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Director, Information Collection Clearance Division
U.S. Department of Education
550 12th Street, SW
PCP, Room 9086
Washington, DC 20202-0023

January 7, 2019

Docket # ED-2018-ICCD-0117

RE: Agency Information Collection Activities; Comment Request; EDFacts Data Collection School Years 2019–20, 2020–21, and 2021–22 (With 2018–19 Continuation)

Dear Director:

The Council for Exceptional Children (CEC) appreciates the opportunity to respond to the proposed changes to the EdFacts Data Collection for school years 2019-20, 2020-21, and 2021-22. The Council for Exceptional Children is a professional association of 20,000 special educators and early intervention personnel dedicated to advancing the success of children and youth with disabilities. We accomplish our mission through advocacy, standards and professional development. CEC's members serve over 7 million infants, toddlers and children and youth with disabilities across the nation in public schools and early intervention programs.

CEC fully supports the proposal to expand the staff category used for the Common Core of Data to include the category of “school psychologist.” School psychologists provide critical services that support the academic, social-emotional, and mental and behavioral health of students. They are also key members of teams that help ensure all schools are safe for all students. Currently, school psychologists are included in the definition of ‘student support staff’ which includes a myriad of other school staff members. Inclusion of school psychologists within this broad category prevents an accurate count of school psychologists employed in public school settings across the country. CEC believes that expanding the staffing category of the Common Core of Data to include ‘school psychologist’ would not constitute a significant burden on the state department of education and would provide valuable information to help key decision makers and interested stakeholders across the country ensure adequate and equitable access to school psychological services.

For School Year 2019-20, NCES proposes to retire the data category "Staff Category (Special Education Related Service)." **CEC recommends NCES retain the "Staff Category (Special Education Related Service)."** This list includes, audiologists, speech-language pathologists, occupational therapists, psychologists, social workers, and nursing staff, among others. Many states are experiencing a critical shortage of these personnel who provide related services to children and youth with disabilities, instructional supports to those in general education, and support the implementation of schoolwide programs (e.g. bullying prevention, school climate, social emotional learning) that benefit all students. Each professional plays a critical role in the learning of children and youth and this data collection is critical to gain a better understanding of how states are staffing these positions and identify states who are lagging behind so supports and interventions can be appropriately targeted. Continuing this data collection will better support states' efforts to recruit and retain high quality specialized instructional support personnel ("related service personnel").

CEC's comments regarding directed question 24 - Pre-school Educational Environments are aligned with the National Association of State Directors of Special Education (NASDSE) and CEC's Division for Early Childhood (DEC) comments and are as follows:

- a. *How are the current educational environments data for children with disabilities, ages 3-5, useful to your state?* Many states and LEA's find the current preschool educational environment data helpful in

monitoring the provision of special education and related services within regular education programs. Inclusion of young children with disabilities in regular early childhood environments is a priority in most states, and these data offer a measure of accountability that is helpful as states work toward continuously improving the quality of services for preschoolers with disabilities. That said, the data have some limitations and some changes would be helpful.

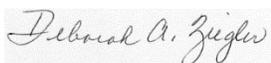
- First would be to allow the options to recognize “home” as an appropriate environment for some children, particularly those young threes who may not developmentally be ready for a group setting. In these instances, “home” should be considered an option that reflects a less restrictive placement closer to “with peers.” This is distinctly different from the concept of “home” for school aged children for which this environment represents a more restrictive setting than in school with their peers.
- In addition, the aggregation of data for all five year olds, including children receiving their special education and related services in preschool as well as those in kindergarten, is challenging and does not provide adequate information for improvement planning. The recommendation provided below in item c would allow states who elect to report 5-year old environments as either preschool or kindergarten to provide the additional data necessary to inform decision-making efforts relative to B-6.

In sum, these data points would be more informative to states and LEA’s if the calculations allowed for recognition of the home as an appropriate choice for some young children and if the data on five year olds were available disaggregated between preschool and kindergarten.

- b. *How would changing the term “attending” to “enrolled” in a regular early childhood program affect the reporting requirement or affect how your state uses the data?* Changing the wording to “enrolled” would be beneficial to states as it provides the additional clarification necessary to support the intent of the data collection.
- c. *Children with Disabilities Age 5 and in Kindergarten: ED is proposing to add an optional data category to measure the number of Children with Disabilities who are both Age 5 and in Kindergarten. This would allow states to distinguish these students from their pre-school Children with Disabilities and in educational environment. Would your state find this additional detail useful, why or why not?* Many states are currently able to disaggregate the B-6 data to measure the five-year-olds in preschool separately from the five-year-olds in kindergarten. For these states, the disaggregation of data would be welcomed, as it would highlight the additional data aligned with state and local improvement efforts. While we recognize providing this data would require some states to modify data collection and analysis, because the strategies for increasing participation in regular education environments vary significantly based on involvement in preschool or kindergarten, some may welcome the opportunity.

Thank you for your consideration of these comments. For additional information please contact Deborah A. Ziegler, CEC Director of Policy and Advocacy. (debz@cec.sped.org).

Sincerely,



Deborah A. Ziegler, Ed.D.
Director, Policy and Advocacy