

# Minnesota State Board of Education

705 Capitol Square Building, 550 Cedar Street, St. Paul, MN 55101 (612) 297-1925

TO: Colleen Wieck, Ph.D.

FROM: Ruth A. Myers, President  
State Board of Education

*Ruth A. Myers*  
by *[Signature]*

SUBJECT: State Board of Education Response to the Consultant Reports Relating  
to the Faribault Residential Academies

DATE: January 7, 1986

The Minnesota State Board of Education wishes to commend the Legislature of the state of Minnesota for the attention given the Academies during the 1985 legislative session by the amendment of Minnesota Statute 128A. The Board also wishes to express its appreciation to the Legislature for the commission of the Academies studies completed by or on behalf of the State Planning Agency.

While the State Board of Education is proud of the program offered at the two Academies, the Board is sincere in its effort to further improve that program. The ultimate goal of the Board is to operate the finest educational facility possible. For this reason, the State Board views several of the recommendations in the report as potential tools which can be considered by the Board in making necessary changes and improvements.

Since each Academy is the subject of a separate report and since each report follows a different format, the Board has directed the Administrator of the Academies to submit a separate response for each report. These responses are approved by and are supported by the State Board of Education.

If you have any further questions, please contact Ruth Myers or Lloyd Swenson, through our office at 297-1925.

RAM/TLS:mhSB36-18

STATE OF MINNESOTA

Office Memorandum

DATE : December 26, 1985

DEPARTMENT Minnesota Residential Academies

TO : Ms. Colleen Wieck, Ph.D., Executive Director  
Minnesota State Planning Agency

FROM : Carl T. Johnson, Residential Academies Administrator  
Minnesota State Academy for the Deaf/Blind

SUBJECT : Response to the Consultants' Report on the Legislative Study

The attached is our response to the Legislative Study conducted by Dr. James Collins, Associate Professor and Director of Clinical Training in the Department of Human Services at the Ohio State University, Dr. Frank R. Zieziula, Professor and Chairman of the Department of Counselling at Gallaudet College, Washington, D.C. and Mr. Gerald Nelson, Executive Director of the Minnesota Foundation for Better Hearing and Speech.

Our response will follow the topic headings as presented in the Study.

We would like to emphasize the professional and efficient manner in which the consultants named above conducted their study. They were very thorough and considerate for all concerned as they proceeded to accomplish their mission. It was a pleasant and rewarding experience for all of the people who participated in the Study. They felt comfortable with the opportunity to have contributed information to the Consultants that was of importance to each of the participants.

If there is need for more information and further clarification of any part of our response, please do not hesitate to contact us.

CJ/mw

## INTRODUCTION

The Introduction clearly demonstrates the consultants' professionalism and their commitment to do an objective evaluation at the Academy. It is gratifying to read of their primary concern as stated in the last sentence of the Introduction, which is the welfare of the present and future students at the Academy for the Deaf.

## BASIC ASSUMPTIONS

We concur with the assumptions as stated and that all adaptations and implementations will occur only after all interested parties have had a chance to express their opinions. Most assuredly, all recommendations will be prioritized as suggested and implemented within the appropriated budget and time available.

## STRENGTHS OF THE PROGRAM

We are very gratified that the authors of the report recognize the strengths that exist in the present program and have made recommendations to improve them. We would like to make a correction in Item 9 inasmuch as several classes in sign language have been offered to students during this school year instead of the one class as stated in the report.

## RECOMMENDATIONS

### FUTURE OF THE ACADEMY

Needless to say, we not only concur but are very pleased to receive such a strong statement in support of the continuation of the Residential Academies as an option for hearing impaired students within the State of Minnesota.

### ATMOSPHERE OF LEARNING

The recommendation as stated will be noted and will be immediately addressed in order for the staff to be able to focus their attention and energies toward the task of educating hearing impaired students.

### LONG RANGE PLANNING

At the present time, we have a two year plan for our budget and also a two-year plan for the activities of the School which is to be presented to the Legislature in January of 1986 and each odd numbered year thereafter. We also have a yearly plan with the Minnesota Department of Education known as Performance Evaluation Review for all of the supervisors. This plan is reviewed each year for its appropriateness. A five year plan could include the plans that we already have in place.

