December 21, 2023

Manager

Strategic Collections and Clearance Governance and Strategy Division

U.S. Department of Education

Re: Docket No.: ED-2023-SCC-0138

Agency Information Collection Activities; Comment Request; Report of Children Receiving Early Intervention Services in Accordance with Part C; Report of Program Settings in Accordance with Part C; Report on Infants and Toddlers Exiting Part C

These comments are being submitted on behalf of the IDEA Infant & Toddler Coordinators Association (ITCA) regarding the proposed information collection requirements as published in the Federal Register on November 21, 2023. The ITCA represents states and other jurisdictions implementing the Individuals with Disabilities Education Act (IDEA) Part C for infants and toddlers with and at risk for developmental delays and disabilities and their families.

ITCA appreciates the opportunity to provide comments related to the Department's proposed revisions to these three existing data collections. We submitted comments on September 22, 2023, during the 60-day comment period as well.

ITCA reviewed the analysis of the comments received in September 2023 and the decisions made by the agency. We are pleased that generally our recommendations were accepted. We continue to support the comments we made in our previous letter. Our members value the data collected under these IDEA 618 collections and use these data to inform system improvements within their states.

We will address these collections separately below.

Report of Children Receiving Early Intervention Services Under Part C - ITCA continues to support the addition of the new metadata question, "For gender, does your state collect more than two reporting categories (male and female)?"
Our membership discussed this and noted that some states currently are using additional reporting categories. ITCA supports asking states to annually report on the permitted values the state uses for reporting gender.

Report of Program Settings in Accordance with Part C - ITCA notes the Department's plan to make no changes in the language proposed previously. We agree the language should be updated, but we also continue to recommend the settings in question "libraries, grocery stores, parks, restaurants" be listed as examples of community settings. We do agree that these settings are not generally the primary setting for delivery of services, we are concerned about any confusion in the field if these settings are eliminated.

We ask that this decision be reconsidered to allow the items "libraries, grocery stores, parks, restaurants" to be now included as examples for community settings.

Report on Infants and Toddlers Exiting Part C - ITCA appreciated the decision not to add additional reporting categories to the Part B eligibility not determined categories to the "Exit at Age Three" group.

We agree additional information would be helpful to decide the best way to obtain information about children who have been referred to Part C. We note the proposal to ask states to answer a metadata question to list the categories they use to collect data on children who reach age three whose eligibility was not reported during the reporting year. This information may be useful in considering future data collection proposals.

ITCA does want to restate our concerns from our September comments. These are still important to consider in any future discussions and are repeated below.

As we have stated, any the new data elements to be included in the revised collection are based on activities that occur under the Part B preschool special education process, not the Part C process. ITCA appreciates the need to understand the Part B status of children who have left Part C. These data are already collected through SPP APR process under Indicator B 12. Therefore, we do not understand or agree that Part C should be collecting and reporting these data. These data reflect activities that occur AFTER the child turns three years and exits Part C.

ITCA also notes that whenever changes are made to data collection requirements, significant costs, time, and resources are necessary to implement them accurately.

This includes programming changes to the state data system, changes in forms and training materials, training on the new categories and work over several years to be sure the data are accurate.

Finally, ITCA notes that any changes proposed must add significant value to the collection that supports the changes being considered.

Thank you for this opportunity to comment on these proposed changes. As always, ITCA is available and willing to provide any additional information or clarification that may be needed. Feel free to contact us by email at ideaitca@gmail.com if we may be of further assistance.

Sincerely,
Jennifer Kaufman, ITCA President
Maureen Greer, ITCA Executive Director