

Non-Substantive Change Request

Date Submitted: October 8, 2026

Submitted by: Department of Education, Office of Special Education and Rehabilitation Services (OSERS)

Summary of request: OSERS is requesting a review of non-substantive changes that remove the implementation of a Middle Eastern / North African (MENA) race category within three of its collections. The additional race category was added and approved through the PRA process, but is now being removed after further consultation. The following collections require this non-substantive change:

Administered by OSERS/Rehabilitation Services Administration:

OMB Number 1820-0508, [Case Service Report \(RSA-911\)](#), ICR expires 9/30/2029

OMB Number 1820-0528, [Client Assistance Annual Performance Report \(RSA-227\)](#), ICR expires 8/31/2029

OMB Number 1820-0627, [Annual Protection and Advocacy of Individual Rights \(PAIR\) Performance Report \(RSA-509\)](#), ICR expires 8/31/2029

Description of Changes Requested: These requests update relevant questions in a non-substantive manner, as detailed in the following table:

Number	Title	Elements Related to Race	Proposed Change
1820-0508	Case Service Report (RSA-911)	Data Element 417 – Individuals with origins in any of the original peoples of the Middle East or North Africa, including, for example, Lebanese, Iranian, Egyptian, Syrian, Iraqi, and Israeli. This DE is required for all individuals in elementary or secondary education. If an individual in elementary or secondary education chooses not to self-identify race, observer identification should be used to assign the individual to a race/ethnicity. For individuals not in elementary or secondary education, self-identification is encouraged to the greatest extent possible. When necessary, record code value 9 to indicate the individual did not self-identify. When reporting on multi-racial individuals, use more than one race variable indicating the individual is of that race (i.e., more than one code value 1). Agencies may leave the data element blank only for individuals with Type of Exit code value 0 (Individual exited as an applicant, prior to eligibility determination or trial work). For example, if an individual applies for services via an application form or letter and exits the agency without being seen by agency personnel, this individual's race would not be known and could not be observed and therefore all race codes would be left blank.	Remove this data element from the collection <i>*Note: no change in data collection burden expected</i>

1820-0528	Client Assistance Annual Performance Report (RSA-227)	C. Race and Ethnicity of Individuals Served 1. Hispanic/Latino of any race For individuals who are non-Hispanic/Latino only 2. American Indian or Alaskan Native 3. Asian 4. Black or African American 5. North African or Middle Eastern 56. Native Hawaiian or Other Pacific Islander 67. White 78. Two or more races 89. Race/ethnicity unknown	Remove this data element from the collection <i>*Note: no change in data collection burden expected</i>
1820-0627	Annual Protection and Advocacy of Individual Rights (PAIR) Performance Report (RSA-509)	C. Race and Ethnicity of Individuals Served 1. Hispanic/Latino of any race For individuals who are non-Hispanic/Latino only 2. American Indian or Alaskan Native 3. Asian 4. Black or African American 5. North African or Middle Eastern 56. Native Hawaiian or Other Pacific Islander 67. White 78. Two or more races 89. Race/ethnicity unknown	Remove this data element from the collection <i>*Note: no change in data collection burden expected</i>

Timing of Requested Changes: OSERS/RSA would like to inform states of these changes as soon as approval from OMB has been obtained. OSERS/RSA has been holding on the implementation of the RSA-509 and RSA-227 until a final determination has been obtained. RSA will initiate collection in the revised manner as soon as possible, as the fiscal year began October 1, 2026. The RSA-911 under this PRA approval cycle will begin collection in July of 2027.

Approval:


Christopher Pope
Digitally signed by Christopher Pope
Date: 2026.10.08 09:02:55 -04'00'

Christopher Pope
Director, State Monitoring and Program Improvement Division,
delegated the authority to perform the functions
and duties of the Commissioner