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DEC Response to Request for Comments
U.S. Departments of Health and Human Services and Education
Policy Statement on Family Engagement
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The Executive Board of the Division for Early Childhood (DEC) of the Council for Exceptional Children would like to express our thanks to the U.S. Departments of Health and Human Services and Education for the development of guidance and recommendations focusing on family engagement in young children's development and learning. Given the central focus of DEC is to promote policies and advance practice for young children with disabilities and their families, these recommendations are key to the successful delivery of high quality educational and early intervention services. Furthermore, it is DEC's opinion that the draft statement is well done and contains exceedingly valuable information for the field. With this in mind, we offer the following feedback for your consideration.

Given the length of the document, DEC recommends that an Executive Summary be developed so that essential components of the policy are available for a broader audience. We would also like to suggest a revision to the purpose statement in the first paragraph as follows to reflect what families are doing and not what is being done to them. The revised policy would read – "The purpose of this policy statement is to provide recommendations ... on systematically partnering with and supporting families as they engage with professionals in their children's development ..."

In the first paragraph, the purpose for the policy statements is established. While the audience for the information is spelled out later in the document, it would be helpful to identify the intended audience at the beginning of the document. A clear statement that state and local programs engaged in providing educational services for young children and their families as principal partners in the collaborative and effective engagement of families would help the reader. Currently, there is quite a bit of information on the rationales related to the document's positions before these audiences are identified. Further, it would be worth considering that there are other potential audiences that could be identified: federal, state, and local policy-makers; federal, state and local parent associations; and networks which focus on early childhood education and services, including services to families.

Also, on the first page, in the second paragraph, line 7 speaks to the fact that effective family engagement "can impact" outcomes. We'd suggest substituting "impacts outcomes" as a stronger descriptor as the preponderance of the current evidence indicates as much. In addition, the information in the box describing "the systematic inclusion of families as partners" could be improved. Given, as stated in a subsequent paragraph, the family serves as the primary context for development, learning,

and wellness in young children, modifying the statement in a way that better acknowledges this would enhance and clarify the statement, ideally emphasizing the expertise families bring to the partnership with professionals.

In numbers 1, 2, and 3 at the bottom of page one, we would suggest substituting the term “to better effectively engage families” for “implement effective family engagement” as the latter appears less in agreement with the paper’s contention that family engagement is not a “supplemental” activity. We feel that the language of the recommendations should be as strong as possible in avoiding the thought that family engagement is something separate from other priorities. As we know, family engagement should be infused throughout the work of early interventionists and early childhood educators.

Also, the footnote defines family members broadly as primary caretakers but narrows the concept to include only as “those that interact” with service providers. This reference should be deleted from the definition. In some families, one parent/caregiver might have to work and not attend all meetings, so the other parent/caregiver attends meetings. In this case, both the working parent/caregiver and the one attending meetings should be considered family and the focus of engagement efforts. Across diverse families and cultures, the current language in the definition has the potential to be even more limiting.

On page 2 paragraph 1 in the *Overview* section, the term “family engagement” is used in the context of beneficial parenting practices. Given the use of the term in the definition and purposes of the recommendations, to avoid potential confusion it might be beneficial to substitute “Effective parenting practices” or similar wording. It is worth noting the wording of the last sentence in the paragraph we found to be very strong and well-developed.

The first paragraph of the 3rd paragraph on page 2 mentions “early childhood staff” as well as family wellness but the paragraph does not discuss staff wellness. Perhaps this reference to staff should be deleted.

DEC has some suggestions for the Policy Highlights section. The IDEA language should mention the required family indicators in the Part C and Part B State Performance Plan/Annual Performance Report (SPP/APR) so the reader will know about the availability of annual data related to families in each state. Further, the ESEA description has citations where the reader can find family engagement guidance. This is not repeated in other sections; particularly notable are the descriptions involving Head Start Parent Family and Community Engagement (PFCE) Framework and the Department of Education’s Dual Capacity-Building Framework for Family-School Partnerships. In the information following these, additional supportive evidence would strengthen this section. Also the paragraphs on the Head Start and Department of Education guidance could be combined. While the information is well-developed, it is repetitive; a “side-by-side” comparison (similarities and differences) might help underscore the direction each federal entity is taking as regards family engagement.

