



The Illinois Subdivision of the
Division for Early Childhood (IDEC)
of the Council for Exceptional Children (CEC)
<http://illinois-dec.org>

Date: Monday, February 15, 2010

To: Shelley Helton, Agency Rules Coordinator, ISBE
100 North First Street, S-493
Springfield, IL 62777-0001
Comments submitted electronically via rules@isbe.net

Re: Public Act 95-793 (effective on 1-1-09):
Proposed Rules and Regulations;
It requires school districts to provide bilingual education services under Article 14C of the Illinois School Code to students enrolled in preschool programs established by districts

The Illinois Subdivision of the Division for Early Childhood (IDEC) of the Council for Exceptional Children (CEC) is the largest organization in the state of Illinois composed of parents and professionals working to “promote policies and advance evidence-based practices that support families and enhance the optimal development of young children birth through age eight who have or are at risk for developmental delays and disabilities”.

We represent 200+ members including many public school employees, such as Directors of Special Education, Directors/Coordinators of Early Childhood Block Grant (ECBG) and Preschool for All (PFA) programs, Directors/Coordinators of Early Childhood Special Education (ECSE) Programs, teachers of children with disabilities and those who are at-risk of developing disabilities and specialists such as psychologists and social workers. We also represent faculty from many universities and colleges across the state of Illinois (University of Illinois – Urbana/Champaign, University of Illinois – Chicago, Loyola University, DePaul University, Southern Illinois University, Northern Illinois University, Northeastern Illinois University, Chicago State University, Elmhurst College, etc.) who are conducting research on a variety of early childhood topics and conducting pre-service and in-service training on assessment and instructional issues, including the impact of children’s diverse backgrounds and language proficiencies on their schooling experiences and levels of independent functioning. Our members also include individuals who work in the state of Illinois Early Intervention (EI) system, including EI service providers, developmental therapists and specialized therapy providers (SLPs, OTs, PTs), and the state of Illinois Early Childhood Staff Development network (STARnet). Our membership also includes parents of children with disabilities, and children

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who are at-risk of developing disabilities. The IDEC has been the Illinois voice for families of children who have disabilities or are at-risk of developing disabilities for almost 20 years. We work collaboratively with many different partner organizations in Illinois including the Illinois Association for the Education of Young Children (Illinois AEYC) and Illinois Head Start

As President of IDEC, I am writing on behalf of our organization to express our concerns regarding the above-referenced proposed rules and regulations as they would apply to Illinois preschool children. Our primary concerns fall into the following areas; supporting information is provided in the table below.

1. Harmful Assessment and Eligibility Decision-Making Procedures:

The assessment procedures suggested for ascertaining children's eligibility for the Transitional Bilingual Education (TBE) program and the process for entering children into services are in direct opposition to NAEYC's (National Association for the Education of Young Children) positions and DEC's (Division of Early Childhood) "Recommended Practices" for understanding children's learning profiles and developing programs to meet their needs. A screening process conducted with an instrument designed for "screening" purposes should NOT be used to determine the student's eligibility for any kind of specialized services. Eligibility for any instructional program other than the general education program should be conducted by a multi-disciplinary team that includes parents and professionals; it should be based on data gathered from a variety of sources, including assessment instruments that meet the technical adequacy requirements (standardization, reliability, and validity) for eligibility decision-making purposes. Additionally, the rights of parents and families to be engaged in the data-collection and decision-making process are significantly limited as proposed. Procedures to ensure that parents are informed about the assessment process, to ask questions about the process, to say that they don't want their child tested, etc. are not described in the proposed rules and regulations (Section 228.10 and 228.15).

2. Unilateral Program Placement: It is not appropriate to require particular preschool placements, curricula, or instructional strategies based on one characteristic or demographic criterion (e.g., English Language Learners). Rather, services and program placements should be determined based on examination of the strengths and needs across developmental domains and early academic skills of each child (Section 228.15).

