



Office of the State Superintendent of Education

DISTRICT OF COLUMBIA
MAYOR ADRIAN M. FENTY

September 23, 2010

TO: Chancellor, District of Columbia Public Schools (DCPS)
Public Charter School Board
Public Charter School Directors

FROM: Beth H. Colley 
Interim State Superintendent

RE: Child Count Procedural Guidance

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The purpose of this memorandum is to provide guidance to Local Education Agencies (LEAs) regarding the specific child count requirements outlined in 34 CFR Sec. 300.645 of the regulations for the Individuals with Disabilities Education Act (IDEA).

The specific requirements of Sec. 300.645 are:

- (a) Establish procedures to be used by LEAs and other educational institutions in counting the number of children with disabilities receiving special education and related services;
- (b) Set dates by which those agencies and institutions must report to the SEA to ensure that the State complies with Sec. 300.640(a);
- (c) Obtain certification from each agency and institution that an unduplicated and accurate count has been made;
- (d) Aggregate the data from the count obtained from each agency and institution, and prepare the reports required under Sec. Sec. 300.640 through 300.644; and
- (e) Ensure that documentation is maintained that enables the State and the Secretary to audit the accuracy of the count.

State Education Agency (SEA) Child Count Procedures:

To ensure a clear and meaningful framework to assist LEAs with their child count responsibilities, the SEA will incorporate the following procedural steps in preparation for the annual December 1st Child Count:

OSSE will disseminate a memo to each local education agency's leader and special education coordinator notifying them of their obligations under IDEA to submit certifications of their child count and educational environments data submission, which will be accompanied by a user manual for the OSSE IDEA*facts* application.

LEAs will be given at a minimum of thirty days to review their data in the OSSE IDEA*facts* application to ensure that it was accurate and reliable. They will be instructed to make any data corrections in the appropriate source system(s).

LEAs will be required to print out the validated data report, as well as the certification requiring a signature, from the OSSE IDEA*facts* application.

OSSE will conduct an internal validation process to ensure the reliability and accuracy of data submitted by LEAs and will reject certifications that do not comply with IDEA requirements until each LEA's certification is deemed to be accurate and reliable.

OSSE will document the child count and environments submission process to accurately conduct an accurate and unduplicated count of all students.

To ensure the certification of accurate and unduplicated count OSSE will require each LEA to submit and sign an official certification document.

LEAs are required to maintain any and all records supporting child count data for a minimum of five years.

Compliance and Monitoring:

The United States Department of Education's Office of Special Education Programs (OSEP) requires that every SEA monitor LEAs to ensure compliance with IDEA Part B, including reporting valid and reliable data. A finding of LEA non-compliance by OSSE results in the requirement to submit an improvement plan containing corrective actions for each area of non-compliance. OSSE may also recommend or require training and technical assistance to LEAs when crafting corrective actions. All items of non-compliance must, by Federal law, be corrected within one year of the finding; sustained non-compliance by a LEA may result in sanctions that include potential withholding of Part B grant funding.

Due in part to longstanding non-compliance regarding reporting valid and reliable data, the District of Columbia is currently under Special Conditions related to its Part B IDEA grant

funding. OSSE has therefore placed special emphasis on monitoring compliance with 1) employing practices that support education of children in the Least Restrictive Environment (LRE), 2) adherence to timelines for evaluation and reevaluation, and 3) timely and complete responses to Hearing Officer Determinations (HODs). All LEAs must comply with monitoring requirements established annually by OSSE, which include the collection and submission of both quantitative and qualitative data that support monitoring for regulatory compliance and programmatic quality.

Further Guidance, Training and Technical Assistance:

OSSE is committed to ensuring that LEAs have the knowledge base and tools to report valid and accurate data. OSSE will conduct activities to support LEA compliance, including, but not limited to:

- A guide that will clearly outline the child count requirements for LEAs
- Ongoing support throughout the child count process for any LEA that has questions

OSSE is committed to ensuring that all children with disabilities receive a free appropriate public education, and in so doing, making sure that all data is valid and reliable within the requirements of the law. If you have any questions or concerns regarding this memorandum, please contact Amy Maisterra, Chief of Staff, Division of Special Education, at 202-481-3757, or by email at amy.maisterra@dc.gov.