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December 21, 2020

President-Elect Joseph Biden
Vice President-Elect Kamala Harris
Attn: Biden Harris Education Agency Review Team
Washington, DC

Dear President-Elect Biden and Vice President-Elect Harris:

We wish you hearty congratulations on your election victory! We are looking forward to working with you and your Administration to improve education for our nation's deaf and hard of hearing students, as well as all students.

The Conference of Educational Administrators of Schools and Programs for the Deaf (CEASD) is a national organization of schools for the deaf. Comprising public, private, and charter schools, our members serve students birth-21 and their families directly and through outreach programs and partnerships.

CEASD mission: CEASD supports and promotes effective school leadership to advance education programs for deaf and hard of hearing children.

CEASD vision: Deaf children will thrive!

We thank you for your inclusion of deaf and hard of hearing children in the [Biden Plan for Full Participation and Equality for People with Disabilities](#). We are pleased with the commitments made in your document. In this letter we note our support, comments, recommendations, and commitment to working with your Administration to bring your commitments to fruition.

Biden Plan: “Ensure that students with disabilities have access to educational programs and support they need to succeed.”

Comment and Recommendations: We heartily agree. In this context we urge the Biden Administration to ensure that, as mandated by the Individuals with Disabilities Education Act (IDEA), public agencies provide the “continuum of alternative placements,” which requires instruction to be available in “regular classes, special classes, [and] special schools . . .”¹ As

¹ 34 C.F.R. § 300.115 Continuum of alternative placements.

(a) Each public agency must ensure that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.

Deaf children will thrive!

noted elsewhere in the Biden Plan, deaf and hard of hearing students require access to a “language rich environment.” The Department should publicly recognize that schools for the deaf are uniquely positioned to provide this environment for deaf and hard of hearing students.

To take a more comprehensive approach, the Administration should actively promote the Alice Cogswell and Anne Sullivan Macy Act, which is expected to be reintroduced in the 117th Congress. (It was known as S. 2681, H.R. 4822 in the 116th Congress). That bill would amend IDEA to ensure that deaf, blind, and deafblind students receive the specialized supports and services necessary to help them succeed.

CEASD pledges to work with the Biden Administration to ensure that access to all appropriate programs and support is available.

Biden Plan: “Invest in our children at birth.”

“ . . . [President-Elect Biden] will work to ensure “continuous language learning support services” are covered under insurance for Deaf and Hard of Hearing Children and their caregivers.”

Comment: Age appropriate language acquisition is the foundation for cognitive, social-emotional, and academic growth for all children. Deaf and hard of hearing children are vulnerable to language delays because spoken language is not fully accessible to them.² The vast majority of deaf³ children are born to hearing parents.⁴ For most of these parents their deaf child is the first deaf person they have ever met. Most hearing parents have little or no exposure to individuals who are deaf and are not familiar with the ways in which deaf children acquire language. However, maternal communication skill is a significant indicator for language development, early reading skills, and social-emotional development.⁵ Therefore, the need for training and support - both for children to acquire language and also for parents to be able to provide adequate language opportunities for their child - cannot be overstated. Services to this effect must be available and paid for.

CEASD pledges to work with the Administration to achieve this goal of insurance coverage.

Biden Plan: “Expand access to high-quality early childhood supports and education.”

“For example, language deprivation for children who are Deaf or Hard of Hearing in the early years of life can have lasting impact on a child’s language and cognitive skills. Biden will provide parents, health care providers, and early childhood professionals the resources needed to support these children, including access to Augmentative and Alternative Communication (AAC) and language-rich environments, and work with the community to develop development milestones. He will ensure that early intervention professionals provide equitable resources to support language learning to parents of children aged 0-5.”

(b) The continuum required in paragraph (a) of this section must—

(1) Include the alternative placements listed in the definition of special education under § 300.38 (instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions); and (2) Make provision for supplementary services (such as resource room or itinerant instruction) to be provided in conjunction with regular class placement.

² Humphries, T. Kushalnagar, P. *et al.*. Language acquisition for deaf children: Reducing the harms of zero tolerance to the use of alternative approaches. *Harm Reduct. J.* 2012, 9: 16. doi: [10.1186/1477-7517-9-16](https://doi.org/10.1186/1477-7517-9-16)

³ The term “deaf” includes both deaf and hard of hearing.

