



September 16, 2021

Attn: Matthew Soldner
National Center for Education Evaluation and Regional Assistance & Evaluation Officer, Institute
for Education Sciences
U.S. Department of Education
400 Maryland Avenue SW, Room 4160
Washington, DC 20202

Re: ED Docket ID ED-2021-IES-0118

Dear Dr. Soldner:

The Consortium for Citizens with Disabilities (CCD) is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. The Education Task Force proactively monitors federal legislation and regulations that address the educational needs of children with disabilities and their families, including the 7.7 million infants, children, youth and young adults eligible under the Individuals with Disabilities Education Act (IDEA) who must be provided a free, appropriate public education (FAPE) and maintain their rights to an individualized education program (IEP) that is implemented in the least restrictive environment (LRE). We also advocate for the 1.3 million students eligible under Section 504 of the Rehabilitation Act of 1973 (Section 504) and ensure equal access to educational opportunity for all these students under the Americans with Disabilities Act (ADA). The Education Task Force advocates for enhanced opportunities for children under these laws.

Students with disabilities have a long history of being excluded from participating alongside their peers. In 1970, U.S. schools educated only one in five children with disabilities, and many states had laws excluding certain students, including children who were deaf, blind, emotionally disturbed, or had an intellectual disability.¹ Although we have made progress, this exclusion still exists and extends beyond the classroom as well. In a recent review of nearly 400 research reports, news stories, and case studies about education and the pandemic published since March 2020, the authors state that they “found that less than 20 percent of the literature in our review even made references to the experiences or outcomes of students with disabilities. Furthermore, those relatively few studies that did discuss students with disabilities typically did

¹ U.S. Department of Education. (2020) A History of the Individuals With Disabilities Education Act. Office of Special Education and Rehabilitation Services.

not differentiate data by disability category or the level of service provided.”² Research is the foundation on which education policy decisions should be made to best meet the needs of all students, families, and educators. High quality scientific inquiry is needed to ensure that schools target resources and focus investments on evidenced-based and innovative practices that close opportunity and achievement gaps. Furthermore, the education workforce must be robust and well equipped with the knowledge and skills to carry out those practices. Without robust and sustained federal investment in research, children, adolescents and adults who have been historically disadvantaged, including those with disabilities, will continue to have inequitable opportunities to succeed in school, work, and life. The education workforce that serves students with disabilities, which is the link to implementation, is currently depleted and strong research-based investments are needed.

Therefore, we welcome the opportunity to provide input to the Learning Agenda’s priority questions and evidence-building activities for each of the six items proposed for the Learning Agenda.

1. Addressing the impact of COVID-19 on students, schools and institutions of higher education, educators, and their communities.

The COVID-19 pandemic has led to unprecedented disruptions in our public education system. CCD appreciates that IES is prioritizing research on the impact of COVID-19 on students, schools and institutions of higher education, educators and their communities. Within this priority, it is important that IES look to answer questions about the impact of the pandemic on historically underserved subgroups of students such as students with disabilities. The pandemic has had a disproportionately negative impact on the well-being and academic success of students with disabilities compared to their peers. ED’s own report stated that “for many elementary and secondary school students with disabilities, COVID-19 has significantly disrupted the education and related aids and services needed to support their academic progress and prevent regression. And there are signs that those disruptions may be exacerbating longstanding disability-based disparities in academic achievement.” The report goes on to state that “students with disabilities in higher education are facing significant hardships and other barriers due to COVID-19, threatening their access to education, including through remote learning, and basic necessities.”

At the same time, students were more physically isolated and had less access to activities that involve social interaction. The result of this means that many students, including those with disabilities, will have additional social, emotional, and mental health needs when they return to in-person learning. In a recent survey, 75 percent of educators strongly agree that social and emotional support for students has never been more important and during 2020, the proportion of mental health-related emergency

² Morando-Rhim, L. & Ekin, S. (2021) How Has the Pandemic Affected Students with Disabilities? A Review of the Evidence to Date. The Center on Reinventing Public Education and the Center for Learner Equity

department visits among adolescents aged 12–17 years increased 31 percent compared to 2019.³⁴

It is important that IES prioritize research that asks questions about the disparate impact of the pandemic on the academic development of students with disabilities and students with intersectional identities such as students of color with disabilities. To the extent possible, all research should disaggregate by disability status (both 504 and IDEA identified students) and type of disability. Priority should also be given to research proposals that ask questions about the impact of COVID-19 on teaching and learning such as what practices were and were not effective and for whom, including for students with disabilities. Finally, research should focus on the social, emotional, and mental health impacts of the pandemic on students disaggregated by disability status and type.

