



May 6, 2014

The Honorable Tom Harkin, Chair
The Honorable Lamar Alexander, Ranking Member
Health, Education, Labor and Pensions Committee
United States Senate
Washington, DC 20510

Dear Senators Harkin and Alexander,

The following members of the Consortium for Citizens with Disabilities Education Task Force offer the following recommendations to S. 1697, the Strong Start for America's Children Act.

Thank you for considering our views.

Sincerely,

ACCSES

American Speech-Language-Hearing Association
American Occupational Therapy Association
Association of University Centers on Disabilities
Autism National Committee
Brain Injury Association of America
Council for Exceptional Children
Council for Learning Disabilities
Division for Early Childhood of the Council for Exceptional Children
Easter Seals
Higher Education Higher Education Consortium for Special Education
IDEA Infant Toddler Coordinators Association
Learning Disabilities Association of America
National Association of Counties on Developmental Disabilities
National Association of State Directors of Special Education
National Center for Learning Disabilities
Teacher Education Division of the Council for Exceptional Children
The Arc of the US

**Comments to S. 1697, the Strong Start for America's Children Act
April 3, 2014**

Highest Priority Recommendations

1. Establish funding set-aside for preschool students with disabilities in Section 114

(5) reserve, at a minimum, 5 percent for Section 619 of the Individuals with Disabilities Education Act.

Rationale: A greater investment in IDEA's preschool program (section 619) is critical to fully ensuring young children with disabilities are able to access and thrive in the newly expanded preschool programs supported by S. 1697. The bill rightly expands preschool opportunities for millions of young children. As a result of this expansion, it is expected that the number of young children with disabilities in these new settings will also increase. According to the "National Survey of Children with Special Health Care Needs Chartbook 2009-2010", up to 20 percent of preschoolers may have a special health care need or disability that may make them eligible for services under IDEA. As a result, a greater investment in IDEA's preschool special education program is critical to ensure young children with disabilities are able to access and thrive in the newly expanded preschool programs and services. S. 1697 adds numerous requirements for coordination with Section 619, but does not match this responsibility with additional 619 resources that will be needed to implement these new requirements. Therefore, reserving a small percentage of funding to support IDEA's preschool grant will be essential to ensuring that appropriate services and supports can be provided to preschool children with disabilities.

2. Establish funding set-aside for infants and toddlers with disabilities in Section 202(3)(A)

(iv) reserve, at a minimum, 5 percent for Part C of the Individuals with Disabilities Education Act.

Rationale: By expanding new early learning opportunities for tens of thousands of infants and toddlers, it is expected that the number of infants and toddlers with disabilities in these new settings will also increase. According to the recent IDEA Infant Toddler Coordinators Association (ITCA) Birth Cohort Study, depending on a state's eligibility criteria, approximately 10 percent of all children under the age of three years may have a developmental delay or disability that may make them eligible for services under IDEA. Additional resources for early intervention services are critical to ensure full participation of children with disabilities in these new opportunities. The bill adds numerous requirements for coordination with part C of the IDEA, but does not include any increase in resources that are needed to implement these requirements. Therefore, reserving a small percentage of funding to support IDEA's Part C system will be essential to ensuring that appropriate services and supports can be provided to achieve this purpose.

Priority Recommendations

1. Add a new purpose to Section 111

(4) increase access to appropriate supports so children with disabilities and other special populations can fully participate in high quality early education programs

Rationale: To fully participate alongside their non-disabled peers in high quality, early education programs, children with disabilities must have access to appropriate specialized supports. It is not sufficient to simply grant such children the opportunity to access early education programs, but rather, they must be provided the necessary supports and services to allow them to fully participate.

2. Add “hearing” to “vision, dental, health” screenings in Title I, Section 112 Definition, (9)(l)(i)(1)

Rationale: Most children with congenital hearing loss have hearing impairment at birth and are potentially identifiable by newborn and infant hearing screening. However, some congenital hearing loss may not become evident until later in childhood. Children who are hard of hearing will find it much more difficult than children who have normal hearing to learn vocabulary, grammar, word order, idiomatic expressions, and other aspects of verbal communication. Several studies indicate variance in the prevalence of newborns with congenital hearing loss in the United States. The overall estimates are between 1 to 6 per 1,000 newborns (Source: <http://www.asha.org/public/hearing/Prevalence-and-Incidence-of-Hearing-Loss-in-Children/>).

