



NATIONAL DOWN SYNDROME CONGRESS

Comments to Department of Education Docket ID ED-2021-OSERS-0018

The National Down Syndrome Congress (NDSC) appreciates the opportunity to comment on the U.S. Department of Education's (ED) Proposed Priorities - Technical Assistance and Dissemination To Improve Services and Results for Children With Disabilities and Technical Assistance on State Data Collection – National Assessment Center. NDSC is the country's oldest national organization for people with Down syndrome, their families, and the professionals who work with them. We provide information, advocacy and support concerning all aspects of life for individuals with Down syndrome, and work to create a national climate in which all people will recognize and embrace the value and dignity of people with Down syndrome. Our comments focus on a request to add a parent component to the National Assessment Center's work. We support the comments submitted on this topic by The Advocacy Institute (AI). The AI comments are pasted below.



*A not-for-profit organization dedicated to services and projects that work to
improve the lives of children, youth and adults with disabilities*

Submitted via Regulations.gov

June 8, 2021

David Cantrell
Office of Special Education Programs
Delegated the authority to perform the functions and duties of the
Assistant Secretary for the Office of Special Education and
Rehabilitative Services
400 Maryland Ave. SW
Potomac Center Plaza
Washington, D.C. 20202-5076

Dear Mr. Cantrell:

We write to provide comments to the U.S. Department of Education's (ED) Proposed Priorities - Technical Assistance and Dissemination To Improve Services and Results for Children With Disabilities and Technical Assistance on State Data Collection – National Assessment Center.

Our comments pertain to Proposed Priority 1: Technical Assistance and Dissemination To Improved Services and Results for Children With Disabilities – National Assessment Center. Regarding this Priority, we ask that the Department consider the following recommendations:

Knowledge Development Outcomes. Please add:

(c) Increased capacity of parents to understand both the statutory and regulatory requirements and the practical necessity to include all students with disabilities in State and districtwide assessments at the students' enrolled grade level or via a State Alternate Assessment on Alternate Academic Achievement Standards.

Rationale: Information tailored to parents of IDEA-eligible students regarding the participation of students with disabilities in State and districtwide assessments is woefully inadequate.

While we were pleased to partner with the Center for Parent Information and Resources on a series of information briefs following passage of the Every Student Succeeds Act, including this [Fact Sheet on Academic Assessments and Students With Disabilities](#), this resource is one of a handful of up-to-date, valid and reliable information on this important topic. ED's IDEAS THAT WORK website offers this rather outdated [FAQ](#). Equally critical to address is the lack of information in alternative formats and in other languages.

Technical Assistance and Dissemination Outcomes. Please add:

(e) Increased awareness of and understanding by parents of students with disabilities regarding how students with disabilities are included in and benefit from participation in State and districtwide assessments including both general assessments and alternate assessments as well as other assessments such as those listed in Knowledge Development Outcomes (a) (5)-(8).

Rationale: It is imperative to include parents of students with disabilities among the audiences to be addressed by the work of the proposed National Assessment Center. Unfortunately, there is no lack of information questioning the purpose and usefulness of including students with disabilities in State assessments at their enrolled grade level. Such information works to dissuade parents of the importance of including students with disabilities in large scale assessments and leads many to seek to opt out. Only through a concerted effort to disseminate valid and reliable information will parents of students with disabilities believe in and support including their students in assessments. Including students with disabilities in State assessments, such as those required by state accountability systems, serves several purposes including:

- Providing baseline information to use in formatting the student's present levels of academic achievement and functional performance in the student's individualized education program;
- Ensuring compliance with the 95 percent participation rate for each student subgroup in order to make assessment results generalizable;
- Providing data to be aggregated for purposes of measuring the academic achievement of the students with disabilities subgroup on district and state accountability systems and reporting;
- Providing data for measuring the achievement of the State-Identified Measurable Results for States that have focused their SIMRs on improving academic achievement.

For all of the reasons stated above, we encourage ED to expand Proposed Priority 1 to include parents of students with disabilities.

Sincerely,

A handwritten signature in cursive script that reads "Candace Cortiella".

Candace Cortiella
Director