We strongly recommend that this item be revised to specifically mention students and their families/parents, and not just communities, as it is at least anecdotally clear that families/parents of students with disabilities functioned as their core educators during periods of virtual/remote learning. It is widely recognized that parents were their children's educators in many instances during this pandemic, significantly elevating the role of parents in their children's education. This change has spawned reports that examine the change in parent-school collaboration such as [Embracing a New Normal: Toward a More Liberatory Approach to Family Engagement](#) by Dr. Karen Mapp and Eyal Bergman, experts in family engagement. Many of the practices that schools employed out of necessity should be studied to identify their value post-pandemic.

We recommend that evidence be built on the following topics:

- Impact of the pandemic on the academic progress of students disaggregated by student subgroups and disability type.
- The effect of modifications made at the state, district, or school level related to curriculum, standards, and/or other graduation requirements.
- Inclusive and affirming social-emotional learning practices for students with disabilities.
- Impact of the pandemic on school-parent communications disaggregated by student subgroups.

2. Promoting equity in student access to educational resources, opportunities, and welcome, safe, and inclusive environments.

All members of the school community must be adequately prepared and have access to high-quality, ongoing professional learning opportunities to implement culturally competent, proactive approaches with students that are fundamentally fair and equitable. This includes the implementation of tiered intervention models to support

³ American Federation of Teachers. (2020, October 21). Educators Say COVID-19 Has Greatly Exacerbated the Grief Support Crisis in Schools, According to New Survey. Retrieved from: <https://www.aft.org/press-release/educators-say-covid-19-hasgreatly-exacerbated-grief-support-crisis-schools>.

⁴ Yard E, Radhakrishnan L, Ballesteros MF, et al. Emergency Department Visits for Suspected Suicide Attempts Among Persons Aged 12–25 Years Before and During the COVID-19 Pandemic — United States, January 2019–May 2021. *MMWR Morb Mortal Wkly Rep* 2021;70:888–894. DOI: <http://dx.doi.org/10.15585/mmwr.mm7024e1>

access to and explicit instruction in social-emotional learning and creating school-wide positive expectations, evidence-based trauma-informed teaching strategies, de-escalation techniques, conflict resolution, peer mediation, and practices of restorative justice.

Professional learning opportunities should also include universal design (UDL) for instruction and assessment, training in supporting use of assistive technology and appropriate communications supports, as well as proper implementation of functional behavioral assessments (FBA) and behavioral intervention plans (BIP) to reduce the triggers for inappropriate school behavior before a problem occurs. The current critical shortage of teachers, particularly in special education, must be addressed in order to meaningfully ensure that students receive a fair and equitable education in an inclusive and safe learning environment.

School-parent/family communications play a critical role in ensuring equity in student access. The requirement for collaboration is built into the IDEA's Individualized Education Program process. Thus, examining how these communications were executed during the pandemic would provide valuable information for future considerations.

We recommend that evidence be built on the following topics:

- Student access to well-prepared, qualified, diverse, and effective teachers
- Resource allocation equity
- Advanced coursework opportunities
- Access to integrated career and technical education
- Equity and quality of access to digital instruction and assistive technology
- Discipline research - more research is needed on non-exclusionary discipline practices and monitoring systems like multi-tiered system of supports (MTSS)
- How the pandemic impacted school/parent communications including those required by the IDEA, disaggregated by disability category

3. Meeting student social, emotional, mental health, basic and academic needs

Research shows that creating inclusive, welcoming learning environments centered on trusting relationships and physical and emotional safety will better enable all students to thrive. Transforming learning environments to better meet the social, emotional, mental health, basic and academic needs of students with disabilities is an important part of this. It cannot be a "one size fits all" approach, but instead needs to reflect the nuanced needs of individual students. A [systematic review](#) by the Yale Center for Emotional Intelligence and EdTogether analyzed 242 studies that were reflected in 146 peer-reviewed manuscripts and 96 dissertations, theses, conference abstracts, and commissioned reports. More than 3 in 4 studies since 2008 did not report on students with disabilities at all, only 1 in 5 studies mentioned students with disabilities in a way that shows these students were included in the intervention, and fewer than 1 in 10 studies reflected students with disabilities in their results. This demonstrates that there is a lack of research on social-emotional learning that is inclusive of students with disabilities and this incomplete evidence base can result in the implementation of

ineffective SEL interventions that perpetuate inequities for students who are multiply marginalized.

