



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

June 20, 2019

The undersigned members of the Consortium for Citizens with Disabilities (CCD) Education Task Force write to share our principles and recommendations as you consider reauthorization of the Higher Education Act.

The CCD Education Taskforce firmly believes that students with disabilities must be thoughtfully and fully included in any policy changes considered for the reauthorization of the Higher Education Act. As the reauthorization of the Elementary and Secondary Education Act (ESEA) demonstrated, the meaningful inclusion of students with disabilities is now the expectation, rather than the exception. In addition, the reauthorization must address the urgent and persistent shortages of special education teachers as well as specialized instructional support personnel (SISP) experienced nationally.

A Few Facts:

- ✓ Despite significant strides in public policy, people with disabilities remain the poorest, least employed, and least educated minority in America (Senate HELP Committee, 2014). Without the education and training needed to start a career, young people with disabilities are trapped in a pattern of perpetual poverty and dependence upon state and federal benefits.
- ✓ 65% of those who completed a Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID) had a paid job one year after exit versus an employment rate of 17% of adults with developmental disabilities in the general population (Think College National Coordinating Center, 2019).
- ✓ 33% of working-age people with disabilities participate in the labor force, compared to 77% of their peers without disabilities (Employment Policy and Measurement Rehabilitation and Research Training Center, 2015).
- ✓ By 2020, 65% of all U.S. jobs will require some postsecondary education and 90% of new jobs in growing industries with high wages will require, at a minimum, some postsecondary education (Georgetown Center on Education and the Workforce, 2013).
- ✓ Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act (504) protect students with disabilities from discrimination and require institutions of higher education (IHE) to provide reasonable accommodations. However, colleges and universities face challenges in supporting students who are unaware of their rights and responsibilities regarding accommodations and in providing accommodations, including

services that involve specialized knowledge. Many faculty and staff are unaware of their legal obligations and how to accommodate students with disabilities (U.S. General Accounting Office, 2009).

- ✓ While 94% of students with learning disabilities received accommodations in high school, only 17% received accommodations in postsecondary education and many go without the accommodations and supports they need (National Center for Learning Disabilities, 2014)
- ✓ Special education and early intervention is the field with the greatest teacher shortage with 48 states and DC reporting shortages.
- ✓ Those prepared through alternate pathways with less coursework and student teaching are 25% more likely to leave their schools and the profession than those who are well prepared.
- ✓ Teacher preparation program enrollment is down 35% in the last 5 years (Learning Policy Institute, 2017).

Teacher, Early Intervention and Specialized Instructional Support Personnel (SISP) Shortages:

CCD has become increasingly alarmed about the shortage of teachers, particularly special education teachers, as well as early intervention providers and specialized instructional support personnel (SISP), in recent years. One of the all too common responses to the shortage in states has been to lower the standards for entry into the professions. We know that lowering the bar for teachers will not bring us the student outcomes needed starting at birth and throughout PK-12 for children with disabilities to move successfully into higher education and eventually into the workforce. Teachers and other providers need strong preparation in order to use evidence-based strategies, such as how to provide multi-tiered systems of support, positive behavioral interventions and supports and universal design for learning. These are not skills that are learned on the fly. CCD wants to draw a straight line between student outcomes and teacher and SISP preparation.

A recently released report concluded: “Evidence shows that underprepared, out-of-field, and substitute teachers typically depress student achievement and have higher attrition rates... Research has found that special education training significantly improves teachers’ capacity to effectively teach students with special needs.” (Learning Policy Institute, 2017).

The Higher Education Act plays a critical role in attracting and retaining individuals into the profession, particularly those in high-need fields such as special education, SISP and early intervention. The CCD Education Task Force makes the following recommendations in relation to addressing these shortages:

- Recommendation:** Retain and strengthen TEACH Grants to attract more teacher candidates and develop provisions to minimize the conversion from grant to loans.
- TEACH grants are scholarships for teacher candidates who will serve in high need fields and in high-need schools. Undergraduates may receive up to \$4,000 per year

for a total of \$16,000. Master's students may receive \$4,000 per year for up to two years. (Note: due to sequestration, the maximum was reduced to \$3,724 per year).

- Any recipient must score in the top 25th percentile on college admissions tests and maintain at least a 3.25 GPA.
- Recipients must fulfill a service obligation, teaching in a high-need field, such as special education, in a high-need school for 4 out of 8 years after receiving their degree.

