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608 WEST ALLEGAN STREET • P.O. BOX 30008 • LANSING, MICHIGAN 48909
www.michigan.gov/mde • (517) 373-3324

September 20, 2011

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U.S. Department of Education
400 Maryland Avenue, SW, LBJ
Washington, D.C. 20202-4537

OMB Control Number: 1850-0882

RE: Comments on Reducing Data Burden and/or the National Longitudinal Transition Study Collection Activity

To Whom It May Concern:

The Office of Special Education and Early Intervention Services appreciates the Office of Management's intent to assess the impact of its information collection requirements and minimize the reporting burden on the public. In particular, we submit comments to answer the Department of Education's questions.

(1) Is this collection necessary to the proper function of the Department?

Although not necessary, the collection helps to provide more comprehensive data that states can use to make meaningful evaluations and improvements of postsecondary initiatives. Currently Indicator B-14 (Postsecondary Outcomes) of the State Performance Plan/Annual Performance Report provides limited measures of student outcomes. In addition, Indicator B-14 only collects data one year after students have exited special education. Postsecondary goals and success are long-term processes and are not documented in the short-term measures contained in Indicator B-14.

(2) Will this information be processed and used in a timely manner?

If the newly collected data are processed and distributed to state educational agencies (SEAs), it will enable SEAs to consider additional educational and economic influences on postsecondary success, and to collaborate with districts to design more comprehensive postsecondary programs.

(3) Is the estimate of burden accurate?

While time estimates for completing the surveys appear reasonable, it is unclear how much time will be involved in the collection and reporting of student record information. There will also be increased data burden for collecting data on students without Individualized Education Programs, the Section 504 students.

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Some of the information needed for the study may be available through the Longitudinal Data Systems, which most states have, limiting the need for duplicate requests to school districts. Finally, it is also unclear what role, if any, the SEA will have in the collection and reporting of the data.

(4) How might the Department enhance the quality, utility, and clarity of the information to be collected?

No comment.

(5) How might the Department minimize the burden of this collection on the respondents, including through the use of information technology?

The Department can minimize the burden of this collection on respondents by utilizing data already collected (e.g., the LDS) and not developing new technology that districts need to learn to report their data. While it appears that CATI technology will be employed, it is not clear how much time it will take respondents to learn and utilize the technology to complete surveys.

Thank you again for the opportunity to comment on the proposed data collection. If you have any questions, please contact Darren Warner at (517) 241-0786, or via email at Warnerd@michigan.gov.

Sincerely,

Eleanor E. White, Ph.D., Director
Office of Special Education and Early Intervention Services