

OFFICE OF CHIEF ACADEMIC OFFICER
Summary of State Board of Education Agenda Items
July 15, 2021

OFFICE OF SPECIAL EDUCATION

01. Action: Begin the Administrative Procedures Act process: To revise Miss. Admin. Code 7-3: 74.8, State Board Policy 74, Chapter 74, Rule 74.8 – University Based Program [Goals 1, 2, and 3 – MBE Strategic Plan]

Background Information: The University-Based Program (UBP) provides an opportunity for parents of children with disabilities or Local Education Agencies to place students with disabilities in a UBP to receive special education and related services. UBPs shall receive MAEP university-based teacher units based on the number of students enrolled in the UBP.

The purpose of this policy is to establish regulations that govern the overall application, approval, reimbursement, and teacher unit allocation process for the UBP.

The SBE met and voted unanimously on May 20, 2021 to begin the Administrative Procedures Act (APA) process. The APA process began on May 25, 2021 and closed on June 24, 2021. Seventy-four (74) comments were received. Based on the comments received and additional reviews of the proposed revisions, the MDE is recommending additional revisions that necessitate another review through the APA process.

This item references Goals 1, 2, and 3 of the *Mississippi Board of Education 2018-2022 Strategic Plan*.

Recommendation: Approval

Back-up material attached

Summary of Administrative Procedures Act (APA) Comments
Approval to revise State Board Policy Chapter 74, Rule 74.8 University Based Programs
The policy authorizes the administration and procedures of university-based programs

Comment	MDE Response
<p>Mississippi State University – Dr. Kasee Gadke-Stratton Proposed 1c <i>“The LEA shall remain the district of enrollment for students placed in the university-based program by the IEP Committee, or through due process, state compliant process or binding mediation. The student shall be included in the LEA’s December 1 Child Count, and the LEA shall be responsible for ensuring the student receives a FAPE.”</i></p> <ul style="list-style-type: none"> • Please list under what specific section the child is listed on the December 1 count for the LEA 	<p>Clarification will be provided through training and technical assistance. No change needed.</p>
<p>Mississippi State University – Dr. Kasee Gadke-Stratton Proposed 2: <i>Teacher Units Approved for University-Based Programs</i></p> <ul style="list-style-type: none"> • Revise to: <ol style="list-style-type: none"> (1.) Documentation verifying birth date and age from birth through 21 years [We request to change the age to birth from the original proposed of age three; this is based on the review of code section 37-23-35, which allows for payment for services for any child. We are requesting that UBP teacher units are eligible for students ages birth through 21 years of age, as has been historically provided to the programming and as outlined in code section 37-23-25.] (2.) Documentation of current eligibility by Early Intervention/LEA [We request the change to be consistent with serving “any student” birth through 21. (3.) Documentation of current IEP/IFSP [We request this change to be consistent with serving “any student” birth through 21. This is also consistent with current procedures for eligibility in our UBP} 	<p>Policy updated to address this concern.</p>

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<p>Mississippi State University – Dr. Kasee Gadke-Stratton Proposed 3: <i>Application Steps for University Based Program Proposal</i></p> <ul style="list-style-type: none"> • (b) General Information <ul style="list-style-type: none"> • i. Number age and IDEA/Early Intervention of students [We request this change to be consistent with serving “any student” birth through 21.] • Length of School Day (UBP teacher must provide a full day of education to receive full funding. 5.5 hours of direct instruction) [We request this clarity to ensure this special educator can receive full funding for serving students for the entirety of the 5.5 hours per school day. Many of our students are unable to participate in a full day academic program due to their complex needs. We would like to have the flexibility of holding a class in the morning and the afternoon with a full 5.5 hours of instruction individually with students for an additional 1.5 hours.] 	<p>Policy updated to address this concern.</p>
<p>Mississippi State University – Dr. Kasee Gadke Stratton Lastly, we would also appreciate the policy to consider adding requirements for a request for a 1/2 teacher unit under the proposed section (2). For example, inf a UBP can provide 2.45 hours (1/2 of an instructional day) of services to 5 medically complex/significant delayed students, we would like to be able to be eligible for reimbursement for a 1/2 unit/part-time UBP teacher. This would be exactly half of the proposed outlined criteria for a teacher-unit.</p>	<p>Policy updated to address this concern.</p>
<p>U. S. M. Statewide Schools 1. Procedures for Enrollment in a University- Based Program Proposed Procedures 1. Procedures for Enrollment in a University-Based Program</p>	<p>Policy updated to address this concern.</p>

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<p>a. Students with disabilities may be enrolled in a university-based program in the following two situations:</p> <p>i. The student is enrolled on a private tuition basis by their parent(s)</p> <p>Concerns USM Statewide Schools 1808 is a public entity by state law * offering service options to families under IDEA regulations. Neither The Children’s Center not the DuBard School charge tuition.</p> <p>Suggested Procedures i. Change to iii</p>	
<p>U. S. M. Statewide Schools</p> <p>Proposed Procedures i. ADDITION to procedures</p> <p>Concerns When a UBP is working with an infant or toddler under IDEA Part C regulations, they should be included in the Part B assessment and eligibility process as they are often the lead agency alerting the Local Education Agency (LEA)/district to the child’s disability and needs.</p> <p>Suggested Procedures i. If a child is receiving Part C services with a University-Based Program (UBP), the parent, MSDH Early Intervention Service Coordinator, UBP personnel, and the Local Education Agency (LEA) shall participate in the <i>Part C to B transition meeting</i> and collaboratively determine the Part B eligibility assessment plan. Assessment data can be obtained from all programs and the LEA should invite the UBP to the Part B eligibility determination and Individualized Education Program (IEP) committee to collectively, with the parent, determine service needs and placement options.</p>	<p>Clarification will be provided through training and technical assistance. No change needed.</p>

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<p>U. S. M. Statewide Schools Proposed Procedures</p> <p>ii. a) if a Local Educational Agency (LEA) initiates a placement because an Individualized Education Program (IEP) committee in that district has determined that the university-based program is that student's Least Restrictive Environment (LRE) for the purposes of providing that student with a Free and Appropriate Public Education (FAPE), and the IEP committee places the student in the university-based program. Yearly placement decisions relative to whether a student with disabilities is to be placed in a university-based program by an LEA continues to be the responsibility of LEA's IEP committee</p> <p>Concerns If an LEA and parent consider the UBP to be the most appropriate placement for a child, the UBP must be invited to the IEP committee meeting and UBP must receive referral information prior to the meeting to assist in the process of determining if the UBP can meet the child's needs and provide FAPE, considering LRE. LEA/districts should be aware that a UBP (a statewide school) may maintain a waitlist and may not have appropriate services to meet the needs of a child at any given time. Without the UBP personnel included, this means that tow IEPs will be required...one which is initiated in the LEA and does <i>not</i> involve the UBP followed by one <i>with</i> the UBP as is currently done. This will add a layer of bureaucracy and delay the placement process for the children with the MOST needs, creating rushed an reduced quality IEP committee decision processes to meet looming deadlines</p>	<p>Policy updated to address this concern.</p>

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<p>Our concern is while USM UBPs do not enroll privately placed students on a tuition basis, the option could be available to a UBP that decides to allow such enrollment</p> <p>Suggested Procedures</p> <p>i. a) if a LEA initiates placement because an IEP committee, that includes UBP personnel, has determined that the UBP is the LRE for the purposes of providing that student with a Free and Appropriate Public Education (FAPE), and the IEP committee places the student in the university -based program. Yearly placement decisions relative to whether a student with disabilities is to be placed in a university-based program by an LEA continues to be the responsibility of LEA’s IEP committee, with UBP personnel included</p> <p>b) when the university-based program staff is requested by a parent to enroll a student on a private tuition basis, the university-based program will provide clear notice to the parent that the participating student has no individual entitlement to a free and appropriate education (FAPE) from their home school district, including special education and related services as long as the student is privately placed.</p>	
<p>U. S. M. Statewide Schools</p> <p>Proposed Procedures</p> <p>c. When a student with disabilities is placed by the IEP Committee in a university-based program, the university-based program shall enter into a collaborative agreement with the LEA that will require state and federal funds already designated for the student placed to be utilized the cover the costs of tuition at the university-based program along with special education and related services to ensure that the student receives a FAPE. Additionally, the collaborative agreement will delineate services, responsibilities, and other costs</p>	<p>Policy updated to address this concern.</p>

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<p>related to placement of students in the university-based program. The collaborative agreement will be a template provided by the Mississippi Department of Education (MDE) and shall reference the IEP developed by the LEA in collaboration with the university-based program and their responsibility for IEP implementation.</p> <p>Concerns The services and responsibilities are already delineated in the student’s IEP that dictates the flow of state and federal money for each child. Stating again in a collaborative agreement is redundant and unnecessary. If the UBP charges more than what is provided under state and federal funding, the district and UBP will be required to enter into a collaborative agreement to address those changes</p> <p>The inclusion of state funds implies that teacher unit funds and other state funds are impacted. These additional state funds include transportation, ESY, and the master teacher/SLP supplement.</p> <p>MDE’s concern is the provision of federal funds (IDEA funds). This issue can be addressed an ensure that all parties are following federal IDEA regulations without involving state funds and hundreds of children’s service plans through adding an MOU/collaborative agreement.</p> <p>Federal code (Code of Federal Regulations §300.2 Applicability of this part of State and local agencies) indicates that (a) <i>States</i>. This part applies to each State that receives payments under Part B of the Act, as defined in §300.4 (b) <i>Public agencies within the State</i>. The provisions of this part –</p> <p>(1) Apply to all political subdivisions of the State that are involved in the education of children with disabilities including:</p> <p>(i) The State educational agency (SEA)</p>	

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<p>(ii) Local education agencies (LEAs), educational service agencies (ESAs), and public charter schools that are not otherwise included as LEAs or ESAs and are not a school of an LEA or ESA</p> <p>(iii) Other State agencies and schools (such as Departments of Mental Health and Welfare and State schools for children with deafness or children with blindness).</p> <p>(iv) State and local juvenile and adult correctional facilities; and</p> <p>(2) Are binding on each public agency in the State that provides special education and related services to children with disabilities, regardless of whether that agency is receiving funds under Part B of the Act</p> <p>It is important to note that MS Code Ann. §37-23-35 indicates that UBPs are to be eligible for funds in the same manner as LEAs and that any additional costs of the programs provided by UBPs are to be borne by the UBP.</p> <p><i>“The university or college shall be eligible for state and federal funds for such programs on the same basis as local school districts. The university or college shall be responsible for providing for the additional costs of the program.”</i></p> <p>Suggested Procedures</p> <p>c. If the university-based program chooses to enter into a collaborative agreement with the LEA for the purpose of receiving additional funds from the LEA to serve the student, this collaborative agreement will be used to address additional funds and/or the cost of tuition.</p>	
<p>U. S. M. Statewide Schools</p> <p>Proposed Procedures</p> <p>d. The LEA shall remain the district of enrollment for students placed in the University-based program by the IEP Committee, or</p>	<p>IDEA funds authorized under § 300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, an agency must meet the State’s definition of LEA <i>and</i> must meet the requirements under § 300.200, including submitting a plan that</p>

