

Public Comment received through email to Linda Turner between 3/20/14 to 3/21/14. The emails were either sent directly to Linda Turner or a compilation of comments submitted on behalf of CASE members through President Elect Valerie Johnson.

Proponents:

I've always thought of it as OR (thinking that was how we qualified mild autism/Asperger students. With AND it would take much more to gather the data necessary to qualify students who have low scores and would need the pragmatic part to qualify. I think if AND were put in place we would have fewer students qualify.

Speech Therapist  
Name withheld

Opponents:

My concern about the eligibility criteria proposed change for language disability is that there has not been input/discussion from a variety of stakeholders (your earlier e-mail stated "through monitoring and through feedback for speech language therapists") and there has not been any discussion or study of the impact of this change from a variety of perspectives.

**Deb Muilenburg-Wilson**  
**Special Services Director**  
**Sioux Falls School District**

Wagner determines eligibility as written using both criteria #1 and #2. We do not find students eligible based on 'or'. After talking with speech/language therapists, they are not in favor of rule language changing without a study group.

Missy Slaba  
Wagner Community School  
Special Education Coordinator

I contacted our twelve SLPs and all are not in favor of the change. Aberdeen District functions under the written language and uses prong #1 and #2.

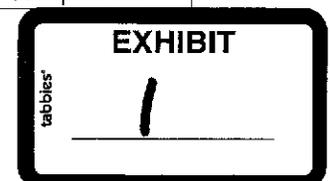
Camille Kaul  
Special Education Director  
Aberdeen School District

(submitted by CASE)

Brandon Valley is applying the criteria as it's written meaning both criteria #1 and #2 need to be met. I believe the proposed change to the word or has the potential to increase the number of students eligible for a language disorder so I think this needs to be studied before changing the criteria.

(Submitted directly to Linda Turner)

I have a concern regarding the proposed change in ARSD 24:05:24:01:28 Criteria for language disorder. I believe this proposed change would potentially identify more students eligible for a language disorder which would have a fiscal impact for districts. I think the proposed change of basing the identification on checklists, language samples or observation, is too subjective and could result in many interpretations. Currently, we assess student's pragmatic skills with standardized measures and they need to meet the - 1.5 standard deviation before being eligible. We use checklists, observation, and language samples as



our skills-based assessments.

I would like to see a workgroup convened to study this issue before changing this proposed criteria.

Lyn Heidenson  
Dir. of Special Services  
Brandon Valley School District

Brookings is not functioning with the idea of "or" - we expect both pieces to be present for a language disability.

If it is a related service, we do not apply this criteria.

**Michelle Powers** Ed.S.  
Director of Special Education  
Brookings School District

I was on the Eligibility Criteria review 'task force' around 2006 (it was in process for quite a while) when criteria was reviewed, discussed, etc. by a broad-based group of stakeholders. This language was in place prior to that process. During that task force process I recall Ann Larson discussing that an "impact study" would be completed with any criteria changes and I remember completing that impact study at the District level as a result of that. My concern is that there has not been a process to gather information from a variety of sources/perspectives and study of what the impact of this is at the State and local level. I agree with your statement Val there could be an impact and I believe that can be from a variety of perspectives; given how this rule change process is happening I do not believe we know all of the impacts right now and my thought it is should be studied prior to any changes.

Name withheld

Hi, I checked with the speech/path in our district who is at the top of her game and I totally trust what she tells me. These are her points on the language change:

- 1) Could mean an increase in caseload.
- 2) As is currently it is difficult to qualify for social communication (pragmatic)
- 3) Change will allow team to qualify kids who have no related service option but are "odd ducks" in terms of communicating with peers and developing positive social relationships.
- 4) Good therapist should evaluate language with a standardized test before just qualifying as a social language student.
- 5) Technically if the wording is changed a therapist could do a checklist with a language sample ... and qualify. Not best practice.

My two cents worth. I can see a real positive for kids and I think it can increase caseloads but it is the right thing to do for some kids.

Not at all fond of the way this is being done and may set a pattern for the future. Thanks.  
Dennis Champ

There are concerns on my part that this sort of language now opens up the criteria for almost ANYONE. I see caseloads going up.

Name Withheld

I just spoke with our SLP and she is opposed to the language change because makes the eligibility too broad, not well defined.

Kathleen Schmeichel, M.Ed.

The way this reads, I don't think the and/or are the only changes. Here's how it reads on the eligibility document

**Language Disorder:**

- Through age 8, performance falls 1.5 standard deviations below the mean on standardized evaluations;
- Beginning at age 9, a difference of 1.5 standard deviations between performance on a individually administered language assessment instrument and measured expected potential as measured by an individually administered intelligence test; and
- The student's pragmatic skill, as measured by checklists, language samples and/or observation, adversely affects the student's academic and social interactions

So it looks to me that they are taking out the criteria for at age 9 as well. Am I right on that??? If that is the case you would qualify more kids after age 9 that maybe don't exhibit a clear cut lang disorder and may be qualifying because of more cognitive issues, behavior, or etc...But that isn't saying they don't need the service or that it couldn't also be addressed by SPED personnel or goals.

It may not be a huge issue since the decision to qualify is a team decision anyway. More kids are going to qualify which I don't necessarily agree with that part of it. I do question WHY the change???? Then maybe I would understand it better!!!

Speech Therapist

Name Withheld