



July 24, 2014

**Re: Department Priorities Docket ID ED-2013-OII-0146**

Honorable Arne Duncan  
Secretary, U.S. Department of Education  
Office of Innovation and Improvement  
400 Maryland Avenue, S.W., Room 4W321  
Washington, DC 20202

Dear Secretary Duncan,

Thank you for the opportunity to comment on the proposed priorities for discretionary grant programs to replace the priorities established in 2010, as outlined in the Federal Register June 24, 2014. The following comments are provided on behalf of the Infant & Toddler Coordinators Association (ITCA). ITCA represents state lead agencies that are responsible for implementing Part C, Infants and Toddlers with Disabilities, of the Individuals with Disabilities Education Act (IDEA) in all 50 states and other eligible jurisdictions.

ITCA strongly supports the Department of Education's continuing commitment to an early learning agenda starting at birth. ITCA requests consideration of the following comments as final priorities are developed and funding decisions made related to ensuring that all young children and their families have the evidence-based services and supports necessary to be successful in quality early learning settings within their community.

ITCA supports the proposed priorities but offers several recommendations to strengthen them. We note that these recommendations are designed so the priorities reflect the full age range of children and youth, as well as the full scope of individuals, instructional activities, outcomes and settings to ensure investments are consistent with the administration's goals.

Our general recommendations are:

- Include early learning (beginning at birth) as an absolute priority, or if more appropriate given the area of investment, a competitive preference priority in all Department of Education discretionary grants including Preschool Expansion and Development grants, Race to the Top, the Investing in Innovation Fund (i3), and Promise Neighborhoods. This will ensure continued emphasis on the importance of early investments in young children's success.
- Use the phrase "early learning and education" consistently throughout priorities instead of "education" to ensure the emphasis on the administration's priority for "cradle to career;"

- Expand the priorities to include emphasis on the critical role and involvement of families in their own child’s growth, development and learning as well as in the policy and systems development essential for successful outcomes;

In addition, ITCA offers the following specific recommendations related to selected proposed priorities:

**Proposed Priority 1: Improving Early Learning and Development Outcomes – ITCA** strongly supports the continued inclusion of this priority including the additional areas of focus on access, a qualified workforce and improvement of data-sharing, coordination and alignment between early learning and development systems and elementary education systems.

While alignment vertically to elementary systems is important, we recommend, as we did in 2010, that this proposed priority be revised to emphasize and address the horizontal alignment and coordination with existing early childhood programs which are already serving infants, toddlers, and young children, and their families such as IDEA Part C and IDEA Part B Preschool Special Education (Sec. 619). This expanded language could easily be added to (c) addressing linkages and alignment across early childhood programs and services including IDEA, Pre-K, Early Head Start, Home Visiting, and child care. Federal initiatives and investments should support and build upon the successful IDEA work currently underway in states and communities.

**Proposed Priority 2: Influencing the Development of Non-Cognitive Factors – ITCA** notes and supports this newly proposed priority with several recommendations including the addition of language to emphasize young children starting at birth and the inclusion of whole child approaches to all systems of development. The term “non-cognitive” should be defined within the priority. Additionally, language including early indicators of success in school settings such as the benefits of play, contributions of physical health and the social emotional factors related to learning should be added to the proposed priority. ITCA suggests the priority reference and consider language from the newly released DEC Recommended Practices in Early Intervention/Early Childhood Special Education.

**Proposed Priority 7: Promoting Science, Technology, Engineering and Mathematics Education – ITCA** suggests that this priority also include an emphasis on the importance of early indicators of success in the early childhood years that are likely to support achievement in this area as children grow. This could be reflected in an additional component to the proposed priority.

**Proposed Priority 9: Improving Teacher Effectiveness and Promoting Equal Access to Effective Teachers – ITCA** recommends language related to “children with disabilities” be added to (b). In addition, ITCA recommends this proposed priority be expanded to address personnel that provide quality services to children in the early childhood years. This could be addressed in the expansion of language used in the priority as well as the possible inclusion of an additional area in the priority to promote improved quality and access to practitioners and service providers for children birth to five years. This is an early childhood workforce that reflects the range of individuals critical to successful outcomes for young children and their families. This

workforce includes, but is not limited to, early interventionists, early learning practitioners, therapists, health professionals and service coordinators.

**Proposed Priority 10 – Improving the Effectiveness of Principals** - ITCA recommends the language and emphasis in this proposed priority be expanded to include leaders within the early childhood community especially administrators in Part C and preschool special education under IDEA. In addition, existing language in (c) should broaden the scope of coursework aligned with “pre-kindergarten” to include course work aligned starting at birth.

**Proposed Priority 11 – Leveraging Technology to Support Instructional Practice and Professional Development** – ITCA supports this priority and is pleased to note the reference to early learning. In that light, we suggest that the language used be expanded past “teachers” “educators” and “students” to fully reflect the importance of this priority and the value of technology in supporting improved outcomes for young children and their families.

**Proposed Priority 13 – Improving School Climate, Behavioral Supports, and Correctional Education** – ITCA supports this proposed priority as one of the more important areas of investment. As such, the priority should be expanded to address early childhood. The Department has funded valuable projects in this area and the need continues to be great. Clearly, investing in ensuring social emotional development and skills in young children as well as the availability of evidence-based interventions as necessary is key to the success of children as they grow and learn.

**Proposed Priority 14 – Improving Parent, Family, and Community Engagement** – This proposed priority represents essential investment for the Department. First, ITCA strongly requests that the language be expanded past “student” to address all children starting at birth. ITCA also recommends the language be expanded to reflect the different roles families play in the early childhood years and particularly in programs such as Part C of IDEA. The newly revised DEC Recommended Practices are an excellent resource for this priority. We suggest consideration be given to adding a new area to reflect investments in enhancing family engagement in relation to early childhood programs.

The following are suggested as possible revisions to some of the language in this proposed priority:

- (a) Supporting state and community leaders to develop and sustain a culture and climate in which teachers, administrators and practitioners value and support parent and family engagement at all levels.
- (b) Developing and implementing systemic initiatives (as defined in this notice) to improve parent and family engagement (as defined in this notice) by expanding and enhancing the skills, strategies, and knowledge (i.e., techniques needed to effectively communicate, advocate, support, partner, and make informed decisions about their child’s growth and development) of parents and families.

(c) Providing professional development that enhances the skills and competencies of program leaders, principals, practitioners, teachers, or other administrative and support staff to build meaningful relationships with children's parents and families.

(d) Providing opportunities that enhance the skills and competencies of parents and community leaders to build meaningful relationships with professionals, effectively communicate, understand systems, understand fiscal processes, resolve conflicts, advocate, and understand how to use data for decision-making and opportunities to become involved.

(e) Implementing initiatives that improve community engagement (as defined in this notice) or the relationships between parents or families and school or program staff by cultivating sustained partnerships (as defined in this notice).

**Proposed Priority 15: Supporting Military Families and Veterans** – ITCA strongly supports efforts to ensure the needs of children of military families are met. However, this priority should be revised to explicitly include references to (a) high need children, including children with disabilities; and (b) to young children and their military families.

In closing, thank you for opportunity to submit comments to these proposed changes. 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](mailto:ideaitca@aol.com) if we may be of further assistance.

Sincerely,  
Donna Noyes, ITCA President