⁴ Mitchell, R.E.; Karchmer, M.A. Chasing the mythical ten percent: Parental hearing status of deaf and hard of hearing students in the United States. *Sign Lang. Stud.* 2004, 5, 83–96.

⁵ Calderon, R. Parental Involvement in Deaf Children’s Education Programs as a Predictor of Child’s Language, Early Reading, and Social-Emotional Development. *J Deaf Stud Deaf Educ.* February 2000, 5(2):140-155. doi: [10.1093/deafed/5.2.140](https://doi.org/10.1093/deafed/5.2.140)

Comment: As previously mentioned, age appropriate language acquisition is necessary for children’s cognitive, social-emotional, and academic growth.

CEASD pledges to work with the Administration to document best practices in preventing language deprivation in deaf children and identifying the components of “language-rich environments.”

Comment: Eleven states⁶ recognize the importance of identifying language and developmental milestones in order to help deaf children succeed.⁷

CEASD pledges to work with the Administration to bring forth “lessons learned” from these states so that they may serve as a basis of action at the Federal level.

Comment: Research shows that the deaf children who do best in language development are the ones whose families receive early intervention services from specialized providers.⁸ However, early interventionists typically do not have the specialized skills needed,⁹ and shortages of teachers in deaf education exist nationwide.¹⁰

CEASD pledges to work with the Administration to identify and promote early intervention programs that are specialized to support deaf and hard of hearing children and their families, and to promote specialized parent counseling and training services¹¹ under Part B of IDEA.

Biden Plan: “Fulfill IDEA’s promise of free appropriate public education in the least restrictive environment for students with disabilities.”

“Biden will fully fund and enforce IDEA and triple Title I funding to increase resources available to educators to meet the needs of students with disabilities. Biden will ensure that schools provide students with disabilities appropriate support, including sign language interpreters, readers, door-to-door transportation, computer-assisted devices, augmentative and alternative communication, as well as braille materials. He will also increase funding for Parent Training Centers.”

Comment: Funding is absolutely critical to these efforts. CEASD has been a long-time member of the Committee for Education Funding, a coalition of more than 100 national organizations, which advocates for increased Federal education spending. CEASD has also supported IDEA full-funding bills.

⁶ California, Georgia, Hawaii, Indiana, Kansas, Louisiana, Maine, New Jersey, Oregon, South Dakota, and Texas.

⁷ Texas Deaf/Hard of Hearing Services. Language Acquisition Bills and Deaf Child Bill of Rights.

<https://www.livebinders.com/play/play?id=2106355>

⁸ Yoshinaga-Itano C. From screening to early identification and intervention: discovering predictors to successful outcomes for children with significant hearing loss. *J Deaf Stud Deaf Educ.* 2003;8(1):11–30

⁹ Sass-Lehrer, M. Early Intervention for Children Birth to 3: Families, Communities, & Communication. In NCHAM E-Book: A Resource Guide for Hearing Detection & Intervention. http://infanthearing.org/ehdi-ebook/2020_ebook/18%20Chapter18EarlyIntervention2020.pdf

¹⁰ U.S. Department of Education Office of Postsecondary Education. Teacher Shortage Areas Nationwide Listing 1990–1991 through 2017–2018. June 2017.

<https://www2.ed.gov/about/offices/list/oep/pol/ateachershortageareasreport2017-18.pdf>

¹¹ 34 C.F.R. § 300(8)(i) *Parent counseling and training* means assisting parents in understanding the special needs of their child;

(ii) Providing parents with information about child development; and

(iii) Helping parents to acquire the necessary skills that will allow them to support the implementation of their child’s IEP or IFSP.

CEASD pledges to continue to support efforts to fully fund IDEA and related programs.

Comment and Recommendation: A free appropriate public education (FAPE) in the least restrictive environment (LRE) is a core tenet of IDEA. CEASD emphasizes that FAPE determinations must be made on an individualized basis and that LRE is determined only after the student is evaluated, academic and functional needs are documented, and appropriate services are identified. For deaf and hard of hearing children, provision of FAPE must address the “special factors” outlined in IDEA.¹² The Department of Education’s long-time position makes clear: “Any setting that does not meet the communication and related needs of a child who is deaf does not allow for the provision of FAPE and cannot be the LRE for that child. Just as the IDEA requires placement in the regular education setting when it is appropriate for the unique needs of a child who is deaf, it also requires placement outside the regular education setting when the child’s needs cannot be met in that setting.”^{13 14 15}

To carry out these placement requirements, CEASD requests that the Department re-issue policy guidance on FAPE in the LRE for deaf and hard of hearing students.

