Introduction

As part of the IDEA Part B data requirements, states submit data on the allocation of IDEA Part B subgrants, local educational agency (LEA) maintenance of effort (MOE), and coordinated early intervening services (CEIS). The data are submitted to the Office of Special Education Programs (OSEP) via the EDFacts Metadata and Process System (EMAPS). The state's data submitted to EMAPS may be flagged for two reasons: fatal errors that prevent the data file from uploading to EMAPS and potential data quality issues that trigger warnings and may require further explanation. In the second case, state educational agencies (SEAs) must provide explanations of why these data warnings have occurred; these explanations are commonly known as data notes.

States are able to submit these data notes (up to 4,000 characters) to OSEP via EMAPS or the Office of Management and Budget (OMB)-MAX Information System along with the original MOE and CEIS data and any necessary revised data during the data submission and resubmission windows. OSEP may request additional information during the resubmission window through the Data Quality Reports and Year-to-Year Change Reports. For those requests, states must submit data notes via OMB-MAX, the online data communication tool used by OSEP. The processes for receiving data note requests and submitting data notes are described in this guide.

This practice guide is intended to help states develop effective data notes to address warnings or respond to data quality inquiries. The document describes the value of well-written explanations of data warnings, provides an overview of OSEP’s data quality review process, and provides examples of both inadequate and exemplar data notes for two common warning messages.
A complete list of warnings and fatal errors is provided in E/MAPS User Guide: IDEA Part B Maintenance of Effort (MOE) Reduction and Coordinated Early Intervening Services (CEIS) and ED/Facts Business Rules Single Inventory (https://www2.ed.gov/about/inits/ed/edfacts/business-rules-guide.html). The IDEA Data Center (IDC) and CIFR have also created a spreadsheet — 618 Data Pre-submission Edit Check Tool - Part B MOE and CEIS — to help SEAs identify data concerns before submitting their data.

Why well-written data notes are important

» Data notes help SEA program, fiscal, and data staff interpret their own data correctly and submit consistent, high-quality data over time.

» All data reported pursuant to IDEA Part B Section 618 are reported publicly — for example, in the Annual Report to Congress. It is important to provide meaningful context to members of the public who are consumers of the data. Without clarifications provided by data notes, the public may not understand the appropriate use of the data, may misinterpret the meaning of the data, and may not understand the limitations of the data.

» A well-written data note provided with the initial submission of data may help reduce the burden of responding to follow-up questions from OSEP. The E/MAPS system flags most of the data quality warnings that appear in OSEP’s Data Quality Reports. If states submit, prior to the due date, an adequate data note to all warnings triggered by the E/MAPS system, they will receive fewer data quality inquiries in their Data Quality Reports.

» Some data warnings that states receive when submitting their data could indicate potential compliance issues regarding the implementation of IDEA at the state and local levels. Providing data notes with clear explanations of the data issues that generated the warnings may help address OSEP’s compliance questions.

OSEP data quality review process

OSEP’s data quality review process assesses the quality of the SEA’s MOE and CEIS data and determines whether SEAs need to submit data notes to explain any data quality issues. OSEP expects a data note via E/MAPS or OMB-MAX for all warnings triggered in the system and for any other data quality concerns.

SEAs must submit their MOE and CEIS data to OSEP through E/MAPS by the data submission due date, which is the first Wednesday in May. The Research to Practice (RTP) Division of OSEP uses the originally submitted MOE and CEIS data to conduct data quality reviews on the following:

» **Timeliness**: Data are submitted on or before the due date.

» **Completeness**: All required data are submitted.

» **Accuracy**: OSEP automatically considers a state’s data submission to have met the accuracy criteria if the data file is successfully submitted (i.e., the file uploads without fatal errors).

» **Year-to-year changes**: OSEP provides comparisons for the prior year and the current year Section 611 allocations.

» **Other data quality concerns**: Submitted data may generate OSEP questions about other data quality issues that may be the result of potential compliance concerns.

RTP also collaborates with colleagues in OSEP’s Monitoring and State Improvement Planning (MSIP) Division to review the data for compliance with IDEA requirements. States are given an opportunity to resubmit their data during the E/MAPS reopen period, but only the MOE and CEIS data submitted as of the initial due date are used to create the Data Quality Reports. The E/MAPS reopen period can vary from year to year. For specific dates, reference the E/MAPS User Guide.
After an initial data review by RTP and MSIP, the following occurs:

» OSEP posts the results as a Data Quality Report to each SEA’s individual OMB-MAX webpage. This report identifies whether additional data notes are required or if the data need to be resubmitted based on the data quality inquiries and the results of the Year-to-Year Change Reports.

» SEAs have about 1 month to review the Data Quality Report and provide data notes and/or resubmit the data. This 1-month window occurs during the EMAPS reopen period.

» RTP and MSIP conduct a final review of the data notes and/or resubmissions to prepare the data for publication. Some data may be suppressed (see “OSEP Data Suppression” box).

» The final reviews are used by MSIP for possible compliance follow-up questions.