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<p>through due process, state complaint process, or binding mediation. The student shall be included in the LEA’s December 1 Child Count, and the LEA shall be responsible for ensuring the student receives a FAPE.</p> <p>Concerns The only additional step that is required to assist with federal regulation requirements is to cross check between the UBP and the LEA that the student is receiving FAPE through the December 1 Child Count. MDE can simply verify, in writing, the LEA that the students included on the UBP December 1 Child Count are receiving FAPE and then release the IDEA funds to the UBP. This would remove the need for collaborative agreements for every student.</p> <p>Suggested Procedures Count per district/LEA so that the LEA can ensure the student is receiving FAPE. MDE will verify with the LEA that these students are enrolled in the UBP and receiving FAPE</p>	<p>provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201 through 300.213. No change needed.</p>
<p>U.S.M. Statewide Proposed Procedures e. The LEA shall convene an IEP Committee meeting that would include representatives and staff from the university-based program who would be responsible for providing the services in order to change the student’s LRE to the university-based program, develop a transition plan for the student to the University-based program, as well as modify the student’s services accordingly based on the new placement. Once the student is transitioned to the university-based program, the IEP Committee must include an Agency Representative from the LEA that will be involved in committee meetings to ensure that the student receives a FAPE at the new placement. The IEP developed for the student shall be reasonably calculated to enable the student to make progress appropriate in light of the student’s circumstances.</p>	<p>Policy updated to address this concern.</p>

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<p>Concerns This is duplicative of the language stated in 1.a, ii, a). The IEP Committee should continue to include an agency Representative from the LEA, UBP personnel, and the parent</p> <p>Suggested Procedures e. REMOVE</p>	
<p>U.S.M. Statewide Proposed Procedures f. The LEA shall continue to be responsible for providing transportation for a student placed in a university-based program through the use of transportation funds from the Mississippi Adequate Education Program (MAEP). Additionally, university-based programs will be eligible to receive MAEP transportation funds for a student that is parentally-placed on a private tuition basis.</p> <p>Concerns These are changes to the flow of state funding, not federal funding, the issue that began these policy updates. <u>Miss. Code Ann. § 37-151-85 Transportation Allowance:</u> “Moreover, the State Board of Education is hereby authorized and empowered to make such payments to all districts and/or university-based programs as deemed necessary in connection with transporting exceptional students as defined in Miss Code Ann. § 37-23-3. The State Board of Education shall establish and implement all necessary rules and regulations to allot transportation payments to university-based programs. <i>“The LEA shall continue to be responsible for providing transportation”</i> is problematic and end requires the LEA to expend funds and provide services that currently are covered by the UBP’s receiving state transportation funds to provide reimbursement to parents.</p>	<p>Policy updated to address this concern.</p>

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<p>Suggested Procedures f. While the LEA shall continue to be responsible for providing transportation for a student placed in a university-based program through the use of transportation funds from the Mississippi Adequate Education Program (MAEP), the funds shall be provided directly to the UBP pursuant to <u>Miss Code Ann § 37-151-85</u>. Additionally, university-based programs will be eligible to receive MAEP transportation funds for a student that is parentally-placed on a private tuition basis.</p>	
Summary of Content	MDE Response
<p>Proposed Procedures g. The LRE and the university-based program must ensure that there is no delay in implementing the student’s IEP, including any case in which the payment source for providing or paying for special education and related services to the student is being determined.</p> <p>Concerns If the UBP is involved in the IEP Committee from the beginning, as is done currently, there will be no delay in services. If state funding continues to come directly to the UBP, as it does currently, there will be no question about payment for services.</p> <p>Suggested Procedures g. REMOVE</p>	<p>This section needs to remain in place to ensure that all UBPs are following the same procedures. No change needed.</p>
<p>U.S.M. Statewide 2. Teacher Units Approved for University-Based Program</p> <p>Proposed Procedures Children counted for the allocations and approval of a university-based teacher unit(s) shall meet the following criteria: 1. Documentation verifying birth date and age of three (3) through twenty-one (21 years), 2. Documentation confirming residency in the State of Mississippi, 3. Documentation of current eligibility, 4. Documentation of current IEP, 5. Documentation of placement by a local school district IEP committee OR documentation of private</p>	<p>Policy updated to address this concern.</p>

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<p>parental placement, 6. Have not finished or graduated from high school.</p> <p>Concerns The proposed policy suggested does not accurately describe the teacher unit process.</p> <p>Suggested Procedures</p> <p>a. Children counted for allocation and approval of a UBP teacher unit(s) shall meet the following criteria:</p> <ol style="list-style-type: none"> 1. Documentation verifying the birthdate and age of zero (0) through two (2) for part C qualification and three (3) through twenty-one (21) years for Part B eligibility. 2. Documentation of current Part C eligibility or medical diagnoses for ages (0) through (2) Documentation of current Part B eligibility for ages (3) through (21), 3. Documentation of current IFSP or medical diagnoses, or current IEP, 4. Documentation of private parental placement *if UBP chooses to enroll on a private basis 	
<p>U.S.M. Statewide Proposed Procedures Documentation of numbers 1-6 above shall be maintained on file for each child served by an approved state funded teacher and be available upon request by the Mississippi Department of Education (MDE).</p> <p>Concerns (no comment)</p> <p>Suggested Procedures (no comment)</p>	<p>No proposed changes to policy recommended. No change needed.</p>
<p>U.S.M. Statewide Proposed Procedures The university-based program shall submit annual child count data in accordance with the procedures of the Office of Special Education. An assurance from the university-based program that</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>data for each child served has been verified and is maintained on file shall be forwarded to the MDE when the teacher unit is requested for approval.</p> <p>Concerns (no comment)</p> <p>Suggested Procedures (no comment)</p>	
<p>U.S.M. Statewide Proposed Procedures The administrator of the university-based program shall submit Teacher Allocation data in accordance with the teacher unit reimbursement request process required by the Office of Special Education. Teacher units shall be allocated based on the teacher certificate requirements of special schools under the Office of Accreditation and each teacher being responsible for the educational instruction of a minimum of ten (10) children. The Maximum number of children served per teacher is fourteen (14). Any request for a teacher to serve fewer than ten (10) or more than fourteen (14) children shall be made in writing to the Office of Special Education and shall include the reason for the request. Approval shall be based on the schedule of the teacher and instructional needs of the children. All exemptions of the minimum and maximum number of children served by a teacher shall be reviewed and approved by the Deputy State Superintendent, Chief Academic Officer.</p> <p>Concerns Clarification needed for a request to serve the number of children outside that range. The timeline of this needs to be addressed. The current practice of approving teacher units in July when teachers are already hired and prepared to begin August 1 is untenable. LEAs typically provide contracts to teachers by April 15, implying that teacher units are secured and, thus, jobs can be offered by that</p>	<p>MDE will revise the timeline for submitting teacher unit request beginning in the 2021-2022 school year. Clarification will be provided through technical assistance and training. No change needed</p>

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<p>date. Approval would ideally occur in the spring, with more clarification provided regarding the request to service children outside the 10-14 range.</p> <p>The DuBard School’s current minimum of 8 students per teacher allows the program to provide the intensity of services needed for students with significant speech, language, and/or academic difficulties. The Children’s Center ratios typically fall between 10-20 children per teacher due to the population served not requiring or tolerating full day instruction (babies, toddlers, and preschoolers with complex disabilities). Requests and approvals for variations from the 10 minimum and 14 maximum teacher:child ratio should be achieved with ease throughout the school year or during the Teacher Allocation Data request in the spring, knowing that babies are born with significant disabilities all year. Delays in enrolling children in specialized educational services, due to awaiting administrative approval, would be extremely detrimental to a child’s development.</p> <p>Suggested Procedures</p> <p>The administrator of the university-based program shall submit preemptive Teacher Allocation data in early spring, based on the December 1 child count, in accordance with the teacher unit reimbursement request process required by the Office of Special Education. Teacher units shall be allocated based on the teacher certificate requirements of special schools under the Office of Accreditation and each teacher being responsible for the education instruction of a minimum of ten (10) children. The Maximum number of children served per teacher is fourteen (14) children shall be made in writing to the Office of Special Education and shall include the reason for the request. Approval shall be based on the schedule of the teacher and instructional needs of the children. All exemptions of the minimum and maximum number of children served by a teacher shall be reviewed and approved by the Deputy State Superintendent, Chief Academic Officer.</p>	

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<p>U.S.M. Statewide Proposed Procedures The administrative head of the facility is responsible for ensuring a teacher approved for a teacher unit shall be paid based on the salary scale, years of teaching experience, and salary schedule requirements found in <u>Miss Code Ann. § 37-19-7</u> and **§ 37-19-17</p> <p>Concerns (no comment)</p> <p>Suggested Procedures **DELETE reference to Miss. Code Ann. § 37-19-17 as this was repealed in 1997</p>	<p>MDE updated the policy to clarify that the only statutes under that framework still in effect are 37-19-7 (salary scale), 37-19-9 (performance-based compensation system), and 37-19-10 (performance incentive program). The allocation of funds will be tied to the certification of the teacher (A, AA, AAA, and AAAA) and years of experience, and any potential supplements allowed by 37-19-7.</p>
<p>U.S.M. Statewide Proposed Procedures Teacher units shall be allocated and approved for the regular school session. The number of days the facility will provide a regular school session shall be in accordance with the MDE’s regulations and <u>Miss Code Ann. § 37-151-7 (3) (c)</u>, <u>Miss Code Ann § 37-3-49</u>, <u>§§ 37-13-61 through 69</u>, <u>Miss. Code Ann. § 37-151-5 (j)</u>, and <u>Miss. Code Ann. § 37-151-7 (3) (c)</u>. The calendar dates of the beginning and ending of the regular school session shall be submitted to the Office of Special Education when requesting an allocation for a teacher unit.</p> <p>Concerns (no comment)</p> <p>Suggested Procedures (no comment)</p>	<p>No proposed changes to policy recommended. No change needed.</p>
<p>U.S.M. Statewide 3. Application Steps for University-Based Program Proposal</p> <p>Proposed Procedures The outline for the proposal which is to be submitted to the Office of Special Education is as follows: a. Title of the Program</p>	<p>MDE updated the policy to reflect this change in the section regarding Teacher Unit Funding.</p> <p>MDE updated the policy to reflect the change in the section regarding <i>Application Steps for University-Based Programs</i>.</p>

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<p>b. General Information</p> <ul style="list-style-type: none"> i. Number, age and IDEA eligibility of students ii. Length of school Day (must be full day program to receive full funding) iii. Number of teachers requested teacher’s name (if available) and certification (if available) iv. Location and description of the classroom(s) <p>c. A list of program objective</p> <p>d. An outline of program evaluation criteria</p> <p>e. A copy of the university/college approved policies and procedures as required</p> <p>f. An assurance that the university/college will comply with all applicable State Department of Education regulations relating to programs for students with disabilities. It is the responsibility of personnel who operate this program to be familiar with all regulations.</p> <p>Concerns Many children with complex health conditions cannot attend a full school day. These requirements are specific to teachers and state funding requirements sre specific to teachers and state funding requirements for educators. Requirements for length of school day are stated in the <u>MS Code</u>. <u>Miss Code Ann §37-13-67</u> for example. Per federal IDEA law, many children should not receive educational services in a classroom setting but should be served in their LRE. For some, this includes their home or daycare.</p> <p>Suggested Procedures</p> <ul style="list-style-type: none"> ii. Length of instructional school day should include 5 1/2 hours or 330 minutes of direct, individual, or group instruction per educator per day to receive full Teacher Unit funding. iii. Location and description of the classrooms(s) or educational environment (home, community, daycare) 	

