



April 25, 2014

Larry Ringer  
Attention: IDEA Determinations RFI  
U.S. Department of Education  
400 Maryland Avenue SW.  
Room 4032  
Potomac Center Plaza  
Washington, DC, 20202-2600

**Re: Docket No. ED-2013-OSERS-0150**

Request for Information on the Use of Results Data in Making Determinations Under Sections 616(d)(2) and 642 of the Individuals with Disabilities Education Act (IDEA)

Dear Mr. Ringer,

These comments are being submitted on behalf of the IDEA Infant & Toddler Coordinators Association (ITCA) regarding the Request for Information on the Use of Results Data in Making Determinations Under Sections 616(d)(2) and 642 of the Individuals with Disabilities Education Act (IDEA) as published in the Federal Register on March 26, 2014. The ITCA represents states and other jurisdictions implementing Part C of the Individuals with Disabilities Education Act (IDEA) for infants and toddlers with and at risk for developmental delays and disabilities and their families.

ITCA recognizes and supports the determinations process as an important part of the OSEP Results Driven Accountability (RDA) process for Part C. ITCA is pleased with efforts to focus on improved results for young children and their families, thereby facilitating a better balance between compliance and results as envisioned in IDEA 2004. ITCA offers the following comments in response to the two Part C related questions posed in the RFI:

- ITCA believes that both child outcomes **and** family outcomes should be considered when designing the determinations process. This is consistent with the purposes of Part C as stated in the statute. There is strong and unequivocal research demonstrating the relationship between families' self-perceptions, knowledge, skills, and supports, and the developmental progress of their children. Improved outcomes for families are important in and of themselves, and are also associated with more positive outcomes for children.
- It is ITCA's understanding that results will not be used for Part C determinations in June 2014 but will be considered for June 2015. The RFI is not clear on this issue.
- There are numerous issues to consider when using child and family outcomes data if the standard included in the RFI is to be met, i.e. "how the Department could use the data in a valid, reliable, and equitable manner in making determinations." ITCA strongly

encourages the Department to initiate a series of input opportunities, including meetings, with relevant stakeholders to consider this important undertaking. How these results data can be used is a complex question that requires a careful deliberative process including reviewing possible data analyses and determination scenarios to determine appropriate use of the data to meet the RFI standard. State lead agencies are important members of this stakeholder community and we commit to participating and assisting in this critical process over the next year. A number of issues need to be addressed in this process including, but not limited to:

- If one state's performance is to be compared to national aggregate data, there needs to be some comparability by eligibility or population in order to ensure valid and reliable data;
- Given states' different methods for collecting child and family outcome data, a process of comparing states to their own target and efforts, not to national aggregate data, needs to be considered;
- Should a maximum expectation for targets for child and family outcomes be considered? Should performance continually be expected to increase every year going forward?
- Should other results indicators, such as settings or child find, be included in determinations?

Thank you for the opportunity to submit comments on the use of results in the determinations process. As always, ITCA is available and willing to provide any additional information or clarification that may be needed. ITCA looks forward to working closely with the Department as you proceed to incorporate results into the determinations process for Part C. 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  
Maureen Greer, ITCA Executive Director

cc: Melody Musgrove, OSEP  
Ruth Ryder, OSEP  
Gregg Corr, OSEP  
Larry Wexler, OSEP