The bulleted findings in paragraph 4, page 4 onto page 5 are exceptionally strong, particularly in the references to the challenges in working with children and families from culturally and linguistically diverse backgrounds; these could serve as a separate section in the recommendations. These are less

“policy highlights” per se, they represent systemic barriers the recommendations are meant to address. More emphasis on this information would strengthen the document. One point of concern is the contention on page 5 that there is a “growing recognition that early childhood programs and schools cannot reach their full potential in preparing children for school success without partnering with families.” There may be a growing impetus in this area (as evidenced by the recommendations), but this has been recognized and supported by evidence as a best practice in early development for some time. We suggest deleting the “growing recognition” modifier from this statement. It could instead be stated as “substantial evidence continues to support the recognition that early childhood programs”

On page 5 through 6, we found the *Principles* section to be very strong and well developed with two exceptions. First, we viewed this as a list of “Principles for Practice.” This may not be grounds for retitling the section but could be considered. Second, in number 7 of the list, additional language regarding the principle that families must be supported to be effective partners would have strengthened this section. Supporting family capacity as informed, equal participants, leaders, etc., must be systematic and ongoing, and is not only comprised of peer-to-peer mentoring (albeit this is a very important practice that deserves significant support). The work of parent training centers and community parent resource centers are one resource to these ends, but a much greater investment is needed in this area if the outcomes of family engagement are to be broadly realized.

The State-level recommendations raised some concerns given that family engagement, to be optimally effective, must occur at all levels of policy and service planning and implementation. While the recommendations are well-organized, detailed and appropriate, they lack adequate steps to engage families and direct service providers in these processes at the state level. As we have seen in, for example, the implementation of Part C of the IDEA, the process benefited greatly from a collaborative approach that engaged stakeholders, including families, at all levels as equal partners. From DEC’s perspective, the inclusion in the guidance of specific strategies insuring that informed and ongoing caregiver input is sought and incorporated into the state recommendations would be of significant benefit in this section (the recommendations do include the statement in the “Plan and Prioritize” section: “Policy makers should develop outreach strategies to ensure that families have input in the plan development, partnering with trusted community-based organizations that have existing connections and relationships with families.” While notable, this recommendation should be better elaborated and strengthened per the information listed above). Particularly notable was the inclusion of the concept of “incentivizing” the implementation of family engagement practices as a particularly innovative concept. For the recommendations “Implementing evidence-based parenting interventions,” it is important to reiterate that these interventions must be culturally and linguistically responsive and respect differences in parenting styles across cultures, race, and ethnicity.

The information in the *Recommendations to Local Programs* section is particularly well-developed. DEC does recommend the addition of the importance of “Supporting and enhancing partnerships between families and providers.” The information in the box on page 10 could be elaborated further (for example, more information on employing peer mentoring specialists as an approach), but contained highly pertinent information throughout. It should also be noted that, in the last sentence of page 10, social services would not be the only referral source available to family engagement specialists; other widely available resources, for example parent training centers as noted earlier or state Protection and

Advocacy agencies could be listed as examples. Furthermore, the role of technology and electronic media in enhancing family engagement is critical and should be delineated explicitly. For example, on page 11, under family connections, the use of electronic media or web-based tools to connect families should be highlighted.

The box on page 11 also contains very well-developed information. The one caveat is the emphasis given to families as volunteers. While this is an effective approach when actionable, evidence is indicating that the availability of families as volunteers, particularly those with children with disabilities or health issues as well as families from diverse backgrounds, are increasingly hard-pressed to volunteer their time (see Watson, G., Sanders-Lawson E.R., & McNeal, L (2008) Understanding Parental Involvement in American Public Education, International Journal of Humanities and Social Science Vol. 2 No. 19 pp. 41-50.) The comment on reaching out to culturally and linguistically diverse families in this instance and other instances in this section, however, is again particularly notable. The section also effectively includes not only peer-to-peer practices but also supports to participation at all levels as well as very pertinent recommendations on transition planning, all of which are particularly laudable. The pursuant information in this section on topics, for example the establishment of processes for supporting family wellness, are very well-elaborated.

DEC recommends the Conclusion section highlight the responsibility of programs and schools to partner with families to enhance family engagement.

In the resource section (pp. 16 -18), DEC products could serve as effective resources in every area listed, including the DEC Recommended Practices (<http://www.dec-sped.org/recommendedpractices>), position statements, monographs and other publications, and other training materials, including web-based information (<http://www.dec-sped.org/publications>). As a specific example, the DEC Recommended Practices are evidence-based and could serve as a significant resource to this end. Examples of specific Recommended Practices that have direct bearing on the information contained in the draft recommendations are attached to this document. We would be more than happy to provide additional specific examples of DEC resources we believe would be of use in implementing these recommendations.

DEC appreciates the ongoing collaborative efforts across multiple Federal Departments through the Early Childhood Interagency Policy Board. These efforts, including the release of policy guidance on Suspension/Expulsion and the guidance on Inclusion, have been instrumental in assisting states and communities to enhance high-quality opportunities for young children and their families.

Thank you for the opportunity to provide input into these recommendations. Please feel free to call on our organization if we can be of further assistance.

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