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<p>U.S.M. Statewide Proposed Procedures Upon receipt of the proposal, Office of Special Education personnel shall review it and either approve it or provide feedback to university/college personnel may proceed with implementation. If teacher certification and number of eligible children is not available when the proposal is submitted, the MDE shall give tentative approval until such time as this information is received. Proposals shall be submitted for renewal every 3 years or any time there are substantial changes to the program.</p> <p>Concerns (no comment)</p> <p>Suggested Procedures (no comment)</p>	<p>No proposed changes to policy recommended. No change needed.</p>
<p>Mississippi House of Representatives – Missy McGee, State Representative-House District 102 I am writing to you regarding the proposed changes for university-based programs by the Mississippi Department of Education. The Children’s Center for Communication and Development and The DuBard School for Language Disorders at the University of Southern Mississippi, which are both in my district, are a tremendous asset to State and have been filling a void in available services for children with disabilities in Mississippi for over 30 years. These programs were built on the notion that all children with disabilities should have the same access to high quality, comprehensive education and therapy, regardless of their social standing or financial status. The changes proposed by MDE will push these programs from a cost-free public option into private, tuition-based entities, causing hundreds of children each year to go without services that literally change the trajectory of their lives, and ultimately resulting in the closure of both programs.</p>	<p>No proposed changes to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth through twenty-one. The revised policy has been updated to reflect this. Clarification will be provided through training and technical assistance.</p>

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Comment	MDE Response
<p>I cannot overstate the gravity of this consequence. The lives of one of Mississippi’s most vulnerable populations, babies and children with disabilities, are at stake. Families of children with the most complex diagnoses will have nowhere to turn should a school district decide that they can provide adequate services without utilizing the extensive resources of a UBP. Parents will lose everything they have in order to pay for services for their child. Caregivers will have to quit their jobs and apply for unemployment to stay home and care for their child. Children who have the potential, after receiving services from these programs, to enter the public school system will be institutionalized or homebound, receiving disability benefits for the rest of their lives. Funding for services for children age 0-2 must continue. Additionally, state funds for all children with disabilities must not be redirected through school districts. Lastly, should a revision be necessary when it comes to the way federal funding flows to UBPs, that can be done without the requirement of an M.O.U. between a UBP and district for every child, which would add a heavy administrative burden on both districts and UBPs and would further delay services.</p> <p>Thank you for your service to the children of our state and for your consideration of the request. I hope that these proposals have been further researched and reconsidered since your last board meeting. However, please know that we are prepared to offer a legislative remedy during the 2022 legislation session if necessary.</p>	
<p>Mississippi State Senate – Senator John A. Polk, District 44</p> <p>I am writing regarding university-based programs (UBPs), specifically the DuBard School for Language Disorders and The Children’s Center for Communication and Development at the University of Sothern Mississippi. These public-school programs also are known as USM Statewide Schools #1808 and, in essence, function as public educational entities on the continuum of</p>	<p>No proposed change to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth through twenty-one. The revised policy has been updated to reflect this change. Additional clarification will be provided through training and technical assistance.</p>

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<p>placement alternatives as required by the Individuals with Disabilities Education Act. There is great concern that state funding support is in jeopardy based on a MDE memo dated November 6, 2020 from Robin Lemonis, State Director of Special Education. That memo, which was distributed statewide without conversations with the affected programs, indicates that both state and federal funds will have to flow from MDE through local school districts to the UBPs effective with the 2021-2022 school year. Subsequent to the memo, it has been reported <i>verbally</i> that the memo was incorrect, and only the flow of federal funds, a relatively smaller amount, would be affected. However, no <i>written</i> clarification to the November 6, 2020 memo has been forthcoming in thee seven months. This is causing great concern among my many constituent groups, including local school districts, parents, and the university-based programs.</p> <p>It is important to note that these two programs currently serve 200 children. In the last five years, they ae been a resource to 39 school districts statewide. They have a history of over 100 combined years of service. We are fortunate to have such resources available in our state. They are models for excellence. Their working relationships with school districts are stellar as reported by personnel in the districts. Since Mississippi struggles to be recognized positively for its educational accomplishments, it is notable that families move from other states to seek the services of these programs. For example, a family of a child with severe oral and limb apraxia and completely unintelligible speech gave up their home, jobs, and with great personal sacrifice relocated from Delaware to Hattiesburg. That family returned to Delaware with a child who could speak, read, write, and with motor skills he developed in our UBP. Of course, not every family can make such sacrifices for their child with a disability but, when they do, they become Mississippi taxpayers, home buyers, and contributing members of the communities in which they reside.</p>	<p>IDEA funds authorized under §300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, an agency must meet the State’s definition of LEA <i>and</i> must meet the requirements under § 300.200, including submitting a plan that provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201 through 300.213</p>

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<p>As you know, the federal government does not dictate the way state funds flow to educational entities. Considering that, I request that MDE act immediately to clarify in writing to UBPs and school districts the plans for future state funding to university-based programs. If federal funding distributions must be adjusted, that is a relatively small amount compared to state funding. An inordinate amount of time has been utilized by all involved to address these critical issues. Please act not to clarify the matter so that the UBPs can get back to what they do best...providing intensive, high quality services that daily improve the lives of children with disabilities.</p>	
<p>Patricia Martin, Ed, CCC-SLP – Assistant Director, Dubard School for Language Disorders As a speech-language pathologist working at the USM DuBard School for Language Disorders for 19 years, I can say, without a doubt, that the miracles that happen here are just that ...miracles. The team of professionals who work here, the school board members, USM, and our community work together to meet the needs of students with specific and unique speech-language-hearing and reading disorders. I am blessed to be a small part of this service to students and their families. As assistant director, my primary job is to work directly with families and their local school districts regarding placement at the DuBard School. These relationships have worked VERY WELL through the legal IEP process for many years! I appreciate the working relationships that have been cultivated with the 25+ special education directors/school districts whom we currently work alongside. They trust us to do the right thing and we have done the right thing. One of my many concerns is that the proposed changes regarding UBPs will sever relationships with LEAs. We have been assured that the proposed process of incorporating an MOU into our current process “should not be a problem” and that it is the LEAs responsibility to ensure that FAPE is being met. I want to stand</p>	<p>No proposed changes to policy. No change needed.</p>

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<p>on record as stating that FAPE has been met and the LEAs have done this with every child that they have agreed to place at the DuBard School through the IEP process. If this bond of trust is broken by this “MOU requirement” and redirection of federal funds, the CHILDREN and their families will ultimately pay the price.</p> <ul style="list-style-type: none"> This change in policy will create more work for them and discontent with the DuBard School (and other UBPs) which will result in fewer students being easily placed for specialized and intensive services. <u>Mississippi will fail these children and their families.</u> <p>Thank you for your work thus far on the revisions of this policy. Please consider creating a complete task force with members who represent ALL those affected by this policy change to ensure that these special children continue to receive the intensive services that they deserve.</p>	
<p>Maureen K. Martin, Ph.D., CCC-SLP, CEDCALT-QI – Director of DuBard School for Language Disorders</p> <p>I write with enormous concern about the proposal reflected in the Mississippi Department of Education memo dated November 6, 2020, regarding university-based programs (UBPs), specifically the USM Statewide Schools #1808, the DuBard School for Language Disorders and The Children’s Center for Communication & Development. This memo, indicating that all funds will flow through local educational agencies (LEAs) to UBPs effective with the 2021-22 academic year, reflects a profound change in the existing, effective, and well-established funding mechanisms. These changes, if implemented, will decimate the programs.</p> <p>I respectfully request consideration of the following critical points:</p>	<p>No proposed changes to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth through twenty-one. The revised policy has been updated to reflect this change. Additional clarification will be provided through training and technical assistance.</p> <p>IDEA funds authorized under § 300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, an agency must meet the State’s definition of LEA <i>and</i> must meet the requirements under §300.200, including submitting a plan that provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201.</p>

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<ul style="list-style-type: none"> • These public, not private, UBPs function as an <i>extension</i> of the 25 or more school districts with which they work annually. The UBPs are on the <i>continuum of placement alternatives as required under the Individuals with Disabilities Education Act</i>. As you know, options for students with disabilities in many school districts are extremely limited. The UBPs provide an alternative placement, and highly specialized, intensive services which frequently means that, when returning to the LEAs, students often require far fewer special education services than would have been necessary otherwise. Why is this so? LEAs have some superior staff. However, with their typically heavy caseloads, they are unable to provide the <i>intensity</i> of services needed. UBPs and LEAs complement each other. • It has been stated that the November 6, 2020, memo is in error and that only federal IDEA funds will be impacted, not state funds. If that is the case, why has MDE been so reticent to correct the errors in writing? Verbal information is helpful. Written information is what stands until retracted, corrected, or replaced. • It has yet to be proven that the current flow of federal funds is incorrect. Since IDEA funds flow directly from MDE to other state entities, such as the Mississippi School for the Deaf and the Mississippi School for the Blind, why is the flow of funds to UBPs in question? Certainly, The University of Southern Mississippi is a state entity, and the USM Statewide Schools #1808 are statewide programs. I respectfully request that MDE carefully consider this language from the US Department of Education, Office of Special Education (OSEP): <i>Most of the federal funds provided to states must be passed on to LEAs. However, a portion of the funds may be used for state-level activities. Any funds not set aside by the state must be</i> 	

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<p><i>passed through to LEAs. These sub-state allocations are made in a fashion similar to that used to allocate funds among states when the amount available for allocation to States increases.</i></p> <p>Source: https://www2.ed.gov/programs/osepgts/index.html</p> <ul style="list-style-type: none"> • It should be clearly noted that the UBPs have worked diligently throughout their histories to provide all required reports to MDE in a timely manner. In addition, in the case of the DuBard School for Language Disorders serving school age children, every state assessment that is required in the LEAs is conducted annually as directed by MDE. Each student also receives individual assessments annually to document progress. An extraordinary amount of data supporting the efficacy of the program is available. • Children’s services already are being delayed because some LEAs will not place additional children until clarity is received from MDE. • This crisis for UBPs already has cost taxpayers and donors many thousands of dollars to cover the extraordinary amount of personnel time used to deal with this matter over the course of the past six months. That does not include the use of hundreds of hours of volunteer time given to assist in managing this crisis. The time, energy, and resources could have been spent far more effectively in providing services to our most vulnerable children. • It is inexcusable that the programs have sought clarity for months, only to begin to receive somewhat collaborative communications once the public comment period has been underway. 	

