



April 24, 2014

Tomakie Washington, Acting Director  
Information Collection Clearance Division  
Privacy, Information and Records Management Services  
Office of Management  
U.S. Department of Education

**Re: Docket No. ED-2013-ICCD-0048**

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; IDEA Part C State Performance Plan (SPP) and Annual Performance Report (APR)

Dear Tomakie Washington:

These comments are being submitted on behalf of the IDEA Infant & Toddler Coordinators Association (ITCA) regarding the proposed information collection requirements as published in the Federal Register on March 25, 2014. The 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. These comments relate to the new Part C State Performance Plan (SPP) and Annual Performance Report (APR) format, the proposed indicators, including the new C-11 indicator, and incorporate responses to the questions specifically asked by the Department in the Federal Register announcement.

ITCA recognizes and supports the SPP/APR process as an important part of the OSEP Results Driven Accountability (RDA) for Part C. As we stated in our previous comments on this proposed collection on June 14, 2013, ITCA is pleased with the emphasis on improved results for young children and their families through the use of both quantitative and qualitative data. We appreciate and support the removal of specific reporting requirements that do not contribute to accountability efforts.

Given the significant time and resources needed to complete Phase I of the new State Systemic Improvement Plan (SSIP), ITCA strongly recommends the deadline for Phase I submission be extended several months. Less than six months is not nearly enough time to complete the necessary analyses, obtain stakeholder input, set benchmarks and targets and complete the critical planning that will drive state results activity for the next five years.

Specific ITCA comments are included below in two sections. First, we address overall comments on the SPP/APR package and then we provide specific comments on the new C-11 indicator.

## **A. Overall SPP/APR Changes Proposed**

ITCA supports and appreciates the inclusion of a competitive grant process in the President's Budget that will, if enacted, assist selected states in implementing the new SSIP. Despite that, we must note that the decrease in reporting burden proposed in this package is not likely to be balanced by the significant increase in state responsibilities for the newly proposed C-11. While States are involved in numerous efforts focused on improved results, any increase in federally required accountability activities and increased data collection and reporting, without increased federal funds will divert scarce resources, both fiscal and human, from services to children and families.

As stated in our June 14, 2013 comments, ITCA supports and appreciates the changes proposed that will eliminate specific indicators and required items in the APR. These changes will reduce reporting burden without eliminating any useful accountability information. Specifically, ITCA:

- Supports the merging of the SPP and the APR into one document. Over the last eight years, it has become apparent that it is not efficient or effective to have two separate documents, both needing annual updates. One document, updated annually, will be a more effective administrative tool that will be more accessible and informative to the public;
- Supports states including a general description of the state's system, stakeholder involvement and public reporting in the introduction of the document. This can be updated as needed during the annual process and will provide a clear description of the system to the public. ITCA does suggest that information regarding the state technical assistance system be included in the description of the Professional Development System and not included as a separate component. Technical assistance is a key part of overall professional development and can be more effectively discussed within that context.
- Supports the use of the GRADS 360 online reporting and analysis system for state submission of the SPP/APR with availability of pre-populated state data. This will save time and resources and increase the quality of the data. We do recommend the system allow data to be exportable into a text format in order to be printed as needed throughout SPP/APR development. This will allow maximum input from stakeholders. In addition, to meet the timelines and ensure effective planning, states need the specific fields that will be required for the SSIP as soon as possible.
- Supports the elimination of C-9 and C-14 since these data already are submitted by states.
- Recommends that with stakeholder input, a state be permitted to establish maintenance targets as appropriate. In some instances, it is not realistic or appropriate to continue to expect improvement in performance. OSEP already has permitted this option in the past for C-2 (Settings) and this has been helpful. For C-6, the stakeholders and the state may determine that the state is already reaching its appropriate target number of children. Another example is C-3, child outcomes, in which improvement may be limited by the level of developmental progress that can be influenced by early intervention services

particularly in light of the state's eligibility criteria and/or the very short period of time most infants and toddlers spend in Part C;

- Supports the elimination of the requirement to discuss progress when the state target is met as this is an unnecessary burden and does not contribute to accountability efforts. ITCA suggests that the requirement to discuss slippage relate only to slippage that is statistically significant. If there is no meaningful slippage in performance, this is unnecessary reporting.
- Supports the removal of improvement activities from each indicator and the movement of these to the state's improvement plan;

## **B. Proposed New C-11 Indicator**

ITCA supports the new C-11 indicator requiring states to develop an SSIP. ITCA strongly recommends additional time be permitted for the submission of Phase I to allow states to carefully analyze their data and infrastructure, obtain valuable input from stakeholders, determine a results area for the state's efforts, establish baseline and targets and to develop a set of improvement strategies. For states that have already begun the process, additional time is also needed to adjust to the C-11 structural and definitional revisions included in this new proposed package.

