



September 11, 2009

Re: Comments on Proposed Collection of Information
OMB #1820-0578 IDEA Part C Annual Performance Report (APR)

Office of Information and Regulatory Affairs, Office of Management and Budget
725 17th Street, NW. Room 10222, New Executive Office Building
Washington, DC 20503

oir_submission@omb.eop.gov.

Attention: Education Desk Officer:

These comments are being submitted on behalf of the Infant & Toddler Coordinators Association (ITCA) regarding the proposed information collection requirements related to the State Performance Plan (SPP) and Annual Performance Report (APR) as published in the Federal Register on August 12, 2009. ITCA currently has 51 state and territory members and represents 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 also provided written comments on proposed changes to the SPP/APR on July 14, 2009 in response to a request for comment in the May 15, 2009 Federal Register. On behalf of our membership, ITCA would first like to express our appreciation for the changes in the August 12th draft SPP/APR measurement table. It is evident that our concerns have been considered and a number of our recommendations have been accepted. We are particularly pleased that the language in Indicators 1, 7 and 8 has been modified to allow states to describe the time period in which the data were collected instead of being required to report on data for the entire reporting year. This is significant to many states using their state data system for monitoring.

In addition, ITCA appreciates the additional time states are being given to implement the new data collection requirements in Indicators 1, 7, and 8. However, we continue to state that these new data burdens are not necessary and should not be required.

ITCA also offers the following specific comments related to the proposed changes to the SPP/APR Part C Measurement Table:

1. Requirement when states use data from the state database.

ITCA supports the language included in the new proposal and appreciates the Department's response on this important issue. Many state Part C systems have invested significant resources in developing extensive statewide data systems that are valuable components to the state's accountability systems. We recognize each state's responsibility to ensure data used for monitoring purposes are valid and reliable. We support the language in the current draft

requiring states to describe the time period in which the data were collected and how the data accurately reflect data for infants and toddlers with IFSPs for the full reporting period.

2. **Indicators 1, 7 and 8 - Additional data required related to reasons for delay.** ITCA is strongly opposed to the change to indicator C-1, 7 and 8 requiring states to collect and report on the *reasons for the delay*. Although this information is important to states to determine root causes to ensure correction of noncompliance by local programs, it is not necessary that this information be systematically aggregated and submitted to the federal level. The process a state uses to analyze data related to noncompliance to ensure correction can be reviewed by OSEP as a part of a state's verification visit without adding this additional reporting burden on states, localities and providers.
3. **Indicator 7** – ITCA appreciates the decision to maintain current language for this indicator.
4. **Indicator 14** - ITCA appreciates that some of the proposed additional language, "...and evidence that these standards are met" has been withdrawn. However, we must restate our concern that the additional requirement proposed to "provide detailed information about the actions the state is taking to ensure compliance. Describe the state's mechanisms for ensuring error-free, consistent, valid and reliable data..." is an unnecessary burden. This information is already included in the SPP. In addition, this information is reviewed and addressed during OSEP's verification visits to states. It is not necessary to include it in the annual APR.

The ITCA remains concerned that in this current fiscal crisis states are not in a position to make additional changes that increase the costs of administering this program. Continual modifications to the data collection requirements divert scarce resources, both fiscal and human, from services to children and families. Changes also have resulted in constantly shifting baselines making it difficult to accurately measure progress from year to year and to develop meaningful strategies for improvement. Over time, this has had the effect of jeopardizing the achievement of the overall purpose of the SPP/APR process– to improve results for children and their families. *Therefore, the ITCA continues to urge the Department of Education and OMB to refrain from making any additional changes to the indicators, measurements or instructions related to the SPP/APR process during this SPP cycle.*

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 me by email at ideaitca@aol.com if I may be of further assistance.

Sincerely,
Julie Curry, President

cc: Patty Guard, OSEP
Ruth Ryder, OSEP
Larry Wexler, OSEP