Recommendation: Include the Educator Preparation Reform Act (S. 969). This bill would expand the Teacher Quality Partnership (TQP) grants.

Recommendation: Include the Supporting the Teaching Profession Through Revitalizing Investments in Valuable Educators Act (STRIVE) Act.

Recommendation: Retain and Strengthen the Teacher Quality Partnership (TQP) grants with a focus on residency preparation, principal preparation and shortage areas such as special education, specialized instructional support personnel, and professional development to ensure skill development in using research-based practices that improve outcomes for all students, including students with disabilities, and partnering with parents in the education of students with disabilities.

This critical program requires partnerships between institutions of higher education and K-12 schools and is intended to transform teacher preparation so that it is centered on the practice of teaching and meeting the workforce demands of school districts. Featuring one-year residency programs, TQP targets high need fields (such as special education) and high need schools.

Recommendation: Require ED to promote the TEACH grants through activities such as public awareness campaigns and to actively engage in recruiting teacher candidates, particularly in shortage fields such as special education.

Recommendation: Maintain TEACH grant funding as mandatory funding.

Recommendation: Include language-adding early childhood education, including early intervention and preschool education, to the list of high-need fields.

Recommendation: Retain and strengthen Teacher Loan Forgiveness Programs including the Teacher Loan Forgiveness program and the Public Service Loan Forgiveness program. Loan forgiveness for teachers is critical in addressing the teacher shortage. These underutilized programs should be strengthened and marketed by the Department of Education as a strategy for addressing the shortage and the shrinking pipeline of teachers.

Increasing Access:

Parents, families, professionals, and students (including high school students) need better access to information about services, supports, legal requirements, and physical, programmatic, and instructional accommodations to help students be successful and graduate from postsecondary education programs. In addition, colleges and universities need technical assistance to effectively understand how to provide services and accommodations to all students with disabilities who enroll in postsecondary programs. Higher education needs to be physically and programmatically accessible (as well as accessible in its curriculum) to all students. Students with disabilities, including those with intellectual disabilities, should be provided appropriate supports and services to allow them equal opportunity to participate in all aspects of higher education that are available to other students, including integrated classroom experiences, access to faculty who are skilled in instructing students with disabilities, accessible instructional materials, inclusive housing opportunities, accessible campus-sponsored transportation, assistive and other technology, work and career opportunities, flexible leave policies, and access to financial aid.

Recommendation: Include the Respond, Innovate, Succeed, and Empower (RISE) Act (S.1585). This bipartisan bill:

- Authorizes increased funding for a technical assistance center that provides students and families with information on disability services available in college and how to access them and offers college faculty training and resources on best practices to support students with disabilities.
- Requires IHEs to accept an Individualized Education Program (IEP), 504 plan, or prior evaluation as documentation of a student's disability when seeking accommodations in an IHE, preventing students from having to undergo a new, costly and burdensome evaluation that many IHEs require.
- Requires IHEs to submit to the Integrated Postsecondary Education Data System (IPEDS) or other federal data collection efforts key data related to their undergraduate students with disabilities.

Recommendation: Maintain the National Technical Assistance Center in Section 777(a) of the Higher Education Opportunity Act.

Recommendation: Include the Expanding Disability Access to Higher Education Act (S. 1176) to promote the matriculation, and increase in the graduation rates, of individuals with disabilities within higher education for first-generation or low-income students with disabilities including through the TRIO program.

Recommendation: Authorize funding to collect (and make available to the public) accurate data about the recruitment, retention, graduation, and employment of students and faculty with disabilities to help postsecondary programs in their ability to serve students with disabilities and to provide middle and high school students, parents, and faculty with information about postsecondary educational options, accessibility, enrollment procedures, supports, and rights and responsibilities.

Recommendation: Include provisions establishing a new commission to identify barriers to ensuring equal opportunity for students with psychiatric disabilities and make recommendations

to address these barriers and promote compliance with the ADA.

Recommendation: Clarify that, consistent with the ADA and other laws, students should not be penalized for behavior related to a disability where individualized, reasonable accommodations could mitigate this behavior.

Recommendation: Retain the definition of “universal design for learning” (UDL) included in current law. In addition, postsecondary education programs and their administration, staff, and faculty should receive training, support, and technical assistance to ensure programs of instruction, curricula, and support services are developed according to the principles of UDL.

Recommendation: Include provisions that require services, including but not limited to housing, websites, and athletic facilities, to be universally designed and accessible to students with disabilities, and require that institutions understand their legal obligation to provide reasonable accommodations.

