



October 20, 2023

Dear Cornelia Stevens, Co-Chair, Sam Huenergardt, Co-Chair, Early Childhood Transition Task Force

I am writing on behalf of the Kansas Coordinating Council on Early Childhood Developmental Services (SICC) to express support for careful attention concerning services for children with developmental delays or disabilities and their families if the decision is made to recommend the development of a new early childhood agency in Kansas. The SICC is an advisory council based in both state and federal law. This council is responsible for advising and assisting the Kansas governor, legislature, and state agencies on matters that impact Kansas families with children, ages birth to five who have, or are at risk for, developmental delays and to ensure that a comprehensive service delivery system of integrated services is available in Kansas for these children.

In the role of advise and assist, the SICC has identified the following for consideration:

- 1) Services for young children with developmental delays or disabilities are guided by both state and federal law and regulations. Within these statutes and regulations specific guidance is provided with clear indicators for identification of children, definitions of services, timelines for services, and measures of outcomes for both the child and family as well as requirements of the governing agency. If a recommendation is made that the services for young children identified under the Individuals with Disabilities Education Act (IDEA) were to be moved to a new agency, assurances must be provided, and care take place that the system of services for these children and families will be protected and not be interrupted or dismantled.
- 2) If any change in state agency responsible for IDEA programs, these programs must continue to have leadership with a working knowledge of evidence/research-based interventions, and documents such as the Division for Early Childhood of the Council for Exceptional Children's Recommended Practices for early intervention and early childhood special education, the Early Childhood Technical Assistance Center's document for making sound decisions related to Least Restrictive Environment, the Mission and Key Principles for Early Intervention, and the Agreed Upon Practices for providing early intervention in natural environments.

• Kansas Coordinating Council on Early Childhood Developmental Services •

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- 3) That a new agency immediately has the capacity and authority to meet requirements identified in IDEA's minimum standards for components of a comprehensive system including a single line of authority for general administration and supervision.
- 4) That any change in agency does not disrupt or effect funding from the federal government, state government, or other funding sources for the state agency or local programs. As appropriate and where necessary new or updated interagency Memorandum of Agreement be developed, in a timely manner, to assure continuity of funding. If a change occurs, this MOU should be developed prior to the establishment and assignment of responsibility for early intervention, special education, or at-risk services to the new agency.
- 5) That the "maintenance of effort" requirement under IDEA continue to be assured by the state and new agency.

The SICC would like to thank the Kansas Early Childhood Transition Task Force for the opportunity to provide comment.

Sincerely,

A handwritten signature in black ink that reads "David P. Lindeman" followed by a long horizontal flourish.

David P. Lindeman, PhD
Chair, SICC

cc. Dan Wuori, Hunt Institute