



*National Association of State Directors of Special Education, Inc.*

1800 Diagonal Road, Suite 320, Alexandria, VA 22314

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July 14, 2009

Re: Comments on Proposed Collection of Information  
OMB #1820-0578-v.11 IDEA Part C Annual Performance Report (APR)

Director, Information Collection Clearance Division  
Regulatory Information Management Services  
Office of Management

[ICDocketMgr@ed.gov](mailto:ICDocketMgr@ed.gov)

Dear Education Desk Officer:

The National Association of State Directors of Special Education (NASDSE), which represents the directors of special education in the states, the District of Columbia, the Bureau of Indian Education, the Department of Defense Education Agency, the Federal territories and the Freely Associated States, appreciates this opportunity to provide comments in response to the above-referenced data collection.

In November of 2008, NASDSE submitted comments on proposed changes to the Annual Performance Report that the Department of Education's Office of Special Education Programs (OSEP) had submitted for the Part B indicators. At that time, we urged OMB and OSEP not to move forward with any changes to the indicators for several reasons:

1. The proposed changes are costly – both in terms of the systems changes to state and local IT systems and in terms of personnel training.
2. OSEP has repeatedly made changes to the indicators since they were first introduced with the reauthorization of IDEA in 2004. The State Performance Plan (SPP) and its indicators are on a six-year cycle, which will soon be up for renewal and we see no reason why these proposed changes are so urgent that they cannot be postponed until the SPP can be looked at as a whole when the next six-year cycle comes up for renewal in 2010-11.
3. State and local governments are facing a fiscal crisis not seen since the Depression of the 1930s and simply lack the financial resources to undertake costly changes at this time.

These points, made last November, still hold true today with respect to the proposed changes to the Part C indicators for the Part C lead agencies and particularly for the local Part C providers. And despite the one-time funding available through the ARRA, that influx of funding really needs to go towards the provision of services and training of providers – both of which have been hampered by cuts in federal funding for the Part C program over the past few years.

Therefore, for all of the above reasons, NASDSE urges OMB and OSEP not to go forward with these proposed data changes to the Part C APR at this time.

Furthermore, by proposing these changes at this time, OSEP expects the states to report on them in February 2010. Even if OMB clears this data collection in record time, there is no way that Part C programs can gear up to adequately train and collect this data AND guarantee that it is valid and reliable data as required by OSEP by February 2010.

NASDSE therefore urges that these proposed changes be put on hold until such time as states are required to submit new state performance plans and that OSEP bring together a group of stakeholders to discuss proposed changes to the indicators BEFORE putting them out for comment.

NASDSE thanks you again for this opportunity to comment. Please feel free to contact me at (703) 519-3800, ext. 322 or at [bill.east@nasdse.org](mailto:bill.east@nasdse.org) or NASDSE's director of government relations, Nancy Reder at (703) 519-3800, ext. 334 or at [nancy.reder@nasdse.org](mailto:nancy.reder@nasdse.org) if you have any questions regarding these comments.

Sincerely,

A handwritten signature in cursive script that reads "Bill East".

Bill East, Ed.D.  
Executive Director

Cc: Alexa Posny  
Patty Guard  
Ruth Ryder  
Larry Wexler