



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-0028 on Proposed Revisions Part C 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 70 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 early intervention provisions of the Individuals with Disabilities Education Act (IDEA).

***Enhancing Stakeholder Involvement in Setting Targets and in SSIP Development*** – National PLACE appreciates that OSEP is planning to move forward with their proposed revisions which will “define a common understanding of how State lead agencies must demonstrate stakeholder involvement.”

***Indicator 4 analysis by specific demographic categories:*** National PLACE appreciates OSEP's commitment to ensure the inclusion of race and ethnicity and at least one other demographic category in Indicator 4 analysis. However, we continue to strongly recommend the inclusion of parent language, which, along with race and ethnicity, is a critical demographic factor. National PLACE agrees with OSEP that “any increase in associated burden is time-limited and is outweighed by the benefit of program improvement that will positively impact early intervention service delivery to infants and toddlers with disabilities and their families.” We appreciate that, rather than eliminate this new requirement, OSEP will delay the requirement to report the specific demographic categories by one year so states will have time to make any needed adjustments.

***Comparison of Demographics of Responding Families with Demographics of Enrolled Families:*** 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.

***Comparing Response Rates Over Time:*** National PLACE agrees with OSEP that “response rates are important in determining the quality and significance of the family outcomes data,” and particularly appreciates the comment that “it is more critical that comparison and analysis lead to improvement in rates for those groups that are underrepresented.”

**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.”

## **Conclusion**

While OSEP did not integrate all of our recommendations into the revised regulations, National PLACE appreciates the many areas where family and Parent Center participation and partnership have been enhanced in comparison to the existing requirements. We appreciate the opportunity to provide these and our earlier comments, and OSEP’s serious consideration and inclusion of our earlier comments regarding the need to strengthen family and family-led organization engagement in and impact on the SPP/APR/SSIP process. 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 Dautin*

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 Ensuring a Place at the Table for Every Family