The current pandemic context has fueled increased focus on learning acceleration initiatives to address lost instructional time and many states and districts have identified the programs and initiatives that they will employ. Remedial instruction has had poor outcomes for students with disabilities as they are pulled out of class to work on target areas and the time away from the general classroom results in less engagement in grade-level curriculum. Future research on learning recovery programs that accelerate learning rather than remediate and include students with disabilities will be critical. Parents also play a critical role in meeting students' social, emotional, mental health, basic and academic needs. Learning how to maximize that role can provide important information for the future. Identifying specific strategies that parents can use to support and promote social and emotional learning as well as the academic needs of their students need to be part of the examination.

We recommend that evidence be built on the following topics:

- Efficacy of social-emotional learning interventions for subgroups of students, including students with disabilities, students of color, and students with intersectional identities.
- Which students, particularly those with disabilities, thrived during virtual/remote learning, what circumstances were present, and how to continue the positive outcomes that may have occurred for certain students.
- Which learning recovery initiatives had the most success in terms of academic, social/emotional, and behavioral outcomes for students with disabilities.
- The capacity of schools to help students “catch up” academically after many students received a full year of virtual/distance learning while also prioritizing social and emotional learning.
- The impact of the pandemic on school personnel, including recruitment and retention as well as the exacerbation of existing shortages.
- Promising practices to transition students back into the classroom after long absences, particularly those with disabilities that impact behavior, emotion, and regulation.
- The rate in which students did not engage in any learning activities and strategies to connect students back into the school community.
- The role of parents in learning recovery initiatives including re-engaging with school, promoting social-emotional learning interventions and facilitating educational success.

4. Increasing postsecondary education access, affordability, completion, and post-enrollment success

About 20% of undergraduate students reported having a disability and students with disabilities [enroll in 2 year institutions at higher rates than 4-year institutions](#). These students face many barriers to success from lack of appropriate accommodations to stigmatizing faculty. Unfortunately, there is no consistent way to track retention and graduation rates of students with disabilities in the U.S. and much of the research uses

incomplete disability categories. Data from the [2011 National Longitudinal Transition Study-2](#) showed that the postsecondary completion rate of young adults with disabilities was lower than that of their peers in the general population: completion rates for young adults with disabilities ranged from 29 percent at 4-year universities, to 30 percent at 2-year or community college, to 55 percent at postsecondary vocational, business, or technical school, compared to 51 percent of similar-age peers in the general population had graduated or completed postsecondary programs.

There are a few federal programs such as the Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID) which provides grants to institutions of higher education to create or expand comprehensive transition and postsecondary programs for students with intellectual disabilities that attempt to address this issue. There is a need for additional research that can support the development, expansion, and efficacy of inclusive higher education programs.

Planning for success in postsecondary education takes time and organization, as noted by the [National Parent Center on Transition and Employment](#). The role of transition planning in postsecondary access and success, including parent involvement and support, should be examined to determine the extent to which this IDEA requirement is contributing to the success of students with disabilities.

We recommend that evidence be built on the following topics:

- Access to postsecondary education enrollment rates for students with disabilities. These should include all postsecondary education options: 4-year colleges, 2-year colleges, Vocational and technical schools, and Inclusive Higher Education Programs.
- Transition supports for students with disabilities. Research should examine the effects of interventions on specific subpopulations of students (i.e., disability category, service continuum, gender, race, ethnicity, geographic context, and grade) and provide information that practitioners can rely on for applicability within the contexts in which they educate and provide services.
- Barriers to student success when enrolling or in postsecondary education.
- Evaluation of Pre-Employment Transition Services provided by state Vocational Rehabilitation agencies. There is currently a lack of data about the specific populations served and student outcomes in these programs.
- Retention and completion rates for students with disabilities. There is a need to track retention and graduation rates of students with disabilities by disability category. Matching postsecondary student support program data with completion/retention rates would develop evidence for this area.
- Post-enrollment outcomes for students with disabilities.
- The efficacy of transition planning including the role of parents and the impact of the pandemic on transition activities including those provided by agencies such as Vocational Rehabilitation services.

