

Summary of Public Comments on the Model Comprehensive Transition and Postsecondary Programs for Students with Intellectual Disabilities Program National Coordinating Center (TPSID-CC) following the 60-Day comment period for Docket #ED-2019-ICCD-0033 (OMB #:1840-0825)

On March 25, 2019, the U.S. Department of Education (Department) published a Notice of Proposed Information Collection Request (Notice) in the Federal Register inviting comments by May 24, 2019, on the Model Comprehensive Transition and Postsecondary Programs for Students with Intellectual Disabilities Program National Coordinating Center (TPSID-CC). A commenter expressed a concern as it relates to whether or not the TPSID Program National Coordinating Center is conducting their data collection process in an ethical manner. To this end, the Department reviewed the comment and provided a response, as cited below.

Comment: My concern is that data collection is ethical. I worked with a previously funded TPSID. Think College wanted programs to collect individual-level data on 72 variables. OMB required them to offer an aggregate reporting option, which was approved by our IRB. After that, we were subjected to regular pleas from Think College to switch to individual-level data reporting. Each time, we asked how the individual-level data would be analyzed and used. For us to consider a switch, we needed that information for our IRB. Think College would never give us that information. Everything I saw that they published about the TPSIDs could have been done with aggregate data. There was nothing to justify the burden of individual-level data collection on 72 variables. I still don't know what they are doing with all that data.

Discussion: The TPSID Program National Coordinating Center (NCC) is charged with conducting and disseminating research on strategies to promote positive academic, social, employment, and independent living outcomes for students with intellectual disabilities and is committed to ensuring that their data collection efforts are ethical, secure and ascribe to all principles of institutional review board requirements and practices. It conducts outreach and training on data entry and shares each of its reports with TPSID program staff annually. The TPSID Program National Coordinating Center ensures that all data collected are secure. The TPSID Program National Coordinating Center creates a user account for each TPSID program grantee. No TPSID program grantee user account is created prior to the TPSID Program National Coordinating Center's receipt of approval from each respective TPSID program grantee's principal investigator. This ensures that only approved project staff will have access to the data.

Additionally, no personally identifying information is included as part of a TPSID program student participant's record. Each TPSID program student participant is assigned a system generated identification number when the TPSID grantee enters data into the TPSID Program's Evaluation Protocol system. Each TPSID has a process (outside of the evaluation system) that allows them to link the system generated student identification number to a particular student.

Although there is a process which allows for the tracking of TPSID program student identification numbers which are matched to their respective student records, the TPSID

Program National Coordinating Center has no access to any identifying information about the student and only uses the system generated identification number in referencing student records. When requested, the TPSID Program NCC has also shared all institutional review board (IRB) application materials with the TPSID program grantee requestor in support of the development of their respective IRB applications. Accordingly, the TPSID Program NCC has individually responded to and met with TPSID program grantee personnel who have inquired about data use.

Additionally, the following response addresses the commenter's concern about aggregate data from the previously (not currently) funded round of TPSID grants as it relates to burden. In 2015 the TPSID Program NCC conducted a complete review of the evaluation protocol tool and its use of data prior to creating its application for OMB approval in 2016. When compared to the initial collection that was conducted by the TPSID Program National Coordinating Center in FY 2010, the burden was significantly reduced due to revisions that were made to the TPSID Evaluation Protocol Tool. Such revisions included reducing or eliminating questions, eliminating infrequently used response options, and auto/pre-filling some data entry fields with verified information. These revisions resulted in a reduction of 52.5 hours and an estimated \$1774.75 in costs annually for respondents. Individual student level data has been critical for the evaluation of TPSID grantees and has been collected from all TPSID program grantees per the 2016 OMB approval of the TPSID Program Evaluation Protocol Tool. These data have been used in each of the TPSID Program National Coordinating Center's annual evaluation reports, subsequent secondary analyses, and have also been used to design and deliver individualized technical assistance (TA) on a program-level basis. Although the grant performance period for the first round of TPSID program grantees has ended (2010-2015), none of the currently funded (2015-2020) TPSID projects that have been implemented at 48 colleges and universities across the country have indicated that the current tool presents their staff with undue burden.

Action Taken: None