**OSEP Data Suppression**

OSEP may suppress particular elements of a state’s MOE and CEIS data submission if there are concerns about the quality of the information. OSEP takes the submission of the data as well as data notes into consideration when making decisions around suppressing data due to quality concerns. OSEP suppresses the data when there is a high likelihood that the information presented does not align with the reporting instructions of the MOE and CEIS data collection. The submission of clear explanations via data notes could prevent the need to suppress the data.

For instance, if OSEP is provided information that a state reports the amount of local and/or state funds that an LEA reduced for reasons other than those pursuant to Section 613(a)(2)(C) under the B3 data element, OSEP would likely suppress these data. Another example: If a state reports that an LEA did not reserve funds for comprehensive CEIS (CCEIS) due to significant disproportionality under data element C2A but reports that the LEA was identified as having significant disproportionality due to “identification as a child with a disability” under data element C2A.1, OSEP would likely suppress these data.

**How to review Data Quality Reports and Year-to-Year Change Reports**

Reviewing a state’s Data Quality Report requires logging in to OMB-MAX with a username and password. If the state’s IDEA Data Manager does not already have an account, the SEA will need to contact the EDfacts Partner Support Center (PSC). Each Data Quality Report includes a list of the data quality measures — timeliness, completeness, accuracy, year-to-year changes, and other data quality concerns — with a response next to each measure for which the SEA met the criteria. For any criteria that were not met, the RTP includes explanatory comments in the report in the “OSEP Comment to State” column and a “Data Quality Check” result that indicates either that data need to be resubmitted or that a data note is needed.

When reviewing a Data Quality Report, state officials should

» review the originally submitted data along with the report;

» review the changes noted in the Year-to-Year Change Report;

» review the data warnings in the Data Quality Report;

» review the data in the SEA’s systems for data quality concerns;

» contact the relevant LEAs/educational service agencies (ESAs) for clarity about the entered data;

» resubmit the data if it is determined that there was a data entry error; and,

» If the SEA determines that the data are accurate but still generate a warning because of an unexpected or unusual combination of data elements, resubmit via OMB-MAX an explanation for the data warning (data notes may also be submitted via EMAPS during the resubmission period), which may involve input from the LEAs/ESAs.
The rest of this document will focus on general guidance and examples of how to respond to two particular data quality warnings generated by the EMAPS system.

General guidance on writing data notes: What types of information should be included in good notes?

What details are helpful?

Be sure to address all data quality warnings from the OSEP Data Quality Report. When composing data notes to explain particular issues, the state should provide the following information:

» LEA(s) National Center for Education Statistics (NCES) ID(s)
» LEA name(s)
» data quality warning that is being explained in the data note
» federal fiscal year(s) associated with the data warning
» funding amount(s) associated with the data warning
» a general explanation of why the data warning occurred
» the actual warning message being addressed (which should be included at the start of the data note), and only report actions actually taken by the SEA or LEA
» enough information for OSEP to determine if the SEA or LEA was compliant with IDEA regulations (e.g., the SEA did not calculate and distribute the correct amount of IDEA Part B funds to an LEA, an LEA reserved more than 15% of the LEA’s IDEA Part B grant for CEIS, an LEA took an MOE adjustment when the LEA did not have a determination of “meets requirements”)
» the amount of the repayment (if the noncompliance issue was associated with LEA MOE or CEIS amounts over 15 percent) and when the repayment was or will be submitted to the U.S. Department of Education
» any steps taken by the SEA to ensure that the noncompliance issue has been corrected and will not recur

Selected data quality warnings and inadequate and exemplar data notes

Each of the following two examples provides a data quality warning followed by an inadequate data note and then one or more exemplar data notes for responding to that warning. The specific wording of these example warnings (e.g., the variable labels) is current at the time of this guide’s publication but may change over time; nonetheless, the general guidance provided by the exemplar data notes should still apply.

» Data notes are inadequate if they do not contain enough information for OSEP to determine the LEA/ESA being discussed and whether possible compliance concerns have been addressed.
» Exemplars contain all of the information described in the above section. They are intended to help the reader understand the types of information that should be included in good notes and the kinds of details that are helpful.
» The first exemplar data note for each of the following sample warnings is written for a situation in which the state has had no indication of potential noncompliance with IDEA. In the second example, two further exemplar data
notes are provided to address situations in which there is potential noncompliance. These two exemplars are labeled “Exemplar data note (w/potential noncompliance).”

In the exemplar data notes, highlighted information is used to indicate dates, dollar amounts, and information about specific LEAs that states need to include to ensure that each data note fully explains the warning.

For writing their own data notes, SEAs should not copy the exemplar data notes verbatim (i.e., do not simply cut and paste the exemplar data note from this document). Rather, these exemplars should be used for guidance on the types of information that should be included in a data note.

Data quality warning example 1:

“Did the LEA/ESA meet the MOE compliance standard (B6) was ‘No’ and By the date of this data submission, did the State return non-Federal funds to the Department based on the failure of the LEA/ESA to meet the MOE compliance standard (B7) was ‘M’ or ‘NA.’”