3. Unrealistic Certification Requirements: The Illinois teacher training institutions are not prepared to have teachers achieve ELL certification within the proposed timeframe (Section 228.35).

4. Unnecessary Certification Requirements: As proposed, there are unnecessary certification requirements for teacher assistants and program administrators that purportedly would meet the needs of ELLs; this purported benefit has not been substantiated (Section 228.35).

5. Teachers for Children with Disabilities: Many Early Childhood programs, including the state of Illinois Early Childhood Block Grant (ECBG) and Preschool for All (PFA) programs, are blended with Early Childhood Special Education (ECSE) programs so that young children with

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disabilities can be educated with their typically developing peers. Many districts engage in this practice to meet the IDEA mandate of educating young children with disabilities in the Least Restrictive Environment (LRE). Early Childhood teachers who teach typically developing children and those who have disabilities are required by law to have a Type 04 certificate and an Early Childhood Special Education approval or early childhood special education certification. Given the current strain on state, federal, and local resources, we do not want administrators to be forced to choose between teachers who have ECSE approval or certification and teachers with ELL or ESL endorsements (Section 235 Early Childhood Block Grant).

6. Local Control: More local control should be built into the proposed rules and regulations. A “One-size-fits-all” program enrollment approach denies the local districts the opportunity to ascertain and then meet the needs of their own children (Section 228.25).

7. Unfunded Mandate: The proposed rules and regulations do not include funding to help programs meet the new requirements. This constitutes an unfunded mandate that will be very difficult for school districts in Illinois to meet and might result in the loss of services to other children as administrators reallocate funding to meet this mandate (Section 228.5).

8. State of Illinois Collaboration: We propose that future efforts to develop rules and regulations regarding the identification and provision of service delivery to young children, whether typically developing, at-risk of developing disabilities, or already identified with disabilities be conducted collaboratively among the state of Illinois Divisions for Early Childhood, Early Childhood Special Education, and ELLs.

STATE BOARD OF EDUCATION NOTICE OF PROPOSED AMENDMENTS TITLE 23:
 EDUCATION AND CULTURAL RESOURCES
 SUBTITLE A: EDUCATION
 CHAPTER I: STATE BOARD OF EDUCATION
 SUBCHAPTER f: INSTRUCTION FOR SPECIFIC STUDENT POPULATIONS
 PART 228
 TRANSITIONAL BILINGUAL EDUCATION

Excerpts from the Illinois Register in order of proposed rules and regulations
 with IDEC comments

Transitional Bilingual Section	Proposed Rule/Regulation	IDEC Comments
Section 228.5 Purpose and Applicability	<u>b) The requirements of Article 14C of the School Code and this Part shall apply to every school district in Illinois, regardless of whether it chooses to seek</u>	This section would create another “unfunded mandate”; school districts do not need another well-intentioned but unfunded

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	<u>funding pursuant to Section 228.50 of this Part.</u>	requirement
Section 228.10 Definitions	<p><u>“Home Language” means that language normally used in the home by the student and/or by the student’s parents or legal guardians, or by anyone who resides in the student’s household.</u></p> <p><u>“Language Background other than English” means that the native language of a student in preschool, kindergarten or any of grades 1 through 12, whether born in the United States or born elsewhere, is other than English or that the student comes from a home where a language other than English is spoken, by the student, or by his or her parents or legal guardians, or by anyone who resides in the student’s household.</u></p> <p><u>“Prescribed Screening Instrument” means the: WIDA ACCESS Placement Test (W-APT)TM (2006 or 2007) for students entering or in the second semester of grades 1 through 12 (World-class Instructional Design and Assessment Consortium, Wisconsin Center for Education Research (WCER), University of Wisconsin-Madison, 1025 West Johnson Street, MD#23, Madison WI 53706 (2006)); Measure of Developing English Language (MODELTM) (2008) for students entering kindergarten or the first semester of grade 1 (World-class Instructional Design and Assessment Consortium, Wisconsin Center for Education Research (WCER), University of Wisconsin-Madison,</u></p>	<p>“Home Language” definition is too broad when you include anyone who resides in the home. This liberal definition results in too many children being referred for a screening of their English Language Proficiency.</p> <p>“Language Background other than English” consequently, becomes too broad as well when one adds in “or by anyone who resides in the student’s household”.</p> <p>Some respondents think that if you are a native English speaker but you have studied another language, then you also meet the criteria of this definition.</p> <p>The WIDA MODEL is “standards based” and it is not norm-referenced. Specifically, the students are asked to perform specific tasks and then their overall performance is rated on a number of factors on a rating scale proposed by experts on how proficient children ought to be to be successful in school. Data on the technical adequacy of this measure (reliability over time, within the measure, and across examiners, predictive validity to long-term outcomes and concurrent “gold standard” criteria) are not available for review. This instrument is not standardized; therefore, there are no national, regional, or local norms available.</p>

