



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

January 27, 2020

Meredith Miceli
U.S. Department of Education
400 Maryland Avenue SW, Room 5141, Potomac Center Plaza
Washington, DC 20202-5076

RE: ED-2019-OSERS-0025

Dear Ms. Miceli,

The Consortium for Citizens with Disabilities (CCD) Education Task Force is writing regarding the U.S. Department of Education's (ED) notice to establish a Technical Assistance (TA) center to improve states' capacity to collect, report, analyze, and use high-quality IDEA Part B data. CCD has consistently supported the provision of high-quality TA to states and would like to provide input on the direct questions posed by ED and make specific recommendations regarding the expected outcomes and proposed requirements listed in the notice.

Direct Question: ED asked whether the establishment of two centers (i.e., one Center addressing the needs of Developed Capacity States, and another Center addressing the needs of Developing Capacity States) would be an efficient and effective approach to meeting the diverse needs of states in integrating, reporting, analyzing, and using high-quality IDEA Part B data?

Response: ED is right to ask specifically about the potential impact of having two centers on the ease and efficiency of accessing TA services; the differing levels of expertise needed to effectively deliver TA services to the two different groups of states; and the types of products that two [or more] groups of states may need to achieve the outcomes proposed. In response, CCD believes there is no need to establish two data management centers and that ED can and should strive to accomplish its goal to support states through one data center.

CCD challenges the premise that states can be easily defined as fitting into one of the two categories described therein [i.e. Developed Capacity and Developing Capacity] to receive TA. The distinction between the two categories is simply whether or not they can demonstrate that their data systems include linkages between special education data and other early childhood and K-12 data, which does not speak at all to the quality of data. Additionally, creating two centers will generate unnecessary redundancies and result in inefficiencies that will waste precious federal TA resources. Consistent with comments made by the National Association of State Directors of Special Education (NASDSE) we ask that ED fund just one Data Management Center. As stated by NASDSE,

“[NASDSE] does not believe the creation of two centers would be beneficial, efficient, or effective. Moreover, we question how states would be assigned if multiple centers existed. Most importantly, state data managers have consistently held that they learn best from each other, and if states are divided between two centers, it will be more difficult for data managers in various stages of integration to learn from their colleagues.”

Recommendations: CCD recommends that ED:

- Establish one data management center and better clarify how the TA needs of a state are identified, including whether the state allows for and thus requires interaction with traditional public and charter schools as allowed under state law.
- Require the TA center to offer differing levels of expertise, services and products that recognize the varying levels of expertise of states to ensure accurate data collection and reporting for all of Part B, including Part B Sec. 619.

Expected Outcomes and Proposed Requirements

Expected Outcomes: IDEA data is used by multiple users however the notice only references the “need to increase use of IDEA data by developing products to allow states to report their special education data to various stakeholders.”

Response: The notice does not clarify that the end result of an integrated state longitudinal system should inform state decision making such as to ease the use of the data for district and state budget activities, research and/or advocacy to support improved outcomes for students with disabilities.

Recommendation: CCD urges ED to *revise Expected Outcome (b)* as follows (**additions are in bold**):

“(b) Increased use of IDEA Part B data within states by developing products to allow states to report their special education data to various stakeholders, **including policymakers, school personnel, researchers, charter school authorizers [as applicable], parents and advocates** through their longitudinal data systems.”

Proposed Priority and Expected Outcome: While the statutory language and the appropriations report language are clear these TA funds are to be targeted to states to assist them in the collection, reporting, analysis and use of high-quality IDEA data, both Part B and Part C, this proposed priority only addresses Part B. Other data from general education, early childhood and Title I are mentioned specifically. There is no mention of Part C data. Including Part C data is necessary if a state is preparing a complete data picture of services and outcomes through these efforts.

Recommendation: CCD strongly recommends that the priority and expected outcomes included in the proposal be revised to add specific language supporting the inclusion of Part C and Preschool 619 data under IDEA. States are using these data to answer critical questions that help evaluate and improve programs and services. Linking data across sources both vertically (Birth to 21 years and beyond) as well as horizontally (across programs such as IDEA, Head Start, Pre-K, child care, child welfare, health, Title 1, etc.) can provide powerful information about the value of these programs as they work to improve outcomes for children and families. Data from Part C and Preschool 619 are needed to create complete information about services provided under IDEA and by collaborating partners. Other TA systems funded through the Department of Education would be logical partners in this work.

Proposed Requirements: While the notice acknowledges that participation by states in TA is voluntary, the reporting of the IDEA [and other education data] is not.

Response: CCD therefore urges ED to ensure that the TA provided will meet the needs of any applying entity - regardless of size, including states with charter schools and charter schools operating as their own LEA. Multiple non-SEA oversight entities also use this data for high stakes evaluation, research and decision making including local and state school boards, charter school authorizers, researchers, parents and other advocates.

Recommendations: Add the following (in bold):

“Significance” how the proposed project will —

"(iv) present information about best practices on data integration strategies that result in a reduced administrative burden for multiple users, including individual schools, LEAs, and non-SEA public oversight entities.

"(v) present information about best practices strategies on data integration that increase potential use of relevant IDEA Part B and longitudinal data for education researchers, such as by data set coordination to facilitate research that integrates multiple data sets. “

CCD appreciates the opportunity to comment in support of ED funding a TA center states to improve states' capacity to collect, report, analyze, and use high-quality IDEA Part B data.

Sincerely,

American Physical Therapy Association
Association of Assistive Technology Act Program
Association of University Centers on Disabilities
Autism Society of America
Children and Adults with Attention-Deficit/Hyperactivity Disorder
CommunicationFIRST
Council of Administrators of Special Education
Council of Learning Disabilities
Council of Parent Attorneys and Advocates
Division for Early Childhood of the Council for Exceptional Children
Easterseals
IDEA Infant Toddlers Coordinators Association
National Association of Councils on Developmental Disabilities
National Association of School Psychologists
National Center for Learning Disabilities
National Center for Parent Leadership, Advocacy, and Community Empowerment
National Center for Special Education in Charter Schools
National Disability Rights Network
National Down Syndrome Society
The Advocacy Institute
The Arc of the United States

The Consortium for Citizens with Disabilities, headquartered in Washington DC, is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. Since 1973, 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.

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