

ED Response to OMB Comments on the E-Complaint Form

1880-0544

Page 1:

OMB Comment: There is an extra closed parenthesis here.

ED Response: This has been corrected.

OMB Comment: Please replace "wanting" with "who want"

ED Response: This has been corrected.

Page 2:

OMB Comment: These parentheses are unnecessary.

ED Response: This has been corrected.

OMB Comment: Please delete the word "and" preceding "/or" A complaint cannot both be dismissed and returned to obtain additional information, can it?

ED Response: This has been corrected.

OMB Comment: This disclosure authority sounds very broad, and potentially chilling. Are there any limits on who this information could be disclosed to, and could that be communicated here?

ED Response: We opted not to make this edit. We are limited in how we use the information based upon our system of record/routine uses. Listing the provisions out would add consider length to the form, so instead we offered the more user friendly sentence preceding the comment. We believe this provides sufficient guidance. Please note that this language as written was done in concert with our assign ODC attorney responsible for FERPA. .

OMB Comment: Please replace the first sentence with the following, for clarity: To complete these sections, please provide all requested information, including the student's correct birthdate.

ED Response: This has been corrected.

Page 4:

OMB Comment: The description below the heading reads: "Name and title of the school district superintendent..." But there is no place on the form to list those names. There is simply a place to list the names of "any school official you contacted in an attempt to resolve this matter." I would guess that that would virtually always be a different person, so the description (and the instructions) should be clarified so as not to reference the officials in the description under the heading.

ED Response: ED agrees with change and corrected to "Name of educational agency and school official you contacted in an attempt to resolve this matter."

ED changed a label for the last field on Page 1 to "Name and title of school official (ex. school district superintendent, the president of the college/university, or state educational agency (SEA) official (if alleging denial to inspect and review education records maintained by the SEA) or the appropriate official of a third party)"