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	<p><u>1025 West Johnson Street, MD#23, Madison WI 53706);</u></p> <p><u>Either the Pre-IPT® Oral English Test (Ballard & Tighe, P.O. Box 219, Brea, CA 92822-0219 (2004)) or a screening process that meets the requirements of Section 228.50(b)(4)(E) of this Part.</u></p> <p>“Standard School Program” means the educational program offered by the local school district to the majority of its students (“general education”).</p>	<p>The Pre-IPT (First Edition; 1988) was normed on 248 English-speaking and 312 Spanish-speaking preschoolers from California and Texas. Other concerns regarding the technical adequacy of the Pre-IPT First Edition are noted in published literature; information from the 2004 renorming process was not available for review. A review of the technical adequacy of the instrument, including how it meets technical adequacy standards for an eligibility decision-making tool, should be conducted and provided to consumers.</p>
<p>Section 228.15 Identification of Eligible Students</p>	<p>a) Each school district shall administer a home language survey with respect to each student <u>in preschool, kindergarten or any of grades 1 through 12 who is entering the district’s schools or any of the district’s preschool programs</u> for the first time, for the purpose of identifying students <u>who have a non-English language background other than English.</u> The survey should be <u>administered as part of the enrollment process, or for preschool programs, by the first day the student commences participation in the program.</u> The survey shall include at least the following questions, and the student shall be identified as having a non-English <u>language background other than English</u> if the answer to either question is yes:</p> <p>1) Whether a language other than English is spoken in the student’s home and, if so, which language; and</p> <p>2) Whether the student speaks a language other than English and, if so, which language.</p>	<p>See problems noted in the “Definitions” section above regarding the “Home Language Survey”.</p>

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	<p>b) The home language survey shall be administered in English and, if feasible, in the student’s home language.</p> <p>c) The home language survey form shall provide spaces for the date and the signature of the student’s parent or legal guardian.</p> <p>d) The completed home language survey form shall be placed into the student’s temporary record as defined in 23 Ill. Adm. Code 375 (Student Records).</p> <p>e) The district shall, using the prescribed screening instrument, screen the English language proficiency of each student identified through the home language survey as having a <u>language non-English background other than English by using the prescribed screening instrument applicable to the student’s grade level (i.e., kindergarten or any of grades 1 through 12) or as set forth in a preschool program’s application submitted pursuant to Section 228.50(b)(4)(E) of this Part.</u> This <u>screening</u> assessment shall take place within 30 days <u>either</u> after the student’s enrollment in the district <u>or, for preschool programs, after the student commences participation in the program,</u> for the purpose of determining the student’s eligibility for bilingual education services and, if eligible, the appropriate placement for the student. <u>For kindergarten, all students identified through the home language survey, including students previously screened when enrolled in preschool, must be screened using the prescribed screening instrument for kindergarten.</u></p>	<p>A screening process conducted with an instrument designed for “screening” purposes should NOT be used to determine the student’s eligibility for any kind of specialized services. Eligibility for any instructional program other than the general education program should be conducted by a multi-disciplinary team that includes parents and professionals; it should be based on data gathered from a variety of sources, including assessment instruments that meet the technical adequacy requirements (standardization, reliability, and validity) for eligibility decision-making purposes. Additionally, the rights of parents and families to be engaged in the data-collection and decision-making process are significantly limited as proposed. Procedures to ensure that parents are informed about the assessment process, to ask questions about the process, to say that they don’t want their child tested, etc. are not described in the proposed rules and regulations</p>
	<p>2) A district <u>must</u> rely upon a student’s</p>	