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<ul style="list-style-type: none"> It is incredibly disheartening that a lead state agency would create such a crisis rather than collaborating and supporting these stellar programs. Disseminating a memo of a critical nature without the common courtesy and professionalism to bring those affected into conversation prior is indicative of extreme disregard for the programs which have provided over 100 combined years of service to the State of Mississippi. At a minimum, it is indicative of an extraordinary lack of management skills at the state level. <p>I had the privilege of serving at the DuBard School for Language Disorders for over 41 years, 28 years as director. During that time, enormous growth, made possible through the generosity of donors and the cooperation of The University of Southern Mississippi, provided increasing services to children and increasing resources to LEAs. The UBPs are not something that is broken that requires fixing. In fact, they should be celebrated and <i>utilized as the models</i> for others that they are.</p>	
<p>Cynthia Bivins - Parent advocate and retired interim director and special educator, The Children’s Center for Communication and Development</p> <p>I am writing to submit my perspective on the changes under consideration, as outlined in the above subject line. It is my understanding that MDE is considering changes that fall under three broad categories:</p> <ol style="list-style-type: none"> continuation of funding of special education and related services for the population of children ages birth through two years who meet MDE eligibility requirements for special education; documentation of a collaborative agreement/contract between each child’s local school district (LSD) and The Children’s Center for Communication and Development (hereafter, The Children’s Center) for each child placed in services through The Children’s 	<p>No proposed changes to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth through twenty-one. The revised policy has been updated to reflect this change. Additional clarification will be provided through training and technical assistance.</p> <p>Extended School Year Services are a provision of FAPE. The IEP committee of any student placed by an LEA in a UBP will include UBP personnel and LEA personnel. Additional clarification will be provided through training and technical assistance. No change needed.</p>

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<p>Center, to include any cost for said services accrued by either the LSD or parent of said student;</p> <p>3. determination of eligibility per pupil and funding for Extended School Year (ESY) and associated Transportation costs as a function of LSD exclusively, including the routing of associated funding through each LSD.</p> <p>I offer my perspectives on the above considerations not only as a retired special educator with 36 years teaching experience, but also as the parent of a 41-year-old man with Down syndrome, who received services through The Children’s Center from age 16 months, when we moved to Hattiesburg, to his enrollment in his local school district special education services at age 6 years. As I write this, he is hard at work at The Hattiesburg Zoo, living proof of the return on investment, MDE’s financial support of The Children’s Center. Full disclosure: 32 of my 36 years teaching were spent on staff at The Children’s Center. I am deeply invested in its continued success as an exemplary program of direct services for its students, their families, and the pre-professionals, para-professionals and professionals it trains. Toward this end, I have dedicated my life to the provision of high quality early intervention services so critical to the wellbeing of families who find themselves in need of these services; however, I will not belabor the well-documented efficacy of early intervention in general nor the accolades accrued by The Children’s Center across its generations of leadership in our state. I trust the empirical and anecdotal data suffice.</p> <p>Regarding consideration #2, it has been my experience that each student’s IEP is developed through the collaborative effort of said student’s parent(s), Children’s Center personnel, LSD representative(s), and any additional IEP committee members invited by this core membership. The IEP documents all aspects of the instructional services to be provided. As these services are provided and funded by The Children’s Center at no cost to the</p>	

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<p>LSD, the student’s family, or any other provider, “tuition” is not applicable. Information regarding The Children’s Center's funding is provided to all parties and is widely available through public sources and publications. It is this remarkable public-private endeavor (MDE/federal funds/USM space combined with Center fundraising, private donations, etc.) that enables The Children’s Center to offer its unparalleled services. Should MDE determine that the funding aspect of each child’s IEP services be delineated in writing, I would hope that the least cumbersome, most cost-effective method be devised. It would be counterproductive to require a method that unduly burdens any of the involved parties. If the current arrangement of understanding among all parties does not satisfy MDE requirements, surely one document per LSD and The Children’s Center would suffice, as opposed to a separate document per student. Historically, written confirmation of these understandings and verbal and/or written agreements have been kept on file in The Children’s Center, documenting each LSD’s position on provision of services by The Children’s Center. This step has always been covered prior to the commencement of assessment and/or eligibility determination for services, the first step following referral of a child. Perhaps MDE would develop in writing a document to be utilized by The Children’s Center (all UBPs) and all LSDs, in order to assure all MDE concerns/requirements are addressed and satisfied. A single agreement per pupil would ideally cover said student’s enrollment in The Children’s Center until that student changes districts, ages out of or fails to meet eligibility requirements for services. Families deserve that level of certainty regarding their young child’s education, just as families of school-age children do not face yearly uncertainty about LSD catchment areas.</p> <p>Regarding consideration #3, it is my opinion that Extended School Year (ESY) services fall under the realm of each child’s educational plan and as such, eligibility and funding for ESY are functions of</p>	

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<p>the provider of services during the school year. In practice, these determinations must be developed by those parties most familiar with the learning patterns and progress of each student, as periodically documented on each child’s IEP by the IEP committee throughout the regular school year. Clearly, common sense dictates that ESY decisions are best made by the parents and professionals most closely involved with each child’s education. It is extremely rare to find a student this well known to LSD personnel. As the IEP meeting for ESY already includes LSD representation, and the implementation/funding of ESY services is not generated by the LSD, I cannot see why the funding must now be routed through the LSD. Just as the joint decision is made regarding the regular school year services, the provision of an “extension” to the school year should flow seamlessly to students who meet the qualifications for ESY and whose parents wish to participate. I fail to see the rational for or benefit from a change in this procedure. Submitted for your consideration and with gratitude for the critical, outstanding services my child and thousands of other young learners have received at no monetary cost through The Children’s Center, I am,</p>	
<p>Taylor Thomas – Speech Pathology graduate student at The University of Southern Mississippi and previous graduate assistant at The Children’s Center for Communication and Development My name is Taylor Thomas. I am currently Speech Pathology graduate student at The University of Southern Mississippi and a previous graduate assistant at The Children's Center. TCC has greatly impacted my education! The clinicians there are absolutely incredible! They are so passionate, caring, and intentional in everything they do there. The clinicians do an amazing job attending to the children's needs and at the same time explaining</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>the "why" behind what they are doing to graduate students like me. Every second spent at TCC was a learning experience. I have learned from some of the most creative, experienced, and knowledgeable professionals and I treasured every moment learning from them. I have been able to see collaboration between Speech-Language Pathologists, Occupational Therapists, Physical Therapists, Audiologists, Behavioral Therapists, and parents. Even though I am a Speech Pathology major, the other professionals (OT, PT, AUD, BT) took time to explain what they were doing and why they were doing it. I wasn't treated as only an SLP student. I got the privilege to see ALL of the "whys" behind the care that these children receive. TCC's primary goal is to provide personalized services to children in need and to set them up for success, but a close second to that would be providing a solid, informational, and supportive education and experience for students like me. I am forever grateful for The Children's Center</p>	
<p>Linda Lott, retired CCC-SLP – Former Speech Language Pathologist in Public Schools and the DuBard School for Language Disorders</p> <p>I am a retired SLP and spent my entire forty-year career in public school settings and at the DuBard School for Language Disorders University-based programs have always worked with and coordinated beautifully with the local school systems , and I strongly feel the current financial appropriation process should continue since it has worked successfully for decades. Currently, university-based programs have provided services at no cost to parents or school districts. With the changes proposed in Policy 74,Rule 74.8, schools will be hesitant to refer children to university-based programs because it will be viewed as “paying tuition”. In turn, these university-based programs will be impacted and damaged greatly. As a professional who has witnessed the enormous effects and life-changing benefits DuBard School and</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>others have had on children and their families, I am strongly opposed to this change in policy. Families have relocated to Hattiesburg from all over the country in order for their children to receive intensive services, and these services should not be interrupted. The working relationship between university-based programs and Special Education Directors in local school systems has been very successful for years and years, and I would hate to see that change as well. I especially feel this change will limit services for children who need intensive speech, language, and hearing services. My understanding, too, is that most school systems do not want these changes either. Please reconsider the idea of making allocation policy changes because many children with speech, language, and hearing disorders will be negatively impacted by the change. These children need every opportunity to reach their full potential.</p>	
<p>Brenda Goza, retired CCC-SLP – Former Speech Language Pathologist in Public Schools and the DuBard School for Language Disorders</p> <p>It has been called to my attention that a change is being considered that concerns the flow of state funding to University Based Programs to include The DuBard School for Language Disorders and The Children’s Center. I am a retired Speech-Language Pathologist who spent my entire career serving children within the public school system before moving to The DuBard School for my last ten years. I have always found university based programs to have an excellent relationship with the Special Education Directors and teachers in local districts, and it is my understanding that Special Ed Directors do not want these proposed changes either. The system that has been in place for decades has been very beneficial for everyone. The services were provided at no cost to parents or the local school districts. If changes are made to the existing policy, school districts will be seen as “paying tuition” and</p>	<p>No proposed changes to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based programs for students birth through twenty-one. Clarification will be provided through training and technical assistance.</p>

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<p>be hesitant to place children who desperately need intensive services in University Based Programs. This would be a tragedy! University Based Programs would die! So many families from across our nation have moved to our city to place their children in these programs for the intensive services they provide and SO many have benefited and are very successful young men and women today due to the early remediation of their speech, language, or hearing deficits! I strongly oppose State Board Policy 74, Rule 74,8, University Based Programs for these reasons and many more. Please reconsider this policy and allow the flow of state funds to remain as it has been done successfully for decades.</p>	
<p>Edward J Langton – CEO and Chairman of Grand Bank and Member of the DuBard School for Language Disorders Advisory Board I have served the University of Southern Mississippi in many capacities as a volunteer and alumni of the university. As past president of the Alumni Association and USM Foundation I have been intricately involved in the advancement of our university and the services and benefits it offers to its students, community and the state of Mississippi. As a volunteer I have also served on a number of State Boards so I appreciate the work of the MDE’s Board. For the past 31 years I have served as a board member of the advisory board for the DuBard School and have worked with the Children’s Center. Both are classified as public schools (USM Statewide 1808) under state statute 37-23-31 through 35 and receive their funding from both State and Federal sources. These are classified as University Based Programs. The Federal Funding is approximately 6% of its funding. The State Department of Education provides the other nearly 94% of funding. For the past 30 years funding for the University Based Programs has been an extraordinarily smooth operation without problem.</p>	<p>No proposed changes to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth through twenty-one. Clarification will be provided through training and technical assistance.</p> <p>IDEA funds authorized under § 300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, an agency must meet the State’s definition of LEA <i>and</i> must meet the requirements under § 300.200, including submitting a plan that provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201. No change needed.</p> <p>The MDE is requiring a MOU or Collaborative agreement between the LEA and the UBP to outline how state and federal funds will be utilized to cover special education and related services at the university-based programs to ensure the student receives a FAPE. The collaborative agreement will delineate</p>

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<p>The needy students who require disability assistance receive it via the public education funding mechanism. These programs at the State of Mississippi Universities are called University Based Programs (UBPs). <u>They are NOT private schools that are funded by paid tuition from citizens.</u></p> <p>What has recently occurred is that a question arose by one UBP program from another university that addressed the way Federal Funding was administered. What has been required is that a student with a disability was provided with an Individual Educational Plan (IEP) to entitle that student to be provided an education in what is termed a Least Restrictive Environment and receive Federal money via the Local Education Districts otherwise known as LEAs – Local Education Agencies. The IEPs spell out what individually tailored plan a student will receive regarding services and proper placement. The change proposed for Federal funding is due to an alleged technicality with Federal Law that can be easily addressed to be compliant.</p> <p>However, the Department of Education has gone past the need for any change to federal funding by now adding state funding to this equation. The need to have a Collaborative Agreement (also known as a Memorandum of Understanding, MOU, would be a new requirement NOT required by State Statute). The Individual Education Program (IEP) meets with state funding requirements. This will result in dire unintended consequences and requires serious study that should not be required pursuant to current regulations and procedures. The present mechanism of funding of state dollars has worked smoothly for over 30 years and not in need of change. The present State Statute provisions contained in 37-23- 1, through 205 actually addresses how it should be done and is not in need of change What is proposed is a change in Administrative Policy and not the law.</p> <p>The new procedure being proposed for State Funding will require EACH student to have separate Collaborative Agreement</p>	<p>individualized services, responsibilities, and other costs related placement of students in the university-based programs.</p>

