



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

November 9, 2009

Office of Innovation and Improvement, Department of Education
U.S. Department of Education, 400 Maryland
Avenue, SW., room 4W321, Washington, DC 20202.

Attention: Investing in Innovation Comments:

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 50 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 the public comment request published in the October 9, 2009 Federal Register that proposes priorities, requirements, definitions, and selection criteria under the Investing in Innovation Fund under ARRA. These grants will (1) allow eligible entities to expand and develop their work so that their work can serve as models of best practices, (2) allow eligible entities to work in partnership with the private sector and the philanthropic community, and (3) identify and document best practices that can be shared and taken to scale based on demonstrated success.

First, we would like to express our support for and appreciation of the inclusion of *Proposed Competitive Preference Priority 5--Innovations for Improving Early Learning Outcomes*. We agree that early intervention and preschool services, particularly for children with developmental delays and disabilities, can enhance young children's development and can reduce the need for more costly and difficult interventions, including referrals to special education, later on in a child's life. We support the Department's efforts to increase the quality of existing early learning programs and expand access to high-quality early learning programs, particularly for children from low-income families. The Early Intervention Program (Part C) and the Preschool Special Education Grants Programs under IDEA are an important part of our nation's efforts to ensure young children reach school ready to be successful.

We enthusiastically support the Department's inclusion of this new competitive preference, particularly the emphasis on services starting at birth and the inclusion of transition efforts between early intervention and preschool and from preschool to kindergarten.

However, in order to ensure that these grants are available to support the innovations occurring under IDEA related to children with disabilities, birth through age five, DEC and ITCA request that the eligible entities for Investing in Innovation Fund grants be expanded to include local and regional early intervention and preschool programs and the entities with whom they collaborate. This is particularly important if the grants are to be available to support innovation in Part C of IDEA. In some states, LEAs do provide services for children under Part C. However, only ten states have selected the State Education Agency as the lead agency for this program. As a result, LEAs are often not the program involved in the provision of early intervention services. Local and regional public and private entities, including but not limited to health departments, social services agencies, developmental disabilities agencies, and private programs, are often the providers of such services. Without the expansion of the eligible grantees, these important innovation grants will not be available to many IDEA programs.

Thank you for opportunity to submit comments to these proposed changes. We appreciate and support the efforts of the Department to ensure quality early learning opportunities for all young children and their families. 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

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