3. Add “early literacy and math skill development” to screenings in Title I, Section 112 Definition (9)(l)(i)(1).

Rationale: Students with learning disabilities and attention issues things like – dyslexia, math disabilities, writing disabilities and executive functioning issues – constitute the largest number of students with disabilities, and yet, because their learning issues are not as immediately visible as students with other types of disabilities, they often go unnoticed for years. Careful screening of risks for learning disabilities offers an early window into what might become a serious issue for that child. Before the age of five, early childhood programs should examine each child’s development in all important areas including math, reading and executive functioning. In early math, for example, programs should for the recognition of patterns and sequences, the concept of time, counting, and numbers. In early reading, they should examine skills including understanding of letter sounds, syllables, rhymes, and alphabet knowledge. By screening for delays in these critical areas, we can prevent problems before they occur and provide supports for children to ensure appropriate skill development. A comprehensive and meaningful screening requirement should be included in the Strong Start for America’s Children Act and the initiatives that are currently underway in the Department of Education and Department of Health and Human Services.

4. Revise definition of ‘High Quality Prekindergarten Program in Section 112 (9)(l)(i)(IV)
(IV) program ***coordination*** with local educational agencies and other entities providing ~~programs~~ ***services and supports*** authorized under part B and part C of the Individuals with Disabilities Education Act (20 USC 1419-1431 et seq.) ***to ensure the full participation of children with disabilities.***

Rationale: Part B and part C authorize services to children, not programs. In order for a prekindergarten program to truly be high quality, it must ensure that children with disabilities can fully participate alongside their non-disabled peers. A prekindergarten program cannot be considered to be high quality unless it enables meaningful, inclusive participation for all children.

5. Revise Section 117 (d)(2)(D)

(D) in awarding subgrants, give preference to early childhood education programs that have a plan to increase services ***a written formal plan with baseline data, benchmarks and timetables to increase access to and full participation in high quality early education programs*** to children with special needs, including children with developmental delays or disabilities, children who are dual language learners ,

homeless children, children who are in foster care, children of migrant families, children who are eligible for nutrition assistance under the USDA Food and Nutrition Service, or children in the child welfare system.

Rationale: It is essential that subgrantees have a written formal plan with measurable targets that fully include children from special populations. Public reporting of data demonstrating improved performance toward targets and annual determination of data-based decisions on strategies to increase full participation is critical to success.

6. Modify Section 120 (b)(1)(A)

(A) Carry out meaningful parent and family engagement, through the implementation and replication of evidence-based or promising practices and strategies, which shall be coordinated with parent and family engagement strategies supported under the Individuals with Disabilities Education Act (20 USC 1400 et seq) and part A of title I and title V of the Elementary and Secondary Education Act of 1965 (20 USC 6311 et seq. and 7201 et seq) and strategies in the Head Start Parent, Family and Community Engagement Framework, if applicable in order to....

Rationale: Research supports the importance of implementing a systematic integrated approach to actively engage families in early childhood programs. Effective family engagement strategies will lead to an increased awareness of developmental expectations for young children in all areas of learning and will support shared goal setting, planned learning opportunities in the community, classroom and home and opportunities to monitor developmental growth.

7. Modify Section 120(b)(3)(B) Protections for Special Populations

Change the heading of this subsection to “(3) Full participation of children from special populations” and revise (B) to read as follows:

(B) establish effective procedures for ensuring use of evidence-based practices in assessment and instruction including use of data for progress monitoring of child performance and provision of technical assistance support for staff to ensure fidelity with evidence-based practices.

Rationale: All children should have access to quality learning experiences supported by individualized accommodations and small group experiences to support the development of skills that are needed to guarantee kindergarten success.

8. Add a new purpose to Section 201

(4) increase access to appropriate supports so children with disabilities and other special populations can fully participate in high quality early education programs

Rationale: To fully participate alongside their non-disabled peers in high quality, early education programs, children with disabilities must have access to appropriate specialized supports. It is not sufficient to simply grant such children the opportunity to access early education programs, but rather, they must be provided the supports and services to allow them to fully participate.

The Consortium for Citizens with Disabilities is a coalition of nearly 100 national consumer, advocacy, provider and professional organizations headquartered in Washington, D.C. Since 1973, the CCD has advocated on behalf of people of all ages with physical and mental disabilities and their families. CCD has worked to achieve federal legislation and regulations that assure that the 54 million children and adults with disabilities are fully integrated into the mainstream of society. Approximately 50 national organizations participate in the CCD Education Task Force. For additional information, please contact:

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