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<p>(MOU/Contract) that would have to be individually funded to local school districts (Local Education Agency-LEAs) BEFORE being funded to the University Based programs. The local school boards and superintendents would be required to individually address each student before being able to fund that student. With over 39 school districts and hundreds of children, this would impose an administrative nightmare. It is NOT needed and further complicates an already efficiently and uncomplicated process for the student, parents school district and university based program. The focus here should be the STUDENT and not otherwise!</p> <p>Pursuant to our legal counsel, the MOU is not required by either State or Federal Law (the IDEA). It is an administrative document being required by MDE that is duplicative of the requirements of the IDEA and state law and repeats what is in the IEP for the child. In fact, for every IEP that is written and mended the MOU would have to be amended also to reflect the changes in the IEP. This results in a total waste of time, unnecessary and an administrative burden. If a UBP wanted to charge more than the state and federal funding that is providing, it could execute a very simple MOU with the school district to reflect those charges.</p> <p>The MOU simply is not necessary. However, if an MOU is going to be approved by the State Board, it should be a general MOU describing the relationship between the UBP and the school district, not child specific. In that case, there would be only one per district.</p> <p>We have only recently been afforded the opportunity to discuss this proposed change in funding and believe it should not be changed for numerous reasons. Before any decision is made pursuant to State Funding there should be proper due diligence and analysis of the new process. We implore you to extend that much needed time to do so and not rush into something that will detrimentally affect these children with disabilities.</p>	

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<p>Otherwise this proposal <u>should not be implemented for State Funding</u> and only for Federal Funding. Thank you for you in depth analysis and discernment before any decision is made.</p>	
<p>Edward J Langton – CEO and Chairman of Grand Bank and Member of the Dubard School for Language Disorders Advisory Board My letter was completed prior to a 5-22-21 meeting at the DuBard School at which representatives from MDE and Chairs of the Education committees of both the legislature and senate were in attendance as well as others. That meeting was an excellent collaboration between all the parties to address the concerns of my attached letter. I am extremely grateful for the wonderful cooperation of all parties to come together to resolve some of the serious concerns we have as well as unintended consequences that may result from the first proposal made May 20, 2021. I thank each and everyone of you for listening and addressing resolution of our concerns. I serve on the DuBard School Advisory Committee.</p>	<p>No proposed changes to policy recommended. No change needed.</p>
<p>Patti Rogers, MSW, LMSW – Member of the DuBard School for Language Disorders Advisory Board My name is Patti Rogers, and I am a board member of the DuBard School for Language Disorders on the campus of USM in Hattiesburg. It is indeed a pleasure to address you today regarding the DuBard School, and the proposed changes, as relates to APA/Public Comment—State Board Policy 74, Rule 74.8, University-Based Programs. The school serves as a distinct entity within our community and abroad. It is a one-of-a-kind service provider in the state for children with significant delays in language, speech, and hearing. As a social worker, I have seen firsthand, the psychological, social, and emotional stressors children often experience associated with having significant learning deficits. The children who attend DuBard, learn best in an</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>environment that fosters their ability to grasp concepts and ideologies that they would not receive at their local school districts. These children daily receive an array of special, student-centered, one-on-one help from a highly trained staff at the school. The school provides much needed benefits to many children/students in our community, which has a trickle-down effect: beginning with the child, which affects the family; thus, affecting the community. The stories I have personally heard, from countless parents/caretakers, have been proof-positive that the school is continuously making profound changes in the lives of their students. They are told with a level of gratitude and humility that silences any room when heard.</p> <p>Please help DuBard continue to provide the much-needed, intensive services to our children, by reconsidering the proposed changes outlined within State Board Policy 74, Rule 74.8, University-Based Programs. Our goal is to offer the continuity of these crucial services, without delay, to the children of our community. Thank you and your staff for all you do to propel our state’s educational system forward for a better Mississippi.</p>	
<p>Dan Kibodeaux - Member of the DuBard School for Language Disorders Advisory Board</p> <p>I am writing to you concerning the proposed changes for university-based programs (UBPs) that I am convinced will decrease, if not eliminate, the effectiveness of two exceptional resources for our children and their families: The Children’s Center for Communication and Development and The DuBard School for Language Disorders. I am writing from the perspective of:</p> <ul style="list-style-type: none"> • A manager of the local Social Security office for 17 years, processing the childhood disability claims for children with a wide variety of disabling conditions and disorders; • The executive director of United Way of Southeast Mississippi for 10 years (and a volunteer for 10 years before 	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>that), providing funding and support to both agencies and evaluating their work throughout our United Way’s four-county service area; and,</p> <ul style="list-style-type: none"> • A member of the DuBard School’s advisory board for the past 7 years, seeing first-hand the exceptional level of service that is provided to our children and their families <p>Both UBPs provide crucial and intensive educational and therapeutic services for children as well as unwavering support for their families that could not be duplicated by the public school without incurring significant additional expenses in human resources and plant facilities. A broad spectrum of services is now brought to bear to the benefit of the children in a manner that school districts could not quickly and effectively replicate, especially districts in poorer, more rural areas. The result of the proposed changes would delay or eliminate crucial services to children who desperately need and deserve them. The “economy of scale” provided by these UBPs yields the most effective possible use of the taxpayers’ dollars.</p> <p>But this is not just about economics. And it’s not just about doing what’s right for children and families. When our policies are formulated and rules are made, they should reflect the best of who we are. A few years ago, I watched tears roll down the cheeks of a father whose 11-year-old son had just spoken to a large audience for the first time. I remember thinking: <i>What if that was my child?</i> Thank you for your consideration of my comments and for the work you do for our children.</p>	
<p>Richie Elkins Malone – Member of the DuBard School for Language Disorders Advisory Board</p> <p>I am a Dubard School Advisory Board member and have been made aware of MDE’s proposed funding changes that would negatively affect the Dubard School.</p>	<p>No proposed changes to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth</p>

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<p>I am 56 years old and do not have any children of my own, so my nieces and nephews have been my kids. The first grandchild born into our family came into the world with multiple challenges. Thank goodness my brother and his wife were able to get my niece into Dubard when she was about █ years old to start addressing her mild mental retardation and communication disorders. As a result of her years at Dubard, she learned to speak, write in cursive and read. Today she is █ years old and has held a full-time job since she finished her public high school education. She is a productive employee, a taxpayer, and a good citizen. Our family has been enabled to communicate with this funny, kind and loving young lady who is constantly achieving more than we ever thought possible.</p> <p>I credit the world-class teachers and staff at Dubard for rescuing Ivy from being a drain on our society and, instead, giving her the power to live to the full and make a difference in the lives of others.</p> <p>With limited funding, Dubard has been doing this same thing from its beginning for countless others. I have always wondered how they maintain such a high level of excellence and professionalism on such tight budgets. But, they do. They manage very well - for the sake of the children.</p> <p>Please reconsider any funding changes that would set this amazing program back.</p>	<p>through twenty-one. Clarification will be provided through training and technical assistance.</p> <p>IDEA funds authorized under § 300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, an agency meet the State’s definition of LEA <i>and</i> must meet the requirements under §300.200, including submitting a plan that provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201 through 300.213.</p>
<p>Michael W. McPhail – Member of the DuBard School for Language Disorders Advisory Board</p> <p>I am writing in response to the Mississippi Department of Education’s notice of intent to revise funding policy for university-based programs. And after reading the revisions, I humbly ask that the MDE not make these changes.</p> <p>I am an advisory board member for The Children’s Center for Communication and Development at The University of Southern Mississippi and a retired Mississippi County and Youth Court</p>	<p>No proposed changes to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth through twenty-one. Clarification will be provided through training and technical assistance.</p>

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<p>Judge. I served for over 34.5 years and during that time I gained a lot of knowledge on children with disabilities and the need for services. Especially, I am proud of Forrest County being one of four locations in our nation selected as an initial project site to be a model court for the Zero to Three project for infants and toddlers who were coming into the court system for reasons of child abuse and neglect. And through the many years our court was and is still involved in ZTT, I learned of the need for early childhood intervention with children with special needs and disabilities. Moreover, with many community partners, as USM's Children's Center, I witnessed how early intervention benefitted children and families</p> <p>Overall, after researching and discussing with others, I do not see the rationale for the significant revision changes that are to occur from the revision of State Board Policy 74, Rule 74.8, as to UBP's. In fact with redirecting funds to the school districts rather than to the UBP and requiring the M.O.U.'s, will be significantly problematic and many children and families will not receive services that are needed for the child's development. More importantly, why cut out the infant to age 2 inclusion when research has shown that is when the greatest percentage of brain development is occurring!</p> <p>In closing, I grew up in a home with a disabled sister. She was Down's Syndrome. And that was many years ago with very few, if any, services for my sister. And that made it hard for my parents, but they persevered in the face of the difficulty in finding services. The dedication that my parents had to my sister is unmeasurable to her life's pathway. So, let us now fifty-plus years later not shut the door on parents and families who need services for their children. Please do not revise the funding policies for university-based programs!</p> <p>Thank you for your consideration!</p>	<p>IDEA funds authorized under § 300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, a agency must meet the State's definition of LEA <i>and</i> must meet the requirements under § 300.200, including submitting a plan that provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201 through 300.213.</p> <p>The MDE is requiring a MOU or a Collaborative agreement between the LEA and the UBP to outline how state and federal funds will be utilized to cover special education and related services at the university-based programs to ensure the student receives a FAPE. The collaborative agreement will delineate to individualized services, responsibilities, and other costs related to placement of students in the university-based programs.</p>

