



National Association of State Directors of Special Education, Inc.

King Street Station I • 1800 Diagonal Road • Suite 320 • Alexandria, VA 22314

Tel: 703-519-3800 • Fax: 703-519-3808 • www.nasdse.org

March 29, 2010

Dear Representative:

On behalf of our members – the state directors of special education in the states, the District of Columbia, the Department of Defense Education Agency, the Bureau of Indian Education, the U.S. federal territories and the Freely Associated States – we are writing to urge you to contact U.S. Secretary of Education Arne Duncan with a request to stop a proposed data collection for IDEA Part B Maintenance of Effort Reduction and Coordinated Early Intervening Services.

The Department of Education estimates that this new data collection will take more than 1 million person hours and cost more than \$20 million to implement. In this time of severe financial crisis for states and when school districts across the country are closing schools and laying off teachers and other school personnel, NASDSE firmly believes that this proposed data collection is both untenable and unwarranted. The Department asserts that this data collection is necessary to protect against fraud and abuse. However, NASDSE believes that the many accountability mechanisms in place to monitor ARRA funds are more than sufficient and further data collections are not needed. Finally, NASDSE firmly believes that this data collection, which is enormously costly both in terms of dollars and person hours, will not help states to (1) save jobs and (2) improve student achievement through school improvement and reform – the two goals that the Department hoped to accomplish with ARRA funds.

The Department published the 30-day notice for comments for this data collection on February 25, 2010 and comments are due to the Department on March 29, 2010. For further information, you can access the Federal Register notice at: <http://edocket.access.gpo.gov/2010/pdf/2010-3872.pdf>. To access all of the Department's other documents concerning this proposed data collection go to: <http://edicsweb.ed.gov> and select the "Browse Pending Collections" link and click on link number 4146. When you access the information collection, click on "Download Attachments."

Again, NASDSE urges you to contact Secretary Duncan with the request to abandon this data collection. We believe that this proposed data collection is cost-prohibitive and will not contribute in any way towards improving outcomes for children with disabilities. On that basis alone, it should not go forward.

Attached to this letter are the comments that NASDSE submitted in response to the Federal Register notice. If you have any questions regarding this matter, please do not hesitate to contact NASDSE's Deputy Executive Director, Nancy Reder, at nancy.reder@nasdse.org or NASDSE's Government Relations Policy Analyst, Amanda Lowe, at amanda.lowe@nasdse.org.

Sincerely,

Bill East, Ed.D.
Executive Director