## GOVERNANCE

We concur with the recommendation to make full use of the advisory council as provided by the Legislation inasmuch as they represent a broad spectrum of people throughout the State who are interested in the Academies. The Advisory Council has been influential in the past and we anticipate will become more so in the future.

## ADMISSIONS AND DISCHARGE

We agree with the intent of this recommendation and would welcome the State Department to become involved and supportive of our referral system. While some people might have some question as to the criteria for the admissions and discharge at the Minnesota State Academy for the Deaf, we feel that the criteria are very appropriate and inclusive. We would also support the joint efforts of the Minnesota Department of Education and the Minnesota State Academy for the Deaf in conducting a survey of the local school districts and the Residential Schools for the Deaf in developing a system of referral for all appropriate hearing impaired children.

## THE ANNUAL REPORT

The concept of reporting and providing information about the residential academies to governing "bodies" has a long history. For many years, an annual report was submitted to the Governor, State Legislature and governing board of the Academies. This form of reporting was discontinued in favor of the Superintendent reporting in person to these various authorities; at present, annual and bi-annual reports are developed and shared with administrative and fiscal planners within the Department of Education.

Individually, department heads submit an annual plan (PER) Program Evaluation and Review. This annual plan serves to identify goals and objectives that are to be met in their respective areas. In addition, a bi-annual budget is prepared outlining program needs and monetary goals for the Minnesota State Academy for the Deaf. We would agree that the Academies can always use the positive public relations that hopefully would result from having an annual plan to disseminate.

## PSYCHOLOGICAL SERVICES

We agree with the recommendation that a systematic program of psychological assessment of the Minnesota State Academy for the Deaf students be established. Much discussion and deliberation have taken place regarding our assessment program, including consultation from the Minnesota Department of Education. This issue will be receiving considerable attention in the near future.

## INDIVIDUAL EDUCATION PLANS

We agree that it would be ideal to have one staff member to be responsible for the IEP process at the Academy, which would include the Residential Program.

We also agree with the importance an IEP plays in the educational services afforded hearing impaired students under P.L. 94-142. Every student attending the Academies has an IEP in place which includes the dormitory program if the student is a resident student. Due to the importance of IEPs on these campuses, a number of evaluations have been accomplished: Office of Monitoring under the direction of Robert Wedl, Department of Education, conducted on-site visits and reviews during May 1983 and during the weeks of December 10, 1984, and February 11, 1985. These compliance reviews were followed by Corrective Action Plans being submitted by the Academies for those items cited as being out of compliance. There have been several in-service sessions focusing on IEP development which have taken place here at the Academy, including a series of classes conducted by the University of Minnesota here on the campus for our staff. The recommendation for having one person in charge of all IEPs will be taken under advisement and consideration for implementation.

#### COMMUNICATION

We fully concur that a systematic assessment training of all staff members in a comprehensive communication program should exist. We are happy to announce that assessment and training have already begun and that many staff members are receiving training at the present time in total communication as well as sign language per se. A communication policy is in the process of being developed and will be presented to the State Board of Education for its' approval in the near future.

#### FACULTY

We concur with the recommendation that incompetent staff should be terminated as is the case at the present time and will continue to be implemented as is appropriate in the future.

#### RESIDENTIAL PROGRAM/STAFF

The dormitory programs lend unique possibilities to help young hearing impaired children develop socially, emotionally, vocationally and academically. While some of the dormitory facilities may be viewed as old, the buildings are well kept and well equipped. In fact, students prefer the older dormitory facility because of its home-like atmosphere, opportunity for greater privacy and its roominess.

Suggestions to expand the present school/dormitory staff interaction has already taken root. Presently, there is a teacher whose schedule permits him to provide tutor assistance to students until 8:00 p.m. four out of five days of the school week. In addition, the work study coordinator is placing students on after-school work sites. The school psychologists, counselor and social worker spend a minimum of one evening per week involved in student counseling and staff support.

We support the recommendation that teachers expand their role to include evening contacts with students for supervision of study, teaching of classes or promoting social and culture awareness. The "togetherness" created by

combined staff efforts to program for children behaviorally and academically is most desirable.

It may appear surprising to find a well organized dormitory program to be meeting most of the students' needs with staff who generally do not hold college degrees. While college level training is encouraged, there are many other skills necessary to carry out the day-to-day functions of the dormitory. Many of these skills are not taught in colleges, but come with experience, on-the-job training and years of in-service training. We would be pleased to offer the opportunity for dormitory staff to receive college training. This type of training will require input and support from union membership and Department of Employee Relations as well as a delivery system to provide this kind of training.

