



December 15, 2023

Director McKenzie Snow
Iowa Department of Education
400 E 14th Street
Des Moines, IA 50319-0146

Dear Director Snow,

We thank you once again for your conversation with our UEN superintendents last September. We share the goal of closing achievement gaps for all students and have undertaken additional discussion about academic performance for students with disabilities. The Urban Education Network Steering Committee subsequently established a new priority for the 2024 Legislative Session regarding Special Education. We believe it might be possible your Department could engage in some action without a legislative directive, so we wanted to communicate directly with you and your team about our concerns.

The learning gap for Iowa students with disabilities and the rest of the nation, based on NAEP student performance, may not be comparing the same population of students. It is paramount to our districts, communities, staff and students that we understand the entire system of special education, from identification of need, determination of services, and alignment of assessment with intended outcomes, before significant changes are imposed. We look forward to additional conversation with you about how best to move forward. Our priority language follows:

Special Education Identification and Instruction

Appropriate identification of students' disabilities and provision of the continuum of care associated with their needs will support academic growth and meet individual goals for students.

Iowa is the only state in the nation that identifies and assigns special education services to students with disabilities based on nonproficiency (failure to progress and performance below expectation) rather than specific disability categories for students entitled for services under the Individuals with Disabilities Education Act (IDEA). Since Iowa's significant achievement gap between students with disabilities and without is evident, UEN supports an evaluation of our state's plan with the federal government for compliance, including a thorough investigation by an independent evaluator to determine how such a change to child find/student identification for services related to disability used by other states and allowed under Federal law would impact student outcomes in Iowa.

The current identification process creates a barrier to identifying needed supports, accommodations and modifications, which are needed to serve students in partnership with parents and keep staff and students safe.

Additionally, Iowa does not provide for a full continuum of needed care for students, i.e., residential placements and all day wrap-around therapeutic classrooms have long waiting lists without appropriate

services in the meantime. The goal to close the achievement gap for students with disabilities is further compromised by special education staff shortages in Iowa. UEN schools are committed to lowering achievement gaps for students with IEPs. Adequate SSA is required to keep pace with inflation for the cost of services required in IEPs to be funded by special education weightings in the formula. Additional state investment to build and support a full continuum of care is required. A workable system gives access to all information needed to effectively serve students entitled under IDEA. Mandates from the State of Iowa should not exceed federal requirements for special education services.

Thank you for your consideration of this request.

Urban Education Network Member School Districts:

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