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Comment regarding the proposed addition of Indicator B-18: As indicated in the 60-day comments, it seems premature to come to conclusions about all states' general supervision systems until more states have been through the DMS process and the information can be compiled to determine whether there really is a systemic need to gather these extensive data from all states. We believe the rationale given by OSEP in 2013 to eliminate the previous similar indicator is still valid, so we suggest waiting until the full cycle of the current DMS process is completed, or at least a larger number of state reviews have been completed, to ensure there are data to inform any necessary changes.

Two recently released Part B DMS 2.0 letters have no mention that the states failed to monitor beyond the SPP compliance indicators. This suggests that OSEP's statement, "Through its monitoring activities, OSEP has learned that virtually all monitored States have not been monitoring EIS program and provider activities outside of the SPP/APR compliance indicators" may not accurately reflect the nationwide situation. This is further supported by information submitted in the 60-day comment period that indicates that a large number of states do, in fact, monitor beyond the SPP compliance indicators.

While the information required by the proposed Indicator B-18 is available to states, the associated burden hours to compile the data from various systems (monitoring, fiscal, dispute resolution, etc.), and to complete the narratives on correction of noncompliance will far exceed the five hours that were added to the burden hours.

If the decision is made to add indicator B-18, it is imperative that the correction of noncompliance sections, both the data and the written detailed information, be removed from the other compliance indicators (B-4B, B-9, B-10, B-11, B-12, and B-13). Correction of noncompliance was added to these indicators when the original indicator B-15 was removed. Reporting on the correction of noncompliance in the compliance indicators AND B-18 is redundant and unnecessarily burdensome on states. These data and information on the process of verification of correction must not be required in more than one place.