data are not comparable across states. (Comment: kleitch1)*

OSEP does not believe that using a different count date between October 1 and December 1 significantly affects the cross-state comparability of the number of children reported. The new flexibility was added to allow states with an education lead agency to use an October count date if that is the date used for Part B.

7. *OSEP should make the cumulative count of children served required and these data should be reported to Congress and OMB. Point in time counts do not adequately demonstrate the number of children served because children pass through the program so rapidly. States should be allowed to choose 12-month reporting period. The cumulative count should be due in November, rather than February. (Comment: kleitch1)*

A cumulative count of children is not required under IDEA. Making this data required would be an increased burden on states.

8. *On page 2 of the instructions, the last sentence under item 4 should be revised to read “proposed regulations that reflect IDEA 2004 have not yet been published.” (Comment: 5233)*

OSEP will revise the instructions as suggested.

### **Report of Program Settings Where Early Intervention Services are Provided to Children With Disabilities and Their Families in Accordance to Part C (Table 2)**

1. *OSEP should increase the estimated number of burden hours. It was too low to begin with and there is a cost associated with changing the data collection. (Comment: kleitch1)*

OSEP increased the estimated burden hours by approximately 25 percent.

2. *OSEP should delay implementation of the revised data collection until 2006. Changing data collection system to collect new data requirements is a burden on states (Comments: kleitch1, agomm1)*

OSEP will not delay implementation. At the 2004 Part C data managers meeting, OSEP received input from states on its plan to revise the settings data collection. It adjusted its plans in response to that feedback. It's now time to implement the collection. However, OSEP will show flexibility in the first year of data collection and make technical assistance available to states struggling to implement the revised data collection.

3. *OSEP should discontinue this data collection: Paperwork requirements are burdensome to states and assigning one setting per child does not reflect the comprehensive family-centered practices we provide. (Comment: jmoore1, jbotten2)*

Section 618(a)(3) of IDEA gives OSEP the authority to collect the settings data. OSEP uses the data about early intervention settings to create an indicator to assess progress in implementing the law under the Government Performance and Results Act (GPRA). In order to assess progress toward GPRA objective 8.2, the settings data are required.

4. *OSEP should not change the settings categories. Changing the number of primary settings categories from seven to three is a burden on states and does not address issues raised by states. (Comment: kleitch1)*

It is OSEP's belief that the use of three primary settings categories instead of seven will reduce burden and will make the data more comparable across states.

5. *Rewrite the definitions of the three primary settings categories. They do not seem in keeping with other materials from OSEP including the Missouri letter. (Comment: jmoore1, jbotten2)*

This form collects data about children's primary service setting. OSEP believes that the three primary settings categories are consistent with the guidance in the Missouri letter and are useful for planning and the implementation of IDEA.

6. *OSEP should add a race/ethnicity category for multiracial (Comment: kleitch1, agomm1)*

When the Department of Education (ED) determines what race/ethnicity categories will be used throughout the department for aggregated data reporting, OSEP will revise this data collection to include those categories.

7. *Keep December 1 as the count date. (Comment: kleitch1)*

OSEP does not believe that using a different count date between October 1 and December 1 significantly affects the cross-state comparability of the children reported by setting. The new flexibility was added to allow states with an education lead agency to use an October count date if that is the date used for Part B.

8. *Define "primary" setting more clearly. (Comment: wwhipple1)*

To improve states understanding of primary setting, OSEP will add the definition of primary setting to the data collection instructions and further reorder and revise the specific row instructions on page 2 as follows (offset in a box to make it clear where the applicable text begins

and ends).

#### Specific Row (Setting) Instructions

For each early intervention service setting, report the number of children whose IFSP indicates this is the primary early intervention setting. This is an unduplicated count; within each section, each child is counted once and only once.

Report children and families in one of the following setting categories:

**Home.** Unduplicated count of children whose early intervention services are provided primarily in the principal residence of the child's family or caregivers.

**Community-based Setting.** Unduplicated count of children whose early intervention services are provided primarily in a setting where children without disabilities typically are found. These settings include but are not limited to child care centers (including family day care), preschools, regular nursery schools, early childhood center, libraries, grocery stores, parks, restaurants, and community centers (e.g., YMCA, Boys and Girls Clubs).

**Other Setting.** Unduplicated count of children whose early intervention services are provided primarily in a setting that is not home or community-based. These settings include, but are not limited to, services provided in a hospital, residential facility, clinic, and EI center/class for children with disabilities.

