



# Division of Elementary and Secondary Education

*Transforming Arkansas to lead the nation in student-focused education*

**Johnny Key**  
Secretary

April 28, 2022

**Dr. Ivy Pfeffer**  
Deputy  
Commissioner

PRA Coordinator of the Strategic Collections and Clearance Governance and Strategy Division  
U.S. Department of Education  
400 Maryland Avenue SW  
LBJ, Room 6W208B  
Washington, DC 20202-8240

**Stacy Smith**  
Deputy  
Commissioner

RE: Docket No. ED-2021- SCC-0159, Comments in Response to EDFacts Data Collection  
School Years 2022-23, 2023-24, and 2024-25 (With 2021-22 Continuation)

**State Board of  
Education**

Division of Elementary and Secondary Education, Office of Special Education appreciates the opportunity to comment on potential changes in the EDFacts data collection. We fully support the collection and use of high-quality data to improve outcomes for the nation's children and youth, particularly those with disabilities.

**Ouida Newton**  
*Poyen*  
Chair

Arkansas' specific comments follow:

**Dr. Sarah Moore**  
*Stuttgart*  
Vice Chair

**Special Education Directed Question 1: IDEA Personnel Data.**

We are in support of the change to personnel reporting to align with the Part B Child Count and Educational Environments data age groups.

**Charisse Dean**  
*Little Rock*

**Special Education Directed Question 2: MOE and CEIS Data.**

Arkansas appreciate the one-year delay in this data collection and the elimination of data collection by age group. More clarification is needed on the reporting of students with and without disabilities. Will the reporting of students who received CCEIS address disability entry status or the end of year status? Since some students may have been non-disabled upon entry and later placed into special education services while maintaining CCEIS services. The answer would determine how a state collects the disability status information.

**Dr. Fitz Hill**  
*Little Rock*

**Kathy McFetridge**  
*Springdale*

**Special Education Directed Question 3: IDEA State Supplemental Survey.**

Arkansas appreciate that the IDEA SSS metadata survey will remain as a single survey, and that the significant disproportionality question will be removed.

**Steve Sutton**  
*Marion*

**Adrienne Woods**  
*Rogers*

**Assessments Directed Question 25: IDEA by major racial/ethnic groups and by disability category at the State and LEA levels. *What impacts are anticipated with reporting these data to ED?***

Arkansas appreciates that the collection of assessment data by disability category has been dropped from the proposal. Arkansas already collects race/ethnicity within the assessment data; therefore, the addition to the file specifications would not be an excess burden.

**Dr. Beth Anne Rankin**  
*Magnolia*

**Randy Henderson**  
*Blytheville*

**Assessments Directed Question 26: Assessment Metadata collection.**

At this time, there are no known issues responding to the assessment metadata questions.