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<p>Anita Henderson, MD, FAAP – Member of the Board for The Children’s Center for Communication and Development, President-Mississippi Chapter of the American Academy of Pediatrics</p> <p>I am writing to you as a pediatrician and a board member for The Children’s Center for Communication and Development at The University of Southern Mississippi. I recently was made aware of proposed changes to state policy and procedures related to the funding of University-Based Programs(UBP). These proposed changes would likely have significant negative impacts on my patients and their educational objectives.</p> <p>I have had many children over the last 25 years here in Hattiesburg and south Mississippi who have been served by the DuBard School for Language Disorders and The Children’s Center for Communication and Development. As you both know, early intervention by quality therapists is critical to improved outcomes for our little patients. These new proposed changes would add extra layers of bureaucracy and red tape and would likely result in many patients falling through the cracks, unable to receive the services and therapies they need.</p> <p>The Children’s Center currently serves 145 students birth through age 5 and provides speech therapy, physical therapy, occupational therapy and more in an intensive manner for children with delays in multiple areas. The Dubard School serves 80 students age 3-14 with significant oral and written language disorders. I have personally had patients who were essentially non-verbal graduate from the DuBard School, subsequently excel in traditional school and then go off to college. One such patient recently let me know he had a 4.0 his first year at college and now wants to be a neonatologist. Last week he job shadowed my husband Dr. Randy Henderson in the Forrest General NICU.</p> <p>Success stories like this one are common with University-Based Programs. Please reconsider the proposed changes to funding and</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>the flow of federal dollars. If implemented these changes will likely result in delays, limitations in treatment and ultimately the closing of successful programs like The DuBard School, The Children’s Center for Communication and Development and others. We cannot afford to let this happen and we cannot allow Mississippi children fall further behind. Please do not hesitate to contact me if you have additional questions.</p>	
<p>Robert T. Jackson, Sr – Chair, DuBard School Foundation Trust and former member of the DuBard School for Language Disorder’s Advisory Board</p> <p>I am writing regarding the DuBard School for Language Disorders and The Children’s Center for Communication & Development, university-based programs (UBPs) at The University of Southern Mississippi. These programs are a point of pride, not only for our community but for the region and the state of Mississippi. It is a grave concern that, according to a Mississippi Department of Education memo dated November 6, 2020, funding is in jeopardy. The UBPs established under Mississippi Code §37-23-31, maintain excellent working relationships with more than 25 Mississippi public school districts annually. For decades, children with significant disabilities have attended the UBPs at no cost to school districts or parents. Changing funding to flow through school districts, rather than directly from the state, will add burdensome administrative processes and ultimately reduce the number of children served.</p> <p>My association with the DuBard School for Language Disorders at The University of Southern Mississippi spans a period of more than 20 years. During that time, I have served on the school’s Advisory Board, as well as founder and chair of the DuBard School Foundation Trust for the benefit of the school. It was my privilege to serve as the legal counsel for the estate of Dr. Etoile DuBard, the founder of the school. In all of these years, I have known of numerous families whose children with disabilities have flourished</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>because of the services they received in the DuBard School. Families move from around the state and nation in order to access this nationally known program. It is common for these children to become adults who are independent, productive, tax-paying citizens as a result of their enrollment in the school. There is no reason to change something that has worked so well for decades. I strongly urge continued funding directly to the university-based programs.</p>	
<p>Katie Charleville – Special Education Director, Petal School District The Petal School District has worked closely with the University of Southern Mississippi Children’s Center for Communication Disorders and the DuBard School for Language Disorders for many years. We have worked collaboratively to ensure that students with significant communication and language disorders received quality services addressing these deficits in speech, language and communication. The University Based Programs have communicated frequently with the LEAs to share student progress and updates to facilitate a smooth transition for students as they return back to their regular school setting. Representatives from Petal School District have attended annual IEP meetings for students enrolled in the UBP to develop relationships with the parents and to stay up-to-date on the progress of our students. When the original policy was sent out to districts in November 2020, we were not aware that this policy applied to us. All of our students were parentally placed, not LEA placed, therefore the students that we had attending these programs were not counted in the district’s December 1 child count. Our district has now been notified that we will be responsible for sending the per pupil allocation to the UBP for the 2021-2022 school year, yet Petal School District will not receive the funding for these students for this school year. At this point, the Mississippi Department of Education has not determined what the per pupil allocation will be</p>	<p>No proposed changes to policy recommended. No change needed. Clarification will be provided through training and technical assistance.</p>

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<p>and districts are unable to calculate the total cost for these students to attend the UBPs. Districts need further clarification about how the funds will be funneled to the UBP and how those funds are to be recorded in MCAPS.</p> <p>The proposed policy also states that school districts and UBPs should have a collaborative agreement in place in order for students to be served through the UBP. All of the students' annual IEP meetings have been held for the 2021-2022 school year with recommended placement at the UBP. If a collaborative agreement is not in place prior to the start of the school year there is a concern about whether or not the students' services would be delayed until this has been completed.</p> <p>District representatives have participated in multiple meetings with MDE and the UBP and feel that there has been some great headway made in working through the proposed policy changes. At this time there are still some questions regarding the funding piece and the MOU/collaborative agreement that need to be clarified before finalizing the proposed policy. We ask that MDE continue to communicate with LEAs and UBP to specify the requirements of each entity as well as determine the cost to the district for placement of these students in the UBP. The UBPs provide valuable services to students that have significant speech, language, and communication disabilities and we look forward to continuing to work with them to provide necessary services to students.</p>	
<p>Michael Posey – Director of Student Services, Pearl River County School District</p> <p>I am writing to express my concerns about the changes proposed regarding university-based programs. The current process for placement and funding is extremely efficient and beneficial for our students, families and districts. The following are some concerns about the changes being proposed:</p>	<p>No proposed changes to policy recommended. No change needed.</p> <p>Additional clarification regarding placement, assessment, and IEP process for students placed in a UBP will be provided through training and technical assistance.</p>

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<ol style="list-style-type: none"> 1. Removing the UBP from participating with the district in the part B assessment, eligibility and IEP committee decision process would be an additional burden for my part time contracted psychometrist, my already overwhelmed and over worked district case manager, myself and many other staff members. Allowing the UBO to assist with this process is essential in helping us meet the needs of our students in a timely manner. 2. Requiring a collaborative agreement/MOU to be in place for EVERY child placed with the UBP would be extremely time consuming. The paperwork required for a student with special needs is already overwhelming and the IEP clearly outlines the services and responsibilities of the UBP with the IEP outlining the services, an additional contract is unnecessary. 3. Requiring state and federal funds assigned to the child to flow through the district simply complicates an already cumbersome project application process. The project application requires that funds assigned by location, making it extremely tedious. The addition of another location would not make it any easier. 4. Removing birth (0) through (2) service options would be an immeasurable detriment to infants and toddlers with disabilities. These services ensure that these children have their specific needs addressed prior to starting school. Early intervention is key to the success of our students and UBPs are extremely instrumental, not only in providing services, but in also helping families with acquiring any special equipment or devices the children may need to be successful in school. 	<p>The MDE is requiring a MOU or a collaborative agreement between the LEA and the UBP to outline how state and federal funds will be utilized to cover special education and related services, responsibilities, and other costs related to placement of students in the UBPs.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth through twenty-one. Clarification will be provided through training and technical assistance.</p> <p>IDEA funds authorized under §300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, an agency must meet the State’s definition of LEA <i>and</i> must meet the requirements under §300.200, including submitting a plan that provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201 through 300.213.</p> <p>The policy has been updated to reflect that the LEA shall remain the district of enrollment for students placed in the university-based program by the IEP Committee, or through due process, state complaint process, or binding mediation. The student shall be included in the LEA’s December 1 Child Count, and the LEA shall be responsible for ensuring the student receives a FAPE. The UBP will count all students enrolled in their program the UBP December 1 child count for the purposes of funding MAEP Special Education teacher units.</p> <p>The MDE will verify FAPE for all students placed in a UBP by an LEA IEP Committee through the programmatic monitoring process.</p>

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<p>5. Requiring two separate IEP meetings per child, one without the UBP and one with the UBP, would be a burden for all involved, especially the families. We currently sit in on all IEP meetings with the UBP. Requiring us to have two meetings would double that time we need to set aside for this. Our district and all of the districts I am aware of, have a very good working relationship with UBPs and collaborate on the students placed there, making two meetings unnecessary.</p> <p>Additional Concerns:</p> <p>1. This is a MAJOR change, which should have been presented to Special Education Directors through an official meeting, virtually or in person. Prior to June 7, 2021, there had not been an official meeting for Special Education Directors since March 3, 2020. All communication was being done through email and voluntary office hours. This change was presented in an email that I must have missed due to being inundated with emails, many of them from MDE. I understand that MDE is still working from home and not having in person meetings. I served as Federal Programs Director this past year due to a co-worker retiring due to health reasons and Federal Programs has several virtual meetings with directors to review or discuss changes. I enjoyed participating in the MDE OSE virtual office hours when I could attend, but since it was considered optional, I was often overbooked and unable to attend. If I had been notified that virtual office hours meeting was mandatory or very important, then I would have made sure to attend.</p>	

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<p>2. The email outlining changes was sent in November. The email stated that we needed to count the UBP students in our December 1 count, which is something we have never done. Because most directors and I missed this email, we did not include the students in question in our December 1 count. Again, this is a significant change, which should have been presented to Directors in an official meeting.</p> <p>3. Because students at UBPs were not counted in our December 1 count they were not factored into our Teacher Units nor our budget allocations. This is going to be a burden on our teachers if the students are required to return to the district because we will not have the teacher units to cover them. It will be a burden financially if they remain at the UBP and we are required to pay for them to attend.</p> <p>4. We have been told that we will need to reconvene all IEPs for students at UBPs to reconsider their LRE. This would be extremely difficult for the district and cause undue stress for the families given that this situation is not likely to be resolved until at least July 15, 2021</p> <p>To have time to adequately prepare for these changes I respectfully request that this process be put on hold for the 2021-2022 school year in order to give us time. If that is not possible, I would like to request the following steps be allowed/followed to ease the burden:</p> <ol style="list-style-type: none"> 1. The UBP will continue to participate in the eligibility assessments and be included in the IEP Committee decisions 2. The UBP will continue to submit December 1 count information directly to MDE (they counted students and submitted them already this year, December 2020) and will continue to include the child's LEA in the process 	

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<p>3. The LEA will also add children enrolled in the UBP to their child count and code them as “out of school”</p> <p>4. Upon request, the LEA will verify with MDE that all information is correctly represented, and the children counted by the UBP are indeed enrolled and receiving FAPE prior to funds being distributed from MDE to the UBP. Thank you for your time and consideration.</p>	
<p>Julie Etheridge – Director of Special Services, Waltham County School District</p> <p>I am writing to express my concerns about the proposed changes to the operation of the UBPs. I don't currently have any students at either of our local EBPs; however, I have had students at DuBard and USM's Children's Center in past years. The current process we use to place students is very effective and efficient. I feel that the current process we use for assessment and eligibility is very beneficial for the district, as well as children and families. The collaboration between the district and UBP is essential in determining what is best for our children. I also feel that only one IEP is appropriate and that that IEP should outline the services to be provided instead of using a MOU. I do understand that the fiscal piece is what is driving these proposed changes, but I hope that every effort can be made to streamline the process if it has to go through the LEAs and not change the setup of the UBPs.</p>	<p>No proposed changes to policy recommended. No change needed</p>
<p>Jacquelyn S. Longmeier, M.S., CCC/SLP – Speech Language Pathologist</p> <p>It has come to my attention your office is planning to re-direct university-based program funds effective with the 2021-2022 school year. Since this will severely impact the DuBard School for Language Disorders I felt the need to contact you.</p> <p>The collaboration between myself and the DuBard School for Language Disorders has been invaluable throughout my training</p>	<p>No proposed changes to policy recommended. No change needed</p>

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<p>and teaching career. Not only did I receive training in the DuBard Association Method as a graduate student at USM I have had the privilege of additional training, conferences, workshops, and actual teaching at the school located on campus.</p> <p>I have referred children to the DuBard School for evaluations, advice regarding placement, and additional suggestions for teaching. I have continued to use the DuBard Association Method in my own teaching with exceptional success in each case.</p> <p>The DuBard School for Language Disorders has received funding directly from the state to the UBP's for decades. Why do you need to change a program that serves so many students (39 districts in the last five years) and teachers so effectively? Dispersing funds from UBP's to other school districts is not well thought out. This action could severely restrict, or in the worst case, result in the closure of the programs offered to students through UBP's. Please reconsider your decision to redirect these funds from UBP's to local school districts.</p>	
<p>Rachel Powell, PhD, CCC-SLP – Past President, Mississippi Speech-Language-Hearing Association</p> <p>I am writing regarding the APA/Public Comment for SBP 74, 74.8, University Based Programs. I am opposed to the change of funding coming directly from the local school districts rather from the MDE to the university-based programs (UBPs). Some points for consideration.</p> <ol style="list-style-type: none"> 1. UBPs provide services at no cost to the school districts or parents. By not funding UBPs directly, districts could end up incurring costs for the services provided by the UBPs. 2. The current system of funding has worked efficiently for decades. 3. By routing funds through the LEAs, school districts will be seen as "paying tuition" for a program that is currently provided at no cost to districts. 	<p>No proposed changes to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth through twenty-one. Clarification will be provided through training and technical assistance.</p> <p>IDEA funds authorized under §300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, an agency must meet the State's definition of LEA <i>and</i> must meet the requirements under §300.200, including submitting a plan that provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201 through 300.213.</p>