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	<p>score attained on the prescribed screening instrument or on the <u>English language proficiency assessment instrument prescribed under Section 228.25(b) Section 228.25(c) of this Part, if either is available from another school district or another state, provided that the score was achieved no more than 12 months prior to the district’s need to assess the student’s proficiency in English for purposes of eligibility and placement.</u></p> <p><u>3) If results are not available pursuant to subsection (e)(2) of this Section, then a district must rely upon a student’s score on the prescribed screening instrument if available from another school district or another state for the purposes of eligibility and placement for students entering any of grades 1 through 12, if the student’s score on the prescribed screening instrument was achieved no more than 12 months prior to the district’s need to assess the student’s proficiency in English.</u></p> <p>4)2) Each student whose score on the prescribed screening instrument is identified as not “proficient” as defined by the State Superintendent of Education shall be considered to have limited English proficiency and therefore to be eligible for, and shall be placed into a program of, bilingual education services.</p> <p>A) For preschool programs using a procedure other than the Pre-IPT, “proficiency” is the point at which performance identifies a child as proficient in English, as set forth in the program’s proposed screening process submitted pursuant to Section 228.50(b)(4)(E) of this Part.</p> <p>f) Each district shall ensure that any</p>	<p>“Placing a child into a program of bilingual education services”, or any educational services should NEVER be done on the basis of one test score; it should not be done on the basis of a “screening” measure whose psychometric properties are not known or considered inadequate, and it should not be conducted without a proper substantive and procedural due process available to the family.</p> <p>In practice, some school district staff members would suggest that the Pre-IT score should be considered as the primary determinant of specialized</p>
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	<p>accommodations called for in the Individualized Education Programs of students with disabilities are afforded to those students in the administration of the screening instrument discussed in this Section and the <u>English</u> language proficiency assessment prescribed under Section <u>228.25(b)</u> 228.25(c) of this Part.</p>	<p>programming, completely ignoring information on adaptive behaviors, cognitive functioning levels, rate of learning, autism qualities, etc. In DEC’s RPs, the best decisions for children result from a team’s (parents and professional staff) examination of ALL available information and then matching the child’s learning profile to an individualized program</p>
<p>Section 228.25 Program Options, Placement, and Assessment</p>	<p>a) <u>Program Options and Placement</u> <u>1) When an attendance center has an enrollment of 20 or more limited English proficient students of the same language classification in kindergarten or any of grades 1 through 12, the school district must establish a transitional bilingual education (TBE) program</u> for each language classification represented by those students (Section 14C-3 of the School Code). A further assessment of those students to determine their specific programmatic needs or for placement in either a full-time or a part-time program may be conducted. b) <u>2) When an attendance center has an enrollment of 19 or fewer students of limited English proficiency of from any single non-English language classification other than English in kindergarten or any of grades 1 through 12, the school district shall conduct an individual student language assessment to determine each student’s need for native language instruction and may provide a transitional bilingual program in the non-English languages other than English common to these such students. If the district elects not to provide a transitional bilingual program, the district shall provide a</u></p>	<p>Given our concerns about the “screening” measure and the assessment process, it would NOT be appropriate for the state to mandate development of these kinds of programs for children. A guideline to suggest that program staff examine the aggregate language development needs of the students might be acceptable, once an acceptable assessment process is in place.</p>

