



## Memorandum

**To:** Public Education Agency Special Education Administrators  
**From:** Exceptional Student Services  
**cc:** Public Education Agency Special Education Data Coordinators  
**Date:** November 1, 2024  
**Re:** Guidance on Federal Primary Need Indicators

Exceptional Student Services (ESS) has revised how federal primary need indicator reporting works in AzEDS to align with federal guidance on special education data disability reporting. These changes are only relevant to federal reporting and ensure that Arizona's disability reporting remains consistent with other states.

EdFacts<sup>1</sup> guidance requires that in circumstances where **more than one disability** is reported for a student, the data is federally reported publicly using the following hierarchy:

1. If developmental delay (DD) or preschool severe delay is reported, then the student shall be reported as having DD regardless of all other reported disabilities
2. If criteria 1 is not applicable and the student is **only reported with** hearing impairment and visual impairment (regardless of which is primary), the state is required to calculate and report the student with the value of deaf-blindness
3. ESS shall federally report the student as MD if the student:
  - a. Does not meet criteria 1 or 2 and
  - b. Is reported with multiple disabilities (MD) or multiple disabilities with a severe-sensory impairment (MDSSI)

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<sup>1</sup> FS002 – Children with Disabilities (IDEA) School Age File Specifications

If the student only has one disability reported, that category (aligning with federal categories) is reported federally. ESS has adjusted the integrity rules to implement these requirements. It is working to fix a bug with one of the integrity rules for MD/MDSSI in concurrent cases with DD, which will be corrected soon (integrity rule - 40100).

PEAs should utilize the following logic when reporting students with disabilities:

1. If the student has DD or PSD, the PEA should report the student with one of these categories being the primary disability
2. If the student does **not** have DD or PSD and the student has either MD or MDSSI, the PEA should report the student with MD or MDSSI as the primary disability
3. If the student does not meet criteria 1 or 2, the PEA may report any primary disability

For any questions, please [contact the ESS Data Management](#) inbox.