



The National Down Syndrome Congress wishes to thank the U.S. Departments of Education and Health and Human Services for the draft policy statement on the inclusion of young children with disabilities in high-quality inclusive early childhood programs. We especially appreciate the comments in the policy statement, which emphasize that the policy applies to students with significant disabilities and mentions some of the critical skills they develop in inclusive environments.

The policy also makes the point that the benefit of early childhood inclusion can be lost if children do not continue to be educated in inclusive settings when they reach school age. The continued inclusion of students with disabilities in general education classrooms is directly related to post-school success. This is also true for students with the most significant cognitive disabilities, as discussed in a National and Center and State Collaborative paper on College and Career Readiness (<http://ncscpartners.org/Media/Default/PDFs/AA-AAS-College-Career-Readiness-NCSC-9-24-2013.pdf>). However, as the paper points out, less than 7% are educated in general education classrooms. This unfortunate trajectory usually starts in early childhood and preschool.

The recommendations offered in the draft policy for expanding inclusive high-quality early learning opportunities for all children are extremely important. Many of them would also apply to the implementation of the Least Restrictive Environment provision in the Individuals with Disabilities Education Act for elementary and secondary education. One critically important recommendation in the policy statement is that the inclusion of children with disabilities be in proportion to their presence in the general population (natural proportions).

NDSC is looking forward to the release of this draft policy statement in its official form as soon as possible. To support the implementation of the recommendations in the policy statement it will be important for two changes to be made to the OSEP 618 Data Collection rules for early childhood education.

- Currently an early childhood setting is counted as a regular early childhood program if it has more than 50% nondisabled children. The current 50% rule should be changed so that only a setting that has a natural proportion of students with disabilities (approximately 10-12%) is considered “a regular early childhood program.”
- At this time, the data collection does not distinguish between a child attending an early childhood setting in a regular education early childhood program that is provided or paid for by the school district and one for which the parents are paying tuition. The data collection should be changed to reflect this important distinction and ensure transparency about whether the district is providing the least restrictive environment for early childhood education.