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	<p>locally determined transitional program of instruction (TPI) for those students. (Section 14C-3 of the School Code.)</p> <p><u>3) When a preschool program of the school district has an enrollment of 20 or more students of limited English proficiency of any single language classification other than English in an attendance center or a non-school-based facility, the school district shall establish a TBE program for each language classification represented by the students. If the preschool program of an attendance center or non-school-based facility has 19 or fewer students of limited English proficiency of any single language classification other than English, then the school district shall meet the requirements of subsection (a)(2) of this Section when determining placement and the program to be provided.</u></p>	<p>School districts should be allowed to develop programs that meet the needs of the students as determined locally and that are responsive to the concerns and priorities of families.</p> <p>Are there scientifically-based data that support the effectiveness and efficiency of these kinds of program over other kinds of programs?</p>
<p>Section 228.35 Personnel Qualifications: Professional Development</p>	<p><u>a) Each individual assigned to provide instruction in a student's native language shall meet the requirements for bilingual education teachers as set forth in 23 Ill. Adm. Code 25 (Certification) and 23 Ill. Adm. Code 1 (Public Schools Evaluation, Recognition and Supervision), as applicable.</u></p> <p><u>b) Each individual assigned to provide instruction in ESL shall meet the requirements for ESL or English as a New Language teachers as set forth in 23 Ill. Adm. Code 25 (Certification) and 23 Ill. Adm. Code 1 (Public Schools Evaluation, Recognition and Supervision), as applicable.</u></p> <p><u>c) Preschool Programs</u></p> <p><u>1) Each individual assigned to provide instruction to students in a preschool program shall meet the requirements of</u></p>	<p>Many Early Childhood Programs, including ECBG and PFA programs, are blended with Early Childhood Special Education programs so that young children with disabilities can be educated with their typically developing peers. Many districts engage in this practice to meet the IDEA mandate of educating young children with disabilities in the Least Restrictive Environment (LRE). Early Childhood teachers who teach typically developing children and those who have disabilities must have a Type 04 early childhood certificate and an Early Childhood Special Education approval or certification. Given the current strain on state, federal, and local resource, we do not want</p>

