



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

September 18, 2017

These comments are submitted on behalf of the IDEA Infant & Toddler Coordinators Association (ITCA). ITCA represents states and other jurisdictions implementing the Individuals with Disabilities Education Act (IDEA) Part C for infants and toddlers with, and at risk for, developmental delays and disabilities and their families. The purpose of these comments is to state our support for the current regulations that have been promulgated to implement the IDEA. These regulations are necessary to continue 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 and be ready to succeed at school.

IDEA and its implementing regulations are designed to address both *access* to early intervention for infants and toddlers with disabilities and their families, as well as the *quality* of those services. These regulations support efforts to implement IDEA successfully, specifically addressing the important role of parents, timelines related to service delivery, consistency across states, stakeholder involvement, provisions of evidence-based practices by qualified personnel, etc. Implementation of IDEA by states is not without its challenges; however, many of those challenges are a result of funding limitations. Increasing federal funding of IDEA would greatly reduce these challenges while still ensuring timely delivery of high quality services to families.

ITCA sees no need for repeal, replacement or modification of any IDEA regulations at this time. We believe that changes to IDEA Part C regulations are better addressed in the context of a statutory reauthorization of IDEA and subsequent issuance of regulations. ITCA always responds, and will continue to do so, when any Notice of Proposed Rulemaking for a specific set of regulations is published. ITCA does not see a concern with current regulations that would warrant the need to bypass this existing federal process.

ITCA also supports the policy guidance OSEP has provided to state leaders to assist in their efforts to help local early intervention programs implement effective policies, practices and accountability measures. We appreciate the collaborative work across federal agencies to produce valuable policy guidance released in the last several years by the Departments of Education, Health and Human Services, and other federal agencies as needed. Examples of these policy statements include, but are not limited to, high quality inclusion, reducing and eliminating suspension and expulsion, strengthening partnerships with families, and coordinating home visiting and IDEA Part C. This collaborative work at the federal level has resulted in the release of a number of powerful policy statements from the respective Secretaries to assist states in both

understanding and implementing best practices for children and families. State and community leaders speak highly of these policy statements and their accompanying resources and ITCA requests that the Department continue these efforts.

Thank you for the opportunity to submit comments on this important matter. In summary, ITCA affirms our support for the regulations that have been promulgated to implement the Individuals with Disabilities Education Act. We see no need for repeal, replacement or modification of any IDEA regulations or policy guidance at this time. This federal process, which is outside of the usual order, is likely to lack the in-depth stakeholder input and public discussion critical to the success of such an activity.

As always, ITCA is available and willing to provide any additional information or clarification that may be needed. Feel free to contact us by email at ideaitca@aol.com if we may be of further assistance.

Sincerely,
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