**Primary setting is the service setting in which the infant or toddler receives the most hours of early intervention service.** Determination of primary setting should be based on **the information included on** the IFSP in place on the child count date. Only the early intervention services delivered to the child should be considered when determining primary setting.

- o If, according to the IFSP, early intervention services are only delivered to the family members, i.e., no services are delivered to a child, report the child in the other setting category (row 3).
- o **If, according to the IFSP, all of the services a child were delivered in the same setting then that setting is the primary setting.** For example, if the IFSP says that the child will receive 1 hour of physical therapy services in their home each week, and that is the only early intervention service the child receives according to the IFSP in place on the child count date, then the home is the primary setting.
- o If, according to the IFSP, a child was to receive services in more than one setting, report the child in the setting in which he or she was to receive the most hours of early intervention service. For example, a toddler who receives 1 hour of service a month in the home and 4 hours of service a month in a preschool, should be reported in the category "community-based setting."
- o **If, according to the IFSP, there is tie for primary setting (the child was to receive an equal number of hours of service in two or more settings and the child does**



**not receive a higher number of hours of early intervention service in a different setting), report primary setting based on the following decision rules:**

- 1. If the child receives an equal number of hours of service in the home and one or both of the other settings, report the child in the home setting.**
- 2. If the child receives an equal number of hours of service in a community-based setting and other settings, report the child in the community-based setting.**

9. *Add combination home/community-based setting and home/other setting categories. (wwhipple1)*

OSEP's decision to continue collecting primary setting is based on feedback from data managers. Data managers were concerned that, because most children receive at least some services in other settings, the use of combination settings would result in state being penalized for reporting these children in one of the combination settings that include other. They felt that primary setting was better suited for demonstrating that children receive most early intervention services in the home and in community settings.

10. *Clarify definitions/directions to make clear that community-based settings are settings in which typically developing children early intervention services are found, and does not include any settings in which children with disabilities are found. (agomm1)*

A task force that convened in 2003 agreed that the question of whether the child receives services while in the presence of typically developing children was not important for this data collection (the "with whom question."). What the task force believed was important is whether the child is receiving services in settings that are typical for children without disabilities. OSEP does not plan to revise the definition of a community-based setting.

11. *OSEP should consider removing grocery stores and restaurants from the list of community-based settings unless there is good evidence for keeping them. (Comment: 5233)*

OSEP will keep grocery stores and restaurants in the list of community-based settings. Data managers specifically requested that these settings be included in the definition. It is not uncommon for early intervention services to be provided such locations.

### **Report on Infants and Toddlers Exiting Part C (Table 3)**

1. *OSEP should clarify the percentages that will be calculated by the data collection software (kleitch1)*

No change was made to the data collection form or instructions. The percentages calculated by the data collection software are based on the data available within the table. The cells showing

100% indicate the source of the denominator. If the 100% appears in the row total, then each of the cells in the row are divided by the row total to calculate the percent. If the 100% appears in the column total, then each of the cells in the column are divided by the column total to calculate the percent. The percentages calculated are the race/ethnicity and gender distribution of each exit category. For each exit category, the numerator is the number of children in the race/ethnicity or gender category reported in that exit category. The denominator is the total number of children reported in that exit category.

2. *OSEP should increase the estimated number of burden hours. It was too low to begin with and there is a cost associated with changing the data collection (kleitch1)*

OSEP removed the burden hours associated with the revised reference period requirements (see #4 below) and increased the remaining estimated burden hours by approximately 25 percent.

3. *OSEP should delay implementation of the revised data collection until 2006. Changing data collection system to collect new data requirements is a burden on states (kleitch1,sabbey1)*

OSEP cannot delay implementation of the requirements of IDEA 2004. The law specifies that these requirements must be in place by July 1, 2005.

4. *OSEP should permit states to continue to choose the 12-month reporting period. (kleitch1, sabbey1) Changing 12-month exiting reporting period is a burden on states. (sabbey1, agomm1)*

OSEP will continue to allow states to choose the 12-month reporting period.

5. *OSEP should add a race/ethnicity category for multiracial (kleitch1, agomm1)*

Once the Department of Education (ED) determines what race/ethnicity categories will be used throughout the department for aggregated data reporting, OSEP will revise this data collection to include those categories.

