

MEMO

Date: December 21, 2007

To: Bridget C.E. Dooling
Desk Officer, Office of Management & Budget

From: Lisa Holden-Pitt
Education Research Analyst, US Dept. of Education/OSERS/OSEP

Re: Blanket OMB 83C Request: Clarifying instruction for IDEA data collection forms

OSEP requests OMB approval to add language to the following collections for which Change Worksheets and associated forms are attached:

1820-0043 - Report of Children with Disabilities Receiving Special Education Under Part B of the Individuals with Disabilities Education Act

1820-0518 - Personnel Employed to Provide Special Education and Related Services for Children with Disabilities.

1820-0517 - Part B, Individuals with Disabilities Education Act Implementation of FAPE Requirements

1820-0521 - Report of Children with Disabilities Exiting Special Education During the School Year.

1820-0621 - Report of Children with Disabilities Subject to Disciplinary Removal.

1820-0659 - Report of the Participation and Performance of Students with Disabilities on State Assessments by Content Area, Grade, and Type of Assessment.

1820-0677 - Report of Dispute Resolution Under Part B of the Individuals with Disabilities Education Act.

1820-0557 - Report of Infants and Toddlers Receiving Early Intervention Services and of Program Settings Where Services are Provided in Accordance with Part C, and Report on Infants and Toddlers Exiting Part C.

1820-0678 - Report of Dispute Resolution Under Part C of the Individuals with Disabilities Education Act: Complaints, Mediations, and Due Process Hearings.

OSEP requests approval to add the following sentence to the collections listed above:

"In providing data for this collection, the State is to submit complete and unsuppressed data."

Justification for the request:

In response to concerns raised recently regarding privacy of data in small cells, the Department desires to add a sentence to the General Instructions for each of the IDEA section 618 data collections (currently for SY2007-08), to clarify that, even for data cell values representing a small number of cases, the data must be submitted. This change is consistent with clarifications included in the instructions to States regarding the ED*Facts* collection approved by OMB [October 19, 2007]. To fulfill the Secretary's stewardship responsibility, the Secretary needs complete, accurate and reliable data regarding the IDEA programs, including the data contained in small data cells. The Department is fully cognizant of, and committed to meeting, all legal requirements to protect information submitted through these collections, both in how it uses the data within ED, and in how it disseminates that information to the public. In reporting to the public, OSEP is particularly sensitive to the need to prevent release of personally identifiable information, which could occur if very small numbers were disseminated.