

# Education Advocacy Coalition

## for Students with Disabilities

August 9, 2018

William E. Kirwan , Chairman  
Maryland Commission on Innovation and Excellence in Education  
c/o Office of Policy Analysis  
Department of Legislative Services  
Legislative Services Building  
90 State Circle  
Annapolis, Maryland 21401

Dear Commissioner Kirwan and Members of the Commission:

The Education Advocacy Coalition for Students with Disabilities, comprised of approximately 25 individuals and organizations concerned with special education policy issues affecting students throughout the state, has followed with interest the work of the Commission and particularly, the deliberations of workgroup 4 as it relates to students with disabilities. We write to offer our thoughts and a recommendation regarding an interim funding weight for students with disabilities who receive special education services. We are aware that although Workgroup 4 has discussed a tiered weighting system for students with mild, moderate and severe disabilities, the Commission is considering a single weight of 1.02 as an interim step pending the special education study ordered by the General Assembly. We will comment on both issues.

After considerable discussion, we propose that the Commission consider an interim stop-gap weight of 1.52 for students with disabilities. We arrived at this number by averaging the three weights suggested by Workgroup 4. The EAC feels strongly that one weight is necessary, both for the interim and in any permanent funding structure, for the following reasons:

- 1) One weight would avoid the perpetuation of inaccurate assumptions: All disabilities occur along a continuum. To identify particular disabilities as mild, moderate or severe fails to take into account this continuum, the individual needs of students, and also perpetuates stereotypes about particular disabilities. A weighting system based on the broad categorization of students by their type of disability would run counter to the hallmark of special education, which is based on individualized assessment, instruction, and services.
- 2) One weight would avoid the unintended consequence of creating an incentive to over-identify students, to identify them as having more significant disabilities, or to place them in more restrictive settings: Workgroup 4 has made reference to assigning a higher weight to students with more severe disabilities and has commented, inaccurately, that these students are usually or always placed in separate special education programs. The EAC is concerned that separate weights for severity of disability could create an incentive to identify students as having more significant disabilities in order to receive more funding and/or to place these students in more restrictive educational settings, depending on how the funding structure is organized.

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The EAC does not believe that a single weight of 1.52 will be sufficient to meet the needs of all students with disabilities. However, since this is a stop-gap proposal based on the Commission's numbers, we feel comfortable suggesting it as a short term measure. Conversely, it runs the risk of creating a disincentive to develop services and provide teacher training to address the needs of students classified with "mild disabilities."

We hope to engage in discussion with Commission members about special education issues as the special education study gets underway and as you continue your work.

Please feel free to be in touch with any questions. Thank you.

Sincerely,



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