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April 23, 2009

Office of Information and Regulatory Affairs

Office of Management and Budget

725 17th Street, N.W. Room 10222

New Executive Office Building

Washington DC 20503

Attention: Education Desk Officer

These comments are in response to the Public Comment request published in the March 24, 2009 Federal Register.

While I share concern expressed by others over the timing associated with the proposed collection I fully support this timeline and share OSEPs sense of urgency in regard to this proposed change. As the Section 619 Coordinator for the State of Minnesota, I believe we have lost valuable momentum in building capacity to include children with disabilities in settings with their same age peers due to the lack of meaningful data that resulted from the collection that has been in place for the past few years and from the lack of congruence between the SPP/APR indicator and the 618 collections. While the timeline is indeed tight I do NOT want to lose another year. At a minimum, make it an option for those states who can confidently implement the change – much like the reporting of the changed reporting of race/ethnicity was phased in out of respect for each state's needs. **Therefore I request that any changes to this data collection be optionally implemented by states immediately.**

Regarding the substance on the collection, I fully support this change as I believe the resulting data will be highly useful in driving program improvement and because 5 settings are unchanged from the prior collection process allowing training on the new system to focus exclusively on the changes.

I do share concerns noted by DEC and others in their comments regarding the definition of “regular early childhood program” and believe that the proposed collection would be strengthened in terms of data validity and ease of collection if the definition of “regular early childhood program” was based on program rationale – is the program an educational program designed primarily for children without disabilities.

For further information please contact:

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