



Michigan Chapter
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March 7, 2011

Board of Directors

Michigan Department of Education
Special Education and Early Intervention Services
P.O. Box 30008
Lansing, Mi.

Shon Halacka
President

Dan Seraphinoff
Vice-President &
Website Administrator

Re: Proposed Amendments to the Michigan Special Education Rules –
Comments

Stacy Haag
Treasurer

Dear Person:

Julie Steele
Secretary

The Michigan Chapter of the Alexander Graham Bell Association for the Deaf and Hard of Hearing (Michigan A.G. Bell) is a Michigan nonprofit corporation with section 501(c)(3) status as a charitable organization. Our membership is composed of parents of children who are deaf and hard of hearing, educators of the deaf and hearing impaired, and adults with hearing loss.

Teresa Sundberg

Becky Selenko

Yaju Loomis

The following are the Comments of the Michigan A.G. Bell to the proposed amendments to the Michigan Special Education Rules.

Huma Soofi

Heather Van De Steene
Summer Camp Program
Co-Chairs:
Heather Van De Steene
Sidney Kraizman
Mark Reeve

R340.1721e (1) (a) Individualized Education Program (IEP). The Michigan A.G. Bell **object to the proposed striking of paragraph 21e (1) (a) requiring that the IEP contain: "a statement of the student's present level of academic achievement and functional performance."**

Early Hearing Detection &
Intervention Chairmen
Sidney Kraizman
Mark Reeve

Comment: The Michigan A.G. Bell strongly opposes the proposed striking of this paragraph. It is essential that parents of deaf and hard of hearing children have this information as to their child's present level of academic achievement and functional performance in the IEP so the parents can see whether their child has made sufficient progress in the last school year and advocate for special education programs and services that meet their child's needs.

Newsletter Editor
Dee Rigg

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The Michigan A.G. Bell strongly opposes the striking out of R340.1721e (4) "the individualized education program team shall determine whether the student has a need for placement with a special education teacher who is endorsed in a particular disability category."

Comment: The Michigan A.G. Bell strongly opposes the proposal striking this paragraph. This rule provision is essential so that children with hearing loss who live in rural areas will be provided with a Free Appropriate Public Education by being placed in a classroom program for the hearing impaired or provided with the services of a teacher consultant for the hearing impaired. I was the representative for the Michigan A.G. Bell, and we originally sought this rule in the 1980s after receiving a number of complaints from both teachers of the hearing impaired and parents that students with hearing loss in rural areas were not being placed in classroom programs for the hearing impaired and were not receiving the services of a teacher consultant for the hearing impaired, but that they needed these services in order to receive a Free Appropriate Public Education (FAPE). In seeking this rule in the 1980s, the Michigan A.G. Bell was joined by other organizations advocating for children with disabilities. We have heard from teachers in the field in rural areas that this rule has been positively effective in getting children with hearing loss the services that they needed by placement in a classroom program for the hearing impaired or the services of a teacher consultant endorsed in the deaf and hard of hearing.

R340.1748 (A) Teacher Consultant with Evaluation and Consultation Assignment; Responsibilities.

Comment: The Michigan A.G. Bell strongly opposes this proposed new rule. In an effort to save money, some school districts are currently assigning teacher consultants for the hearing impaired to do consultations and evaluations of huge numbers of students. If there is going to be a special category of teacher consultants with evaluation and consultation assignment only, then the Michigan Department of Education should set a maximum number of students that they can serve and that takes into account the time necessary for evaluation, consultation with special and general education personnel, and report writing, just as in done with teacher consultants providing instructional services, evaluation, and consultation services under R340.1749. We also take the position that Teacher Consultant Services are critically important for the overall success of children with hearing loss in the general education classroom. Eliminating the direct instructional service from the teacher consultant for the deaf and hard of hearing would undermine the progress made by many children with hearing loss in the general education setting.

R340.1799c Teachers of Students who are deaf and hard of hearing: special requirements.

Comment: The Michigan A.G. Bell strongly disagrees with a substantial part of the proposed amendment to this rule governing the teacher education program for teachers of students who are deaf and hard of hearing in our Michigan universities, which are at Eastern Michigan University and Michigan State University.

The proposed amendment at R340.1799c (1) would unreasonably strike out:

“(e) knowledge of the anatomy, physiology, and pathology of the organs of speech and hearing.

“(f) knowledge of audiological assessment information, and its application to the individualized education program of a student with a hearing impairment.

“(g) knowledge of personal and group amplification systems, including their basic maintenance.

“(h) ability to incorporate and teach appropriate procedure to maximize the use of speech, speech reading, and auditory skills.”

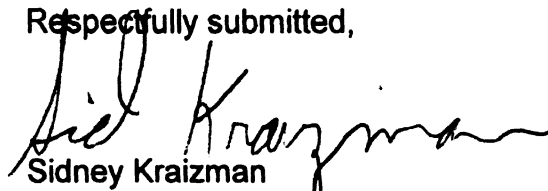
This proposal would represent the triumph of ignorance over knowledge. Teachers of the deaf and hard of hearing need to have an understanding of the hearing impairment, audiology, the use of hearing aids and cochlear implants, the monitoring of these devices to determine whether they are functioning correctly, FM units, speech reading, and auditory verbal therapy, and knowledge of skills to develop speech and language.

It should be noted that knowledge of Deaf culture and American Sign Language (ASL), referred to as “sign language indigenous to the deaf community” are included a number of times in the new proposed rule.

In the proposed rule under instructional strategies for students who are deaf and hard of hearing there are listed a number of specific strategies, but there is a gross failure to include developing proficiency in auditory verbal therapy. The proposed rule includes understanding the use of interpreters, but not real time reporting (CART), C-Print and Typewell.

Additionally, there is a major failure to include training for future teachers of the deaf and hard of hearing in teaching parents how to teach their own children with hearing loss. The parents are equally as important as the educators in developing the language, whether spoken or signed, of children who are deaf and hard of hearing.

Respectfully submitted,



Sidney Kraizman
Attorney & Advocate for the Michigan A.G. Bell



Shon Halacka
President of the Michigan A.G. Bell