



EXECUTIVE ORDER FOR REVIEW OF FEDERAL REGULATIONS & GUIDANCE Priorities for Family-Led Organizations

BACKGROUND | The National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE) is a national non-profit organization – composed of over 40 family-led non-profits - committed to helping family-led organizations and individual families acquire the knowledge and skills needed to effectively “sit at the table” and influence the policies and decisions that impact the lives of children, youth, and families, including those that face the greatest challenges due to disability, special healthcare needs, poverty, and discrimination.

We submitted initial comments at the listening session for parent centers facilitated at the biannual OSEP Leadership Conference on July 17, 2017. They are divided into three primary areas: Family Engagement, Accountability, and Non-Discrimination, and a new section on the process itself.

Family Engagement: Regulatory requirements related to education laws, including but not limited to the ESSA, IDEA, Section 504, Perkins Act, and FERPA pertaining to family engagement, participation, decision-making rights, and procedural safeguards to protect the parents’ role(s), **should NOT be eliminated or weakened.** Research demonstrates that family engagement in education leads to better outcomes for students, and it would be counterproductive to weaken or eliminate support for such engagement. Regulations regarding Parent Centers **should NOT be eliminated or weakened.** Parent Centers play a critical role in helping families understand how early intervention, special education, and transition to adult life systems work; their roles in decision-making on behalf of their individual children and in systems improvement; and how to collaborate with EI providers and schools. Policy guidance related to family and stakeholder engagement, **should NOT be eliminated or weakened,** as they support the importance of the role of the intended beneficiaries of early childhood and education programs at all levels.

Accountability: Regulatory requirements and other guidance related to the ability of families, stakeholders, and the public to hold EI programs and schools, including charter schools, accountable **should NOT be eliminated or weakened.** These are public institutions which must be accountable to those for whom their services are intended and who are the intended beneficiaries – infants, toddlers, children, youth, young adults, and their families.

Non-Discrimination: Regulatory requirements and other guidance related to ensuring the rights of all infants, toddlers, children, youth, young adults and their families, regardless of race, ethnicity, immigrant status, economic status, language, gender, sexual orientation, family composition,

religion, disability or special health/mental health needs, or other characteristics, ***should NOT be eliminated or weakened.***

The Process | National PLACE is concerned about the proposed process of wholesale evaluation of existing regulations for the purpose of repeal, replacement, or modification reflected by Executive Order 13777, which we believe is both unusual and misguided. The process of promulgating regulations is codified in the Administrative Procedures Act (APA). The ED regulations listed for possible “repeal, replace or modify” have already gone through the open, transparent, and prescribed procedure mandated by the APA including consideration of the costs and benefits of regulatory action and other steps that together ensure that development of regulations is based on a wide range of input and sound information. The normal process of promulgating regulations already takes into account the factors included in Executive Order 13777. National PLACE agrees that agencies should periodically review their regulations to ensure that they remain relevant and effective, but eliminating regulations for the sake of elimination is harmful and misguided. No wholesale review of regulations and non-regulatory guidance, particularly within such a limited time span, can do justice to the thoughtful, participatory process needed to ensure a high-quality, fair, and equitable outcome. ***Any review of regulations and guidance related to EI and education must be conducted thoughtfully and with the active and meaningful participation of representatives of the diverse range parents of infants, toddlers, children, youth and young adults served by and who are the intended beneficiaries of US ED-funded programs.***

Thus, National PLACE strongly opposes the process itself, as well as any specific proposals to weaken the regulations and non-regulatory guidance that protects our nation’s most vulnerable students and the participation and involvement of their families.