6. *OSEP should add a gender category for unknown (kleitch1)*

OSEP does not plan to add an unknown gender category. Section 618(a)(1)(B) of IDEA requires that states report all children with disabilities by gender.

7. *OSEP should clarify the meaning of the exit category Part B eligible, exiting Part C. The definition states that this category includes all children determined to be eligible for Part C during the reporting period and who exited (or will soon exit) Part C. Please clarify what "will soon exit" means. (kleitch1, agomm1)*

The exiting data collection has always required states to report the Part B eligibility status of all

children who still have an IFSP in place on their third birthday. It does not require that these children stop receiving Part C services or that they exit Part C. Some Part B eligible children temporarily remain in Part C until the school year begins or until a Part B program opening is available. These children have historically been reported in the Part B eligible category. Other children remain in Part C past their third birthday while awaiting eligibility determination. These children are reported in the category Part B eligibility not determined.

Section 635(c) of IDEA permits states to offer parents of children who are eligible for Part B the choice of continuing in Part C until their child is eligible to enter kindergarten. The phrase “or will soon exit” was added to the Part B eligible label to distinguish children who are known to be eligible for Part B, but are temporarily continuing in Part C until there is an opening for them in Part B from the Part B eligible children whose parents have chosen to stay in Part C until the child is eligible to enter kindergarten.

8. *OSEP should delete the phrase “will soon exit” from the definition of the Part B eligible, exiting Part C category. The count should only include children who have left Part C within the reporting period not those who will leave in the future. (kleitch1, agomm1)*

OSEP will not delete the phrase “will soon exit” from the definition of the Part B eligible category. See response above.

9. *OSEP should report the exits of children who are Part B eligible, continuing in Part C separately (as is done in Tables 1 and 2) from exits of children who are not continuing in Part C. (kleitch1)*

Children who continue in Part C are reported only once, at the time they turn three. OSEP is not tracking their subsequent exit status. Therefore, only one row of the table applies to them, not the entire data collection grid. OSEP will continue to collect these data on the same form and grid as all other exits from Part C. The row is a logical part of the data collection on all children exiting Part C (or reaching their third birthday) and is necessary to account for all children who exited (or reached their third birthday) during the reporting period.

10. *Revise instructions so that children whose parents do not consent to transition planning, and children who enter Part C close to their third birthday are not reported as Part B eligibility not determined. (agomm1, wwhipple1)*

OSEP will modify the reporting instructions to make clear that if the parent does not consent to transition planning, the child should be reported in the exit category not eligible for Part B, exit with no referral. However, children whose eligibility has not been determined as of the child’s third birthday should be reported in the exit category Part B eligibility not determined. This is true even if the child entered Part C close to their third birthday.

### **IDEA 2004 Citations Referenced in OSEP Responses**

#### SEC. 618. PROGRAM INFORMATION.

(a) IN GENERAL- Each State that receives assistance under this part, and the Secretary of the Interior, shall provide data each year to the Secretary of Education and the public on the following:

(1)(B) The number and percentage of children with disabilities, by race, gender, and ethnicity, who are receiving early intervention services.

#### SEC. 618. PROGRAM INFORMATION.

(a) IN GENERAL- Each State that receives assistance under this part, and the Secretary of the Interior, shall provide data each year to the Secretary of Education and the public on the following:

(3) Any other information that may be required by the Secretary.

#### SEC. 635. REQUIREMENTS FOR STATEWIDE SYSTEM.

(c) Flexibility To Serve Children 3 Years of Age Until Entrance Into Elementary School-

(1) IN GENERAL- A statewide system described in section 633 may include a State policy, developed and implemented jointly by the lead agency and the State educational agency, under which parents of children with disabilities who are eligible for services under section 619 and previously received services under this part, may choose the continuation of early intervention services (which shall include an educational component that promotes school readiness and incorporates preliteracy, language, and numeracy skills) for such children under this part until such children enter, or are eligible under State law to enter, kindergarten.

9. Payments of gifts to respondents.

No payments or gifts are provided to respondents for completing this information request.

10. Assurance of confidentiality.

No assurance of confidentiality is provided to respondents.

11. Questions of a sensitive nature.

There are no questions or requirements of a sensitive nature contained in the form.

