

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL UNDER THE
PAPERWORK REDUCTION ACT**

A. JUSTIFICATION

1. Circumstances necessitating information collection.

Section 618 of the Individuals with Disabilities Education Act (IDEA), Public Law 108-446, directs the Secretary of Education to obtain data on: (1) the number and percentage of infants and toddlers with disabilities, by race, ethnicity, and gender, who are receiving early intervention services; (2) the number and percentage of infants and toddlers, by race and ethnicity, who are at risk of having substantial developmental delays (as described in Section 632), and who are receiving early intervention services under Part C; and (3) the number and percentage of children with disabilities, by race, ethnicity, and gender, who, from birth through age 2, stopped receiving early intervention services because of program completion or for other reasons. The specific legislative authority for these data collections may be found in Section 618(a)(1)(B), Section 618(a)(1)(C), Section 618(a)(2) and Section 618(a)(3).

The purposes of such data are: (1) to assess the progress, impact, and effectiveness of State and local efforts to implement the legislation and (2) to provide Congress, the public, and Federal, State, and local educational agencies with relevant information. OSEP also uses these data for monitoring activities, planning purposes, congressional reporting, and disseminating data to individuals and groups.

Legislative authority in Section 618 of IDEA requires that:

"(a) IN GENERAL- Each State that receives assistance under this part, and the Secretary of the Interior, shall provide data each year to the Secretary of Education and the public on the following:

(1)(B) The number and percentage of children with disabilities, by race, gender, and ethnicity, who are receiving early intervention services.

(C) The number and percentage of children with disabilities, by race, gender, and ethnicity, who, from birth through age 2, stopped receiving early intervention services because of program completion or for other reasons.

(2) The number and percentage of infants and toddlers, by race, and ethnicity, who are at risk of having substantial developmental delays (as defined in Section 632), and who are receiving early intervention services under part C.

(3) Any other information that may be required by the Secretary".

In addition to the specific data requirements described in Section 618, other provisions of IDEA address the need to examine where services are provided for infants and toddlers with disabilities. Section 635(a) specifies that:

“(a) IN GENERAL-A statewide system described in section 633 shall include, at a minimum, the following components:

(16) Policies and procedures to ensure that, consistent with section 636(d)(5)--

(A) to the maximum extent appropriate, early intervention services are provided in natural environments;”

An additional provision of IDEA addresses the flexibility of serving children 3 years of age until entrance into elementary school. Section 635(c)(3) specifies that:

“If a statewide system includes a State policy described in paragraph (1), the State shall submit to the Secretary, in the State’s report under section 637(b)(4) (A), a report on the number and percentage of children with disabilities who are eligible for services under section 619 but whose parents choose for such children to continue to receive early intervention services under this part.”

Section 637(b)(4)(A) specifies that:

Each State shall provide for “making such reports in such form and containing such information as the Secretary may require to carry out the Secretary’s functions under this part.” This clearance package includes three data collection forms. Each form provides instructions and information for States when submitting their data. Table 1 provides the data required by Section 618(a)(1)(B) and Section 618(a)(2).

- Section A collects the number children with disabilities by the child’s age and race/ethnicity.
- Section B collects the number of children with disabilities by the child’s gender.
- Section C collects the number of infants and toddlers who are at risk of having substantial developmental disabilities, by the child’s age and race/ethnicity. This count is a subset of the children reported in Section A and is completed only by States that serve at-risk infants and toddlers.
- Section D collects the cumulative count of the number of infants and toddlers with disabilities who received early intervention services during the most recent 12-month period by child’s age and race/ ethnicity.
- Section E collects the cumulative count of the number of infants and toddlers with disabilities who received early intervention services during the most recent 12-month period by child’s gender.

Because IDEA requires each State to report the percentage of children with disabilities, by race, gender, and ethnicity and the percentage of at-risk infants and toddlers by race and ethnicity, Table 1 also includes cells for these percentages. However, to assure cross-state comparability and minimize State burden, these percentages will be calculated by the data collection software. To accommodate the flexibility of Section 635(c), additional data collection elements are included in Table 1 (child count) to collect counts of children age 3 and older, by age, race/ethnicity, and gender. See sections A2 and B2 of Table 1.

