



May 16, 2014

These comments are being submitted on behalf of the IDEA Infant & Toddler Coordinators Association (ITCA) on the draft Executive Summaries of the Preschool Development and Preschool Expansion Grants authorized and funded under the FFY 2014 Consolidated Appropriations Act, 2014 (Public Law 113-76). The ITCA represents states and other jurisdictions implementing the Individuals with Disabilities Education Act (IDEA) Part C for infants and toddlers with and at risk for developmental delays and their families.

ITCA appreciates the Administration's support of a number of the recommendations we made in February 2014 and the changes made to enhance efforts toward inclusion of IDEA, Part C and Preschool Special Education in these grants. These positive changes reflect the administration's priorities and will help ensure all young children and their families have access to and are able to participate in quality early learning opportunities.

As we have stated previously, our priority is a final application package that ensures full involvement of the Part C and Preschool Part B 619 programs in the implementation of these preschool grants. The changes made in this version will help ensure that young children with disabilities and their families have the services and supports necessary for them to be successful in community early learning opportunities.

ITCA comments and recommendations for these Executive Summaries are as follows:

- ITCA supports the competitive priority in both grants that gives preference to those applications that demonstrate how grant efforts will be integrated within a broader continuum of high quality care and education supports for children participating in an ambitious and achievable plan from birth to third grade. We support the language requiring a description of how partnerships will be fostered and resources leveraged from community agencies. We do request that Part C and 619 of IDEA be specifically included in the identified list of community programs in this section. ITCA notes and supports the reference to transition, including from Part C to 619 under IDEA.
- ITCA supports the required application selection criteria under Strong Partnerships (Section E.) in both grants that require a description of how the state will ensure each subgrantee coordinates and collaborates in "supporting full inclusion of children with disabilities..." This is a very positive addition. We do suggest that the language be revised to include "supporting access to and full participation in all opportunities."
- ITCA appreciates and supports the requirement in both grants that the State Advisory Council on Early Education and Care must include state coordinators from both the Part C and the 619 programs.

- ITCA notes that the language clearly states grant funds are to be used for four year olds. We strongly encourage the Administration to include language permitting and encouraging states to make a portion of the project funds available for children beginning at birth. We further recommend language that would give competitive advantage to applications that include children starting at birth. Adding references and focus on activities down to birth in this priority will increase significantly the value of this preschool effort, making it more likely that children will succeed in school and life.
- ITCA is pleased to see the requirement in both grants that states must ensure the percentage of children with disabilities served under the grant reflects, at a minimum, the percentage of children served statewide through 619 of Part B of IDEA statewide. However, we recommend that states be required to set numerical targets reflecting appropriate increases in the percentage of preschoolers with disabilities that will participate in these opportunities. A required plan for activities to work toward that these targets and required public reporting of data demonstrating improved performance toward targets is recommended to ensure full inclusive opportunities.
- ITCA appreciates and supports the required application requirement in both grants on how the state will address the needs of eligible children, “including those who may be in need of additional supports, such as children who have disabilities or developmental delays...”
- ITCA supports element (f) “full inclusion of children with disabilities” in the definition of a high-quality preschool program. We suggest a slight revision to include access to and supports to ensure full opportunities.
- ITCA recommends that the required Memorandums of Understanding include agencies implementing Part C and 619 of IDEA and include a description and plan to ensure that these programs are fully integrated into grant activities to ensure necessary supports and services are available for children with disabilities and their families. The MOU should be required to specify how the Part C and 619 representatives will be involved in grant leadership and decision-making and how the grantee will evaluate and report to the federal office periodically on the implementation of all partnership efforts including any changes that will ensure that grants implement partnership activities as planned and proposed in the application.
- ITCA must again state the reality that additional resources for early intervention and preschool special education services are critical to ensure full participation of children with disabilities in these new opportunities. As new early education opportunities for children from birth to five are expanded, the number of infants, toddlers and preschoolers with disabilities identified can be expected to increase. ITCA recommends a percentage of funding to support IDEA’s early childhood programs be set-aside from the \$250 million allocation to ensure that appropriate services and supports can be provided to achieve this purpose.

Thank you for opportunity to submit comments to these proposed changes. As always, 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,

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