



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

May 25, 2020

Jennifer Coffey
U.S. Department of Education
400 Maryland Avenue, SW
Room 5161
Washington, DC 20202-5076

Submitted via [regulations.gov](https://www.regulations.gov)

Re: Docket ID [ED-2019-OSERS-0156](#)

Dear Ms. Coffey:

The undersigned members of the Consortium for Citizens with Disabilities (CCD) Education Task Force appreciate the opportunity to comment on the Proposed Priority and Definitions - State Personnel Development Grants, as published in the April 24, 2020, Federal Register. CCD is committed to ensuring that all early intervention providers, teachers, and support personnel have the skills, knowledge and support required to effectively support and teach children with disabilities. We write to express the following concerns with this proposed priority for the State Personnel Development Grant program under the Individuals with Disabilities Education Act.

The State Personnel Development Grants (SPDG) program is a well-established grant program with comprehensive requirements set forth in 20 U.S.C. 1451-1455. Of particular importance is the expectation that grant application activities be aligned with proposed activities of the state plan specific to the Personnel Qualifications, 20 U.S.C. 1412(a)(14). States are required to ensure that “local educational agencies in the State take measurable steps to recruit, hire, train, and retain personnel who meet the applicable requirements described in this paragraph to provide special education and related services under this subchapter to children with disabilities.” Further, in order for the SPDG to meet the goal of “assisting States in reforming and improving their systems for personnel preparation and personnel development in order to improve results for children with disabilities,” it is imperative that proposed activities align with the performance goals and indicators set forth in State Performance Plans, and, in particular, State Systemic Improvement Plans. A review of current SPDGs shows the *preponderance* of grants are focused on the implementation of multi-tiered system of supports (MTSS) for academics and behavior. The successful implementation of these evidence-based strategies is dependent upon teaming of educators, support personnel and administrators.

Providing special education teachers and other personnel the autonomy to select professional development activities based on their individual needs will prove disruptive and detrimental to the core purpose of the SPDG program. The SPDG program has a requirement for an extensive collaboration

process which provides ample opportunities for input from personnel, including special education teachers, regular education teachers, principals, administrators, specialized instructional support personnel, paraprofessionals, and early intervention personnel (20 U.S.C. §1452 (b)(2)).

For this and the reasons stated below, CCD opposes the proposed priority and urges OSERS to maintain the purpose of the SPDG program as delineated in the IDEA and articulated in the two absolute priorities and one competitive preference priority published in the Federal Register on February 13, 2017.

The priority proposed sets too low a bar for evidence-based professional development

The proposed priority requires that applicants use “evidence-based” professional development methods and defines this term as “the proposed project component is supported by one or more of strong evidence, moderate evidence, promising evidence, or evidence that demonstrates a rationale. (34 CFR 77.1).” The latter term defined in 34 CFR 77.1 simply means that “a key project component included in the project's logic model is informed by research or evaluation findings that suggest the project component is likely to improve relevant outcomes.”¹ Further, only a single publication is referenced to support the proposed program model. The referenced study is on on-line learning for teachers and merely states that allowing educators to create their own professional learning plans and to select their activities to achieve the goals outlined in those plans *could* have positive effects on student achievement and attainment.² The proposed priority goes on to speculate that, “Thus, it may be the case that a stipend program or other mechanisms to provide personnel with choice in selecting professional development options could magnify the efficacy of other personalization efforts by giving teachers access to options that otherwise may have been inaccessible due to professional development requirements or that were cost prohibitive.” We believe this is simply too low a bar to warrant this new priority.

The priority proposed does not meet best practice standards for professional development.

Effective professional development is context-based and collaborative in structure, with the goal of building institutional and collective knowledge. A voucher program designed to serve individual early intervention, educational, and transition services personnel does not align with that goal and is particularly ill suited to improving the outcomes of children with disabilities. For instance, since students with disabilities are educated in both general and special education classrooms, their general and special education teachers must work together in developing their knowledge base of effective academic and behavioral strategies and should use these opportunities to have constructive exchanges on their own ideas, insights, and experiences.

The priority proposed undermines existing state and local requirements.

The Department has repeatedly reaffirmed its belief that education is a matter best left to states and localities, yet this program would undermine the role of states and localities in creating their own professional development programs. States and districts across the country have longstanding professional development policies and programs which include extensive teacher input in their development. Further, in many cases, these are established in statute or regulation (for example, Florida’s professional development requirements are set in Chapter 1012 Section 98 of the Florida Statutes³).

The priority proposed will result in inequitable benefits.

The program presumes that early intervention professionals, teachers, and specialized instructional support personnel have the time and information needed to carefully research the available professional development opportunities and weigh their relative strengths and weaknesses. The last

thing these providers and staff – particularly those in under resourced and distressed communities - are seeking is to take on more time-consuming administrative responsibilities. Instead, what they all can benefit from is more resources for existing stakeholder systems created by their states and LEAs to provide a more robust set of options for collaborative learning.

CCD has consistently opposed the use of federal public education funds to support voucher programs for K-12 education, and we maintain our opposition to vouchers for professional development especially when the program is not designed to support and align with all federal education statutes.

Sincerely,

The Consortium for Citizens with Disabilities (CCD) is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. The Education Task Force monitors federal legislation and regulations that address the educational needs of children with disabilities and their families, including the Individuals with Disabilities Education Act (IDEA) programs.

¹ 34 CFR 77.1 See <https://www.govinfo.gov/content/pkg/CFR-2019-title34-vol1/xml/CFR-2019-title34-vol1-sec77-1.xml>

² Rabbitt, B., Finegan, J., & Kellogg, N. (2019). Research-Based, online learning for teachers: What the research literature tells us about the design of platforms and virtual experiences for working adult learners. The Learning Accelerator. Available at https://bplawassets.learningaccelerator.org/artifacts/pdf_files/Research-Based-Online-Learning-for-Teachers.pdf

³ Florida statutes. 2013; section 10128.98, School Community Professional Development Act. Available at <https://www.flsenate.gov/laws/statutes/2013/1012.98>