



August 18, 2014

Director of the Information Collection Clearance Division
U.S. Department of Education

Comments Related to ED-2014-ICCD-0090

These comments are provided in response to the announcement in the Federal Register on June 18, 2014 related to the Report of Infants and Toddlers Receiving Early Intervention Services. The comments are provided on behalf of the Infant & Toddler Coordinators Association (ITCA). ITCA represents state 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 welcomes and supports the proposed change in Table 1, “Report of Children Receiving Early Intervention Services in Accordance with Part C,” that would require all states to submit a cumulative count of children served under Part C of IDEA. Currently, this cumulative count is optional but more than half the states already submit these data.

ITCA has been consistent in our public statements that the single point-in-time count under Table 1 significantly under-represents the number of infants and toddlers who benefit from the Part C program. In fact, by most estimates and the data available under reported cumulative counts, children served under Part C according to the 12-month cumulative count is generally double the number counted on a single-day point-in-time count.

ITCA supports the proposed requirement that these cumulative data be reported disaggregated by race/ethnicity and by gender.

However, ITCA does not support the proposed requirement in Section D that these data also be reported by discrete age year “according to the count date.” The concept of discrete age works well for a point-in-time count but not for a cumulative count. There is “no count date” for cumulative counts. Data are provided according to a year of data, with start and end dates of the count. If cumulative data were required to be reported by “discrete age years”, the same child would fall in two different “discrete age years” during the same reporting year, depending on whether it was before or after his/her birthday.

The current instructions allow the cumulative count to be reported according to a state’s specified start and end dates from “the most recent year data are available.” ITCA

suggests the proposal requiring a cumulative count by discrete age be eliminated. If the Department intends to require this count to be reported by discrete age range, we suggest consideration be given to reporting by a child's "birth year" (i.e., children born in 2010 or 2011 or 2012). However, it should be noted that this would result in some children being counted after they have already turned 3 years. For example, a child born June 30, 2010 would be included in the 2009-10 count, the 2010-11 count, the 2011-12 count and the 2012-13 count.

Additionally, ITCA suggests that states be given the "option" of also reporting child count data according to a birth cohort year. At least half the states already collect data on how many children participate in Part C at some point in the time between birth and 36 months. It is our experience in reviewing and analyzing these data, that birth cohort data provide the most reliable picture of the role Part C plays in the lives of young children and their families. Permitting an optional count to be reported of these birth cohort data will provide valuable data to the public, as well as demonstrate the importance of an accurate picture of the full implementation of Part C of IDEA across the county.

In closing, thank you for opportunity to submit comments on this proposed data collection. 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 if we may be of further assistance.

Sincerely,
Donna Noyes, ITCA President