



Division for Early Childhood
of the Council for Exceptional Children
2900 Crystal Drive, Suite 100
Arlington, VA 22202-3557
Phone: 310-428-7209 | Fax: 855-678-1989
Website: dec-sped.org

Docket ID: ED-2017-OS-0074
Document Number: 2017-13157

August 9, 2017

The purpose of these comments is to voice strong support for the Individuals with Disabilities Education Act (IDEA) and the regulations that have been promulgated to support its implementation. IDEA and these regulations are critical to continuing the progress made over the last 30 years to ensure young children with or at risk for disabilities and their families receive the services they need to reach their full potential. The Division for Early Childhood (DEC) of the Council for Exceptional Children is the largest membership organization focused solely on the development and education of young children (ages birth–8) with or at risk for disabilities and other special needs and their families. **As such, DEC sees no need for repeal, replacement or modification of any IDEA regulations at this time and notes that changes to regulations are better addressed in the context of a reauthorization.** The current process is outside of the usual order, and as a result, is likely to lack the in-depth stakeholder input and public discussion critical to the success of such an activity.

IDEA and its implementing regulations are designed to address both access to early intervention and special education for children with disabilities, as well as the quality of those services. IDEA Parts A, B and C, outline the rights, responsibilities and infrastructures to ensure access to early intervention and education for eligible children and their families. In Part D, IDEA provides for investments in the quality of those services and infrastructures. Part D provides funding for parent support and information centers and the demonstration and dissemination of evidence-based, effective practices.

There is no doubt in the field of education and in the experiences of families, that IDEA is a success. Certainly, there are challenges in implementing such a broad and visionary policy and federal action can indeed assist in these efforts. But the answer to these challenges is not to revise or reduce IDEA regulations. Quite the contrary, these regulations support efforts to implement IDEA successfully. Fully funding IDEA federally would go a long way to addressing the challenges states and communities are facing.

IDEA has a federal infrastructure that implementation science tells us is necessary for the installation of effective practices. This infrastructure includes guidance from OSEP in best

practice, accountability, and monitoring. For the early childhood provisions of IDEA (Part C and Section 619 of Part B), OSEP provides policy guidance as needed to state leaders to assist in their efforts to help local early intervention programs and school districts implement effective policies, practices and accountability measures while also holding them accountable to indicators of compliance and quality.

IDEA early childhood programs also serve as a key mechanism of supports and services for young children with disabilities in community settings such as preschool, Head Start, Home Visiting and child care/early learning. DEC appreciates the valuable policy guidance that has been released in the last several years through collaboration across federal programs in the Departments of Education and Health and Human Services as well as other federal agencies as needed. This federal collaborative work has resulted in the release of a number of powerful policy statements from the respective Secretaries to assist local programs serving young children in understanding best practice giving all young children opportunities to succeed and be ready for school. DEC requests that the Department continue these efforts. State and community leaders speak very highly of these policy statements and express how their use has helped further efforts for young children and families at the community level. Examples of these policy statements include, but are not limited to, high quality inclusion, reducing and eliminating suspension and expulsion, and strengthening partnerships with families.

DEC's membership, representing all states, includes a diverse population of teachers, related service personnel, administrators, families, higher education faculty, and researchers. Our values and beliefs include: 1) the right of every infant and young child, regardless of ability, and his or her family to wholly participate as full members of their communities; 2) an urgent and substantial need for high-quality, evidence-based Early Intervention/Early Childhood Special Education services; 3) services must include family, academic and behavioral supports to minimize the need for special education and related services at school age; 4) services maximize the potential for individuals to live independently as adults, and enhance the capacity of families to meet the needs of their children; and 5) equity in education and educational excellence for all children can only be achieved through equal access to opportunities, services and supports, devoid of discrimination.

Thank you for the opportunity to submit comments on this important matter. In summary, DEC voices strong support for the Individuals with Disabilities Education Act (IDEA) and the regulations that have been promulgated to support its implementation. **DEC sees no need for repeal, replacement or modification of any IDEA regulations or policy guidance.** The current process is outside of the usual order, and as a result, is likely to lack the in-depth stakeholder input and public discussion critical to the success of such an activity. DEC is available and willing to provide any additional information that may be needed. Feel free to contact us if we may be of further assistance.

Sincerely,
Peggy Kemp
Executive Director