



National Association of State Directors of Special Education, Inc.

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January 4, 2016

RE: Comments on HD/HHS Draft Family Engagement Policy Statement

TO WHOM IT MAY CONCERN:

The National Association of State Directors of Special Education (NASDSE) appreciates the opportunity to comment on ED/HHS's draft family engagement policy statement. NASDSE is the national nonprofit organization that represents the state directors of special education in the states, District of Columbia, Department of Defense Education Agency, federal territories and the Freely Associated States.

This is a comprehensive statement that includes a number of steps that states, local entities and local programs can take to engage families in programs. We have just a few comments that we believe would strengthen the document.

1. Rather than provide a laundry list of 'must do' actions, it would be more helpful to states, local communities and programs to prioritize these proposed steps and initiatives. This way, entities could identify what they are already doing and what the next steps might be. It is unrealistic and overwhelming to lay out lengthy lists of steps to take without putting them in a context, e.g., if you are 'here' in the engagement process, the next step would be _____.
2. On page 2, under the discussion of Research Highlights, we believe that the statement should stress the importance of early intervention when addressing the needs of young children with disabilities.
3. The statement does not reflect the time crunch that many working parents are under to actively engage with their children's child care center or school. Parents with children in different settings who must rely on public transportation have little spare time to participate in the important activities that are suggested in the statement. Home visits or having activities at times when parents are available are critical to family engagement. However, no mention of home visits appears until page 13 of the document. Providing food and/or child care (in the home – not at the activity) may also be considered necessities and not optional. This is particularly important if someone in the family has a disability – whether it is the child, a parent or another family member who requires the parent's attention.
4. The statement neither recognizes or addresses those families that are not already connected in some way to a community 'system' such as a Head Start center or school. One only needs to look at the sad circumstances of the family that was completely disconnected from the community involved in the Sandy Hook shooting to recognize that there are other families who may need reaching out to. This can start with each school or program making sure to make contact with every enrolled child's family. But beyond

that, there is a need to extend the concept of family engagement to community engagement, such as inviting neighbors without children to celebrations in child care settings, Head Start centers and schools where community engagement could be stressed.

NASDSE welcomes the opportunity to discuss our comments with your staff working on this statement. Please feel free to contact NASDSE's director of government relations, Nancy Reder, at nancy.reder@nasdse.org or 703-519-1506 if you have any questions about our feedback.

Once again, on behalf of NASDSE, I thank you for your work on behalf of America's families and children.

Sincerely,

A handwritten signature in black ink that reads "Theron (Bill) East, Jr." in a cursive style.

Bill East, Ed.D.
Executive Director