

**Comments of the American Society for Deaf Children  
to the United States Department of Education  
on Its Proposed Comprehensive Plan for Part D**

The American Society for Deaf Children (ASDC) comments on the Department's proposed comprehensive plan for Part D (71 Fed. Reg. 68697-68706, November 27, 2006). ASDC ([www.deafchildren.org](http://www.deafchildren.org)) is a parent organization that supports and educates families of deaf and hard of hearing children and advocates for high quality programs and services. ASDC thanks the Department for the opportunity to comment on the proposed plan.

As parents of deaf and hard of hearing children we know that our children need teachers, related service providers, educational evaluators, and other professionals with knowledge about and expertise with deaf and hard of hearing children. These professionals must be able to meet our children's unique language and communication needs. Also, our schools need research-based teaching approaches that have been shown to be effective with deaf and hard of hearing children.

In our experience, often these personnel and practices are absent from our children's educational setting. The Department's proposed Part D plan is broad enough so that it could include attention to deafness related issues however, there is no affirmative statement of how the plan will address them. A teaching approach or methodology that is effective for students with one type of disability – or even a group comprised of students with several types of disabilities - may not be immediately applicable for students with another type, such as deafness. Education programs that “provide differentiated instruction across all age, academic, and functional levels of students” may have wide breadth but shallow depth, at least when it comes to children with hearing loss. Recruitment and retention practices that are effective for special education may not be effective for deaf education.

In designing and carrying out its plan, the Department should remain cognizant of its role supporting students with low incidence disabilities and should ensure that the plan's outcomes, projects, and activities appropriately consider and address the needs of deaf and hard of hearing children and their families.

As for our specific comments, first, we disagree with the wording of Outcome 1, “To the Maximum Extent Appropriate, Children With Disabilities Will Receive High Quality Educational and Early Intervention Services in Natural Settings With Typically Developing Peers.” We believe that, standing alone, this conflicts with the legal requirement for states to ensure that a continuum of alternative placements is available. The Department should change this to “To the Maximum Extent Appropriate, Children With Disabilities Will Receive High Quality Educational and Early Intervention Services in Settings That Are Appropriate to Their Needs.” We respectfully request that the Department support the continuum as vigorously as it supports placement in the general education environment. Because the needs of deaf and hard of hearing children (and

other children in special education) are so heterogeneous, it is critical to keep all placement options available.

We have two points to make about Outcome 7, “Family Capacity Will Be Enhanced.” Again, we point out that deaf and hard of hearing children have unique language and communication needs, and this needs to be addressed with families if they are to become more involved in their child’s education. Most families of deaf and hard of hearing children aren’t aware of the components of appropriate educational programs for these children. Parent trainers should be equipped to share this information so that parents know what they are advocating for. Second, the effectiveness of these projects and activities should be measured. A possible way is through parent surveys done with parents of children with all types of disabilities.

Again, thank you for the opportunity to comment.

Respectfully submitted,

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January 11, 2007