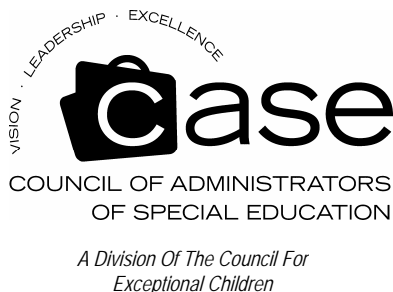


Luann L. Purcell, Ed.D., Executive Director  
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August 24, 2017

Hilary Malawer, Assistant General Counsel  
Regulatory Services Div., Office of General Counsel  
U.S. Department of Education  
400 Maryland Avenue, SW, Room 6E231  
Washington, DC 20202

**Docket ID: ED-2017-OS-0074**

Dear Ms. Malawer:

The Council of Administrators of Special Education (CASE) appreciates the opportunity to comment regarding Department of Education regulations, including repeal, replacement, or modification. The Council of Administrators of Special Education (CASE) is an international professional educational organization affiliated with the Council for Exceptional Children (CEC) whose members are dedicated to the enhancement of the worth, dignity, potential, and uniqueness of each individual in society. CASE represents special education administrators in local school districts, the individuals charged with responsibility for implementation and financial oversight of special education programs for children and youth with disabilities in schools across the country.

CASE is dedicated to high quality implementation of the Individuals with Disabilities Act (IDEA). IDEA is a comprehensive and complex law bolstered by regulations which are highly aligned with the statute. While CASE has specific areas of interest in recommending changes and improvements to IDEA and the associated regulations, it is not appropriate or helpful to consider singular regulations for revision or reduction without considering the full context of the law. It is for these reasons that CASE does not support any one regulation be altered or reduced at this time, but instead supports waiting until reauthorization of the full law takes place to recommend these alterations.

IDEA serves an incredibly important role in supporting school and district leaders in ensuring high quality and inclusive educational opportunities for students with disabilities. As leaders in the field of special education we are highly sensitive to the interrelationship between each section of the law and the regulations that flow from it. There are several regulations under IDEA that have required significant amounts of time to understand and implement. Recent regulations around significant disproportionality are a good example where implementation is presently just getting underway.



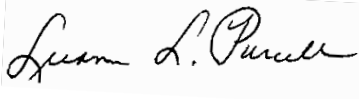
**Council of  
Administrators  
of Special Education**

The voice and vision of special education

While we understand the need to discuss efficiencies, effectiveness is of utmost importance in these discussions. Reducing regulations will result in decreased efficiencies, creating greater complexity and confusion if one or two regulations are changed without a full review of the law itself. CASE supports maintaining the IDEA regulations as currently written. Changes in regulation should not be piecemeal and instead should be considered very carefully in the context of reauthorization.

Thank you for the opportunity to provide input regarding the request for comments on the status of current education regulations. CASE would be happy to engage in further discussions and serve as a resource on the IDEA. For further information, please contact Dr. Luann Purcell, CASE Executive Director, [lpurcell@casecec.org](mailto:lpurcell@casecec.org).

Sincerely,

A handwritten signature in black ink that reads "Luann L. Purcell". The signature is written in a cursive style with a large initial "L".

Dr. Luann Purcell  
Executive Director