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Thank you for the opportunity to comment.

As stated in the comments provided within the 60-day review period, it appears premature to draw definitive conclusions regarding the efficacy of all states' general supervision systems until the majority of states have undergone the DMS process, allowing for a more data-driven decision-making strategy to establish whether a critical need exists to gather such extensive data from all states and territories. We maintain that the rationale put forth by OSEP in 2013, in favor of discontinuing the previous analogous indicator, remains valid. Therefore, we recommend deferring the consideration of Indicator B-18 until the current cycle of the DMS process concludes, or at minimum, until a greater number of state reviews have been finalized to ensure adequate data upon which to base this decision has been collected and analyzed.

Notably, two recently issued Part B DMS 2.0 letters provide no indication of states failing to monitor beyond the SPP/APR compliance indicators. This implies that OSEP's assertion, "Through its monitoring activities, OSEP has learned that virtually all monitored States have not been monitoring ... activities outside of the SPP/APR compliance indicators," may not accurately depict the nationwide landscape. This observation is further substantiated by information submitted during the 60-day comment period, which indicates that a substantial number of states do indeed conduct monitoring activities extending beyond the SPP/APR compliance indicators.

Further, the associated burden hours required to aggregate data from diverse systems (including, but not limited to monitoring, fiscal, dispute resolution, etc.) and to complete narratives detailing the correction of noncompliance will almost certainly surpass the five burden hours added.

Should the determination be made to incorporate Indicator B-18, it is imperative that the sections pertaining to the correction of noncompliance, encompassing both the data and the narratives, be excluded from the other compliance indicators (specifically, B-4B, B-9, B-10, B-11, B-12, and B-13). The addition of correction of noncompliance to these indicators followed the removal of original Indicator B-15. Reporting on the correction of noncompliance within both the compliance indicators and Indicator B-18 would be redundant and unduly taxing on states. It is imperative that this data and information concerning the verification of correction process not be mandated in more than one location.