



NDSC is a member-sustained, nonprofit organization, which works to promote the interests of people with Down syndrome and their families through advocacy, public awareness, and information. We appreciate the opportunity to provide input on the blog post from the Office of Special Education and Rehabilitative Services (OSERS) regarding funding for Technical Assistance (TA) to states on collecting and reporting data required under Sections 618 and 616 of the Individuals with Disabilities Education Act (IDEA).

In its blog post OSERS proposed four options for providing TA to states. For the reasons stated below, **NDSC feels strongly that the U.S. Department of Education (ED) should continue with Option 1: Continuing to fund national TA Centers from the funds reserved under Section 616(i) (Part B) of IDEA to improve the capacity of states to meet their IDEA Part B and Part C data collection requirements under Sections 616 and 618.** All the other options would reduce or remove funding from critically important national TA centers and send it to the states where it would not be used as effectively or efficiently. The National Association of State Directors of Special Education (NASDSE) stated in its comments that changing the funding or structure of TA is counterproductive to achieving their members goals, as it assumes the states have the resources and time to address data issues as they arise. NASDSE's comments also express how much their members value the work of the national TA Centers. NDSC agrees.

- The TA centers, as currently funded, have provided tremendous assistance to help ensure that the data collected is valid and reliable and reported in a manner that enables states to make important policy decisions so that states and local education agencies meet requirements under IDEA.
- The TA centers have the expert knowledge and information to facilitate states learning from one another, which is critical when resources are scarce and the IDEA is not fully funded.
- Currently, the TA centers are funded at approximately \$21 million, therefore dividing and distributing a portion to each state using the Section 611 formula will result in the per state funding being too small to have much impact. Additionally, this option would eliminate national Part C data technical assistance since these funds would be reallocated to Part B grants, only.
- A change in the funding structure would result in an inequitable distributions of funds. Smaller states would receive fewer dollars, although their oversight, reporting and other responsibilities are the same as larger states.

- Giving the funds to states to purchase TA would mean additional overhead in each state as states will have to make awards to vendors who would provide the TA.
- Even if the states want to band together to purchase TA it would be very complicated with each state having its own procedures, statutes, lawyers, etc.
- The model of each state (or even groups of states) providing TA on data collection would result in redundancy in product development and other work across the states that National Centers generally minimize.

The critically important support provided to states by the Part B funded TA Centers can be exemplified by three projects at the National Center on Educational Outcomes (NCEO). Through its efforts supported by Part B set-aside funds for data collection requirements, NCEO is:

1. Providing support for a Community of Practice of 30 states with 69 state personnel on data collection and topics related to their implementation of the 1% cap on participation in alternate assessments based on alternate achievement standards. **The number of states exceeding the cap makes it clear that they need this TA from NCEO.**
2. Developing intensive technical assistance plans with states on their State-Identified Measurable Results (SIMRs).
3. Working with States to support their understanding of how to effectively use local assessment data within a larger state assessment and accountability system.

NDSC firmly believes that in addition to the financial, logistical and other challenges described in the bullets above if Option 1 is not continued, OSEP's monitoring, technical assistance, and accountability for implementing IDEA would be weakened as the quality of data collected and reported diminishes. Additionally, we fear that a reduced or weakened Federal role likely means lower compliance with the IDEA and reduced commitment to the education of students served under the IDEA. **NDSC strongly urges ED to continue with Option 1.**