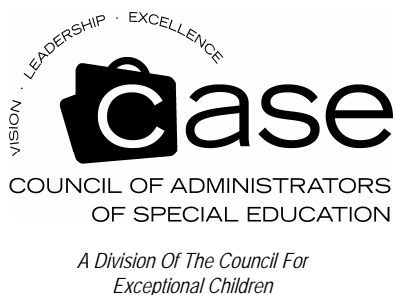


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August 3, 2017

Joe Conaty
Delegated the functions and duties of the Deputy Secretary
Co-Chair, Agency Reform Taskforce
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Mr. Conaty:

The Council of Administrators of Special Education (CASE) appreciates the leadership of the U.S. Department of Education (USDOE) in ensuring a quality education for all children. CASE enjoys a collaborative, productive relationship particularly with the Office of Special Education and Rehabilitative Services (OSERS) and the Office of Special Education Programs (OSEP). For these reasons, we offer this response to the request for feedback regarding potential reorganization of the USDOE.

Given the importance of and reliance on the critical work of OSERS and OSEP, CASE supports maintaining both offices and funding both at the current or higher levels within the current USDOE structure. The leadership provided by these offices is critical to the implementation of the complex Individuals with Disabilities Education Act (IDEA) and accompanying regulations. Technical assistance, Dear Colleague letters, policy guidance and many other supports provided by the USDOE are essential components of consistent implementation of the law providing services for students with disabilities across the nation.

While we understand the need to discuss efficiencies, effectiveness is of utmost importance in these discussions. Reduction of staff, decreased funding and lower levels of oversight of IDEA implementation will have an unintended negative impact on the ability of special education leaders to improve student outcomes. CASE believes the Department must maintain its traditional strong role in supporting IDEA implementation, and any Department reorganization must only serve to enhance rather than decrease technical assistance and guidance from OSERS and OSEP.

Any USDOE plans now and the in the future should continue the strong focus on improving student outcomes, especially for the ESSA subgroups, including students with disabilities. In order to accomplish this, the Department must also continue providing ongoing clear guidance on issues arising in general and special education and being responsive and accessible to stakeholders tasked with implementing federal education laws.

In addition to our comments regarding maintaining OSEP and OSERS, CASE also believes the Department must enhance supports to general and special education stakeholders to ensure quality implementation of ESSA and other federal education laws and regulations. Students who are eligible



Council of
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The voice and vision of special education

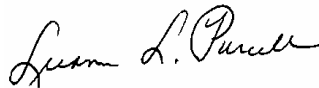
for special education are general education students first. Any decrease in support, technical assistance and guidance to local school districts may negatively impact the progress we have made in outcomes for students covered under IDEA.

Thank you for the opportunity to provide input regarding the reorganization of the USDOE. As special education administrators, CASE members look forward to receiving continued high quality support from the USDOE and a strong collaboration to reach the goal of realizing success for all students with disabilities.

Sincerely,



Gary Myrah
President



Dr. Luann L. Purcell
Executive Director