

Senator Stillman, Representative Fleischmann and esteemed members of the Education Committee,

I have been an education advocate for over ten years. In this role I guide individual families through the special education process by reviewing student records, creating action plans and attending school-based meetings. Throughout, I have believed that while complex to navigate, Connecticut's special education process was reasonable and fair. This view is now challenged due to the confusion ushered in with scientific research-based interventions (SRBI).

One of the most pervasive and harmful effects of SRBI as it is often implemented, is the significant delay it causes in special education services due to understandable confusion on the part of districts. This lost opportunity for instruction can not be regained.

The data gathering component of SRBI, while well-intentioned, requires a tremendous number of resources that districts do not have. Districts that actually are able to collect the data required for SRBI usually have no reliable system for analyzing this vast amount of information. The result is children stuck in a limbo of tiered intervention, neither closing the achievement gap nor being designated eligible for special education services.

Please amend H.B. 6501 to clearly state that comprehensive evaluations and eligibility determinations can not be delayed while the SRBI process ensues.

Respectfully submitted,
Kathleen Casparino M. Ed.
Connecticut Educational Advisors, LLC

Please see the document below for further information.

How Connecticut's SRBI Creates Delays

Historically, general education interventions had to be attempted prior to a child's being identified with a specific learning disability. In the 2004 reauthorization of IDEA, this requirement was more formally referred to as response to intervention (RTI). The Connecticut State Department of Education responded by creating a process called scientific research-based interventions (SRBI) and refers to it as Connecticut's framework for RTI.

SRBI consists of 3 Tiers:

- Tier I - All students are in Tier I which focuses on sound education practices and differentiated instruction.
- Tier II – Students who do not make adequate progress with some short term remedial instruction are elevated to Tier II for more focused and intense instruction.

- Tier III - If they do not respond to Tier II intervention after a recommended 8 to 20 weeks they are elevated to Tier III for even greater intensity of instruction for an additional 8 to 20 weeks. **Connecticut's SRBI suggests up to a total of 40 weeks of interventions after a child has demonstrated a need beyond that which can be met by Tier I.**

The total of 40 weeks in Tier II and III instruction is merely a guideline. There are documented cases of children remaining in Tier II or III in excess of a year while no referral to special education is initiated by the district. Furthermore, there is no requirement that families be notified of a child's placement in Tier II or III.

The Connecticut State Department of Education acknowledges that SRBI should not delay a referral to special education, yet apparently contradicts itself in its newly published "2010 Guidelines for Identifying a Child with a Specific Learning Disability". On page 30 it cites criteria to determine eligibility and one of the criteria is, **"The child does not make sufficient progress to meet age or state approved grade level standards ... when using a process based on the child's response to scientific research-based intervention"**

As a result of this wording, there is a significant danger that districts may interpret the Connecticut State Department of Special Education's guidelines as a requirement to complete all 3 Tiers of SRBI prior to a referral.

This fear is supported by the Connecticut Special Education State Advisory Committee's (SAC) 2010 Annual Report which states, **"We also heard from Council members that some districts in the state are denying services to special education students in the name of SRBI. One cited example was a student who was exited from special education because all the tiers of interventions in SRBI had not been completed prior to the student being referred to special education."**

Furthermore, the Office of Special Education Programs (OSEP) issued a memorandum on 1-21-11, acknowledging that RTI strategies were being used to delay or deny a comprehensive evaluation and warned that this practice was inconsistent with IDEA.