5. Supporting a well-prepared diverse educator workforce and their professional growth to strengthen student learning

For students of color, students impacted by poverty, students with disabilities, and student learning English, the inequitable access to a well-prepared, diverse, supported,

and stable educator workforce translates into a denial of the opportunities necessary to learn. Where there are high concentrations of inexperienced teachers or underprepared teachers [there are higher](#) suspension rates. Addressing these inequities starts with ensuring that prospective educators – especially educators of color – have access to comprehensive educator preparation programs at institutions of higher education that [research shows](#) are associated with effectiveness, retention, and diversity. Over the last three decades, schools have seen a shortage of qualified special education teachers. [A high turnover rate](#) among special education teachers, which has remained relatively stable at around 25% over the past 20 years, contributes to this shortage. Consequently, thousands of positions for special education teachers have been filled with individuals without minimal qualifications, or by long term substitute teachers with no qualifications at all. The result is a tragic inequity for students with disabilities and deep concern about the outcomes for the future.

Professional development (PD) is key to strengthening student learning and all school staff, not just special education teachers, should receive PD to support students with disabilities. Many students with disabilities spend instructional time in general education classroom settings but [research](#) has shown that many general education teachers do not receive enough training or support to feel well prepared to do so (for example, only 17% of general education teachers feel very well prepared to teach students with mild to moderate learning disabilities). Furthermore, effective collaboration with parents and families is critical for educators in all situations, but even more so during and after pandemics and other emergencies. With the receipt of ESSER funds, many states and districts have invested in professional development opportunities. Thus, there is an opportunity to seek evidence from research on the implementation of such programs.

We recommend that evidence be built on the following topics:

- Access and retention for special education teachers, with a focus on teachers of color. Research is needed to determine the key contributing factors to attracting and retaining well-prepared, diverse teachers in special education who are also prepared to partner with diverse parents and families.
- Efficacy and scalability of pathways into teaching which result in fully prepared educators whose retention rate is impressive including Grow Your Own, Teacher Residency programs and dual enrollment programs whereby higher education partners with high schools.

6. Improving Federal student aid programs

There are some federal student aid programs such as the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program which seeks to assist candidates in managing their debt load and pursuing their teaching careers. Yet, enrollment in teacher preparation programs is declining while, at the same time, teacher shortages are on the rise. In addition, the number of students with disabilities is increasing. The latest data show at least [48 states and DC](#) have special education teacher shortages, making it the teaching field with the greatest national shortage. Students of color are disproportionately affected by the high cost of college. Many potential candidates are concerned about entering a field such as special education where the pay is relatively low compared to the student debt which can be incurred.

Thus, upfront grants, such as those offered by TEACH are critical for recruitment purposes. The poor implementation of the program and the faulty loan conversion processes have resulted in limited utilization. These deficiencies need to be addressed. Far more candidates are eligible for the program than use it and increased utilization could make a significant difference in addressing the special education teacher shortage.

In addition, there continues to be under enrollment of students with disabilities in postsecondary education compared to their peers as mentioned previously. It is important to have a better understanding of the financial aid system as it relates to students with disabilities including ways in which to reduce the financial burden of postsecondary opportunities.

We recommend that evidence be built on the following topics:

- The extent to which federal student aid programs increase educator diversity and address teacher shortages, including in special education.
- The extent to which students with disabilities have access to postsecondary opportunities with assistance from federal student aid programs.

The CCD Education Task Force appreciates the opportunity to provide these recommendations to ED. We look forward to working with you to assure equity in education for all infants, children, youth, and young adults with disabilities. If we can provide additional information, please contact the CCD co-chairs listed below.

Sincerely,

American Foundation for the Blind
American Psychological Association
Autism Society of America
Bazelon Center for Mental Health Law
Brain Injury Association of America
Center for Learner Equity
Children and Adults with Attention-Deficit/Hyperactivity Disorder
Council for Exceptional Children
Council for Learning Disabilities
Council of Administrators of Special Education
Council of Parent Attorneys and Advocates
Division for Learning Disabilities (DLD)
Easterseals
Higher Education Consortium for Special Education
Learning Disabilities Association of America
National Center for Learning Disabilities
National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE)
National Disability Rights Network (NDRN)

National Down Syndrome Congress
RespectAbility
Teacher Education Division of the Council for Exceptional Children
The Advocacy Institute
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The Consortium for Citizens with Disabilities (CCD) is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. The Education Task Force of CCD monitors federal legislation and regulations that address the educational needs of children and youth with disabilities and their families, including regulatory efforts under federal law such as the Individuals with Disabilities Education Act (IDEA), the Every Student Succeeds Act (ESSA), Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act (ADA). The Education Task Force advocates for high expectations for children with disabilities under these and other laws.

www.c-c-d.org