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<p>4. UBPs have outstanding working relationships with the LEA special education directors. The sped directors do not want the additional administrative burden of funding through the LEA to the UBP.</p> <p>5. Changes in the system could result in changes in the number of teacher units received in the LEAs and UBPs.</p> <p>6. Changing the system could result in an increased cost to parents outside of education such as transportation.</p> <p>7. Changing the current system would create an administrative burden in that the student would have 2 separate IEPs, one for the LEA and one for the UBP.</p> <p>8. Changes to the current system through funding could result in the closure of the UBPs. We as a state cannot risk losing these critical programs.</p> <p>I thank you for your time and consideration of my comments regarding this critical service to students.</p>	
<p>Pamela Guess, M Ed, NBCT – Kindergarten Special Education Teacher, Lamar County School District</p> <p>It goes without saying that the Children’s Center is a blessing to parents of children with special communication needs. Their multidisciplinary approach and access to specialized therapy is unmatched and provides children with the early intervention they need to be prepared for public school. I am a kindergarten special education teacher in Lamar County School District and have experienced first hand many transitions of students from the Children’s Center. Not only does the staff collaborate with the district on insuring the IEP is written based on the student’s needs, but they provide a liaison to help with all physical aspects of the transition. I also know from twenty-eight years of experience that these students have a much better rate of success because of the access of services they were given at an early age from the Children’s Center.</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>I can't imagine making access to these services more difficult or impossible for parents. The Children's Center is something that the state of Mississippi is proud to have for our children. Why fix something that isn't broken and continues to improve the lives of families and children in our state? Please feel free to contact me for any further discussion or comments on this matter.</p>	
<p>Rhonda Bayles, NBCT</p> <p>Please, don't. Please don't make the needs of exceptional students, their families, and support groups any harder. Enacting changes to the style of funding for all these programs will do just that. I have spent almost forty years of meeting the needs of Mississippi's children and know what a difference these University based programs make in these lives. I have walked the halls of Blair E. Batson to deliver materials to the teachers who work with ill children, trying to help them stay on track and return to my classroom prepared to resume life. I have worked with siblings whose brother or sister and families benefited from the summer programs at T.K. Martin. It allowed those traditional students to meet others in their situation and realize they are not alone. I have seen the amazing results that the DuBard School produces for a beloved friend's child who was able to achieve a high level of autonomy. These University based programs have been and continue to be successful. As the Teacher Academy Instructor for Lawrence County, I made sure my students saw these efforts in person. A speech pathologist, a social worker, and many teachers were inspired by the actions of those working in these programs. As a matter of practicality, it is very difficult for some families to attend one IEP meeting a year. I fear transitioning the funds to channel through the public districts will make multiple meetings an even more arduous process.</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>Please, leave the University programs in their current funding style. It has worked well for Mississippi children and families. Let's not mess with a good thing.</p>	
<p>█████ and ██████ – Parents of a student attending the DuBard School for Language Disorders My husband and I have 3 children. Our oldest two are biological children, and our youngest (█████) is our adopted son from China. He became ours when he was turning two. He currently attends Dubard School in Hattiesburg, Mississippi, where he has been a student for █████ years. I have recently received news of the State Board Policy 74, Rule 74.8, University-Based Programs that is under consideration by MDE. I looked over the proposed terms and have great concern for how this will affect all involved in teaching children with communication disabilities and how it will also affect the families looking for help for their children. I ask for a few moments of your time, so that I can express how much Dubard's services have meant to our family, as well as others that have been impacted in our state and across our country. Our son attended the Children's Center (also on USM campus) for about one year. The services were helpful, but they only offer part-time teaching. It was there that I first met with a Lamar County representative and set up the meeting for his IEP. The county encouraged us to seek services through ██████ Elementary pre-k (public school). We were very pleased with the help he received there, but it was clear he needed more defined attention that Dubard School can offer. Due to his cleft palate, he had had ongoing trouble with his ears. He is █████ years old now and has had surgery to close his lip, surgery to close the soft palate, bone graft surgical procedure to bridge the gap in his upper jaw, and five sets of tubes in his ears. He is a very hard worker, and he has made great strides over the years. However, he lost close to half of speech clarity after the bone graft surgery two years ago. It was discouraging to see him have to regain lost ground. The teachers</p>	<p>No proposed changes to policy recommended; no changes needed</p>

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<p>and staff at Dubard have gone above and beyond to see that he has had every opportunity to work on speech and other areas where he struggles, and he is improving every day.</p> <p>I firmly believe that our local public school offer excellent educational opportunities, but also recognize that some students need more individualized care. The care Dubard provides does not cost our families. [REDACTED] recently came home and told me about a friend at his school that is now thriving but was born without ears. We have a dear friend that moved from [REDACTED] to Hattiesburg, so that her son could get help with his apraxia. Prior to that, they struggled more than I can express, because he could not communicate. I recently heard a lady say that her niece is now able to get help through Dubard. Her niece was [REDACTED] years old before she could speak the words, "I love you, Mommy." As the lady told her story, she cried at the memory of hearing the little girl speak those words after getting the help she needed from Dubard.</p> <p>I imagine this letter would contain about ten pages, if I were to start collecting testimonies about how Dubard has helped students. Many of these families are struggling just to make ends meet. Implementing a tuition based mandate would be quite a strain and would prevent many families from receiving the help they need. To address the IEP proposed changes, it seems appropriate that the staff and teachers should remain an integral part of the process. Dubard works very well with the Lamar County representatives that I have met with each time. If I could ask anything, it would be that MDE would consider INCREASING funds and teachers for Dubard School. Some drive one and a half hours (one way) per day, in order to receive services. For a child that cannot hear and a family who is desperate for help and communication services, it seems this is a critical service and a school that our state can-and should-be very proud of.</p>	

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<p>██████████ – Parent of student attending the Dubard School of Language Disorders</p> <p>I am the parent of a child who attends the Dubard School for Language Disorders. His name is ██████████ and he is █ years old. He has been attending Dubard since he was █ years old. Since attending Dubard, ██████████ has made great progress in the areas of language and speech, social emotional development and beyond. It has been nothing short of a miracle for my son to be able to attend the Dubard School, especially at no cost to us. To ensure that he receives his education in a format that is the most appropriate for his diagnosis of Mixed Expressive & Receptive Language Disorder, I commute three hours per day from the MS Gulf coast. I work part time because I do not have anyone else available to bring ██████████ to and from school each day. I share this information with you because without the school offering a free education & fuel reimbursement to families like mine, many of our children would not be able to attend.</p> <p>To date, I have only positive things to say about the staff and administration at Dubard. Our transition from our school district to Dubard was seamless. I have witnessed the positive collaborations between Dubard & our school districts. I attend every IEP meeting and have been pleased with the levels of professional consultation between both parties. In particular, last year we moved to a new school in another district. At first I expected there to be some type of delay with my son's paperwork and receiving permission to continue to attend Dubard. This was especially concerning because of other delays associated with COVID-19. I was delighted to find out that the new school district was more than happy to work alongside Dubard in order to ensure the well-being of my child.</p> <p>My son's experiences at Dubard have been life altering for him. Already the trajectory of his life has shifted for a more positive outcome. It is my hope that he, along with his current and future</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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peers, will continue to have the opportunity to attend their wonderful school free of charge.	
<p>██████████ – Parent of student attending the Dubard School for Language Disorders</p> <p>I am writing a letter to extend my deep concern about some of the changes that are being considered for the Dubard School. We have a █ year old daughter who would have been academically lost, if it were not for Dubard. Our █████ started out in speech therapy at 18 months. When she entered traditional school, more evaluations were obtained, and we were told that she needed OT and PT as well. We had her in all of her therapies with the expectation that that’s all she needed. Fast forward a year to the end of kindergarten, we were told that they did not know what to do with her. There were concerns that she may never be able to achieve much. We were devastated. We had, a year earlier, put her on the waiting list for Dubard, but she was still not able to start. One more very long year in traditional school later, we got the call from Dubard. She was in. I still get teary-eyed thinking about that day. Dubard was it- her last chance. She has been at the school for 2 years, and she is making gains that we never could have imagined. The change that Dubard has made for █████ is just shy of a miracle. We could not have gotten to where we are without them. █████ would have had a very dim future without them. In addition to my very personal experience with Dubard, I have had life changing experiences with patients that I have sent to Dubard. I am a pediatrician. Just like us, many families have this struggle, and I am so happy that we have help for these children. We are one of the few places in the country with a place like Dubard. I know that they cannot do it without their funding so I pray that this does not get altered. Thank you for hearing this letter. I wish you well!</p>	No proposed changes to policy recommended. No change needed.

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<p>██████████ – Parent of student attending the DuBard School for Language Disorders</p> <p>The Petal School District has worked closely with the University of Southern Mississippi Children’s Center for Communication Disorders and the DuBard School for Language Disorders for many years. We have worked collaboratively to ensure that students with significant communication and language disorders received quality services addressing these deficits in speech, language and communication. The University Based Programs have communicated frequently with the LEAs to share student progress and updates to facilitate a smooth transition for students as they return back to their regular school setting. Representatives from Petal School District have attended annual IEP meetings for students enrolled in the UBP to develop relationships with the parents and to stay up-to-date on the progress of our students. When the original policy was sent out to districts in November 2020, we were not aware that this policy applied to us. All of our students were parentally placed, not LEA placed, therefore the students that we had attending these programs were not counted in the district’s December 1 child count. Our district has now been notified that we will be responsible for sending the per pupil allocation to the UBP for the 2021-2022 school year, yet Petal School District will not receive the funding for these students for this school year. At this point, the Mississippi Department of Education has not determined what the per pupil allocation will be and districts are unable to calculate the total cost for these students to attend the UBPs. Districts need further clarification about how the funds will be funneled to the UBP and how those funds are to be recorded in MCAPS.</p> <p>The proposed policy also states that school districts and UBPs should have a collaborative agreement in place in order for students to be served through the UBP. All of the students' annual IEP meetings have been held for the 2021-2022 school year with</p>	<p>No proposed changes to policy recommended. No change needed. Clarification will be provided through training and technical assistance.</p>