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	<p><u>23 Ill. Adm. 235.20(c)(8)(A) (Early Childhood Block Grant).</u></p> <p><u>2) By July 1, 2014, each individual assigned to provide instruction to students in a preschool program also shall meet the applicable requirements of subsection (a) or (b) of this Section, depending on the assignment.</u></p> <p><u>3) Noncertificated staff employed to assist in instruction in a preschool program shall meet the requirements of 23 Ill. Adm. 235.20(c)(8)(B).</u></p> <p><u>d) Administrators</u> <u>Beginning July 1, 2008, each individual newly assigned to administer a program under this Part shall meet the applicable requirements of this subsection (d). Administrators first assigned on or before June 30, 2008, shall be subject to the applicable requirements of this subsection (d) as of July 1, 2010.</u></p> <p><u>1) Except as provided in subsections (d)(3) and (4) of this Section, any person designated to administer a TBE program must hold a valid administrative certificate or a supervisory endorsement issued on an initial or standard teaching certificate by the State Board of Education in accordance with applicable provisions of 23 Ill. Adm. Code 25 (Certification) and 23 Ill. Adm. Code 1 (Public Schools Evaluation, Recognition and Supervision) and must hold the bilingual approval or endorsement or the ENL endorsement with a language designation.</u></p> <p><u>2) Except as provided in subsections (d)(3) and (4) of this Section, any person designated to administer a TPI program must hold a valid administrative certificate or a supervisory endorsement issued on an</u></p>	<p>administrators to be forced to choose between teachers who have ECSE approval or certification and teachers with ELL or ESL endorsements.</p> <p>It is unrealistic for ALL preschool teachers to attain ELL certification within the proposed timeframe.</p> <p>It is not necessary for ALL preschool teacher assistants to be ELL certified. Are there scientifically-based data to indicate that EC teacher assistants with an ELL certification are better at meeting the needs of children who are English Language Learners than those who do not have it?</p> <p>It is an unnecessary burden to ask for preschool program administrators to also meet this requirement. Are there scientifically-based data to indicate that preschool program administrators with an ELL certification are better at meeting the needs of children who are English Language Learners than those who do not have it?</p> <p>It is an unnecessary burden to ask for preschool program administrators to also meet this</p>
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	<p><u>initial or standard teaching certificate by the State Board of Education in accordance with applicable provisions of 23 Ill. Adm. Code 25 and 1 and must hold the bilingual or ESL approval or endorsement or the ENL endorsement.</u></p> <p><u>3) A person designated to administer a TBE or TPI program in a district with fewer than 200 TBE/TPI students shall be exempt from all but the requirement for an administrative certificate or a supervisory endorsement issued on an initial or standard teaching certificate, provided that he or she annually completes a minimum of eight hours of professional development specifically designed to address the needs of students with limited English proficiency. An assurance that this requirement has been met shall be provided annually in a school district's application submitted pursuant to Section 228.50 of this Part. Documentation for this professional development activity shall be made available to a representative of the State Board of Education upon request.</u></p> <p><u>4) A person who has been assigned to administer a TPI program in a district that experiences such growth in the number of students eligible for bilingual education that a TBE program is required shall become subject to the requirements of subsection (d)(1) of this Section at the beginning of the fourth school year of the TBE program's operation. A person who has been assigned to administer a program under subsection (d)(3) of this Section in a district where the number of students eligible for bilingual education reaches 200 shall become subject to the requirements of subsection (d)(2) of this Section at the beginning of the</u></p>	<p>requirement.</p>
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	<p><u>fourth school year in which the eligible population equals or exceeds 200 or more students. That is, each individual may continue to serve for the first three school years on the credentials that qualified him or her to administer the program previously operated.</u></p>	
<p>PART 235 EARLY CHILDHOOD BLOCK GRANT</p>	<p>8) A description of the full-time and part-time professional and nonprofessional staff to be paid by the program, indicating that program administrators, early childhood teachers, counselors, psychologists, psychiatrists and social workers are appropriately qualified.</p> <p>A) Teachers of children ages 3 to 5 years must hold an initial, initial alternative, standard, master, provisional, provisional alternative, resident teacher, or visiting international teacher early childhood certificate. (See Section 2-3.71(a)(3) of the School Code and 23 Ill. Adm. Code 1.Appendix A.)</p> <p>B) By July 1, 2014, noncertificated staff employed to assist in instruction provided to children ages 3 to 5 years shall meet the requirements set forth in 23 Ill. Adm. Code 25.510(c).</p> <p>C) <u>Teachers of children ages 3 to 5 years who are assigned to a transitional bilingual program or a transitional program of instruction that is administered by a school district, either in an attendance center or a non-school-based facility, shall meet the requirements as set forth in 23 Ill. Adm.</u></p>	<p>Many Early Childhood programs, including the state of Illinois Early Childhood Block Grant and Preschool for All programs,, are blended with Early Childhood Special Education (ECSE) programs so that young children with disabilities can be educated with their typically developing peers. Many districts engage in this practice to meet the IDEA mandate of educating young children with disabilities in the Least Restrictive Environment (LRE). Early Childhood teachers who teach typically developing children and those who have disabilities are required by law to have a Type 04 certificate and an Early Childhood Special Education approval or early childhood special education certification. Given the current strain on state, federal, and local resource, we do not want administrators to be forced to choose between teachers who have ECSE approval or certification and teachers with ELL or ESL endorsements.</p> <p>It is not necessary for ALL preschool teacher assistants to be ELL certified. Are there scientifically-based data to indicate that EC teacher assistants with an ELL certification are better at</p>

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		<p>meeting the needs of children who are English Language Learners than those who do not have it?</p> <p>It is unrealistic for ALL preschool teachers to attain ELL certification within the proposed timeframe.</p>
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Thank you very much for your kind consideration of our comments.

Letter is submitted electronically, so it is not signed in this version. A signed version is available.

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