Table 2 collects information about the settings in which early intervention services are provided to the children reported on Table 1.

- Section A collects primary setting of infants and toddlers according to the child’s age.
- Section B collects the primary setting according to the child’s race/ethnicity.

Each child reported in Table 2 is reported in only one setting. To accommodate the flexibility of Section 635(c), additional data collection elements are included in Table 2 (settings) to collect counts of children age 3 and older according to their primary service setting, by age and race/ethnicity. See sections A2 and B2 of Table 2.

Table 3 provides the data required by Section 618(a)(1)(C), the number and percentage of infants and toddlers with disabilities who, from birth through age 2, stopped receiving early intervention services.

- Section A collects the reason for no longer receiving services according to the child’s race/ethnicity.
- Section B collects the reason for no longer receiving services according to the child’s gender.

As in Table 1, Table 3 includes cells for percentages that will be calculated by the data collection software. To accommodate the flexibility of Section 635(c), additional data collection elements are included in Table 3 to collect counts of the number of families of children who chose to take advantage of the flexibility, by race/ethnicity and gender. See row 3 of Sections A and B of Table 3.

2. Use for which the information is gathered.

OSEP uses the information collected on these forms to assist in establishing programmatic priorities (such as promoting services in the natural environment), to monitor States to ensure compliance with the Federal statute and regulations, including the State’s Annual Performance Report under each State’s Performance Plan required by Section 616 of IDEA, and to disseminate data to Congress and the public. These data are also used to measure progress under the performance indicators established by OSEP under the Government Performance and Results Act (GPRA; P.L. 103-62) for early intervention services.

3. Use of improved information technology.

OSEP will collect the data electronically through the ED*Facts* Metadata and Process System (EMAPS) from State agencies. EMAPS is an established submission system that State agencies have been using to submit information to the Department for several years. EMAPS allows each State agency to provide the data in the non-proprietary, electronic formats that could be generated through automated processes within the State agency. The EMAPS surveys include a number of data edits to improve data entry validity. For example, as States enter their data, the edits flag relationships between the

counts reported that are impossible (e.g., situations where 150 African American infants and toddlers with disabilities are reported in Section A of Table 1 but only a total of 100 infants and toddlers with disabilities are reported in Section B of Table 1). The use of a survey with built-in edits reduces the number of follow-up contacts with the States after the data are submitted. Additionally, the EMAPS surveys auto-calculate totals and subtotals where appropriate to minimize reporting burden on the State. Finally, the surveys provide space for States to comment on their data, for example providing additional information about how the data were aggregated, what changes were made to these procedures since the last data report, how changes in state policy or legislation affect the data, or other issues the State believes are applicable to the data collection.

4. Efforts to identify duplication.

The information collected on the forms does not represent any duplication of paperwork, content, reporting, or performance requirement beyond that imposed under the statute. This information is only available from State agencies. There is currently no other source of national information on the number of infants and toddlers receiving early intervention services, on the settings in which they receive services, or on infants and toddlers who are no longer receiving Part C services.

5. Small businesses.

The information requested does not involve the collection of information from entities classified as small organizations.

6. Consequence of less frequent collection.

P.L. 108-446, Section 618(a) requires: "Each State that receives assistance under this part, and the Secretary of the Interior, shall provide data each year to the Secretary of Education and the public..."

7. Special circumstances.

There are no special circumstances associated with these data collections.

8. Federal Register notice/consultation outside the agency.

Public comments were solicited through a 60- and 30-day Federal Register Notice (FRN), receiving no public comments during the 60-day FRN period.

9. Payments of gifts to respondents.

No payments or gifts are provided to respondents for completing this information request.

10. Assurance of confidentiality.

No assurance of confidentiality is provided to respondents.

11. Questions of a sensitive nature.

There are no questions or requirements of a sensitive nature contained in the forms.

