



NAIS NPRM COMMENTS
SEPTEMBER 13, 2008

The IDEA Infant Toddler Coordinators Association (ITCA) thanks you for the opportunity to provide written comment on (03753)1850-NEW-v.1 Individuals with Disabilities Education Act (IDEA) 2004 National Assessment Implementation Study (NAIS). ITCA currently has 51 state and territory members and represents state lead agencies that are responsible for implementing Part C of the Individuals with Disabilities Education Act (IDEA) in all 50 states and other eligible jurisdictions. In 2006, the states and jurisdictions served 304,510 infants and toddlers birth through two years of age.

ITCA has significant concerns about the length of this survey and the request for specific information that is already available from other federally funded sources. At a time of limited resources, financial as well as personnel, it is not good stewardship to collect duplicate information. While ITCA appreciates the need for current and accurate information, the Department can already access this information. Creating a web-based survey that has pre-filled responses where they are already known, would allow the respondents to indicate if the information continues to be accurate. This process would be respectful of the time and resource challenges that face state leadership.

The following are specific comments raised by our members:

Page 1, Instructions

The definition of "developmental interventionist" is too broad. Because certified teachers have been lumped together with others who are not certified teachers and may have BA or HS level degrees, it will make answering questions about shortages in this area useless. For example, states may have shortages of certified early childhood special education teachers, but may be able to find other BA-level staff who can become developmental interventionists or early interventionists with training or coursework.

Page 5, Question #7

Please clarify the difference between "provides" and "Responsible for", It is confusing. There should also be a column for " provides ongoing service coordination"

Page 6, Question 8

There should be an additional choice which indicates both models.

Page 6, Question #10

It would be helpful to include "Must complete mandatory training" as one of the options.

Page 10, Question #20

Please clarify the difference between "State General Fund" and "State Part C Funds"

IDEA Part B should be added as a possible funding source

A question should be added so that the percentage of Part C funding in relation to the other funding sources can be determined. Choices could be 0-10%, 11% - 20%, etc.

In general, Part C Coordinators feel that funding and financing of Part C is the most challenging issue they face and this one question about funding sources is not adequate to indicate what an all-important issue this is for Part C.

Page 12, Question #23

Choice b is "state agency", yet choices d and e are often also state agencies. Please clarify what seems to be the duplication.

Families and Primary Health Care Providers are typically the top two referral sources for most states, yet neither are included in this list.

Page 13, Question #24

Do these activities include those performed by local programs or merely those performed by the lead agency itself?

Page 15, Question #29

Choice "f" "Head Start" should probably be "Early Head Start" or a combination of "Head Start/Early Head Start"

Child Protective Services should be included as an option, given the provisions of both CAPTA and the IDEA for referral of children who are victims of substantiated abuse or neglect.

Page 16, Question #31

Does choice "b" mean insufficient lead agency staff or insufficient provider capacity?

Page 19, Question #36 – 37

Since Part C is not typically an academic program, the term "standards-based IFSPs" is unclear. Does this specifically refer to standards in early learning guidelines or can it refer to developmental standards established in various other curriculums or assessments? Please define.

Page 21, Question #42

As explained on the comments for Page 1, asking questions about “Developmental interventions/Special Educators/Early Interventionists” is unclear, especially when asking about who licenses or certifies. Typically certified teachers are licensed by State Departments of Education, while other BA-level staff may be credentialed by the state Part C lead agency.

Page 24, Question 47

Please add a line that would allow states to acknowledge parents as Part C staff members

Page 26, Dispute Resolution questions

Most of these questions are redundant with the information already provided in Table 4 of the 618 data and with the Annual Performance Report which is submitted to OSEP on an annual basis.

Page 29, Questions #58-60

It is not clear what a “state administrative review” is.

Page 30, Question #62

It is not clear what a “state/federal judicial review” is.

Page 31, Question #63

It is not clear what a “dispute continued into the Part B “ system means or even how this would be possible.

Appendix F Crosswalk

It is not clear what the shaded areas represent and in some cases, they don’t seem to make sense.

Thank you for the opportunity to comment. If you have any questions, please feel free to contact:

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