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RE: ED-2021-OPEPD-0054

Submitted at: www.regulations.gov

Comments on Secretary of Education's Proposed Priorities and Definitions for Use in
Discretionary Grant Programs

Dear Ms. Ofodile-Carruthers,

The National Down Syndrome Congress (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.

NDSC supports the comments submitted by the Education Task Force of the Consortium for Citizens with Disabilities (CCD) on the Secretary's proposed priorities and definitions (<http://www.c-c-d.org/fichiers/CCD-Letter-Cardona-priorities-July-30-Final.pdf>). NDSC wishes to express appreciation for the many important topics covered in the priorities, including the need to address staffing shortages (although the priorities should be amended to also focus on staffing shortages for specialized instructional support personnel and paraeducators, in addition to teachers), the use of universal design for learning and the various specific references to students with disabilities.

NDSC also wishes to highlight some key parts of the CCD comments, which directly impact many students with Down syndrome and other students with the most significant cognitive disabilities.

All students, including those with Down syndrome, will benefit from the priorities chosen by the Secretary but only if the grantees include these students in their work. For far too long students with the most significant cognitive disabilities have been left out of important grants or have been included as an afterthought. An example would be assessment grants that cover the state's general assessment but do not consider the state's alternate assessment. States are now talking about increasing the use of interim

assessments even though these interim assessments are not designed for the accessibility needs of students with the most significant cognitive disabilities or students with sensory disabilities. The CCD letter requests a specific mention of these students in the definition of children and students with disabilities to ensure they are not overlooked.

NDSC also feels it is important to point out some omissions regarding students with intellectual disabilities in the postsecondary education priorities. In priority 1 there is a focus on credit bearing students who did not enroll in, withdrew from, or reduced course loads in postsecondary education or training programs due to COVID-19. However, this priority does not mention non-credit bearing students in Comprehensive Transition and Postsecondary Programs for Students with Intellectual Disabilities. We join CCD in asking for this omission to be corrected and for the Secretary to add language under Priority 5 supporting the development and implementation of Comprehensive Transition and Postsecondary Program for Students with Intellectual Disabilities, as defined in sec 760 of the Higher Education Act of 1965, as amended (HEA). We also support the other CCD recommendations regarding postsecondary education.

NDSC welcomes the opportunity to be a resource to the Administration as it works to finalize and implement the Secretary's grant priorities. Please contact Ricki Sabia, NDSC's Senior Education Policy Advisor, with any question or requests for assistance at ricki@ndscenter.org.