The SSIP will be an integral part of states' quality improvement efforts over the next five years. The initiative will take significant human and fiscal resources and careful planning will help ensure its cost-effectiveness and the achievement of its intended outcomes.

Due to state clearance requirements, most states must complete the draft FFY 2013 SPP/APR by the end of November 2014 and some states before then. Given the timelines for this second round of public comment, it is unlikely states will receive the final OMB approved package until early summer. The baseline year for data for this new indicator will already be over and states will only have a few months to develop Phase I. This is not nearly enough time to do a thorough and careful plan with necessary stakeholder input. In addition, if a state selects a measurable result that is not a current APR indicator, there is not sufficient time to collect and analyze baseline data in time for the February 2015 submission deadline.

The SSIP deserves adequate development time if its intended purposes of driving statewide results are to be achieved for the next five years. Nothing is to be gained by rushing the process when an extension of the timeline is consistent with the statute.

Therefore, ITCA requests extension of timeline for Phase I of the SSIP of at least 4 months until June 1, 2015. The remainder of the SPP/APR can be submitted February 1, 2015 and the full APR including Phase 2 of the SSIP can be submitted on schedule on February 1, 2016.

ITCA has several additional recommendations related to this proposal for a new C-11:

- The success of this results effort will depend, in part, on the commitment of all partners including state agencies and stakeholders. This commitment will be enhanced by the ability of the state, in consultation with stakeholders and OSEP, to make the final selection of the Measureable Result.
- ITCA supports the inclusion of state option to select a Measurable Result that is not an APR indicator.
- ITCA strongly recommends that, in addition to child outcome results, states be permitted to select a family result, either C-4 or another family measure as their area of statewide focus. This is consistent with the purpose of Part C as stated in the statute. Section 631 of the IDEA includes in its Findings – “Congress finds that there is an urgent and substantial need-- ...  
(4) to enhance the capacity of families to meet the special needs of their infants and toddlers with disabilities; and...”

Additionally, there is strong and unequivocal research demonstrating the relationship between families’ self-perceptions, knowledge, skills, and supports, on the one hand, and the developmental progress of their children, on the other. Improved outcomes for families are not only important in and of themselves, but are also associated with more positive outcomes for children.

There are many other family outcomes that state stakeholder groups may wish to target in the context of a SSIP. These might include parents’ knowledge about their child’s delay or disability, their parenting self-efficacy, their parenting skills, and/or their perceived family quality of life. The research literature offers numerous validated instruments that could be used to collect relevant data on family outcomes that go beyond the perceived helpfulness of Part C services and that are strongly associated with positive outcomes for children.

- ITCA remains concerned about the anticipated costs that are evident in this proposal for a new C-11. It is clear that once evidence-based strategies are identified for state implementation, the process of effective scaling-up statewide will be extremely expensive. C-11 as proposed would require significant professional development that would include training and ongoing coaching and support. These efforts will require additional funding, expertise and time for the design and development necessary. These additional responsibilities will also apply to local programs and providers.

There is serious concern about the lack of state capacity and resources. In recent years many states have had to decrease support for infrastructure, systems activities, professional development costs and staffing that will be critical for successful implementation of C-11. No additional resources are available. ITCA requests that the Department continue to explore and identify other sources of funds that may be available to states for this important effort.

- ITCA is concerned about the Phase II requirement that the Evaluation “must include short-term and long-term objectives to measure implementation of the SSIP...and long-term objectives as those children enter preschool and kindergarten.” OSEP should consider that most Part C lead agencies are not in state Departments of Education and do not have access to these data. Many states are working towards such data sharing across early childhood programs but the process takes time and is challenging on a number of fronts. Data sharing agreements and mechanisms to link the data need to be established. More importantly, there is a question of availability of kindergarten data in all states. This information will be available in some states at some point in the future but the date of the availability will vary across states and some states have no plans to collect assessment data on children in kindergarten for the state’s data system. Further, Phase III speaks to reporting progress toward these goals. ITCA is concerned that future determinations for Part C will be based, in part, on progress toward these objectives.
- ITCA recommends that the final plan be constructed to allow state flexibility regarding the scope of the efforts, the data collected, timelines and resources committed. For some states, this flexibility will be critical depending on the current fiscal situation as well as existing state infrastructure and capacity for such an effort. The outline for the C-11 plan should include an opportunity for states to address unexpected fiscal, political, staffing, agency priority and other changes.
- In response to Question #6 in the package, ITCA is concerned about time and resources required for states to assist in evaluating other state’s C-11 work. States will be challenged with completing their own responsibilities in this area and it is not at all clear how they could assist in evaluation of other states.
- ITCA believes it would be helpful to have available TA related to identifying appropriate evidence-based practices for Part C systems, in processes for scaling up evidenced – based practice and in processes for the use of data for continuous improvement.

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

Sincerely,  
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 Maureen Greer, ITCA Executive Director

cc: Melody Musgrove, OSEP  
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