



of the Council for Exceptional Children

Division for Early Childhood
of the Council for Exceptional Children
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November 5, 2017

Dear Secretary DeVos:

Thank you for the opportunity to comment on the Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs as outlined in the Federal Register October 12, 2017. The following comments are provided on behalf of the Division for Early Childhood (DEC) of the Council for Exceptional Children. DEC is the largest membership organization focused solely on the development and education of young children (ages birth–8) with or at risk for disabilities and other special needs and their families. Therefore, our comments and recommendations focus on how the Department's discretionary programs should provide for new and improved practices and systems to support: 1) all young children and their families, and 2) children and students with disabilities or who are at risk for disabilities and their families.

As with other federal education policies, the Individuals with Disabilities Education Act (IDEA) is designed to address both access to early intervention and special education for children with disabilities, as well as the quality of those services. IDEA Parts A, B and C, outline the rights, responsibilities and infrastructures to ensure *access* to appropriate early intervention and education for eligible children and their families. Part D of IDEA, the national discretionary grants program, provides for investments in the *quality* of those services and the infrastructures that support the provision of evidence-based practices.

Part D provides funding for parent support and information centers, the demonstration and dissemination of evidence-based practices, technical assistance to state and local leaders, technology and media support and the preparation and support of qualified and highly effective personnel. DEC recommends continued investments in Part D discretionary programs that support the quality of the early intervention and early childhood special education services provided to children and students and their families nationwide.

DEC recommendations on the proposed priorities are provided below. First and foremost, **DEC recommends the Department add a new Early Learning Priority to provide for projects focused on all young children and their families and the early intervention, special education and other early childhood learning, and education opportunities designed to meet their individual needs and promote their optimal development.** Improving education begins with services and supports to children and their families starting at birth. Through IDEA Part D and

other federal statutes such as Every Student Succeeds Act (ESSA), DEC strongly urges the Department to ensure the discretionary and grants programs address young children and families and the critical early learning experiences that affect the rest of their lives. Science continues to document that children's success in school and later in life is greatly enhanced by their learning experiences prior to kindergarten. Early investments in children and their families yield maximum returns to society.

DEC recommendations. DEC requests consideration of the following recommendations as final priorities are developed, and funding decisions made related to ensuring that young children and their families have the evidence-based services and supports necessary to be successful in quality early learning settings within their community:

- Include reference to “all children and students, including those with disabilities and other high needs” in all priority areas. While Priority #5 is focused on children and students with disabilities, all the areas of priority should benefit all children and students, including those with disabilities and other high needs.
- Include references in all priorities to “children and students.” Some of the proposed priorities reference only “students” while others speak to “children and students.” In most of the priorities, there are obvious and appropriate opportunities to begin the investments in the early childhood years starting at birth. The priorities should be revised to consistently address all ages to focus on the importance of early learning as the foundation to high quality education.
- Use the phrase “early learning and education” throughout the priorities instead of “education.” For instance, in Proposed Priority 4, Priority 7 and Priority 10, the Department acknowledges the importance of literacy, problem solving, interpersonal and social skills to support instruction and school climate. All of these priorities can benefit from and be strengthened when introduced and supported in early learning opportunities starting at birth.
- Expand the priorities to emphasize the critical role and involvement of families in their own child's growth, development and learning as well as in the policy and systems development essential for successful outcomes.
- Expand references to “teachers and principals” to include the early childhood workforce that reflects the range of individuals critical to successful outcomes for young children and their families. This includes, but is not limited to, administrators, early interventionists, early learning practitioners, therapists, health professionals, service coordinators, etc.
- Promote evidence-based approaches throughout all grant programs. The proposed priorities use the language “where possible, incorporates evidence-based activities,

strategies and interventions.” DEC strongly recommends that discretionary grants programs only promote evidence-based approaches.

- Include early learning (beginning at birth) as an absolute priority, or if more appropriate given the area of investment, a competitive or invitational preference priority in all Department of Education discretionary grants. This will ensure continued emphasis on the importance of early investments in young children’s continued success.

Finally, DEC notes the proposed priorities contain language supporting “choice” in educational opportunities. DEC recommends that public resources, e.g. federal education dollars, be used to strengthen and support public early intervention and education services. Where choice is available for such publicly funded services, DEC strongly supports current law that those services must meet federal and state requirements for providing early intervention and a free appropriate public education (FAPE) for children with or at risk for disabilities and their families.

DEC offers our assistance as priorities are developed to support young children beginning at birth and their families. Leaders within our organization are available to offer expertise across a variety of research and practice areas impacting young children with diverse abilities and their families as well as feedback and input on policy as it is developed. Please contact us if we may be of further assistance.

Sincerely,
Peggy Kemp
Executive Director