Recommendation: Apply accessibility standards to all platforms used by IHEs to deliver instruction in recognition of the increasing availability of web and computer-based instructional delivery and web and computer-based course materials for students.

Recommendation: Incorporate the use of UDL principles into teacher preparation coursework and professional development.

Recommendation: Require teacher preparation programs to ensure that candidates complete their preparation prior to serving as the teacher of record and qualify for full state certification upon program completion.

Recommendation: Require that individuals who complete teacher preparation programs receiving funds via HEA demonstrate content knowledge and skill in instructing diverse learners, including students with disabilities.

Recommendation: Include provisions that require the administration, staff, and faculty of postsecondary program to receive training, support, and technical assistance to ensure programs of instruction, curricula, and support services are developed according to the principles of UDL.

Recommendation: Include provisions requiring that higher education institutions receiving Garrett Lee Smith Memorial Act grants return those grant funds if they are found to have discriminated against students based on a psychiatric disability.

Student Loan Availability, Accessibility and Affordability.

Students with disabilities, and professionals who work with children and adults with disabilities must be taken into consideration as our federal government tackles the important issue of

affordability and access to higher education. These students must be eligible for all types of financial aid and programs to create greater access, especially for first-generation college students and all other students. HEA should ensure that educators, those who provide early interventions services, specialized instructional support personnel, and other professionals who work with people with disabilities are provided the financial support to pursue a public service career. These individuals are critical to ensuring that children and adults with disabilities have access to the range of services and supports they need to participate in the workforce and community life.

Recommendation: Provide access to adequate levels of federal loans and affordable loan repayment options to all students (providers of services beginning at birth and students with disabilities).

Recommendation: Federal law should ensure that students with disabilities are accommodated if they cannot meet credit-hour requirements per semester.

Recommendation: An updated HEA must retain provisions that allow students with intellectual disabilities to access financial aid.

Recommendation: Maintain, improve, and grow direct supports, scholarships, loan forgiveness, and loan cancellation programs for individuals who work with young children starting at birth in any community setting with young children, including a home, Preschool setting, Early Head Start, and Head Start, as well as childcare and education settings.

Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID)

Postsecondary programs for students with intellectual disabilities that focus on academic enrichment, socialization, independent living and employment are critical to the postsecondary success of students and must be expanded and geographically distributed across all states. In fact, since the creation of Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID) program in 2008, this program has had a positive impact on student rates of employment and wages, social networks, self-determination skills, and community living.

Recommendation: Change the Title of Sec. 766 Model Comprehensive Transition and Postsecondary Programs to “Inclusive Higher Education Programs for Students with Intellectual Disabilities.”

Recommendation: Require programs to integrate work experiences and career skills that lead to competitive integrated employment.

Recommendation: Require TPSID programs to collect longitudinal outcome data for enrolled students.

Recommendation: Change “curriculum” to “program of study” to clarify that a separate curriculum is not desired or required.

Recommendation: In awarding TPSID grants, give preference to an institution of higher education that provides institutionally owned or operated housing for students attending the institution, such as dormitories or other on-campus housing, and integrates students with intellectual disabilities into the housing offered to nondisabled students; or to an institution that provides access to integrated housing by providing supports to students directly or through a partnership with other organizations.

Sincerely,

American Association of People with Disabilities
American Physical Therapy Association
American Speech-Language-Hearing Association
American Therapeutic Recreation Association
Association of Assistive Technology Act Program
Association of University Centers on Disabilities
Autism Society
Children and Adults with Attention-Deficit/Hyperactivity Disorder
Council for Exceptional Children
Council for Learning Disabilities
Council of Parent Attorneys and Advocates
Council of State Administrators of Vocational Rehabilitation (CSAVR)
Division for Early Childhood of the Council for Exceptional Children (DEC)
Higher Education Consortium for Special Education
IDEA Infant Toddler Coordinators Association (ITCA)
Judge David L. Bazelon Center for Mental Health Law
National Association of Councils on Developmental Disabilities
National Association of State Directors of Special Education (NASDSE)
National Center For Learning Disabilities
National Disability Rights Network
National Down Syndrome Congress
National PLACE
Perkins School for the Blind
TASH
Teacher Education Division of the Council for Exceptional Children
The Advocacy Institute
The Arc of the United States
The National Center for Special Education in Charter Schools

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