



*Office of the General Counsel*

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June 14, 2019

**Submitted Electronically**

Director of the Information Collection Clearance Division  
U.S. Department of Education  
550 12th Street SW, PCP, Room 9089  
Washington, DC 20202-0023

**Re: Agency Information Collection Activities; Comment Request;  
Individuals With Disabilities Education Act (IDEA) State and Local  
Implementation Study 2019  
Docket ID No. ED-2019-ICCD-0050**

Dear Sir or Madam:

Thank you for the opportunity to submit comments on the U.S. Department of Education's ("Department") Individuals With Disabilities Education Act (IDEA) State and Local Implementation Study 2019. 84 Fed. Reg. 15,204.

The United States Conference of Catholic Bishops ("USCCB") is a nonprofit corporation, the members of which are the active Catholic Bishops in the United States. Catholic schools comprise the nation's largest private educator, with almost 6,300 schools educating nearly 1.8 million children in the United States today.

The USCCB welcomes the opportunity to offer comments on the Department's *Agency Information Collection Activities; Comment Request; Individuals With Disabilities Education Act (IDEA) State and Local Implementation Study 2019*. Any IDEA state and local implementation study should specifically collect information about parentally placed private school children with disabilities, in order to ensure that state educational agencies (SEAs) and local educational agencies (LEAs) are meeting their obligations under the IDEA statute and regulations regarding parentally placed students in private and faith-based schools.

The USCCB generally shares the views articulated by the National Catholic Educational Association (NCEA) in its June 10, 2019 comments, which describe in detail why this data collection is necessary and how the Department can enhance the quality, utility, and clarity of the information collected. (See NCEA Comments on Docket No.: ED-2019-ICCD-0050.) Further, we agree with NCEA concerning the consequences of not collecting this data, which include that "essential statistical data about the current implementation of IDEA that is used to inform decisions made by states, districts and policymakers about improving policies and practices for providing equitable services for

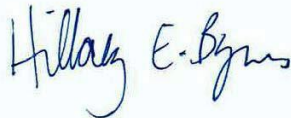
all students with disabilities will be lacking a significant and critical component of a valid investigation.” (NCEA Comments at 2.)

We appreciate the opportunity to present our comments and ask that the Department carry out its IDEA study in a way that specifically includes parentally placed students with disabilities in private and faith-based schools, in order to improve the implementation of the IDEA.

Sincerely,

Handwritten signature of Anthony R. Picarello, Jr. in blue ink.

Anthony R. Picarello, Jr.  
Associate General Secretary & General Counsel

Handwritten signature of Hillary E. Byrnes in blue ink.

Hillary E. Byrnes  
Director of Religious Liberty & Associate General Counsel