

August 12, 2010
OMB Questions & ED Responses

Q: The response to question nine states that the IDEA NAIS will "document district use of CEIS dollars, as well as sources and strategies of support for district RTI implementation." Will this RTI evaluation be able to use any of the data collected from the NAIS? If so, what data elements?

1. Tabulations from the NAIS on the extent to which Rtl is being implemented by all, some, or none of the elementary schools within a district are informing our sense of the feasibility of identifying comparison (non-Rtl) schools within districts for the comparative interrupted time series design. If, as appears to be the case, most districts take an "all or nothing" approach to Rtl implementation within their elementary schools, then, for the comparative interrupted time series design to be feasible, comparison schools would need to come from other districts in the same state utilizing the same data elements over time. The regression discontinuity design, in contrast, does not require non-Rtl schools, since the impact analysis focuses on variation in services received **within** Rtl schools at any point in time, rather than **between** Rtl schools and non-Rtl schools over time. The RDD approach, which should be feasible wherever district schools use explicit criteria for identifying children as at risk of reading difficulties, is useful for studying the effects of identification for assistance on reading outcomes, but not for studying the effects of Rtl adoption on identification for special education.

Q: We understand that IES has consulted with OSEP on the design and research questions of this evaluation, but we don't know if OSEP has been consulted regarding the latest design/questions. Please confirm that IES has shared the latest evaluation design/research questions with OSEP and incorporated their feedback where appropriate.

2. IES has briefed OSEP on the status of each of our studies of IDEA, invites OSEP staff to meetings with expert advisors on the design of each study, and will consult with OSEP in the future regarding the design of data collection and the presentation of study findings. OSEP is aware and supportive of our shift from an experimental evaluation of "artificially" introduced Rtl strategies to a "real world", observational, quasi-experimental design evaluating established Rtl practices. OSEP's strong interest in the relationship between Rtl implementation and the identification of children for special education is informing IES efforts to identify districts and schools for the comparative interrupted time series design. OSEP's interest has also stimulated thinking at IES on how data on school-level Rtl practices could be combined with longitudinal student data (such as data from the NCES Early Childhood Longitudinal Study-Kindergarten cohort) to understand the association between Rtl practices and students' subsequent identification for special education.