



Equity, Opportunity, and Inclusion for People with Disabilities since 1975

February 16, 2017

Ruth Ryder, Acting Director
Office of Special Education Programs
Office of Special Education and Rehabilitative Services
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202-7100

Dear Ms. Ryder:

We are writing to express our deep concern with the announcement from OSEP in the January 3, 2017 Federal Register regarding personnel preparation grants. For many years, the personnel preparation funds under CFDA #84.325K have been designated for personnel preparation for students with “low incidence disabilities.” Low incidence disabilities included dual sensory disabilities, severe intellectual disabilities, multiple disabilities, and other complex sensory, cognitive, and developmental disabilities. These personnel preparation grants have provided important funding for an area of special education that has serious shortages of qualified personnel.

In January, the notice that appeared has an absolute priority which reads as follows:

“Absolute Priority: For FY 2017 and any subsequent year in which we make awards from the list of unfunded applications from this competition, this priority is an absolute priority. Under 34 CFR 75.105(c)(3), we consider only applications that meet this priority. This priority is: Interdisciplinary Preparation in Special Education, Early Intervention, and Related Services for Personnel Serving Children with Disabilities Who Have High-Intensity Needs.”

While we highly support the emphasis on “interdisciplinary preparation programs,” our concern is with the definition of children with disabilities who have “high-intensity needs.” In the research literature, “highly intensity needs” means children or adults who have the most significant intellectual and/or multiple disabilities, individuals who may always need intensive levels of support (Brown, McDonnell & Snell, 2016; Orelove, Sobsey, & Gilles, 2016; Westling & Fox, 2009).

The definition proposed by OSEP in the Federal Register on page 96, placed in a footnote at the bottom of the page, is quite different and represents a highly significant change. The definition reads as follows:

“For the purposes of this priority, ‘high-intensity needs’ refers to a complex array of disabilities (e.g., multiple disabilities, significant cognitive disabilities, significant physical disabilities, significant sensory disabilities, significant autism, significant emotional disabilities, significant learning disabilities (including dyslexia) or needs of children with these disabilities requiring intensive, individualized intervention(s) (i.e., that are specifically designed to address persistent learning or behavior difficulties, implemented with greater frequency and for an extended duration than is commonly available in a typical classroom or early intervention setting, or which requires personnel to have knowledge and skills

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in identifying and implementing multiple interventions supported by evidence.”

We will try to briefly outline our concerns below.

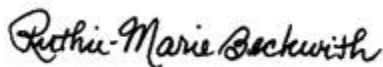
By including learning disabilities, dyslexia, emotional disabilities, and physical disabilities (by itself), the term “high-intensity needs” becomes so broadened that teacher preparation programs of all kinds, especially those that focus on high incidence disabilities, will be able to apply for funding under this category. This will reduce the amount of funding for children and youth with low incidence disabilities immensely. We are not arguing that high incidence disability teacher preparation programs should not also receive funding. We are arguing that there should be 2 categories of funding with money appropriated for both. By lumping all disabilities in to one funding priority, the high incidence programs will naturally have more applications and funding for personnel preparation in low incidence will be significantly reduced.

The progress that has been made in our field has been enormous and many of the evidenced-based practices which have been developed by researchers and teachers in low incidence fields have been adopted by experts in high incidence fields (e.g. positive behavioral interventions and supports; systematic, data-based instruction; augmentative and alternative communication). Whereas, research and teacher training in high incidence fields rarely includes children with low incidence disabilities. Over the last decade, most of the research dollars have been shifted to the Institute of Education Sciences, which rarely funds projects focused on children/youth with low incidence disabilities. This step by OSEP is yet another blow to funding which focuses on this population. This will increase teacher shortages, and decrease quality of service delivery. Given OSEP’s emphasis on college and career readiness, this change in policy and definition seems to go drastically against these goals.

Our second concern in the wording of the definition is the use of the following:“specifically designed to address persistent learning or behavior difficulties, implemented with greater frequency and for an extended duration than is commonly available in a typical classroom or early intervention setting,” This wording seems to suggest that there are children who cannot be included in general education settings and invites teacher preparation programs that do not stress integrated service delivery models to apply. We know from the research literature that children with intensive instructional needs can be educated alongside their typical peers and still receive the intensive supports/instruction they need (Browder & Spooner, 2014; McDonnell & Hunt, 2014; Ryndak, Jackson, & White, 2013).

On behalf of the TASH membership, we urge you to reconsider this definition, and would appreciate the opportunity to dialogue with you about these significant changes in the personnel preparation funding policies.

Sincerely,



Ruthie-Marie Beckwith, PhD
Executive Director

References

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