### SOCIALIZATION

We agree with the recommendation that documentation and dissemination of information regarding the excellence of its socialization opportunities provided by the residence hall programs and accompanying educational programs is of utmost importance.

Many fine activities are planned and carried out by the dormitory programs in order to promote personality development and social interaction. Most of these activities are designed to increase self-confidence, awareness to the world, cooperation, broaden experience in community activities, develop leisure time activities with high carry over value and exposure to real life experiences.

We would be in agreement and support of working with a university research laboratory in developing a systematic approach to identifying and measuring social levels. Information gathered from this research could then be disseminated as recommended for future planning.

### CURRICULUMS

Again, we concur with the recommendation on curriculum and will proceed to further our efforts to consummate the same. In September of 1984, a curriculum coordinator was appointed. Although this is a part-time position, the individual has developed a course of study describing all presently taught courses at MSAD. In August of 1985, the curriculum coordinator worked with a group of teachers and administrators representing the K-12 program in initiating a Math curriculum.

The curriculum coordinator is also preparing a plan of curriculum activities addressing hours of work, format, review of existing curriculum resources outside resources and final products to be developed.

### ACCREDITATION

We wholeheartedly agree with this recommendation that the Academies take steps to meet the accreditation standards established by the Conference of Educational Administration for the Deaf and the North Central Association. Some preliminary work has already occurred toward this activity and with the recommendation of the consultants, will be accelerated.

## GIFTED AND SLOW LEARNERS

We concur with the recommendation that a long range plan would be beneficial for gifted as well as slow learning students, which should include residential components to make them comprehensive programs. There have been program modifications developed for several of the exceptional students, but we recognize that further efforts are essential.

## STAFF DEVELOPMENT

We agree that a comprehensive staff development plan be established. A staff development coordinator was appointed for this school year and we feel the concern as stated is being addressed and will be further developed. The recommendation regarding involvement of colleges and universities to help promote formal training will be pursued with the assistance of the Department of Employee Relations. We must state that we disagree with the comment, staff development is occurring at MSAD but somewhat haphazardly. There has been a great deal of coordination, time and effort exerted into providing staff development in all areas or departments of the Academy.

## ASSESSMENT CENTER

We strongly agree that an assessment center should be established at the Minnesota State Academy for the Deaf with the full support and cooperation of other agencies and local school districts to serve the hearing impaired children throughout the State of Minnesota. Some of the services that are mentioned in the recommendation are now being provided, such as psychological assessment, educational intelligence assessments and consultation to local school districts, which has been coordinated by our Outreach Coordinator.

## LIBRARY AND MEDIA HOLDINGS

We are in total agreement that MSAD should serve as a statewide media service for all hearing impaired programs and will request necessary funds and a plan to do so.

In September of 1984, the school library was relocated into the high school building and, along with Instructional Media Center, serves all students and staff. At the present time, our buildings are connected by close circuit educational television available to all students and staff which allows for the broadcasting of educational materials.

## MULTI-HANDICAPPED YOUTH

Programming for multi-handicapped students originated on the Minnesota State Academy for the Blind (MSAB) campus in 1965 with the establishment of a separate and distinct academic and dormitory program for the blind. In 1968, a decision was made to also program for deaf-blind students on the MSAB campus. Based on experience, curriculum and facilities, the multi-handicapped deaf unit was later established on the MSAB campus. At present, there are multi-handicapped deaf students on both the MSAB and MSAD

campuses. There are multi-handicapped deaf students who live in the MSAD dormitories but attend classes on the MSAB campus, and multi-handicapped deaf students living at MSAB and attending classes on MSAD campus.

The natural results of individualizing instruction and programming for students has made available the various MSAD and MSAB programs for the multi-handicapped students. In essence, there is not a single program for multi-handicapped deaf students between the campuses, but a systematic bringing together of classes and dormitory placements that can best meet the individual needs of the multi-handicapped student.

We are now mainstreaming the multi-handicapped deaf students in dormitories and classrooms. We will continue to program for these students through selection what is most appropriate from both the MSAD and MSAB programs. We are in agreement that all efforts should be made to develop and use a mainstreaming program for the multi-handicapped deaf.