**Inadequate data note:** The SEA did not return nonfederal funds to the Department.

**Exemplar data note:** For the warning, “Did the LEA/ESA meet the MOE compliance standard (B6) was ‘No’ and By the date of this data submission, did the State return non-Federal funds to the Department based on the failure of the LEA/ESA to meet the MOE compliance standard (B7) was ‘M’ or ‘NA.’” LEA(s) [list by NCES ID and name] did not meet the MOE compliance standard. The SEA completed the audit in April YYYY, right before the data collection submission date. The SEA is working with the LEAs pursuant to state regulation XX to collect nonfederal funds. The SEA will submit the nonfederal funds by (MM/DD/YYYY).

**Note to Guide Users**

Be sure to review LEA MOE compliance data warnings based on reporting logic. Some warnings may indicate data entry errors that require correction and not a data note.

For example, one common data quality warning is: “Did the LEA/ESA meet the MOE compliance standard in FFY XX (B6) is ‘Yes,’ ‘M,’ or ‘NA’ and By the date of this data submission, did the State return non-Federal funds to the Department based on the failure of the LEA/ESA to meet the MOE compliance standard in FFY XX (B7) and What amount of non-Federal funds did the State return to the Department based on the failure of the LEA/ESA to meet the MOE compliance standard in FFY XX (B8) are not equal to ‘NA’ or ‘M.’”

When MOE compliance is “Yes,” “M,” or “NA,” the SEA generally should enter “NA” or “M” for both the date of payment and the amount of payment.

Addressing data warnings triggered by reporting logic at the time of data submission may reduce the number of warnings that require data notes.

Data quality warning example 2:

“The LEA/ESA reserved 15% of IDEA 611 or 619 funds for CEIS (C2A) was ‘Yes’ and 15% of the total LEA/ESA allocation for Sections 611 and 619 for FFY XX (A5) is less than the amount reserved for comprehensive CEIS (C2B).”

**Inadequate data note:** The LEA did not use the grant from the reported year for CCEIS.
Exemplar data note: For the warning: “The LEA/ESA reserved 15% of IDEA 611 or 619 funds for CCEIS (C2A) was ‘Yes’ and 15% of the total LEA/ESA allocation for Sections 611 and 619 for FFY XX (A5) is less than the amount reserved for comprehensive CEIS (C2B),” the LEA [list by NCES ID and name] chose to reserve funds from the next year’s (FFY XX+1) grants to implement comprehensive CEIS in SY XXXX–YY. The total for the Sections 611 and 619 grants in FFY XX was $XXX,XXX.xx. Fifteen percent of that amount is $YY,YYY.yy, which is equal to the amount reported in C2B. The SEA resubmitted the file reporting zero dollars reserved for the reference year (FFY XX). The SEA will report the correct amount of funds for the reference year (FFY XX+1).

Exemplar data note (w/potential noncompliance): For the warning: “The LEA/ESA reserved 15% of IDEA 611 or 619 funds for CCEIS (C2A) was ‘Yes’ and 15% of the total LEA/ESA allocation for Sections 611 and 619 for FFY XX (A5) is less than the amount reserved for comprehensive CEIS (C2B),” the LEA [list by NCES ID and name] reserved the improper amount of funds for comprehensive CEIS in SY XXXX–YY. SEA staff verified with the LEA that the maximum amount was $XXX,XXX.xx [use number in A5] and that the LEA has since reserved the proper amount for CCEIS and that the amount of funds expended for CCEIS was not higher than the maximum allowed amount. In order to avoid this in the future, the SEA has begun calculating the 15 percent CCEIS for all LEAs and communicates that number to each LEA with the IDEA application for funds and the IDEA award. This number is now also compared to the documentation that is submitted by LEAs.

Exemplar data note (w/potential noncompliance): For the warning: “The LEA/ESA reserved 15% of IDEA 611 or 619 funds for CCEIS (C2A) was ‘Yes’ and 15% of the total LEA/ESA allocation for Sections 611 and 619 for FFY XX (A5) is less than the amount reserved for comprehensive CEIS (C2B),” the LEA [list by NCES ID and name] reserved the improper amount of funds for comprehensive CEIS in SY XXXX–YY. SEA staff verified with the LEA that the maximum amount was $XXX,XXX.xx [use number in A5] and that the LEA expended more IDEA funds for CCEIS than allowed. The SEA has determined the amount of unallowable costs and is working with the LEA to determine if there is any way for the unallowable costs to be reallocated to state or local funds and the IDEA funds expended for allowable costs. At the conclusion of this process, the SEA will repay the federal government from nonfederal funds the amount of the unallowable costs. In order to avoid this in the future, the SEA has begun calculating the 15 percent CCEIS for all LEAs and communicates that number to each LEA with the IDEA application for funds and the IDEA award. This number is now also compared to the documentation that is submitted by LEAs.

Suggested citation: Center for IDEA Fiscal Reporting. (2022). Writing exemplary data notes for local educational agency maintenance of effort reduction data and coordinated early intervening services data. WestEd.

This publication is an update to the original resource published in 2016. We recommend replacing the original resource in your records with this version.

If you have questions about the contents of this document, please contact CIFR at: cifr_info@WestEd.org