



2900 Crystal Drive, Suite 1000 | Arlington, VA 22202-3557
(P) +1.703.620.3660 | (Toll Free) 888.232.7733 | (TTY) 866.915.5000 | (F) 703.264.9494
www.cec.sped.org

July 11, 2011

The Honorable Arne Duncan
U.S. Secretary of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Secretary Duncan:

On behalf of the 40,000 members of the Council for Exceptional Children who are special education teachers, early interventionists, special education administrators, high education faculty, researchers and others concerned with the development and education of children and youth with disabilities and/or gifts and talents, we welcome the opportunity to provide feedback on the Race to the Top-Early Learning Challenge program (RTTT-ELC). CEC's comments echo those made by its Division for Early Childhood, whose members work with or on behalf of children and youth with disabilities and other special needs.

CEC has long recognized the critical importance of investing in high quality early intervention and preschool programs for young children with disabilities and supports a cohesive system that meets the needs of all children. CEC requests consideration of the following comments and recommendations as the application package is finalized:

Inclusion of Children with Disabilities and the Professionals, Systems that Serve Them:

CEC strongly supports the clear and comprehensive inclusion of children with disabilities and the services, providers and programs that support their success in quality early learning settings within the community. CEC was pleased that many of these references were included in RTTT-ELC, such as in the definition of "high need children" which includes children who have disabilities and developmental delays; inclusion of Part C and Section 619 Preschool under Part B are recognized programs under this plan; Part C lead agencies and the state agencies administering the Section 619 program under IDEA are required partners; the Part C of IDEA Interagency Coordinating Council is included in the governance structure; child find activities under IDEA are covered; organizations such as CEC state affiliates are mentioned; and finally it is clear that the requirements of IDEA must be met as a condition of a state's participation under this program.

Funding Considerations:

While CEC is appreciative of the \$500 million funding commitment it must be noted that existing federal, state and local resources are not adequate to ensure the needs of all children are met. The package requires states to "reallocate or repurpose" existing funds. The obvious implication is that adequate funds are available but not being spent wisely. These funds, particularly IDEA funds, have statutory requirements about their use. All funding sources mentioned are in fact underfunded and stretched beyond their limit. Therefore, CEC recommends that states not be

required to report how the state will “reallocate or repurpose” existing funds. Instead states should be asked to address how all funds will be used to support the overall goal of the effort.

Data-Based Performance Measures:

CEC supports the inclusion of data-based performance measures particularly related to tracking and reporting increases in the numbers of children participating in high-quality early learning and development programs. We strongly support subgroup reporting including by age group and disability status.

Collaboration with Families:

While CEC strongly supports the emphasis on engaging and supporting families as a selection criterion we recommend that the final package emphasize not only what early learning systems provide “to” families but how systems partner “with” families. Family engagement is a core element to the success of this initiative and states should be directed emphasize the role of parents and family members.

Addressing the Home Environment:

CEC notes that many infants and toddlers do not participate in group or program settings in their community. Infants and toddlers receiving early intervention services may receive those services in their home, a family member’s home or in a family child care setting. The application package should be reviewed and revised consistent with this reality to be sure that the home environment is appropriately addressed in this investment. This is particularly true for the existing component of a “State’s Tiered Quality Rating and Improvement System” that seems to more closely align to group or program settings.

Emphasizing Evidence-Based Practices:

While supporting this federal initiative to improve early learning and development programs for young children, CEC asks that states be encouraged to utilize evidence-based practices that are associated with positive child and family outcomes. These practices should be at the core of services provided to children and families and should also serve as the centerpiece of professional development. In the application criteria, this would require a definition of evidence-based practices and ask states to place greater emphasis on early care and education practices throughout the criteria. CEC’s Division on Early Childhood’s Recommended Practices initiative underscores the need for a focus on specific, evidence-based practices in order to build a strong early childhood system.

Assessments:

CEC is concerned about the required plan to have a kindergarten entry assessment for all children entering kindergarten by 2014-15 school year. We agree with many of our colleagues that a onetime snap-shot of a child is not an adequate way to measure a child’s knowledge and functional capabilities. It is important that teams conduct comprehensive, universally designed, and authentic assessment and ongoing monitoring of all children’s development and learning. Team members need a clear understanding of all children’s current skills and abilities to ensure access and participation, and to develop appropriate learning opportunities. The comprehensive assessment system should differentiate between child performance measures and indicators of



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program quality. The assessment should have established technical adequacy including evidence of validity and reliability for both the population it is used on and the purpose it is being used for.

Supporting the Early Childhood Education Workforce:

CEC fully supports the emphasis on professional development and training for early childhood professionals. Professional development and training is particularly critical for early childhood educators to appropriately administer assessments and interpret and use assessment data in order to guide and improve instruction, programs and services. This training is particularly important as it applies to children with disabilities and other special needs.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Deborah A. Ziegler". The signature is written in a cursive style.

Deborah A. Ziegler, Ed.D
Associate Executive Director
Policy and Advocacy Services