12. Estimate of respondent burden.

Estimating burden is difficult for the Part C program because of variations in the availability and sophistication of computerized data collection systems and the difficulty of collecting information across participating agencies. OSEP developed the burden estimates based on previous experience with each data collection, the information available about State data collection systems, and through consultation with representatives of several State agencies. In calculating the average burden, we applied different burden estimates based on whether or not the State agencies use individual child record systems to collect these data. The estimate of total respondent burden is based on 56 reporting entities¹.

The estimated burden for Table 1 (count of infants and toddlers served) is 45.5 hours per State agency or 2,546 hours total.

Number of Respondents	Burden Hours	Total Burden Hours²
37 States with Individual Child Record Systems	38 hours	1,406 hours
19 States without Individual Child Record Systems	60 hours	1,140 hours
56 States ¹	45.5 (Avg.)	2,546 hours

¹ 56 reporting entities refer to: 50 States, District of Columbia, Puerto Rico, Virgin Islands, American Samoa, Guam, and Northern Marianas.

² Total burden is based on averages rounded to the hour.

The estimated burden for Table 2 (settings) is 23.9 hours per State agency or 1,336 hours total.

Number of Respondents	Burden Hours	Total Burden Hours²
37 States with Individual Child Record Systems	13 hours	481 hours
19 States without Individual Child Record Systems	45 hours	855 hours
56 States ¹	23.9 (Avg.)	1,336 hours

The estimated burden for Table 3 (exiting) is 50.3 hours per State agency or 2,815 hours total.

Number of Respondents	Burden Hours	Total Burden Hours³
37 States with Individual Child Record Systems	35 hours	1,295 hours
19 States without Individual Child Record System	80 hours	1,520 hours
56 States ³	50.3 (Avg.)	2,815 hours

OSEP estimated respondent costs as \$20 per hour. The total number of burden hours across all three tables is estimated at 6,697. Therefore, the estimated cost to the respondents is \$133,940.

13. Estimate of cost to respondent.

There are no additional costs other than the cost burden identified in 12.

14. Estimate of costs to the Federal Government.

OSEP estimates the cost of maintaining and updating the databases for the Part C Child Count, Settings, and Exiting data collections to be \$82,000 in contractor data services.

³ Total burden is based on averages rounded to the hour.

³ 56 States and Outlying Areas refer to: 50 States, District of Columbia, Puerto Rico, Virgin Islands, American Samoa, Northern Marianas, and Guam.

15. Reasons for program changes or adjustments.

There is a program adjustment increase of 710 hours of response burden for respondents. This increase is due to the submission of new data elements related to the cumulative count of infants and toddlers receiving services under Part C of IDEA in Table 1. This cumulative count will provide OSEP with a more accurate count of how many infants and toddlers are receiving early intervention services under Part C of IDEA during a 12-month reporting period. These data will be used to better understand the number and characteristics of infants and toddlers receiving services under Part C of IDEA at anytime during a 12-month reporting period for monitoring purposes and to better evaluate the impact of the Part C program.

There is an increase in the estimated cost associated with this information collection package from \$22,310 to \$82,000. This increase is due to collecting these data via EMAPS. Slight adjustments were made to the instructions of these data collection forms to clarify the process for submitting these data via EMAPS. We anticipate no change in the response burden associated with these adjustments to the data collections.

16. Plans for tabulation and publication.

OSEP will tabulate and display the information submitted by States in a variety of ways. The primary vehicles of distribution are through the Secretary's Annual Report to Congress (P.L. 108-446, Section 664(d)(2)) and through publication of these data on the Internet. OSEP will also use this information for the purposes of monitoring, GPRA performance reports, focusing discretionary activities, guiding policy development, and suggesting topics for model demonstration projects. Occasionally, the data are summarized and presented at conferences, in ad hoc reports or articles submitted for publication, and in speeches by senior officials.

17. Display of OMB expiration date.

The OMB expiration date will be displayed on the forms.

18. Exceptions to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not permit the use of statistical methods in submission of data to the Department of Education.