Biden Plan: “Ensure educators and schools have the resources to educate students with disabilities.

“Biden will support efforts to recruit and retain special education teachers, including diverse special education teachers.”

Comment and Recommendation: It is important to recognize that other types of teachers, such as teachers of the deaf, are included in the category of special education teacher. However, teachers of the deaf often are overlooked in these discussions.

There is a severe shortage of teachers of the deaf. The number of deaf education teacher graduates has shrunk from a high of 1,680 in 1982 to a predicted number of around 600 for the current year.¹⁶ This is so even as the percentage of Individuals with Disabilities Education Act students eligible for services in the “hearing impairment” category¹⁷ has remained static at around 1.1 to 1.3 percent of the special education population.¹⁸

¹² 34 C.F.R. § 300.324 Development, review, and revision of IEP.

(a) Development of IEP—

...

(2) Consideration of special factors. The IEP Team must-

...

(iv) Consider the communication needs of the child, and in the case of a child who is deaf or hard of hearing, consider the child’s language and communication needs, opportunities for direct communications with peers and professional personnel in the child’s language and communication mode, academic level, and full range of needs, including opportunities for direct instruction in the child’s language and communication mode;

¹³ U.S. Department of Education. (1992). Deaf Students Education Services; Policy Guidance. 57 Fed. Reg. 49274. <https://www2.ed.gov/about/offices/list/ocr/docs/hq9806.html>

¹⁴ U.S. Department of Education, Office of Special Education Programs, Letter to Bosso, August 23, 2010. <https://www2.ed.gov/policy/speced/guid/idea/letters/2010-3/bosso082310lre3q2010.pdf>

¹⁵ U.S. Department of Education, Office of Special Education Programs, Letter to Stern, September 30, 2011. <https://www2.ed.gov/policy/speced/guid/idea/letters/2011-3/stern093011lre3q2011.pdf>

¹⁶ Luft, P. Addressing Challenges to the Pool of IDEA-qualified Teachers of Deaf and Hard-of-Hearing Students. <https://www.ceasd.org/wp-content/uploads/2020/03/Shortages.pdf>

¹⁷ 34 C.F.R. §300.8.

¹⁸ Luft, Footnote 16.

IDEA authorizes funding specifically to prepare personnel to serve students with “low incidence” disabilities,¹⁹ such as a “hearing impairment.”²⁰ However, Department of Education interpretation of these provisions has resulted in exclusion of many university programs from eligibility. Our concerns are validated by the House Committee on Appropriations, which in 2019 stated “The Committee is concerned about a shortage of teachers of deaf students and urges the Department to consider revisiting policy changes it has made in recent years which may have exacerbated this problem”.²¹

The lack of sufficiently trained personnel influences not only language and education measures at the younger ages, but also at the postsecondary level. A center that specializes in studying achievement in deaf adults found that the root causes of gaps in postsecondary outcomes are:

- limited access to language and communication
- reduced social opportunities
- negative attitudes and biases
- lack of qualified and experienced professionals.²²

The Administration should review recent Department interpretations and practices to ensure it is training and developing a workforce that will meet the needs of deaf and hard of hearing students. It should assess the need for teachers of the deaf as well as the number of teachers being prepared, and, in collaboration with the field of deaf education, seek viable solutions.

CEASD pledges to work with the Administration to increase the number of teachers of the deaf available nationwide.

Biden Plan: “Support postsecondary education for students with disabilities.”

Comment and Recommendation: Two distinguished institutions exist for deaf postsecondary students: Gallaudet University (Gallaudet), which includes the Laurent Clerc National Deaf Education Center, and Rochester Institute of Technology/National Technical Institute for the Deaf (RIT/NTID). There are two issues we would like to share regarding these schools: access and funding.

It is said that “Access is more than accommodations.”²³ Access is influenced by the attitudes of decision makers on campus, types of technology available, effectiveness of communication, educational environment, services available, and opportunities for seamless social engagement. When considering these factors, most colleges and universities do not measure up. In fact, a

¹⁹ 20 U.S.C. § 662(c).

²⁰ 20 U.S.C. § 662(c)(3).

