

August 31, 2007

MEMORANDUM

TO: Chandana Achanta
Desk Officer, OMB

THRU: Joe Schubart, OCIO/ED

FROM: Lisa Holden-Pitt, COR for Technical Assist. on Data contract/OSEP/ED

SUBJECT: Explanation of changes to form instructions: Report of the Participation and Performance of Students with Disabilities on State Assessments by Content Area, Grade, and Type of Assessment

PURPOSE

The purpose of this memorandum is to obtain your approval and signature of the above data collection instrument.

In August, 2006, OSEP's Assessment data reporting form [#1820-0659] was cleared by OMB for a period of three years. In conjunction with the 'Two Percent' regulations initiated by OESE/ED, OSEP's Assessment data form for reporting on special ed students had to be adjusted to incorporate the potential addition of assessment performance entries. So, early this year, that revision was submitted and reviewed and cleared by OMB in June 2007, as a part of the 'Two Percent' clearance package. Our form as provided in that package was assigned the number 1820-0681. During the several-month period of preparation and review of the 'Two Percent' regs package in which our Assessment data form was included, OSEP examined that form and worked to make clarifying edits to the form, in order to improve the consistency of instructions for respondents completing the form. No new data elements were added.

As advised by OMB (specifically, Rachel Potter), OSEP held off its submission of a Change Worksheet requesting approval of these clarifications until the Two Percent regs package (containing our Assessment data form now with section for reporting performance from modified academic achievement standards) had cleared. As indicated in the Two Percent package, the addition to that form as approved in that package was associated with 15 total hours (15 mins for each of 60 respondents) of additional burden. We were aware that, once the Two Percent package cleared, our form would need to be extracted and the additional burden shifted to the number of our original form, #1820-0659. As instructed, those 15 hours now are being included under 'New Record' on right-hand column of the Change Worksheet.

In late June, I communicated some of this in an email sent to Nicole (OMB Desk Officer) through Joe Schubart in our OCIO/ED, as well as to Jameela (OMB) during a meeting of OMB, OCIO/ED and OSERS/ED program staff regarding collections proposed and under review.

Below, to detail the types of edits to form instructions contained in the form submitted with this Change Worksheet, I have listed the following descriptions. Note that several of the identified edits appear in more than one section of our instructions. Each edit occurrence has been bolded in the accompanying form.

Instruction pages 1 - 4 – Definitions (included in instructions for respondent’s convenience)

- Changed phrase "scored against" to "based on" for consistency with statutory and regulatory language.
- Minor revisions were made to definition of "alternate assessment based on alternate academic achievement standards" and "alternate assessment based on grade level academic achievement standards," to better reflect language in applicable statutes and regulations.
- Minor revisions to definitions of "invalid results," "out of grade level test," "students with IEPs," "NCLB 1% cap," "NCLB 2% cap," and "valid score," to clarify and better specify intent.
- Added definitions for "alternate assessment based on modified academic achievement standards" and "NCLB 2% adjusted cap," as those pertain to the ‘Two Percent’ data reporting that was cleared last June.

Instruction pages 4 - 10 - Specific Instructions, Enrollment, Participation, Performance

- Clarified that information should be entered by grade level of the student for grades 3 through 8, rather than by grade level for which the assessment is administered.
- Clarified instructions for specifying grade level at which assessment is administered in high school.

Instruction pages 6 - 10 - Specific Instructions, Performance

- Added a paragraph specifying that respondent should enter own descriptors for the achievement levels used in State as column headers in referenced tables in form.
- Added instruction for entering the total count of students with valid scores in the referenced tables in form.
- Clarified instructions for counting students under the NCLB 2% and 1% caps, in order to more accurately reflect the language in the relevant statutes and regulations.