Council for Exceptional Children
The voice and vision of special education

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May 14, 2012

Jennifer Coffey
U.S. Department of Education
400 Maryland Avenue, S.W.
Room 4097, Potomac Center Plaza
Washington, DC 20202

RE: State Personnel Development Grants; Proposed Priorities and Definitions; CFDA Number 84.323A

Dear Ms. Coffey,

On behalf of the 35,000 special education teachers, early interventionists, administrators, higher education faculty, and researchers who are members of the Council for Exceptional Children, I am pleased to provide feedback on the Proposed Priorities and Definitions of the State Personnel Development Grant (SPDG) program.

Training and supporting our nation's special and general educators is critical to achieving positive developmental and academic outcomes of the over 6 million children and youth with disabilities. The Individuals with Disabilities Education Act – State Personnel Development Grants provide systemic support to address many of the most pressing issues confronting the education of children and youth with disabilities at the State and local levels. A strong, well-funded SPDG program will enable States to address many of the challenges facing special education:

- **Providing Relevant, Evidence-Based Professional Development**
- **Building a Stronger Pipeline of Special Educators, Early Interventionists**
- **Addressing the National Special Education Teacher/Related Service Personnel Shortage Through Recruitment and Retention**

While CEC appreciated the Administration's request of $45 million for fiscal year 2013, a $1.09 million increase from fiscal year 2012, it still does not restore the SPDG program to its recent funding level of $48 million. The SPDG grants are designed to answer the state and local needs as identified by frontline educators. Unfortunately, due to the financial crisis reverberating throughout the country, funding for state and local professional development has decreased dramatically, making the SPDGs role even more important. CEC members understand that many reforms in education – such as the implementation of the common core standards and utilizing new assessments – will impact their daily practice. Therefore, CEC supports a much greater investment in the SPDG program, not only to address the fiscal realities but, more importantly, to adequately address the needs of the field.

While CEC supports the overall direction of the SPDG program, we would like to share some concerns and appreciate their consideration when determining the final priorities and definitions. Our specific concerns are outlined on the following pages. Please feel free to contact me or Kim Hymes, Director of Policy and Advocacy at kimh@cec.sped.org or 703.264.9441 with any questions.

Very Truly Yours,

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General Recommendations

CEC Recommendation: To adhere to the letter and spirit of the Individuals with Disabilities Education Act of 2004 statute, CEC recommends that the proposed priorities place a greater emphasis on personnel preparation.

CEC Rationale: The current proposed priorities: *Effective and Efficient Delivery of Professional Development* and *Targeting Teachers' Professional Development Needs Based on Student Growth* are both focused on professional development for educators once they are providing special education services. While the propose of the State Personnel Development Grants – as written in IDEA 2004 – does focus on professional development as a means to assist State educational agencies in reforming and improving their systems, it also focuses on personnel preparation as means to providing this assistance.

Additionally, the U.S. Department of Education Office of Postsecondary Education's March 2011 Report: *Teacher Shortage Areas – Nationwide Listing*[1] shows that nearly every state has a shortage of special educators and related service personnel. Recruiting high-quality educators of children and youth with disabilities is central to improving developmental and academic outcomes.

Therefore, CEC encourages the Department to consider better emphasizing personnel preparation throughout the proposed priorities.

CEC Recommendation: Include the wide cadre of professionals who contribute to student achievement in both proposed priorities, including early interventionists, related service personnel, principals, and administrators, in addition to special education teachers in both proposed priorities.

CEC Rationale: CEC believes that many professionals contribute to student achievement and student growth. As such, CEC believes that the priorities of the SPDG program should recognize this professional contribution by emphasizing that professional development opportunities are a priority for all educators, rather than solely focusing on teachers.

CEC Recommendation: Include references to Universal Design for Learning (UDL) within the background, priorities and other narrative areas of the SPDG Priorities.

CEC Rationale: Universal Design for Learning is a framework for guiding educational practice that has been supported through various federal initiatives and has been shown to benefit both children with and without disabilities. As such, UDL should be reflected in the priorities for the SPDG program.

Proposed Definitions

CEC Recommendation: Revise the proposed definition of *evidence-based* to read:

"Evidence-based refers to practices that are supported by a sufficient number of high quality studies that use research designs from which causality can be inferred and that demonstrate meaningful effects on student outcomes."

CEC Rationale: The current definition of evidence-based is overly broad and vague. CEC is concerned that the current definition would do little to improve instructional practice because the language referring

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[1] U.S. Department of Education Office of Post Secondary Education. *Teacher Shortage Areas: Nationwide Listing, March 2011*. Retried on May 12, 2012 from:
http://www.shorter.edu/academics/financial_aid/high_need_teaching_fields_state.pdf

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to "moderate evidence of effectiveness" undermines the purpose of evidence-based practices, which is intended to set a high bar for practices supported by a trustworthy body of research.

Currently, CEC together with its Division for Research, is working to develop a definition of evidence-based as well as criteria the special education field can use to make determinations of what constitutes 'evidence-based practice'. While this work is still underway, and therefore CEC believes a more complete definition of evidence-based may emerge, the proposed definition must be strengthened to ensure the spirit of evidence-based is upheld in its implementation.

CEC believes that to make this definition more meaningful, it should address the following four standards which we believe are reflected in the proposed CEC definition of 'evidence-based':
1) Research design
2) Quantity of supporting research
3) Quality of supporting research
4) Magnitude of effect

CEC's proposed definition and the four standards outlined above originate from the work of numerous special education researchers, most directly from CEC-Division for Research whitepaper, *Thinking and Communicating Clearly About Evidence –Based Practices in Special Education* by Bryan G. Cook and Sara Cothren Cook.[2]

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[2] Cook, Bryan and Sara Cothren Cook. *Thinking and Communicating Clearly About Evidence-Based Practices in Special Education.* July 2011. Retrieved from:
http://education.uoregon.edu/uploads/1087/Thinking_and_Communicating_Clearly_About_Evidence-based_Practices_in_Special_Education.pdf