### COUNSELING

We concur with the recommendation that the guidance counselor be permitted to spend the majority of his time in tasks of individual and group counseling. At the present time, group and individual counseling sessions are established for elementary and high school students as well as in the dormitory on a regular basis. We also agree that curriculum outlines be developed in areas of human growth and development and socialization by the counselor.

### CAREER PLANNING

We also agree with this recommendation that a formal career guidance curriculum program be designed and implemented.

At the present time, we have career awareness courses at the high school level but agree that career education needs to be developed down through the elementary school level. The school counselor along with the school principal and dean of students, should design a career planning system to be in-serviced to all teachers and houseparents so as to help tie together the career guidance of all students.

### COMPUTER TECHNOLOGY

The computer coordinator position was established in September of 1984 and is a part-time position. This individual has presented in-service training after school to a large number of teaching staff and continued to be a resource to both teachers and houseparents.

At the present time, we have one elementary computer lab with nine computers and one high school computer lab with eight computers, plus three individual classroom computers in the school department. These 20 computers give us a ratio of one computer to every seven students when a 140 student population is figured. In addition, there are two computers in the dormitories. We are in agreement that increased computer utilization be incorporated into our program and in this regard have requested the computer coordinator to prepare an overall recommendation to guide administration and staff.



### ALUMNI RELATIONS

This recommendation will be given serious consideration as we agree that the alumni of MSAD are committed to the functions of MSAD and could provide substantial support and insight into the needs of the student body.

### DEMOGRAPHIC DATA

We agree that MSAD have a systematic procedure for compiling data related to the demography of students, test score distributions and placement of graduates. We will pursue the suggestion that the research staff at the University may be able to provide us with assistance in providing a mechanism to gather such information more efficiently.

### LOCAL SCHOOL DISTRICTS

We strongly concur with the recommendation that the State of Minnesota should conduct a study focusing on educational programs for hearing impaired children operated by local school districts. This can only enhance the programming for all students by providing a common base for which to work. Without the knowledge of how local school programs are operating, it would be difficult to make recommendations in regard to what programs would best serve the students.

### DISSEMINATION OF THE REPORT

We agree with this recommendation and will disseminate this report to teachers, parents and to hearing impaired consumers as requested.

It should be noted that many of the issues identified in this report will be addressed in the two year plan. The two year plan is being developed in accordance with the requirements of Chapter 128A.

STATE OF MINNESOTA

# Office Memorandum

DATE : December 30, 1985

DEPARTMENT : Minnesota Residential Academies

TO : Ms. Colleen Wieck, Ph.D., Executive Director  
Minnesota State Planning Agency

FROM : Carl T. Johnson, Residential Academies Administrator  
Minnesota State Academies for the Deaf and Blind



SUBJECT : Response to the Consultants' Report on the Legislative Study

The attached is our response to the Legislative Study conducted by Dr. David Ticchi, Cambridge, Massachusetts, and Dr. Fredric Schroeder, Albuquerque, New Mexico.

Our response will follow the topic headings as presented in the study.

We would like to emphasize that the consultants were pleasant and amiable in their contact with students and staff. Nonetheless, as certain of our responses indicate, we stand in very direct disagreement with a number of your consultants' observations and recommendations.

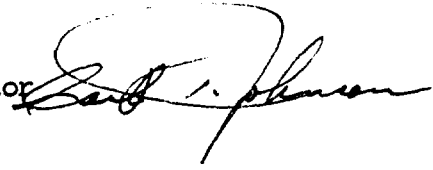
If there is need for more information and future clarification of any part of our response, please do not hesitate to contact us.

December 30, 1985

TO: Colleen Wieck, Ph.D., S.P.A.  
Director, Developmental Disabilities Program

FROM: Carl T. Johnson, Residential Academies Administrator  
Minnesota State Academies for the Deaf and Blind

RE: Response to MSAB Chapter 240 Report



The format of this response will be page by page, and paragraph by paragraph. We apologize for the tedious nature of this approach, but this style seems to be the most effective approach.

1. Page ii - Acknowledgements

We appreciate recognition of our "open and frank" approach to our visitors.

