

Hi Rachel. Here are my answers:

2. States have always been required to obtain a complete count by age of infants and toddlers served under Part C. My sense is that States believe that once they have completed all the work to get that count, obtaining subsamples for race/ethnicity or settings does not buy them much convenience. In Part B, in the past, States have indicated that sampling only buys them convenience if they can exclude certain areas, such as large cities. That would, of course, mean the sample would not be representative. However, States can sample if they present an approvable representative sampling plan to OSEP. Section 618(b)(2) states, "The Secretary may permit States and the Secretary of the Interior to obtain the data described in subsection (a) through sampling." Thus, OSEP is not statutorily required to offer the sampling option, but is permitted. In the past, we have offered the option for virtually all data, except child count.

3. OSEP does not plan to collect the data. The areas are blacked out to discourage States from entering those cells, but to allow the data to be entered in one table.

Dr. Holden-Pitt asked me to address an issue related to the 1820-NEW Dispute Resolution form. OSEP is instituting this Section 618 data reporting requirement, because Section 618(a)(1)(F,G and H) requires OSEP to collect these data. OSEP collects data through Section 618 when we believe there is national comparability across States in the data reported.

I hope this helps.

Scott  
245-7282

-----Original Message-----

**From:** Potter, Rachel F. [mailto:Rachel\_F.\_Potter@omb.eop.gov]

**Sent:** Monday, November 20, 2006 2:57 PM

**To:** Carey, Sheila

**Cc:** Holden-Pitt, Lisa; Brown, Scott

**Subject:** RE: OMB Comments on 1820-0557 Part C Child Count Forms

We have two follow-up questions:

2. In the past, no State has requested to sample for any of the Section 618 Part C forms; hence, OSEP has no sampling plans for these forms.

Why does OSEP believe that States haven't used sampling in previous years? Is OSEP statutorily required to offer a sampling option to States?

3. The blacked out cell means those data are not required. States are to leave those cells blank; thus, there will be no data reported for those cells. In those tables, States are to enter the row and column totals only.

Why does OSEP present the data in this format (with the blacked out cells) if only certain cells are needed? Does OSEP plan to collect this data in the future?

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**From:** Carey, Sheila [mailto:Sheila.Carey@ed.gov]

**Sent:** Monday, November 20, 2006 8:21 AM

**To:** Potter, Rachel F.

**Subject:** FW: OMB Comments on 1820-0557 Part C Child Count Forms

FYI

-----Original Message-----

**From:** Brown, Scott  
**Sent:** November 17, 2006 5:04 PM  
**To:** Carey, Sheila; Holden-Pitt, Lisa  
**Cc:** Surprenant, Kala; Ryder, Ruth  
**Subject:** RE: OMB Comments on 1820-0557 Part C Child Count Forms

Hi Sheila. Here are our responses:

2. In the past, no State has requested to sample for any of the Section 618 Part C forms; hence, OSEP has no sampling plans for these forms.

3. The blacked out cell means those data are not required. States are to leave those cells blank; thus, there will be no data reported for those cells. In those tables, States are to enter the row and column totals only.

-----Original Message-----

**From:** Carey, Sheila  
**Sent:** Friday, November 17, 2006 7:44 AM  
**To:** Holden-Pitt, Lisa; Brown, Scott  
**Cc:** Surprenant, Kala  
**Subject:** FW: OMB Comments on 1820-0557 Part C Child Count Forms

FYI, forward your response back to me and I will submit to OMB. Thanks

-----Original Message-----

**From:** Potter, Rachel F. [mailto:Rachel\_F.\_Potter@omb.eop.gov]  
**Sent:** November 16, 2006 3:29 PM  
**To:** Carey, Sheila  
**Cc:** Rudolph, Kim; Liu, Lin  
**Subject:** OMB Comments on 1820-0557 Part C Child Count Forms

Sheila,

Attached below please find OMB's comments on the subject collection. Let me know if you have any questions. Thanks!

1. Please give us a few examples of the types of sampling plans States have submitted in previous years.
2. What do the blacked out cells (e.g., in Table 1 A the birth to age 3 race and ethnicity cells are blacked out except for the totals) in the tables represent? Do States fill out this data or is it somehow provided to them?

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