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Director of the Information Collection Clearance Division
U.S. Department of Education
550 12th Street SW
PCP, Room 9086
Washington, DC 20202-0023

RE: Docket No. ED-2018-ICCD-0117, Comments in Response to EDFacts Data Collection School Years 2019-20, 2020-21 and 2021-22

The Division for Early Childhood (DEC) of the Council for Exceptional Children submits the following comments in response to the November 6, 2018 notice in the Federal Register regarding public comment on required IDEA data collections. 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.

DEC supports the collection and use of high-quality data to inform state and local continual improvement to support the provision of evidenced-based practice to enhance outcomes for children and their families. We take this opportunity to comment only on the preschool specific questions related to environments as included in “Directed question 24: Pre-school Educational Environments: ED would like to understand the usefulness of the preschool educational environments data.”

In responding to these preschool related questions, DEC notes that we agree with the comments provided by the National Associations of State Directors of Special Education (NASDSE). The NASDSE comments were made in coordination with their affinity membership of state 619 Coordinators and state Part B Data Managers. These comments are consistent with collaborative conversations DEC has had with the state 619 coordinators and other partners over the last several years. The DEC response follows.

- a. ***How are the current educational environments data for children with disabilities, ages 3-5, useful to your state?*** Many states and LEA’s find the current preschool educational environment data helpful in monitoring the provision of special education and related services within regular education programs. Inclusion of young children with disabilities in regular early childhood environments is a priority in most states, and these data offer a measure of accountability that is helpful as states work toward continuously improving the quality of services for preschoolers with disabilities. That said, the data have some limitations and some changes would be helpful.
 - First would be to allow the options to recognize “home” as an appropriate environment for some children, particularly those young threes who may not developmentally be ready for a group setting. In these instances, “home” should be considered an option that

reflects a less restrictive placement closer to “with peers.” This is distinctly different from the concept of “home” for school aged children for which this environment represents a more restrictive setting than in school with their peers.

- In addition, the aggregation of data for all five-year olds, including children receiving their special education and related services in preschool as well as those in kindergarten, is challenging and does not provide adequate information for improvement planning. The recommendation provided below in item c would allow states who elect to report 5-year old environments as either preschool or kindergarten to provide the additional data necessary to inform decision-making efforts relative to SPP/APR Indicator B-6. DEC supports this option.

In sum, these data points would be more informative to states and LEA’s if the calculations allowed for recognition of the home as an appropriate choice for some young children and if the data on five-year olds were available disaggregated by preschool and kindergarten.

- b. How would changing the term “attending” to “enrolled” in a regular early childhood program affect the reporting requirement or affect how your state uses the data?* Changing the wording to “enrolled” would be beneficial to states as it provides the additional clarification necessary to support the intent of the data collection.
- c. Children with Disabilities Age 5 and in Kindergarten: ED is proposing to add an optional data category to measure the number of Children with Disabilities who are both Age 5 and in Kindergarten. This would allow states to distinguish these students from their pre-school Children with Disabilities and in educational environment. Would your state find this additional detail useful, why or why not?* Many states are currently able to disaggregate these data used in B-6 data to measure the five-year-olds in preschool separately from the five-year-olds in kindergarten. For these states, the disaggregation of data would be welcomed, as it would highlight the additional data aligned with state and local improvement efforts. While we recognize providing this data would require some states to modify data collection and analysis, because the strategies for increasing participation in regular education environments vary significantly based on involvement in preschool or kindergarten, some may welcome the opportunity.

Thank you for the opportunity to submit comments on this important matter. DEC is available and willing to provide any additional information that may be needed. Feel free to contact us if we may be of further assistance.

Sincerely,
Peggy Kemp, DEC Executive Director