2. Page iii - Foreward

The State Board of Education is in agreement that, if at all possible, students should be educated in their home school district so they may reside at home and benefit from their families' love and nurturing. However, for many reasons, that is not always possible in a diverse state such as Minnesota. Therefore, the necessity of residential programs.

3. Page 1/Paragraph 4 - Introduction

We are in agreement with the need for high quality instructional leadership in all schools of the state and in particular the Residential Academies. The academies are currently participating in the state wide educational effectiveness program which includes components designed to build instructional leadership skills as a part of the school improvement project.

4. Page 1/Paragraph 5 - Entrance/Exit Criteria

The entrance/exit criteria issue has consumed much time in the last two years. The Advisory Council of the Academies participated in developing entrance/exit criteria for adoption by the Board. These criteria were adopted by the Board in the fall of 1984. The students who have been admitted to the school since that time have been admitted under the new criteria. The report alleges inconsistency of application of criteria. It is our belief that the criteria were consistently applied to all 16 newly admitted students for 1985-86. We did not formally consider admissions for earlier years, but it is our belief that all those students would satisfy the criteria as they now exist.

The paragraph continues to assert that "IEPs are developed without objective data concerning the students' present levels of academic and behavioral performances." We consider that statement to be in error. Prior to admission of a student, we secure all current assessment and performance information relevant to the student that the parents and district of residence will release and submit. If that information is inadequate, we supplement it with teacher or psychologist administered assessments. It is

this data base which contributes to the IEP development process. We agree that a curriculum outline (course of study) also contributes to the IEP process and final content. As a public school guided by curricular expectations of the State Board of Education, and directly governed by said Board, we think it appropriate that we should present a curriculum which adheres to those expectations. Consequently, students' IEPs will display elements of both individuality and commonality. This refining and data base are needed to make sound admission decisions, appropriate placements and responsible IEPs. The entrance/exit criteria will continue to be evaluated and refined as suggested in the report.

5. Page 2/Paragraph 1 - Curriculum

The report states the absence of a "central curriculum to be consistently implemented throughout the Academy." However, the consultants acknowledge the four categories of students being served at MSAB (blind/visually impaired, blind multi-handicapped, deaf/blind, and deaf multi-handicapped). While the consultants appeared to interact only with the students from the first group and a few from the second, there are distinct and marked differences that separate these groups. For example, we have eighteen year olds internal to these groups who function, respectively, as eighteen year olds, twelve year olds, eight year olds and two year olds. To further complicate the issue, they are blind, or deaf and blind, or deaf and intellectually handicapped. Curriculum development has begun and will address the issues of concern stated in the report.

6. Page 2/Paragraph 2 - Staff Development

In carrying out a directive of the State Board for greater emphasis on Staff Development, a staff development coordinator was appointed in September, 1985. Progress has materialized with the expectation of a comprehensive plan for the academies to be completed by the end of this school year. The following items are currently in effect:

- a. Staff development report for school year 84-85;
- b. Staff development plan transmitted to State Department of Education for incorporation into its master plan;
- c. Staff development policy;
- d. Staff development implementation plans for school year 85-86;
- e. Board of Teaching rules re relicensure requirements.

It is interesting to note that the consultants chose not to address the residential nature of the program that they were evaluating since they limited staff development remarks, as well as others, to teachers; ignoring the broadly based educational team here which consists also of non-instructional personnel.

7. Page 2/Paragraph 3 - Teacher Evaluation

The goal is to improve instruction by identifying the consequences, positive and negative, of teacher and other employee behaviors, reinforce the positive aspects and reduce/replace the negative. Retention, promotion, termination, etc., also become an end product of the process, which admittedly is an administrative consequence but not the primary function as stated. Employee maintenance or improvement of job satisfaction is also a product of the process.

8. Page 2/Paragraph 4 - Outreach

We do have a full-time Outreach employee serving the Academies for the Deaf and Blind. We provide psychological services to requesting school districts and parents. Consultations are provided by skilled teachers and administrators to school personnel, parents, group homes, Day Activity Centers, colleges, state agencies and professional and lay person organizations. These services were formed and enacted without additional complement or appropriations. The superintendent and assistant superintendent did express hopes of making available this facility, its staff, and their expertise increasingly to local school districts, their personnel, college teachers and students, parents, and handicapped children/youth/adults. We expressed these ambitions both as hopes and developing realities. We also expressed concern regarding our limitations without Legislative expansion of our mission and accompanying appropriations.

