



May 18, 2010

Honorable Arne Duncan
Secretary
US Department of Education
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Honorable Kathleen Sebelius
Secretary
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Comments submitted by email to: earlylearning.comments@ed.gov

Listening and Learning About Early Learning

These comments are being submitted on behalf of the IDEA Infant & Toddler Coordinators Association (ITCA) regarding the request for comments on Early Learning as published in the Federal Register on April 21, 2010. ITCA represents the state and territory lead agencies that are responsible for implementing Part C, Infants and Toddlers with Disabilities, of the Individuals with Disabilities Education Act (IDEA).

We appreciate this opportunity to provide comments. ITCA is committed to ensuring that all young children, including those with disabilities and their families have the supports and evidence-based services necessary for each child to be successful in quality early learning settings within their community.

This statement from ITCA includes a discussion of the major fiscal challenges facing states and territories in implementing Part C of IDEA, recent relevant state survey data, and several recommendations related to the Administration's Early Learning initiatives.

Significant Fiscal Challenge Facing Implementation of Part C ITCA must take this opportunity to discuss the fiscal challenge that our members are facing that directly impact their ability to continue to ensure early intervention services for young children with disabilities and their families. As states and territories continue to face a growing and significant fiscal crisis, there is increasing difficulty in continuing to participate in the federal Part C program.

A major part of this crisis is the lack of federal investment in Part C. The current federal Part C allocation is \$4.9 million lower in actual funding in FFY'10 than its highest funding level of \$444 million in FFY'04. Despite this continuing lack of federal financial investment in Part C, data gathered from 31 states and territories in April 2010 indicate that at least \$2.5 billion is spent on early intervention in those states. For eleven of the states, the federal Part C funds provide less than 20 percent of the state's entire early intervention budget. Of the funds that were identified by those 31 states and territories, 31% were from federal sources with 56% from state fund sources with the remaining 13% of funds accessed at the local level. The number of

children receiving services under Part C continues to increase annually going from 284,170 children in FFY'04 to 342,544 in FFY'08.

ITCA Survey Data ITCA periodically surveys its members on topics significant to the implementation of the Part C Program. Data from these surveys can be found on our website at www.ideainfanttoddler.com ITCA provides some data relevant to the topics including in this request for comment below.

- In 2009, thirty-six states responding to a survey on family involvement report as follows:
 - 44% reported the state has a State Interagency Coordinating Council (SICC) Committee responsible for working to ensure family involvement;
 - 72% reported that families are employed as service coordinators or family liaisons in the state;
 - 94% indicated families participate on committees and task forces other than the SICC
 - Others roles of families reported including participation on state monitoring teams, providing training to other parents and to early intervention practitioners and as providers of parent-to-parent support.

- In 2009, thirty-one states responding to a survey on personnel issues report as follows:
 - 52% reported the state has a credential/certification in addition to required professional licensure;
 - 47% indicated they have developed a plan with institutions of higher education to address personnel preparation and shortages;
 - 100% reported professionals are required to get continuing education units specific to EI; and
 - 50% indicated the paraprofessionals are required to get continuing education units specific to EI.

- In the same survey, twenty-six states responded to a question asking if paraprofessionals were used for specific disciplines reported as follows:
 - 73% states report using paraprofessionals for Physical Therapy;
 - 73% states report using paraprofessionals for Occupational Therapy (COTA);
 - 54% states report using paraprofessionals for Speech Therapy (assistant);
 - 73% states report using paraprofessionals for special instruction; and
 - 46% states report using paraprofessionals for service coordination

- In addition, 50% of the 32 states reporting indicated they have developed web-based training modules in topics including developing and implementing an IFSP, transition and procedural safeguards.

Recommendations ITCA supports the Administration's commitment to enhancing Early Learning Opportunities for all young children and their families. In order for children birth to age three with disabilities to be successful in their community early learning settings, evidence-based services and supports must be available to them and to their families. With this goal in mind, ITCA recommends that as policy and funding decisions are made:

- Adequate and significantly increased federal funds be made available for Part C and Preschool 619 programs under IDEA;
- Any additional modifications to the already significant data collection requirements be deferred until reauthorization as implementing these changes diverts scarce resources, both fiscal and human, from services to children and families;
- As standards and assessment policies are developed for programs serving all young children, careful consideration be given to align any new efforts with the existing child outcomes systems states have implemented in response to the State Performance Plan requirements under IDEA 2004. All states have implemented costly systems of assessment to respond to required child outcome indicators for children with disabilities ages birth to age three and three through age five years.
- As important federal investments in state and local efforts such as Race to the Top, Investments in Innovation, State Longitudinal Data Systems, and Promise Neighborhoods, ensure that these important federal investments are available to Part C lead agencies and local early intervention programs. ITCA recommends that RFPs require participation of Part C lead agencies and specify how available funds will benefit and be allocated to efforts related to young children with disabilities and their families.
- Revise early learning state council requirements (under Head Start Reauthorization and ARRA Head Start RFP) to ensure that both a Part C **AND** a Preschool 619 state representative be required on the council. This will help ensure that the needs of all young children with disabilities are addressed in states' early learning efforts.

Thank you for opportunity to submit comments. As always, ITCA is available and willing to provide any additional information or clarification that may be needed. Feel free to contact:

For additional information and to discuss these strategies, contact:

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