



Transition Priorities Statement for Part C of IDEA Early Intervention for Children with Disabilities and their Families January 2009

The IDEA Infant Toddler Coordinators Association (ITCA) represents states and other jurisdictions implementing the Individuals with Disabilities Education Act (IDEA) Part C for infants and toddlers who have or who are at risk for developmental delays and disabilities and their families.

Part C of IDEA was enacted in 1986 to assist states in developing and implementing statewide, comprehensive, coordinated, multidisciplinary, interagency systems that provide early intervention services for infants and toddlers with disabilities and their families. State Part C systems ensure that infants and toddlers, birth to age three, at risk for or with disabilities and their families receive appropriate early intervention services to enhance their development and to enhance the capacity of their families to meet the needs of their children with disabilities.

Early childhood investments have been shown to offer a significant rate of return when compared to other public investments ranging from about 7% to more than 16% annually, inflation adjusted. (*Rolnick, 2006*) “Research shows us that starting early has more impact than starting late. As brain circuits are built up and stabilize over time, they become increasingly more difficult to alter. Early Intervention makes sense economically and has greater potential for closing the persistent and pernicious achievement gaps that pre-K is largely about.” (*Meisels, 2006*)

A strong and effective Part C Early Intervention System in every state makes sense to the immediate needs of families and the long-term goals of society.

States are not required to participate in the federal Part C Program. But currently, despite major challenges, all states are participating in Part C. These states are providing the necessary services and supports that allow infants and toddlers with disabilities to effectively participate in everyday activities in their home and in their communities and achieve positive outcomes.

There has been more than 60% growth in the number of children served under Part C in the last 8 years. The federally required annual single day count (December 1) of children served in Part C has grown from 187,899 children in 1999 to 322,000 children in 2007. States that elect to report to the federal government an optional cumulative count of children served over the full year report their cumulative annual child count is about double the state’s one day count.

ITCA appreciates the significant priority the new Obama Administration places on policies, initiatives and investments to respond to young children and their families. ITCA is ready and willing to participate and assist in the implementation of these early childhood initiatives. The following is a statement of ITCA’s priorities for Part C of IDEA:

ITCA Priorities for Part C of IDEA

- **Enactment of a Stimulus Package with immediate and sustainable investments in jobs to provide early intervention services for children and their families.** ITCA recommends that funding for the Part C Early Intervention Program and the Preschool Grants Program be doubled through the stimulus package. This will allow the creation of thousands of jobs at the community level to expand availability of services to young children and their families. This will also begin to address the years of federal funding neglect. ITCA also recommends the Stimulus Package include a temporary increase in the Federal Medical Assistance Percentage or FMAP rate.
- **Significant increase in funding for Part C of IDEA including restoring the cuts from recent years.** Despite growth of more than 60% in the number of children served in the last 8 years, the amount of Federal Part C funds has decreased in actual dollars by \$8.7 million since FFY'04. More than 20 states report experiencing a budget cut in Part C in this fiscal year. To respond to these fiscal challenges, in the last 10 years 20% of states have narrowed their eligibility and 75% have enacted family cost share in the form of fee systems.
- **Investments and initiatives to address the significant shortages in qualified personnel.** States and local programs are experiencing major shortages of personnel to provide services under Part C. Major investments in professional development at the preservice and inservice level are important to ensure an available workforce to meet the growing needs of children and families under Part C of IDEA. This should include targeting of personnel initiatives in IDEA and other federal programs to the specialized needs of infants and toddlers and their families.
- **Ensure a meaningful accountability system that balances quality of services, outcomes for children and families with compliance with federal requirements that are likely to impact the achievement of those outcomes.** The continual increase and change in federal data collection requirements related to the State Performance Plan (SPP) process is diverting scarce resources, both fiscal and human, from services and quality initiatives. ITCA asks that the Department of Education and OMB not make any additional changes to the indicators, measurements or instructions related to the current SPP/APR process. Any necessary changes can be considered for the next six year cycle of the SPP.
- **Provision of a temporary waiver to the supplement/not supplant requirements.** When submitting an application for federal Part C funds, states must sign an assurance that Part C funds will be used to supplement the level of state and local funds. Part C is a voluntary program. There is increasing concern that some states are considering not requesting a Part C grant for July 2009, in part because of their inability to assure the state is maintaining fiscal effort. Adding a provision consistent with Part B of IDEA would permit the Secretary to waive this requirement for a state for a year in which there is a "precipitous and unforeseen decline in the financial resources of the state."
- **Major investments in funding of federal programs necessary to implement the purposes of Part C.** This includes full funding for federal programs critical to young children and their families as follows- all programs under IDEA including the Part B State Grant Program, the Preschool Special Education Program, and the Part D Support Programs that provide critical infrastructure, training, and research necessary to drive improvements in special education and early intervention practice; the Maternal and Child Health Services Block Grant (MCH); the Child Care and Development Block Grant; Head Start; Developmental Disabilities; and Child Abuse Prevention and Treatment Act (CAPTA).

- **Permanent authorization of Part C and revision of the Part C federal funding formula.** This is critical to provide the necessary incentives and investments to provide a stable source of funding that permits states to budget adequately and continue to participate in the Part C program.
- **Adequate resources to ensure provision of services to children identified through increased federal screening initiatives.** New federal initiatives and legislation continue to put a greater emphasis on increased screening efforts to identify children with developmental delays at younger ages. These initiatives are very important. However, there is no parallel emphasis on availability of federal funding for services once children are identified. As an example, there has been a dramatic increase in the diagnosis of children identified with Autism Spectrum Disorder (4 to 6 per 1000.) Each year, states experience a significant increase in intensive service needs for children with autism with no increase in federal funding.
- **Ensure Permanent Moratoria on the 7 Medicaid Regulations proposed/published by CMS in 2007-2008.** Medicaid reimbursements related to these regulations are critical to ensure adequate funding for Part C services and represent longstanding Congressional intent.
- **Reauthorize the State Children's Health Insurance Program (SCHIP).** This should occur immediately. The SCHIP reauthorization should ensure adequate funds to cover all eligible children and allow states to expand eligibility at state discretion.
- **Ensure active and effective collaboration of all federal agencies and offices that support programs and services for young children and their families.** The primary goal of this collaboration is to align requirements across programs to increase opportunities for all children to participate in early childhood programs in their communities and to ensure maximum benefit of resources to children and families. This should include clear direction to states that all federal programs in a state that are providing or paying for services in the Part C system follow the federal Part C regulations. Under the general supervision requirements of Part C, State Part C lead agencies are held accountable to this standard with no existing authority.

ITCA recognizes there are great challenges facing our country. We also have great expectations for the priority this administration is placing on young children and their families. It is now widely accepted that investments in comprehensive and coordinated early intervention and preschool services will generate long-term benefits for children and families. (*Guralnick, 2005*).

Thank you for the opportunity to submit recommendations. We are available and willing to provide any additional information or clarification that may be needed and to assist in these efforts. Feel free to contact Julie Curry, ITCA President at ideaitca@aol.com

Guralnick, M. J. (2005). Early intervention for children with intellectual disabilities: Current knowledge and future prospects. Journal of Applied Research in Intellectual Disabilities, 18, 313-324.

Meisels, Sam Ph.D., EdWeek (Vol 25:20, pages 36-44) January 25, 2006

Rolnick, Arthur, (2206) National Scientific Council on the Developing Child, Perspectives: Child Development is Economic Development.