



August 10, 2020

Submitted via regulations.gov

I am writing on behalf of the National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE) with regard to the Department of Education’s Office of Special Education and Rehabilitative Services (OSERS) Information Collection Docket No. ED-2020-SCC-0030 on Proposed Revisions Part B SPP/APR State Performance Plan (SPP) and Annual Performance Report (APR). National PLACE’s mission is to strengthen the voice of families and family-led organizations at decision-making tables. As a national, family-led organization with 65 national, state, and local family-led organization members including Parent Centers, Family to Family Health Information Centers, Federation of Families for Children’s Mental Health chapters, and Parent to Parent USA affiliates, we provide information and support to our members to assist them to support families of children and youth with disabilities and special healthcare needs, and are aware of the critical importance of the State Performance Plans/Annual Performance Reports in implementation of the Individuals with Disabilities Education Act (IDEA).

We appreciate that the comments we previously submitted regarding the proposed revisions to the SPP/APR/SSIP IDEA Part B information collection regulations and forms were given careful consideration as reflected in the Comments and Analysis published with this information collection.

GENERAL COMMENTS REGARDING THE PROPOSED REVISIONS

Rethinking. We agree with the comments of our member organization, The Advocacy Institute, that the statement in the revised draft regulations that “OSEP is still considering comments received and will continue to make available additional information about RDA [Results-Driven Accountability] revisions as they become available” is not responsive to the concerns expressed on this matter. The SPP/APR, annual state determinations, and differentiated monitoring are designed to work together to improve outcomes for students with disabilities. We again encourage OSEP to provide a comprehensive plan to reconfigure its responsibilities under 20 U.S.C. 1416.

Stakeholder (especially parent/family) involvement.

National PLACE is pleased to see that OSEP is proposing to maintain its earlier proposed language in the Part B SPP/APR regarding strengthening and clarifying requirements for stakeholder involvement. In particular, National PLACE strongly supports the following:

“a. Stakeholder Involvement: The mechanisms for soliciting broad stakeholder input on the State’s targets in the SPP/APR and any subsequent revisions that the State has made to those targets, and the development and implementation of Indicator 17, the State’s Systemic Improvement Plan (SSIP). This must include:

- i. The number of parent members and a description of how the parent members of the State Advisory Panel, *parent center staff, parents from local and statewide advocacy and advisory committees, and individual parents were engaged in target setting, analyzing data, developing improvement strategies, and evaluating progress;*
- ii. *Description of the activities conducted to increase the capacity of diverse groups of parents to support the development of implementation of activities designed to improve outcomes for children with disabilities;*
- iii. The mechanisms and timelines for soliciting public input for target setting, analyzing data, developing improvement strategies, and evaluating progress.” (Emphasis added).

These proposed requirements reflect a significant improvement in the information states must provide on the engagement and impact of families, parent centers, etc. National PLACE strongly supports these proposed requirements and thanks the Department for maintaining these proposed changes to the SPP/APR process. We also appreciate OSEP’s analysis of the amount of time that will be required to work with stakeholders to engage them in target-setting on the indicators, recognizing that authentic stakeholder engagement does, indeed, take time!

National PLACE also strongly supports the proposed language in the measurement table encouraging States to “work in collaboration with their OSEP-funded parent centers in collecting data.” We would also continue to recommend a requirement – or at least encouragement – for States to work in collaboration with their OSEP-funded parent centers in disseminating data analysis and information to the public, particularly families.

SPECIFIC COMMENTS ON PROPOSED REVISIONS

National PLACE supports the detailed comments addressing each proposed change submitted by our member, The Advocacy Institute. As an organization whose primary purpose is to strengthen and support the active, informed engagement of families and family-led organizations in decision-making at all levels, including in particular families whose children face the greatest challenges and who have the poorest outcomes, National PLACE in particular supports, and provides additional comments, on the proposed changes related to Indicator 8 and aligning the SPP/APR and SSIP due dates, see below.

Indicator 8 Parent Involvement: National PLACE supports OSEP’s proposal to revise the indicator to require that a State analyzes the extent to which the demographics of the infants or toddlers for whom families responded are representative of the infants and toddlers receiving Part C services.

Revision of SSIP Due Date to Coincide with SPP/APR Due Date: National PLACE appreciates OSEP’s decision to move forward with a change of the SSIP due date to coincide with the due date of the SPP/APR. As OSEP notes, the “SSIP is one indicator in the SPP/APR;” that it “should not be treated as separate from the remaining indicators in the SPP/APR;” and that “if States are implementing and evaluating infrastructure improvement efforts and use of evidence-based practices within these frameworks, data and stakeholder input should be readily available to populate a SSIP report that includes the required information per the measurement language.”

This will also make it easier for stakeholders, including families, advocates, and Parent Centers and other family organizations, to understand the complete State plan and performance and be engaged in improvement activities.

Thank you for the opportunity to provide comments on these important data collection and reporting requirements for the Part B SPP/APR. Please feel free to contact me with any questions or for further discussion regarding the perspectives and recommendations of National PLACE and its members.

Sincerely,

Diana MTK Autin

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 Ensuring a Place at the Table for Every Family