

Comprehensive Cover Memo

TO: Bridget Dooling, OMB Desk Officer

THRU: Sheila Carey, RIMS/ED

FROM: Lisa Holden-Pitt, OSEP/OSERS/ED

September 12, 2008

SUBJECT: Blanket OMB 83C Request

Under this cover, OSEP requests OMB approval for two types of adjustment to data collection forms currently cleared for a three-year period. The forms are currently cleared for use through either August (for some) or November (for others), 2009.

Justification for the request:

The Change Worksheets and associated data collection forms that accompany this blanket memo are in follow up to the advance notice of this request conveyed to OMB via email exchange through Sheila Carey a few months ago. At that time, you okayed this approach to obtaining the necessary approvals.

The adjustments found among this set of collection forms are of two basic types:

1. Instruction edits toward clarifying instructions or term definitions, or (in one instance, #1820-0659*) isolating a data element reported in the currently-approved forms.

*On the proposed Table 6, 1820-0659, for SY 2008-09, the report of 'Medical Emergencies' is entered as a numeric data element, rather than as a comment associated with 'other reasons' for not being assessed, on the data submission. The numeric entry allows for more accurate and more easily tabulated data. And this adjustment is consistent with parallel actions being taken by ED Facts and OESE (NCLB) for assessment data reporting.

2. Form adjustments to accommodate data intake and reporting of State data in accordance with the Department's Final Guidance on Maintaining, Collecting and Reporting Racial and Ethnic Data to the US Department of Education in the Federal Register (October 2007), which we reference as the '*new guidance*.' States have been informed that they may, as early as for the SY 2008-09 data report (but no later than for SY 2010-11 data), convert from the traditional five (5) to the new seven (7) aggregate categories of race/ethnicity data reporting, **if they are collecting and aggregating their data as specified in the new guidance**. Therefore, we must modify the data collection forms that collect race and ethnicity data, to permit the new levels of reporting. As an umbrella package associated with this change already has been cleared at the Department level, we now are simply providing for your review the forms displaying the necessary adjustments. Since we anticipate that States will vary with respect to the year in which they convert to application of the *new guidance*, we must continue to make available the traditional form (which now carries the suffix 'RE5') while adding the alternate form (which we have labeled with the same table name and number, but with 'RE7' as the suffix. You will note that text pertaining to the new guidance has been added to each of the

two companion forms associated with the tables affected – though the insert language differs between RE5 and RE7.

To the best of my knowledge, the proposed adjustments to the IDEA data collection forms in this set are consistent with existing or requested State data reporting requirements under NCLB and for companion data submitted to *EDFacts*. The proposed changes to the forms are not in response to regulations, but instead to improve submitted data quality by better specifying the instructions. Refer to the chart below to see which of the two types of form changes pertain to each of the IDEA Section 618 data collections listed. None of the adjustments to data reporting forms is expected to result in any appreciable increase in reporting burden. Over time, it is possible that the clarifications will result in a slight reduction in the reporting burden. However, that it unlikely to occur during this final year of OMB clearance for these forms.

OMB response to this request for approval of indicated (bold print) changes in the accompanying collection forms would be much appreciated by September 19, 2008, as OSEP would like to distribute the approved forms to States by the end of this month. As I will be out of the office until September 15th, please contact Kelly.Worthington@ed.gov (OSEP – phone 202-245-7581), who may consult with Carol Bruce (data contractor), or clarification for further information regarding this package.

Part B forms

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.

Part C Section 618 collection forms

1820-0557 (Tables 1, 2, and 3) – 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.
 Chart indicating the type(s) of change made to the data collection forms under this cover.

OMB Form #	Table Number(s)	Form Name	Instructional Clarifications	Alterations re new R/E guidance
1820-0043	<i>Part B</i> T1-RE5 T1-RE7	Report of Children with Disabilities Receiving Special Education Under Part B of the Individuals with Disabilities Education Act	X	X
1820-0518	<i>Part B</i> T2	Personnel Employed to Provide Special Education and Related Services for Children with Disabilities.	X	
1820-0517	<i>Part B</i> T3-RE5 T3-RE7	Part B, Individuals with Disabilities Education Act Implementation of FAPE Requirements		X
1820-0521	<i>Part B</i> T4-RE5 T4-RE7	Report of Children with Disabilities Exiting Special Education During the School Year.		X
1820-0621	<i>Part B</i> T5-RE5 T5-RE7	Report of Children with Disabilities Subject to Disciplinary Removal.		X
1820-0659	<i>Part B</i> T6	Report of the Participation and Performance of Students with Disabilities on State Assessments by Content Area, Grade, and Type of Assessment.	X	
1820-0677	<i>Part B</i> T7	Report of Dispute Resolution Under Part B of the Individuals with Disabilities Education Act.	X	
1820-0557	<i>Part C</i> T1-RE5 T1-RE7 T2-RE5 T2-RE7 T3-RE5 T3-RE7	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.	X	X X X
1820-0678	<i>Part C</i> T4	Report of Dispute Resolution Under Part C of the Individuals with Disabilities Education Act: Complaints, Mediations,	X	

		and Due Process Hearings.		
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