9. Page 3/Paragraph 1 - Programs and Leadership

This paragraph again compliments competent staff and good instructional programs while raising concerns with the instructional leadership necessary to cause "overall direction and a clear sense of purpose".

The reality is, this school, staff and students alike, have existed throughout the last two years with the threat that the school may not continue as an educational facility. Maintaining overall direction and a clear sense of purpose are difficult in that environment. Despite these circumstances, the Academy enrolled the largest number of summer school students in 1985 (82 students) and received the largest influx of new students in recent years in the fall of 1985 (16). From our perspective, these enrollments document an expanding sense of purpose and mission.

10. The issues raised in this paragraph are important. With input and suggestions from the Advisory Council, the curriculum changes will be made to insure that students will have the opportunity to develop positive attitudes toward blindness.

11. Page 4 - Structure and Overview

We appreciate the comments made by the consultants. It is our observation that the State Board of Education has worked very diligently to understand the Academies' missions, functions, challenges, and achievements. It is also our hope that the Board would wish to continue in this role despite frustrations and excessive time demands.

12. Page 6/Paragraph 1 - Entrance/Exit Criteria

We agree the entrance/exit criteria are crucial components of the overall program and we will continue to refine the criteria as appropriate.

13. Page 6/Paragraphs 2-3 - Criteria

It is agreed that "visual impairment which documentably adversely affects educational performance" is less precise than some parties might like. We must remember, however, the recent legislation and its inclusion of "socialization skills" as a legitimate factor for admission/enrollment may

even supersede the necessity for a potential student to meet this academic criterion. Verification of visual impairment information, upon being received and utilized in the admissions process, is then routinely transmitted to the nurse's office where, as medical information, it is more routinely used than if deposited in the office files. In the future, we will duplicate the verifying data of visual impairment for use in the nurse's office leaving the original data in the students' files.

14. Page 7/Paragraph 5 - Report Content

We appreciate the provision of a Sample Examiner's Report and will review it for usefulness.

15. Page 8/Paragraph 1 - Criteria

The Paragraph 1 assertion that the criteria do not adequately document the existence of visual impairment or blindness appear to directly conflict with the Department of Education's Monitoring and Compliance determination on the same subject (p. 24, 3/22/85). We contend this assertion is in error.

16. Page 8/Paragraphs 2-4 - Assessments

In Paragraphs 2,3 and 4, it is stated that student needs are inadequately determined by way of assessment. The Department of Education Monitoring and Compliance Review (Report 3/22/85, p. 11, p. 24) did not produce any citations of inadequacies in determining student needs by way of assessment.

The Paragraph 4 recommendation, re: Every student's intelligence and achievement testing is one which merits continuing discussion and is under study with the Department of Education.

The Paragraph 4 interdisciplinary team evaluation recommendation appears to closely approximate a description of our current evaluation and admissions approach in which we include all the professionals cited as well as teachers, administrators, dorm personnel, etc.

17. Page 8/Paragraph 5 - Multi-Sensory Impairment

We do not propose that any student be in attendance at the Minnesota State Academy for the Blind for whom placement would not be appropriate. The Academy for the Blind, however, has a responsibility to serve students for whom placement at the Academy is appropriate.

18. Page 9/Paragraph 1 - Visually Impaired, Multi-Handicapped

We appreciate the point that the consultants make in this paragraph, i.e., residential school placement should be based on student need, not program availability. As repeatedly litigated, the prevailing interpretation is that a resident school district is required to provide an appropriate, least restrictive environment for educational opportunity.

19. Pages 10-13/Paragraphs 1-8 - Multi-Handicapped

We feel that the consultants raise several legitimate issues within these pages of their report.

Insofar as the practice of educating Deaf Multi-Handicapped individuals on the MSAB campus is concerned, we are inclined to agree that a narrow reading of the recent legislation might call into question the legitimacy of this practice. The present program, however, expands options available between two campuses of a unified School for the Sensory Impaired. Critical challengers of current practice are invited to observe the program in question and to form their own conclusions.

20. Page 14/Paragraphs 1-2 - Application

Re Paragraph 1, we have spoken previously of the apparent misunderstanding regarding the location of the ophthalmological records.

Paragraph 2 seems to dispute the appropriate use of a Diagnostic or Interim IEP, which we have twice been authorized to use by the Minnesota Department of Education.

