



Ensuring a Place at the Table for Every Family

October 24, 2019

Director of the Information Collection Clearance Division
U.S. Department of Education
550 12th Street SW, PCP, Room 9086
Washington, DC 20202-0023

RE: ED-2019-ICCD-2103, ED-2019-ICCD-0102

Dear Director,

The National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE) thanks you for the opportunity to comment on the US Department of Education's (ED) proposed revisions to the Annual State Application Under Part B of the IDEA, OMB Information Collection 1820-0030, and the State and Local Educational Agency Record and Reporting Requirements Under Part B of the IDEA, OMB Information Collection 1820-0600.

National PLACE is a national organization that works to strengthen the voice of families and family-led organizations at decision-making tables that affect our nation's children, youth, and families. Our 60+ local, state and national members represent Parent Training and Information and Community Parent Resource Centers, Family to Family Health Information Centers, Parent to Parent USA affiliates, National Federation of Families for Children's Mental Health chapters, Family Empowerment Centers, Early Start Family Resource Centers, and other family-led, family-run organizations committed to ensuring the highest quality and most effective services and supports for diverse children and families, including those with disabilities and in particular children with disabilities who are at greatest risk of significant disproportionality. National PLACE submitted comments supporting the implementation of the final significant disproportionality regulations and opposing ED's proposal to delay implementation as well as comments opposing the proposed Significant Disproportionality State Study. Our comments on those topics as well as our comments today are based on our knowledge and expertise regarding effective strategies to engage diverse families of children of all ages to help improve services to, and outcomes for, their children, as well as our experience as family-led organizations and parents ourselves. National PLACE is also a member of the Consortium for Citizens with Disabilities (CCD) and supports their comments.

Like CCD, National PLACE has consistently supported policies that seek to raise expectations and improve outcomes for students with disabilities and strengthen the role of their families and family-led organizations that serve them. CCD has consistently provided input to the U.S. Department of Education (ED) regarding the need to require states to improve both policies and practices to identify significant disproportionality. Consistent with our past communications and recommendations on the topic of significant disproportionality, our recommendations today focus on ED's proposed revisions to the Annual State Application Under Part B of the IDEA, OMB Information Collection 1820-0030, and the State and Local Educational Agency Record and Reporting Requirements Under Part B of the IDEA, OMB Information Collection 1820-0600, which incorporate the data collection and reporting requirements necessary to assess compliance with ED's significant disproportionality (Equity in IDEA) regulations, 34 CFR §§ 300.646 and 300.647.

To ensure full compliance with the IDEA and its regulations, our recommendations are:

Recommendation 1: Maintain and proceed with the proposed updates to the IDEA Part B data collection. National PLACE specifically supports the following recommendations of CCD:

- ***“Revision: Significant Disproportionality.*** The revision that clarifies states must collect data to determine if significant disproportionality based on race and ethnicity is occurring in the State and Local Education Agencies (LEAs) with respect to the identification, placement, and discipline of children with disabilities as required in 34 CFR §§300.646 and 300.647.
- ***New: Setting Standards for significant disproportionality with advice from stakeholders.*** The addition that says: “[States must develop] State selected standards for reasonable risk ratio thresholds, minimum cell-sizes, minimum n-sizes, and, if the State uses the “reasonable progress” flexibility, standards for measuring reasonable progress and the number of year’s data that determinations are based upon. These standards “must be based on advice from stakeholders, including State Advisory Panels, as provided under section 612(a)(21)(D)(iii) of IDEA.”

As an organization whose mission is to enhance the voice and impact of diverse families and family-led organizations at decision-making tables, National PLACE also strongly urges ED to provide detailed guidance – developed with meaningful input from the students and families who are the intended beneficiaries of the significant disproportionality regulations – and effective technical assistance to help States implement an impactful stakeholder input process that is inclusive of all communities required by the statute – with a particular emphasis on diverse families and youth, and the family-led organizations such as Parent Centers who support them - and to also ensure transparency in the selection process, the planning process, and in creating and implementing the agreed-upon standards.

Recommendation 2: Discontinue plans to conduct the Significant Disproportionality State Survey (Survey) as proposed in July 2019 (See: ED-2019-ICCD-0065).

As noted above, National PLACE opposed the implementation of the proposed Survey in July, 2019, noting several major problems including that the Survey's purpose and timing [as described by ED] were not consistent with the Equity in IDEA regulation requirements and not

well-aligned with existing federal data collection sources; the Survey was not mandatory for all states; and that the Survey design was flawed. Given that ED is now complying with the requirements of the Equity in IDEA regulations, National PLACE reiterates our opposition to the Survey and supports the comments of CCD urging ED to discontinue plans to implement this Survey. As noted by CCD, “It is imperative that ED now turn its resources toward helping all states come into compliance with the Equity in IDEA regulations and providing the required updates to the public and to Congress as mandated by IDEA. Implementing the proposed Survey will only work to further burden State Educational Agencies which already spend extensive time and resources on data collection and reporting.”

National PLACE appreciates this opportunity to comment and look forward to ED collecting the data as required by the Equity in IDEA regulations without delay.

Very truly yours,

A handwritten signature in cursive script that reads "Diana MTK Autin".

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National PLACE Members

National PLACE Members – National

Advocacy Institute

National Federation of Families for Children's Mental Health

Parent to Parent USA

National PLACE Members – State & Local

Advocates for Children of NYC

AFCAMP (Hartford, CT)

Arkansas Waiver Association

ASK Resource Center (Iowa)

Association for Children's Mental Health (Michigan)

Association for Special Children and Families (NW New Jersey)

Bayada (New Jersey)

Community Inclusion and Development Alliance (NYC)

Connecticut Parent Advocacy Center (Connecticut)

Exceptional Children's Assistance Center (North Carolina)

FACT Oregon (Oregon)

Families Together (Kansas)

Family Connection of South Carolina

Family Matters PTI (Illinois)

Family Network on Disabilities (Florida)

Family Resource Center on Disabilities (Chicago Metro Area, Illinois)

Family Soup (California)

Family Voices of California

Family Voices of New Jersey

Family Voices of Wisconsin

Federation for Children with Special Needs (Massachusetts)

FIRST Parent Center (North Carolina)

Formed Families Forward (Virginia)

INCLUDEnyc (New York City)

Long Island Advocacy Center (Long Island, New York)

Louisiana PTI

Maryland Coalition of Families

Matrix Parents (California)

Mission Empower (Erie, PA)

Mississippi Coalition for Citizens with Disabilities

Open Doors for Multicultural Families (Washington)

Parent Connection (S. Dakota)

Parents CAN – Napa Valley Child Advocacy Network (California)

Parent Education Advocacy Training Center (PEATC) (Virginia)

Parent Education and Advocacy Leadership (PEAL Center) (Pennsylvania)

Parents Helping Parents (San Jose, California)

Parent Information Center (Delaware)

Parent Network of Western NY (Buffalo)

Parents Let's Unite for Kids (Montana)

Parents Place of Maryland
Parents Reaching Out (New Mexico)
Parent to Parent of Georgia (Georgia)
Parent to Parent of NJ (New Jersey)
Parent to Parent of VA (Virginia)
Partners Resource Network (Texas)
PEAK Parent Center (Colorado)
Pyramid Parent Center (New Orleans)
Rhode Island Parent Information Network
Rowell Family Empowerment
SPAN Parent Advocacy Network (New Jersey)
Starbridge (New York State)
STEP-Support and Training for Exceptional Parents (Tennessee)
Support for Families (San Francisco, California)
Washington PAVE
West Virginia Parent Training & Information
Wisconsin FACETS
Wyoming Parent Information Center