²¹ Committee on Appropriations, Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Bill, 2019, Report 115-862 <https://www.govinfo.gov/content/pkg/CRPT-115hrpt862/html/CRPT-115hrpt862.htm>

²² National Deaf Center on Postsecondary Outcomes. (2018). Root Causes of Gaps in Postsecondary Outcomes of Deaf Individuals. <https://www.nationaldeafcenter.org/resource/root-causes-gaps-postsecondary-outcomes-deaf-individuals>

²³ Palmer, J. L., Cawthon, S. W., Garberoglio, C. L., & Ivanko, T. (2019). *ACCESS is more than accommodations: 2018–2019 deaf college student national accessibility report*. National Deaf Center on Postsecondary Outcomes, The University of Texas at Austin. https://www.nationaldeafcenter.org/sites/default/files/POD_Report_WEB.pdf

recent study found that deaf students (not attending Gallaudet or RIT/NTID) did not provide favorable ratings of accessibility of their postsecondary education environments.²⁴

On the other hand, Gallaudet and RIT/NTID embrace deaf and hard of hearing students. They are familiar with - and provide - innovative technology. They provide full and direct communication to their students. They are designed to be accessible from the start. School leaders, mentors, and students are deaf and create a community where there are no barriers. Students participate in all activities seamlessly.

The experiences these schools offer are unique. Despite this, some Vocational Rehabilitation (VR) agencies are reluctant to support students to attend Gallaudet or RIT/NTID. Instead, students are steered toward community colleges or other colleges in their state which do not provide the same level of access. This limits opportunities for deaf students for a full educational experience. The Administration should review policies that hinder support to deaf students who want to attend Gallaudet or RIT/NTID.

CEASD pledges to work with the Administration to ensure that deaf and hard of hearing students are able to access Gallaudet University and Rochester Institute of Technology/National Technical Institute for the Deaf with VR support.

Comment and Recommendation: In addition, CEASD urges the Administration to fund these entities at the highest level possible. While they fill a unique role for the students who attend their campus, their influence extends well beyond. They also offer a number of outreach, training, and professional development programs to support deaf and hard of hearing students of all ages, throughout the country. These schools are a bedrock of deaf education in the United States and should be supported as such.

CEASD pledges to work with the Administration to protect and increase funding for these universities.

See summary of CEASD Recommendations and Pledges on next page, and our closing with [“Brown Girl, Brown Girl”](#) in American Sign Language.

²⁴ *Ibid.*

Summary of CEASD Recommendations:

CEASD respectfully requests Department to:

- In keeping with IDEA, ensure that public agencies provide the “continuum of alternative placements.”
- Publicly recognize that schools for the deaf are uniquely positioned to provide a “language rich environment” for deaf and hard of hearing students.
- Promote the Alice Cogswell and Anne Sullivan Macy Act.
- Re-issue policy guidance on FAPE in the LRE for deaf and hard of hearing students.
- Review recent Department interpretations and practices to ensure it is effectively training and developing a workforce that will meet the needs of deaf and hard of hearing students.
- Review policies that hinder support to deaf students who want to attend Gallaudet or RIT/NTID.

Summary of CEASD Pledges:

CEASD pledges to work with the Biden Administration to:

- Ensure that access to all appropriate programs and support is available.
- Achieve the goal of insurance coverage for “continuous language learning support services.”
- Document best practices in preventing language deprivation in deaf children and identifying the components of “language-rich environments.”
- Bring forth “lessons learned” from states that collect data on deaf students’ developmental milestones so that they may serve as a basis of action at the Federal level.
- Identify and promote early intervention programs that are specialized to support deaf and hard of hearing children and their families, and to promote specialized parent counseling and training services under Part B of IDEA.
- Continue to support efforts to fully fund IDEA and related programs.
- Increase the number of teachers of the deaf.
- Ensure that deaf and hard of hearing students are able to access Gallaudet and RIT/NTID with VR support.
- Protect and increase funding for Gallaudet and RIT/NTID.

In closing I would like to share the American Sign Language poem “[Brown Girl, Brown Girl](#)” performed by a Texas School for the Deaf 4th grade student in honor of Vice President-Elect Harris.²⁵



Thank you for your consideration. We look forward to the years ahead.

Very truly yours,

A handwritten signature in black ink that reads "Barbara Raimondo".

Barbara Raimondo
Executive Director

²⁵ <https://youtu.be/GAXCcdCViWg> and <https://www.goodmorningamerica.com/living/story/brown-girl-brown-girl-poem-celebrates-kamala-harris-74154696>