21. Page 14-15/Paragraphs 3-4-5 - Exit Criteria

Paragraphs 3, 4 and 5 represent thoughtful reflections on our exit criteria. We appreciate them.

22. Page 16-17/Paragraphs 1-5 - Background

We appreciate the helpful background re P.L. 94-142 contained in this summary.

23. Page 17/Paragraph 1 - IEPs

Paragraphs 1-2 raise concerns of MSAB's IEP process and products. We would again like to call attention to the 3/22/85 Department of Education Monitoring and Compliance report which pronounced, "The Individual Education Plans (IEPs) reviewed for most of the students were current, complete and included "state of the art" levels of objectivity."

24. Page 17/Paragraphs 2-3 - Assessments

The assessment process has been discussed in detail with the State Board of Education in the last year and two papers (Assessment Informational Background dated 10/26/84 and Residential Schools' School Programs/Student Assessment, Fall '85) have been prepared to describe them. We will continue to evaluate and improve the process as recommended in the report.

25. Page 18/Paragraphs 1-2 - IEPs

It is true that the student in question was referred some years ago to MSAB for a variety of purposes, one of which was Braille instruction. This student developed a considerable resistance to Braille instruction and utilization, which peaked last school year (1984-85) and the IEP for the 1985-86 year accommodated this negative reaction by dropping formal instruction in Braille and allowing the 18 year-old student to utilize large print as his preferred medium of instruction. This decision was not made lightly as the student's case manager at MSAB and his caseworker from State Services for the Blind are both blind/visually impaired individuals with great dependence on, and respect for, Braille as a medium of

instruction/learning. Given the student's resistant attitude and age, they felt there were better ways for him to be engaged in learning activities than being force fed something which he considered to be intolerable, particularly since his vision is sufficient to allow learning/instruction by large print media. We suspect that this student is the same individual referred to on Page 17, Paragraph 3, who has displayed minimal academic gain over a considerable period of time. Again, denied the opportunity to provide any clarifying background information to the consultants, we were not able to advise them that this student appears to be afflicted with vision impairment, dyslexia, and some form of learning disability. He also seems to be traumatized by written testing situations, to "choke" and subsequently, do poorly. Nonetheless, he is President of the Student Council, is participating in raising \$3,000 to support five of our students, including himself, to spend one week in Washington, D.C. in February in "Close Up", an activity allowing students to observe our Federal government at work. He also presented welcoming remarks to an audience of 150 for our Academy Holiday Program, and is involved in a host of other activities. While this student's recorded test scores may be depressed for his age and grade level, it is possible that other qualities, partly engendered and nurtured at MSAB, may cause him to become a successful graduate and adult.

26. Page 19/Paragraphs 1-3 - IEPs

We regard the comment that admissions meetings should be separate from IEP meetings with mixed feelings. In a number of instances this summer/fall, we combined the two because we had taught the students in summer school for four weeks and were reasonably familiar with their strengths, weaknesses, needs, parents, prior educational performance, etc. Given that situation and a desire to reduce parent and child travel and lodging time, as well as staff time, we combined the two events in a number of instances. In Paragraphs 2-3, the consultants speak to a LAC recommendation that an independent third party participate in the admissions meeting to represent the students' interests and assure appropriate placements. The consultants opposed this recommendation as we also did.

27. Pages 19-20/Paragraph 3, 1-2 - IEPs

Paragraph 4 suggests that some relationship exists between adequacy of educational opportunity, student performance, and decisions to seek placement at the Academy. In the pure and theoretical sense underlying LRE, we are aware that factors #1 and #2 should have little relationship to the placement decision. However, the student who experiences repeated failure or inadequate performance "back home", for a variety of reasons, is the student whose parents and school district of residence, seek placement within the constraints of our criteria. It is helpful when sufficient data have been accumulated by the resident school district before agreeing to a level 6 placement. If not, we generate and aggregate that information. Out of that will flow the IEP.

In Paragraph 1, Page 20, it is observed that our IEPs are very detailed. We agree. So does the Department of Education. To assert that we lack accurate means to measure student progress is in error, we feel. To say that we should measure student progress more systematically across a variety of dimensions would be reasonable and more to the point. We are working on that.



Paragraph 3 recommends the IEP process be "changed" and then describes the current process as the proposed change.

