# National Center for Information and Technical Support for Postsecondary Students with Disabilities (NCITSPSD) Program CFDA/ALN-84.116D Program – Fiscal Year 2022

### **Summary of Public Comments with Responses**

#### Introduction

The U.S. Department of Education (Department) received one comment and five questions from an individual entity that is interested in the NCITSPSD Program. The comment addressed the topics of: Updating of the NCITSPSD program grantee's Disability Resource Database (CeDar) website, which is a primary responsibility of the grantee's project partner, the National Center for College Students with Disabilities (NCCSD) as well as specific data collection related questions about the NCITSPSD's survey.

Below is a summary of the responses to the comments and questions and the Department's responses for the award made in fiscal year (FY) 2021.

## **Updating the NCITSPSD program grantee's CeDar Database**

**Comments:** The initial collection for the College Disability Resource Database was announced in 2019 and resulted in the https://www.cedardatabase.org/, several years after the funding of the NCCSD in 2015. The Department of Education received several comments in response to the initial collection notice (see

https://www.regulations.gov/document/ED-2019-ICCD-0012-0005/comment) which provided several suggestions and recommendations regarding how to maximize the proposed database. Those comments were ignored.

**Response:** The National Center for College Students with Disabilities (NCCSD) responded to each *Federal Register* comment and recommendation for the 2019 database survey instrument.

**Change:** None.

# Specific Data Collection Related Questions About The NCITSPSD Program's Survey.

**Comments:** This comment request indicates that in 2021 the University of Minnesota was awarded a 4-year federal discretionary grant to continue operation of the National Center for College Students with Disabilities (NCCSD). However, as of this date (July 25, 2022) the NCCSD website at https://www.nccsdonline.org/ reflects no updates or current information nor does it indicate that the University of Minnesota is the current awardee. This is of particular concern since the NCCSD College Disability Resource Database (CeDar) is a primary responsibility of the NCCSD.

**Response:** A limited budget award serves as the basis for the delayed initiation of the NCITSPSD's project activities. This includes work related to the maintenance and updating of the CeDar database, which are currently underway and should be completed by late August

Change: None.

**Question**: (1) Is this collection necessary to the proper functions of the Department. The database that was built in 2019 should have been designed in such a manner that does not require a complete new data collection in ensuing years.

**Response:** The NCITSPSD survey and the data that is being collected as a result of this database are authorized activities that were included in the NCITSPSD's funded project and will be implemented according to purpose/scope of this program.

Change: None

**Question:** (2) Will this information be processed and used in a timely manner? As we did in our comments to Docket No. ED-2019-ICCD-0012 in 2019, we strongly encourage the Department to incorporate the database of disability services and activities in higher education into the College Navigator. Doing so would have a number of advantages over the separate database currently offered at https://www.cedardatabase.org/. It would, to name a few:

- •Utilize a well-established database (rather than building a separate database that presumably would not be integrated with the College Navigator);
- •Provide far better visibility since the College Navigator enjoys strong performance in search engines and links from publications, IHEs, etc.;
- •Ensure ongoing funding and stability since the College Navigator is administered by the National Center on Education Statistics and is not subject to Congressional appropriations of grant programs such as the NCCSD;
- •Communicate a clear message that disability support services are a core part of higher education (rather than something separate from other characteristics of institutions of higher education).

**Response:** The Department continues to work towards the goal of the processing and using the data that we collect in a timely manner.

Change: None.

**Question:** Is the estimate of burden accurate? Since the previous grantee (AHEAD) has already engaged in this collection activity, it should have more detailed information regarding the burden. It should be noted that the Supporting statement at https://downloads.regulations.gov/ED-2022-SCC-0072-0002/attachment\_2.pdf does not appear to have been updated for this comment request since it bears the same information as the Supporting statement issued in 2019.

Response: Yes.

**Change:** None.

**Question:** How might the Department enhance the quality, utility, and clarity of the information to be collected? The database at https://www.cedardatabase.org/ should be incorporating into the College Navigator. Usage of the CeDar should be examined to see how the current database is being accessed.

**Response:** Current limitations in the NCITSPSD program funding, coupled with other project related activities that are in the process of being implemented, limits the project's ability to fully explore the potential of enhancements to the CeDar database.

Change: None.

**Question:** How might the Department minimize the burden of this collection on the respondents, including through the use of information technology? Create a database system that IHEs can easily update their information. There should be no need to do a complete data collection every year/few years.

**Response:** Current limitations in the NCITSPSD program funding, coupled with other project related activities that are in the process of being implemented, limits the project's ability to fully explore the potential development of a new or making major improvements to the CeDar database.

Change: None.