



May 22, 2015

The Honorable Arnie Duncan
US Department of Education
400 Maryland Avenue SW
Washington, DC 20202

The Honorable Sylvia Matthews Burwell
US Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Dear Secretary Duncan and Secretary Burwell:

The undersigned members of the CCD Education Task force thank you for this opportunity to provide comments on the draft Policy Statement on Inclusion of Children with Disabilities in Early Childhood programs. We applaud the Departments of Health and Human Services and Education for elevating this important topic. CCD shares the concern that there are too few inclusive early education opportunities for many young children with disabilities.

We believe there are multiple audiences for this policy: parents and other caregivers, early education and care providers, and state and local policy makers. Each has a role to play in increasing the availability of quality, inclusive education opportunities for young children and their families. This is a very strong statement and we encourage its wide dissemination to all channels available within the Departments of Education and Health and Human Services and to professional and advocacy organizations.

We support a policy that promotes having more children with disabilities included in preschool programs with children who do not have disabilities and for your consideration, offer the following recommendations:

Definition of inclusion in early education programs. We agree that inclusion means children with and without disabilities are physically together and accessing the same curriculum. We do believe, however, that inclusion means that there are more children without disabilities in the setting. A setting that has 90 percent children with disabilities and 10 percent children without disabilities is not inclusive. Here are some data sets to explore:

- The Maternal and Child Health Bureau reports that approximately 20 percent of all children under the age of 5 have a special health care need.



- The Department of Education reports that approximately 3 percent of infants and toddlers are enrolled in the Individuals with Disabilities Education Act Part C services, 5 percent of preschoolers are enrolled in special education services under section 619 of IDEA and approximately 11 percent of elementary and secondary education students receive special education and related services under IDEA Part B.
- According to the Maryland Coalition for Inclusive Education (2011), an inclusive classroom would include no greater than 15 percent of children with disabilities.. [http://www.mcie.org/usermedia/application/8/quality-indicators---building-based-practices-\(2011\).pdf](http://www.mcie.org/usermedia/application/8/quality-indicators---building-based-practices-(2011).pdf)

Private pay preschool families counting as part of ‘inclusive’ programs. Currently, if school districts offer parents of preschoolers a part-time segregated program, and if parents are unable to convince the school district to place their child in an inclusive early childhood setting, and the parents privately place their child in an inclusive program, the district is still given "credit" in the OSEP 618 Preschool Data Collection for the child attending an early childhood setting in an inclusive (regular education early childhood) program. This is patently unfair and needs to be changed.

Access to other resources: The paper should include footnotes, definitions, and links to websites for PBIS and ECMHC and links to 619 lead agencies and part C lead agencies.

Thank you for considering our views.

Sincerely,

Association on University Centers on Disabilities
Autistic Self Advocacy Network
Bazelon Center for Mental Health Law
Council of Parent Attorneys and Advocates
Easter Seals
Higher Education Consortium on Special Education
National Association of Councils on Developmental Disabilities
National Center for Learning Disabilities
TASH
Teacher Education Division of the Council for Exceptional Children
The Advocacy Institute