28. Pages 21-22/Paragraphs 1-4, - Principles

We appreciate the thoughtfulness of the remarks and the recommendations. We could and will do more in this dimension.

29. Page 22/Paragraphs 1-3 - School Day

The remarks re school day, time and number of class periods, breaks, etc., are appreciated.

Let it be noted, prior to learning this report's recommendation, it was decided to reduce the student class day by 15 minutes per day with the expectation that teachers would use that time to establish a closer operational connection with dorm personnel. At the outset of the year, we decreased the class day by approximately one hour for many of the younger children. We are also contemplating installation of an eight-period day to reduce interruption in scheduled academic or other time for O.T., P.T., Speech, etc. A scheduled break has also been under consideration.

In short, the consultants' recommendations parallel or follow those internally generated here.

30. Page 23/Paragraphs 1-4 - Orientation and Mobility

We agree with the emphasis placed by the consultants on these skills. We have discussed in detail the practice of assigning a teacher assistant to be the full-time direct provider of instruction. We are studying options in order to find an appropriate, responsible solution to this dilemma.

The hollow, fiberglass cane recommendation will be taken under advisement.

31. Page 24/Paragraphs 1-4 - Cane Travel

We agree that cane usage in the Academy (Paragraph 1) should be increased. Several months ago, we decided to declare particular days as mandatory cane usage days for blind/visually impaired students for whom that is appropriate. At the same time, it is felt that credit should be given to the O & M program that makes cane travel in the facility frequently unnecessary.

Paragraph 3 recommends that cane travel start at an earlier age. We have discussed this suggestion for some time. It will receive further consideration, as will the recommendation in Paragraph 4 re use of longer canes.

32. Pages 25-27/Paragraphs 1-8, 1-2, 1 - Braille Instruction

We appreciate the several complimentary remarks found here, as well as the helpful suggestions re:

- a) The Mangold Program
- b) Slate and Stylus
- c) Braille or Print
- d) Large Print

We shall give thoughtful study to the above.

33. Page 27/Paragraph 2 - Computer Instruction

Immediate repair of the Kurzweil machine will be seriously considered.

34. Page 28/Paragraph 1 - Mainstreaming

A year ago, we developed a liaison coordinator position to accomplish this task. We anticipate expanded student mainstream participation when appropriate.

35. Page 28/Paragraph 4 - Department Meetings

This recommendation was under study for implementation four weeks prior to the report's arrival.

36. Page 29/Paragraph 1 - Position Vacancy

The observation that a vacancy for a teacher trained in deaf/blind education remained unfilled for "possibly as long as 16-18 months" is in error. The person previously in this position unexpectedly announced her resignation three days prior to our September 4, 1985, school opening. We conducted a nationwide search for a replacement and had a qualified employee in the affected classroom as of November 13, 1985.

37. Page 29/Paragraph 2 - Deaf Multi-Handicapped

The student behavior cited in this paragraph was observed, recorded and referred to psychological personnel, teaching and dorm staff. We discussed our concerns with parents, and proposed in-hospital observation and study. The inappropriate behavior disappeared over the summer. Absent a perceived need, a behavioral program and attendant IEP objectives were not developed.

38. Page 29/Paragraph 4 - Summary

On behalf of the teaching staff, we express appreciation for the compliment for their work.

39. Page 29-30/Paragraphs 6 and 1 - Staffing Observations

The first recommendation is to abandon the school psychologist position in favor of a methods/materials position. This suggestion is in conflict with the consultants' frequently expressed concerns regarding assessment data, standardized test administration, behavioral management, accurate placement decisions, etc.

We have the recommendation that the principal position, now vacant for seven months, be filled. We feel the current amalgamation of the Assistant Superintendent and Principal duties is not the most preferred of arrangements, but given immediate considerations, is functionally adequate.

The consultants seem to recommend termination of the Dean of Students position. Neither motivation nor rationale are provided. The feasibility of this recommendation will be taken under advisement.

40. Pages 31-32/Paragraphs 1-6, 1-2 - Performance Evaluation

We appreciate the analysis presented on performance evaluation. We are, however, confident the evaluation instrument is primarily used for the improvement of instruction as well as administrative decisions. As indicated previously, improvement of instruction is addressed in the Staff Development Plan as outlined on Page 2.