12. Estimate of respondent burden.

Estimating burden is difficult for the Part C program because of variations in the availability and sophistication of computerized data collection systems and the difficulty of collecting information across participating agencies. OSEP developed the burden estimates based on previous experience with each data collection, the information available about State data collection systems, and through consultation with representatives of several State agencies. Recent input from State agencies suggested

that the burden hours underestimate the true burden of reporting these data to OSEP. In response, as indicated in number 15 below, the estimated burden hours were increased for each table. In calculating the average burden, we applied different burden estimates based on whether or not the State agencies use individual child record systems to collect these data.

The estimated burden for Table 1 (count of infants and toddlers served) is 28 hours per State agency or 1,966 hours total.

<b>Number of Respondents</b>	<b>Burden Hours</b>	<b>Total Burden Hours<sup>2</sup></b>
31 States with Individual Child Record Systems	26 hours	806 hours
25 States without Individual Child Record Systems	46 hours	1,150 hours
56 States <sup>3</sup>		1,956 hours

The estimated burden for Table 2 (settings) is 22 hours per State agency or 1,528 hours total.

<b>Number of Respondents</b>	<b>Burden Hours</b>	<b>Total Burden Hours<sup>3</sup></b>
31 States with Individual Child Record Systems	13 hours	403 hours
25 States without Individual Child Record Systems	45 hours	1,125 hours
56 States <sup>2</sup>		1,528 hours

<sup>2</sup> Total burden is based on averages rounded to the nearest hour.

<sup>3</sup> 56 States and Outlying Areas refers to: 50 States, District of Columbia, Puerto Rico, Virgin Islands, American Samoa, Northern Marianas, and Guam.

The estimated burden for Table 3 (existing) is 51 hours per State agency or 3,085 hours total.

<b>Number of Respondents</b>	<b>Burden Hours</b>	<b>Total Burden Hours<sup>4</sup></b>
31 States with Individual Child Record Systems	35 hours	1,085 hours
25 States without Individual Child Record System	80 hours	2,000 hours
56 States <sup>5</sup>		3,085 hours

13. Estimate of cost to respondent.

OSEP estimated respondent costs as \$20 per hour. The estimated total number of burden hours across all three tables is estimated at 6,569. Therefore, the estimated cost to the respondents is \$131,380.

14. Estimate of costs to the Federal Government.

The following table represents the estimated costs to the Federal Government associated with the form.

Copying:	\$50
Mailing:	\$260
Staff:	\$6,000
Contractor Data Services:	<u>\$16,000</u>
	\$22,310

Contractor services include costs for updating the database and processing, verifying, and analyzing the data.

15. Reasons for program changes or adjustments.

The increase in the total annual burden hours is due to three factors: the addition of gender to the reporting requirements, the change in the categories used to report primary setting, and the feedback from states that OSEP underestimated the burden hours of these data collections. OSEP expects the annual hours to decline as States make the necessary changes to their data collection systems.

16. Plans for tabulation and publication.

<sup>4</sup> Total burden is based on averages rounded to the hour.

<sup>5</sup> 56 States and Outlying Areas refers to: 50 States, District of Columbia, Puerto Rico, Virgin Islands, American Samoa, Northern Marianas, and Guam.

OSEP will tabulate and display the information submitted by States in a variety of ways. The primary vehicles of distribution are through the Secretary's Annual Report to Congress (P.L. 108-446, Section 664(c)(2)) and through publication of these data on the Internet (IDEAdata.org). OSEP will also use this information for purposes of monitoring, GPRA performance reports, focusing discretionary activities, and suggesting topics for model demonstration projects. Occasionally, the data are summarized and presented at conferences and in ad hoc reports or articles submitted for publication.

17. Display of OMB expiration date.

The OMB expiration date will be displayed on the form.

18. Exceptions to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

For Table 1 (Child Count), States may use sampling to obtain data for discrete ages and race/ethnicity; however, the counts reported for the birth-through-2 age grouping must be an actual count. All counts of children ages 3 or older must be actual counts. If a State plans to use sampling, it must submit its sampling plan to OSEP by September 1 of the collection year (the September prior to the child count). The State's sampling plan must be approved by OSEP prior to data collection.

States may also use sampling to obtain most of the data reported in Tables 2 (Settings) and 3 (Exiting). As with Table 1, the data in Table 2 for children, ages 3 or older, must be actual counts. A State planning to use sampling for the data in Tables 2 and 3 must submit its sampling plan to OSEP by September 1 of the collection year (the September prior to the child count). The State's sampling plan must be approved by OSEP prior to data collection.