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February 26, 2014

The Honorable Arne Duncan  
Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

The Honorable Kathleen Sebelius  
Secretary  
U.S. Department of Health & Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Secretaries Duncan and Sebelius,

On behalf of the 30,000 members of the Council for Exceptional Children (CEC) – the largest international professional organization dedicated to improving educational outcomes of children and youth with disabilities and/or gifts and talents – CEC is pleased to present the following recommendations for the implementation of the \$250 million in Race to the Top (RTT) funds to improve early childhood care and education, as authorized by Public Law 113-76.

CEC members serve on the frontline as special educators, early interventionists, administrators, researchers and higher education faculty, who work with children and youth with disabilities and their families. Last year, 1.2 million infants, toddlers, and preschool children with disabilities and their families were served by the Individuals with Disabilities Education Act. Over the last several decades, there has been a steady increase in the number of young children who have received early intervention and/or special education through IDEA.

However, while IDEA's early childhood programs continue to serve more children than ever before, federal funding has failed to keep up with program demand, forcing states to introduce austerity measures to keep services available, such as:

- 20% of states have narrowed their eligibility criteria for IDEA's Infants and Toddlers with Disabilities program over the last decade;
- 75% of states charge families a fee to participate in IDEA's Infants and Toddlers with Disabilities program;
- 34% less funding-per-child for IDEA's Infants and Toddlers with Disabilities program available now as compared to 1992;
- 37% less funding-per-child for IDEA's Preschool program than 20-years ago.

Assessment data from across the nation shows that children who participated in IDEA's early intervention and preschool programs demonstrate positive developmental outcomes. According to the federally-funded Early Childhood Outcomes Center<sup>1</sup>, in 2010–11:

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<sup>1</sup> The Early Childhood Outcomes Center (2012). Summary of child outcomes. *Outcomes for Children Served through IDEA's Early Childhood Programs*. Retrieved March 5, 2013 from: <http://projects.fpg.unc.edu/~eco/pages/papers.cfm#childoutcomes2012>

- Approximately 70% of infants and toddlers in Part C showed greater than expected growth, acquiring skills at a faster rate when they left the program than when they began it;
- 55% of toddlers exiting Part C were functioning within age expectations ranged for *knowledge and skills* , and 61% for *social relationships*
- 81% of children served by IDEA’s preschool program showed greater than expected growth outcome area evaluated.

It is with these positive impacts and fiscal austerity measures in mind, that CEC strongly urges the Administration to ensure that all children with disabilities and the IDEA programs that serve them are integral to the new RTTT early childhood care and education initiative through the following recommendations:

- Devote set-aside of funds to support IDEA’s early childhood programs. By expanding new early education opportunities, it is expected that the identification of infants, toddlers and preschoolers with disabilities will also increase. Additional resources for early intervention and preschool special education services are critical to ensure full participation of children with disabilities in these new opportunities, particularly in light of the fiscal challenges currently facing both programs, as noted above.
- Encourage states to make a portion of their grant funds available for children beginning at birth. Prioritize applications that propose to address the needs of children starting at birth to increase the value of this preschool effort.
- Require grant applications to expand and enhance child find activities to identify young children with developmental delays or disabilities; and reinforce and strengthen transition processes for infants, toddlers and preschool children and their families as they move from early intervention programs to preschool and prepare for kindergarten.
- Require grants to include IDEA’s Early Intervention program (Part C) and Preschool Grant program (Part B-Sec. 619) are fully integrated into grant activities in the following areas:
  - Each state partner will coordinate their state specific early learning efforts with other state partners to ensure maximization of all federal, state and local resources;
  - All state partners, including IDEA Part C and Section 619 Preschool Grant systems, will be included in the implementation of grant activities;
  - Grant resources, funds and activities will be directed to include all state partners, including Part C and Preschool 619;
  - All partners, including the Part C and 619, will be involved in grant leadership and decision-making; and
  - The project will evaluate and report to the federal office periodically on the implementation of all partnership efforts. This should include any changes that will ensure that grants implement partnership activities as planned and proposed in the application.



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Thank you for opportunity to submit feedback on this new program. As always, CEC is available and willing to provide any additional information or clarification that may be needed. Feel free to contact Kim Hymes, Senior Director, Council for Exceptional Children at [kimh@cec.sped.org](mailto:kimh@cec.sped.org)

Sincerely,

A handwritten signature in black ink that reads "Deborah A. Ziegler".

Deborah A. Ziegler, Ed.D.  
Associate Executive Director  
Policy and Advocacy Services  
Council for Exceptional Children