

January 5, 2018

Special Education Compliance  
Department of Elementary and Secondary Education  
P.O. Box 480 Jefferson City, MO 65102-0480

### **MSHA's Comments on IDEA Part B State Plan Revisions**

Submitted to [Idea.Comments@dese.mo.gov](mailto:Idea.Comments@dese.mo.gov)

On behalf of our 1100 members, the Missouri Speech-Language Hearing Association (MSHA) respectfully provides the following comments on the proposed changes to the IDEA Part B State Plan for Special Education.

MSHA strongly supports the proposed changes to the speech and language eligibility criteria. MSHA is appreciative of the recent collaborative work with DESE and MO-CASE over the last few years to improve services for Missouri's school children. While MSHA is also appreciative of the support from and current collaboration with DESE and MO-CASE on a MSHA authored handbook/guideline document for Missouri SLPs in the schools, we also look forward to future collaborative endeavors.

MSHA commends DESE for working collaboratively with MSHA and MO-CASE and other critical stakeholders to update the speech and language eligibility criteria. MSHA was actively involved and well-represented in the work group that developed the proposed revisions to the speech and language (SL) criteria. MSHA does not support the use of cognitive referencing. The national speech-language-hearing association, which is the American Speech-Language-Hearing Association (ASHA), has not approved the use of cognitive referencing since 2002. Therefore, elimination of the use of cognitive referencing for language impairment (LI) is long overdue especially in light of the fact that Missouri is the last state to consider elimination of this approach to eligibility determinations.

The eligibility criterion work group also recommended that districts have the option to extend the age requirement for mandatory application of categorical criteria to children found eligible as YCDD to help smooth the transition from the different communication criterion of YCDD and the proposed revised LI criterion. While this recommended change was not included in the current proposed State Plan revisions, MSHA continues to support its consideration. The suggested revision is as follows:

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(4) Students who are [~~first~~] **third** grade age eligible (age [~~six (6)~~] **eight (8)** before August 1) must meet criteria of any disability category other than Young Child with a Developmental Delay (YCDD).

MSHA also supports the recommendations of MO-CASE to consider a review and possible revision of the eligibility criteria for learning disabilities to better align the oral language area with the revised LI criteria and to address recommendations made by the Legislative Task Force on Dyslexia related to identification of learning disabilities within an MTSS/RTI framework.

We appreciate the opportunity to provide comments and recommendations to the proposed revisions to the IDEA Part B State Plan.

Respectfully submitted,  
MSHA Executive Board  
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