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Regarding Special Education Directed Question 2: MOE and CEIS Data - We appreciate the one year delay in this proposed data collection and the elimination of data collection by age group, however we still believe that the burden of collecting of data by disability status will exceed its utility. The original comments for the 60 day comment period requested clarification on how or whether to report students if CCEIS funds are used for professional development or procedural improvements. Clarification was not provided in the response to comments. That, along with the fluidity of IEP status across a school year, will make it difficult to count students in a meaningful and consistent way across LEAs and states.

There is no evidence that the current data collection for voluntary CEIS has provided any meaningful information for evaluation or use of CEIS practices, and it is not clear that the proposed collection for mandatory CCEIS will either. It would be far better to put this proposed collection on hold and work with a small number of states to consider how best to evaluate the use and effectiveness of both CEIS and CCEIS practices to determine a meaningful data collection.