



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

June 14, 2013

Melody Musgrove
Director
Office of Special Education Programs
U.S. Department of Education
400 Maryland Avenue, SW
LBJ Building
Room 2E105
Washington, DC 20202-4537

Dear Ms. Musgrove:

The undersigned members of the Consortium for Citizens with Disabilities (CCD) Education Task Force appreciates this opportunity to comment on proposed revisions to the State Performance Plan (SPP) and the Annual Performance Report (APR) for both the Part B and Part C programs.

Our members have been carefully following the Office of Special Education Program's (OSEP) Results Driven Accountability (RDA) initiative and while we believe that there are still numerous components of the initiative to be finalized, we are pleased that the proposed changes to the SPP/APR and their focus on outcomes for children and youth with disabilities are consistent with the RDA approach that focuses on both compliance and outcomes. Overall, we believe that the proposed changes reflect a better balance between these two components of IDEA implementation.

In general, we find the proposed changes to be carefully thought through and responsive to ongoing input that CCD members have provided to OSEP over the last few years regarding OSEP's monitoring of states' compliance with the law, how determinations of state compliance are made, and directing a more targeted focus on outcomes for children and youth students with disabilities. However, we must note that this is a particularly difficult time for states to initiative such a significant effort given the recent sequestration cuts. Our specific comments follow.

Comments related to Part B and Part C

- The proposal to combine the SPP and APR into one document will save state staff time that can be focused elsewhere. We support this recommendation.
- We believe that the goal of submission of the SPP/APR through an online system that connects with other U.S. Department of Education (ED) data and provides pre-populated data will also save time and resources. We support this goal and hope that its implementation will be accomplished as expeditiously as possible.

- We request that additional clarification be provided in sufficient detail for C-11 and B-17 so that it is clear what is expected of states including the scope of the plan. It is not clear as to whether Indicator C-11 and B-17 is a plan for just children and youth with disabilities or will the state coordinate this effort to other ongoing state improvement activities that are being addressed under other systems initiatives including Title 1 or Race to the Top. Since we believe that children and youth with disabilities should be included in these other state improvement activities, making it unclear how the new indicator will be incorporated into other state systems changes and improvement efforts.
- It is not clear as to how performance on this new indicator will be evaluated for purposes of making states' determinations under IDEA. It is important to clarify that before states begin this important work.

Comments related to Part B only

- We agree with the change previously implemented for Indicator 9 that removes the requirement to report on underrepresentation.
- It appears that Indicator 10 combines some of the data in Indicator 9 and we therefore recommend that the duplication be eliminated by combining the two indicators into one.

Again, we thank you for this opportunity to comment and look forward to working with you on the implementation of the new system.

Sincerely,



Katy Beh Neas



Laura Kaloi



Cindy Smith

The Consortium for Citizens with Disabilities is a coalition of over 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 disabilities and their families. CCD works 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. For more information, please contact:

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