



**The Division for Early Childhood
of the Council for Exceptional Children (DEC)**

November 24, 2009

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The Director, Information Collection Clearance Division
Regulatory Information Management Services
Office of Management
U. S. Department of Education

These comments are being submitted on behalf of the IDEA Infant & Toddler Coordinators Association (ITCA) and the Division for Early Childhood of the Council for Exceptional Children (DEC). ITCA currently has 51 state and territory members and represents lead agencies that are responsible for implementing Part C, Infants and Toddlers with Disabilities, of the Individuals with Disabilities Education Act (IDEA) in all states and other eligible jurisdictions. DEC is a professional membership organization whose mission is to promote policies and advance evidence-based practices that support families and enhance the optimal development of young children who have or are at risk for developmental delays and disabilities.

These comments are in response to two notices published in the September 25, 2009 Federal Register. The comments address both notices and relate to proposed information collection forms and instructions for the:

- Report of Children and Toddlers Receiving Early Intervention Services in accordance with Part C;
- Report of Program Settings Where Early Intervention Services are Provided to Children with Disabilities and Their Families in accordance with Part C;
- Report on Infants and Toddlers Exiting Part C; and
- Report of Dispute Resolution Under Part C of the Individuals with Disabilities Education Act.

We have two general comments. First, we agree with the proposed changes to the instructions and forms. These minimal changes will provide important clarification on some of the data elements, thereby enhancing the quality of the data and making the data more useful to the field.

Second, however, we must express our strong concern regarding the timing of this comment process. As you are aware, when the four tables under review were last approved, the scheduled expiration date was set at November 30, 2009. The comment process for these tables and instructions ends just one week before the December 1 date that most states use to collect data for Tables 1 (Child Count) and Table 2 (Settings). In fact, as permitted by the instructions, some

states collect these data on a date between October 1 and December 1. The final tables and instructions were not available for this latter group of states and may not even be available for the group of states using December 1 as their count date.

These last minute changes present challenges to the states and local programs responsible for this data collection. We ask that in the future the process begin much earlier to allow ample time for public comment, revisions, making the necessary changes to data systems, dissemination and training on any revised data collection.

Thank you for the opportunity to submit comments to these proposed changes to the Part C data collection tables and instructions. ITCA and DEC are available and willing to provide any additional information or clarification that may be needed. Feel free to contact Sharon Walsh by email at walshtaylo@aol.com or at 703-250-4935.

Sincerely,
Julie Curry, President ITCA and
Sarah Mulligan, Executive Director, DEC

cc: Alexa Posny
Larry Wexler