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<p>recommended placement at the UBP. If a collaborative agreement is not in place prior to the start of the school year there is a concern about whether or not the students' services would be delayed until this has been completed.</p> <p>District representatives have participated in multiple meetings with MDE and the UBP and feel that there has been some great headway made in working through the proposed policy changes. At this time there are still some questions regarding the funding piece and the MOU/collaborative agreement that need to be clarified before finalizing the proposed policy. We ask that MDE continue to communicate with LEAs and UBP to specify the requirements of each entity as well as determine the cost to the district for placement of these students in the UBP. The UBPs provide valuable services to students that have significant speech, language, and communication disabilities and we look forward to continuing to work with them to provide necessary services to students.</p>	
<p>██████████ – Parent of student attending the DuBard School for Language Disorders</p> <p>Thank you for giving parents who have children that have attended the DuBard School for Language Disorders an opportunity to express our thoughts and concerns regarding the proposed policy changes by the Mississippi Department of Education (MDE). It is my understanding that MDE has proposed changes to the state policy and procedures on how the DuBard School collaborates with local school districts to meet the needs of students with speech, language and/or hearing disabilities.</p> <p>Of the proposed changes to the state policy and procedures, I would like to express my concern regarding the policy that would remove the DuBard School from having any placement decisions into the program and require a separate Individual Education Plan (IEP) for each child. I was fortunate enough to experience firsthand what the DuBard School could do for my child, and it was</p>	<p>The Individuals with Disabilities Education Act (IDEA) requires that students with an IEP and enrolled in a public school district must be placed by his/her IEP Committee in any separate school setting. No change needed.</p>

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<p>nothing short of amazing. To take a child who had significant speech and language disorders before attending DuBard and see the results that would not have been achieved while attending a public school speaks volumes to what this school can do. It is very concerning to me to think that a new policy would take away the ability from DuBard to make placement decisions and give that decision solely into the hands of the public-school district. I know that if my child had not attended this school for three years and only received the services of a public school, which is 30 minutes per day for a maximum of three days per week, she would still have the same speech and language disorders she had before entering DuBard.</p> <p>I ask that you please consider giving the DuBard School full authority to make placement decisions into their school and not let the local school district make these decisions. These school districts are unable to provide the quality services that only the DuBard School can provide to these children.</p> <p>Thank you again for the opportunity to express our thoughts regarding this matter. If you have any questions, please feel free to reach out to me. Thank you and have a great day.</p>	
<p>██████████ – Parent of student attending the DuBard School for Language Disorders</p> <p>My son, ████████, has been attending DuBard School for Language Disorders for three years. Prior to that, he attended a ████████ County School District (██████) preschool at ████████ Elementary. He has had an IEP with ████████ since he was three years old, he will turn ████████ years old in August. I also have another child in ████████ with an IEP that is now in high school.</p> <p>Prior to DuBard, ████████ was often frustrated at school (his teachers too). He was unable to communicate his thoughts and his social emotional skills lagged behind others his age. His ████████ teacher was concerned about his avoidance of crayons, coloring, and writing among other things.</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>Now everyone is amazed at how much this once quiet little boy has to say. If he is not reading a book, he is drawing. Over Christmas, he even wrote and illustrated his own book. His teacher at DuBard quickly noticed his need for occupational therapy. DuBard paid for the therapy, and it took place at DuBard. He has the best handwriting of my three children. My other son did over two years of outpatient occupational therapy for dyspraxia. His handwriting is still difficult to read. Having the occupational therapy take place at school and the therapist being able to communicate with the teacher seemed to make a world of difference.</p> <p>While his social emotional skills are still behind, they have grown leaps and bounds. He will often now offer to breath with his siblings when they are upset (to their dismay). He can utilize the calm down area in his classroom successfully and independently now. His words are no longer trapped in his body (that is how a friend recently described him). None of this would be possible without the intensive daily speech therapy he receives through the DuBard method. Only having ten children in his classroom has been a blessing. A typical classroom with twenty or more would have overwhelmed him and resulted in him acting out or shutting down. The IEP planning/process is the easiest and most efficient I have participated in (I have participated in over a dozen). ██████ employees have expressed to me that they fully trust DuBard with the IEPs. Since DuBard School’s classrooms and instruction is very specific to their student’s disabilities, the details differ from what I have seen in my other child’s IEPs and ██████’s prior IEPs. ██████ adores all the staff at DuBard and to me it seems they feel the same about him. They accept and understand the special challenges these students have. At other schools, this was not always the case (eye rolling when the carline teachers realized it was him in carline).We are so fortunate that ██████ can attend this specialized school without us having to pay additional tuition. I highly doubt we (and many others) could have afforded it. Many in the</p>	

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<p>community have expressed amazement that attendance is tuition free for the students and grateful their tax dollars are helping fund such a terrific place! This school is a gift to [REDACTED] and our whole family (and future teachers). I still remember, his first speech pathologist telling me that talking/language may not be his primary means of communication. While he will still face struggles ahead, I am grateful that talking is no longer one of them. The DuBard School is an answer to our prayers. [REDACTED] is overcoming obstacles that we once thought were insurmountable. I hope this gives you a glimpse at how special this school is and how much hope it gives to families that were hopeless and frustrated. I now look forward to how successful [REDACTED] will be once he returns to [REDACTED]. This school is a gem that our state needs to embrace and support! DuBard has the ability to transform a student with challenges into a successful student that teachers embrace. Please feel free to reach out to me if needed.</p>	
<p>[REDACTED] – Parent of student attending the DuBard School for Language Disorders My name is [REDACTED]. I am the mother of [REDACTED], a student at the Dubard School. Recently it was brought to our attention that the way in which the Dubard School would receive funding could possibly change. I would like to urge anyone that is responsible for making this decision to pause and evaluate the potential issues that might arise with this change. Altering the current flow of funding directly to Dubard School is concerning to me. We do not want to see any funds displaced or lost in the process of changing hands like it's musical chairs. I fail to understand why this change is necessary. We for one could not be happier with the way things are ran at Dubard. Over the last year, we have witnessed an unbelievable amount of progress in [REDACTED]'s speech, maturity, and academics. [REDACTED] has been receiving therapy since age two. She is [REDACTED] now. The quality of</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>instruction at the Dubard School is unparalleled. The strides she has made in the last year far outweighs the other four years in total. Our hope is that she can attend the school for several years to come.</p>	
<p>Melanie Gatlin – Parent of student attending the DuBard School for Language Disorders My name is Melanie Gatlin and I have a daughter, Annsley Gatlin that is in her 3rd year at Dubard School. I would like to give you a background on my daughter and how far she has come since being accepted into the Dubard program. Annsley was adopted at birth and her biological mother has disabilities. I knew when I adopted her, she would need special care. I was embraced by my community from the day she was born. She went through multiple surgeries, had interventions of speech, occupational & physical therapies. Along with that, she was enrolled in the state early intervention program. She also attended The Children’s Center on the USM campus as well. Dubard has been phenomenal in Annsley’s care and growth. She is legally blind without glasses. They have provided invaluable programs to assist in helping her reach her IEP goals at every step. Being autistic, ADHD and with extreme sensory processing disorder, along with having a severe language disorder and excessive speech delay, the DuBard team has guided me to also help Annsley reach her highest potential. If the receipt of the funds goes to the public school, I am concerned. I live in Petal at this time but if I move, the monies for Dubard are then in “transition”. The Petal School representative, Katie Charleville, has been at every IEP meeting. I am grateful for their participation. Annsley will be at DuBard for some years to come and her continuous uninterrupted care is crucial. These monies pay for the top notch teachers they employ. These monies in my opinion need to be distributed where they are utilized. That is DuBard School.</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>██████████ - Parent of student attending the DuBard School for Language Disorders</p> <p>My son, ██████████, attended The Dubard School. They made him feel such a part of the family on USM campus that, to this day, he tells people he attended USM. This love for USM will, more than likely, keep him in the Mississippi university system. I cannot imagine ██████████ wanting to go anywhere else when he completes high school.</p> <p>██████████ is in the ██████████ grade now with all A's and just a couple of B's since he transitioned back to Oak Grove School District. He finished the ██████████ Grade with straight A's for his last semester. The transition from Dubard back to normal school was virtually seamless due to the focus Dubard placed on ██████████ and the counselors in OG Upper elementary. I cannot put a value on the improvements my son experienced with his time in Dubard. His frustrations were lifted, due to his understanding of working through difficult problems in the Dubard fashion. School suddenly became something that he enjoys. I credit Dubard for that!</p> <p>Most of all, I believe the success in Dubard is the number of teachers and aids in each classroom. The ability to give a student your full attention or an aid's full attention when they are struggling is absolutely a difference maker. Our transition back to larger classrooms would have been more difficult had we not worked through improved learning techniques in Dubard.</p> <p>I still get a text or note from Ms. Tara checking on ██████████ a few times a year. The entire staff is definitely dedicated to the success of the students at The Dubard School. Dubard and Lamar county school district counselors and transition team were on a first name basis. Each of them knew what the other required for a smooth transition from Lamar County to Dubard. Without that working relationship with the County School system, I am not sure how this process would have been.</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>██████████ – Parents of student attending the DuBard School for Language Disorders</p> <p>Please advise the Department of Education to re-consider making any changes affecting how the Dubard School operates. This school has been a Godsend for us and our child and its educational value for our state has been proven over and over for years now. Requiring the school to rely on the school districts for funding and IEP implementations will most likely waste valuable time getting students the help they need. The school is already doing a fantastic job as is and we feel that making any changes will put this success in jeopardy. Again, please advise the board to re-consider and not take the risk of damaging this fantastic educational opportunity for children in our state.</p>	<p>No proposed changes to policy recommended. No change needed.</p>
<p>██████████ – Parent of student attending the DuBard School for Language Disorders</p> <p>It has come to my attention that MDE has proposed changes to the Dubard School, As a concerned parent I would like to just take a moment and let you know how the Dubard school has changed my child’s life a ██████ year old kindergarten student who was a student at ██████ Elementary struggling because she could not complete the verbal testing because her language disorders make it very hard for her. Until I got the call from Dubard, I was sure she would have to repeat kindergarten not because she did not know the information but, because she could not verbally respond to questions while being tested. As a parent can you imagine how frustrating that is for your child to be in a place where she is held back because she cannot get the help she needs? Is it fair to the child to take the one thing that is working for her away when it is working so well? The school district cannot accommodate her and her disability she had great teachers there that tried to help but, no resources in the school district accommodate a child that has a language disorder I even reached out to your office for help and got</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>no answers or solution to assist her in her struggle to communicate. I could not even get more than a one word response from my child when asking how was her day at school. She started at Dubard the week after Thanksgiving break and in that short amount of time she has blossomed. I can ask her about her day and she goes on and on still not the perfect answer and she may miss words here or there trying to explain but it definitely is more than one word. You have to think about these kids and the benefits from this school and how it adds to their quality of life. I have a student in the Physical Therapist Assistant Program here and she was a student at Dubard she was around my child's age with language disorders and dyslexia she said that all she could do was make sounds and if it was not for this school she would never be where she is today. If it's not broke why fix it?</p> <p>In reference to: APA/Public Comment- State Board Policy 74, Rule 74.8, University Based Programs</p>	
<p>██████████ – Parent of student attending the Children's Center for Communication and Development</p> <p>I hope you are well. My name is ██████████. I am a Southern Miss graduate and the father of ██████████. He has hydrocephalus due to a grade three and a grade four brain bleed. We were told that he may not be able to move, talk, or see. He does all three. He has CVI but we are seeing tremendous improvement every week. He is a patient/student at the Children's Center. I am contacting you in hopes of persuading you to not make the proposed adjustment to funding and structuring for the program. Through First Steps: Early Intervention we are allowed to bring ██████████ to the Children's Center for treatment. I fear that restructuring the program may cause us to lose access to this rehab. The relationships between ██████████ and his therapists have been extremely beneficial to his progress here at the Children's</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>Center. We are amazed at the growth that has taken place since he has been a student. My wife and I benefit as much as [REDACTED] does from the services here at the Children's Center. We feel capable and adequate once we are home working with him due to the thorough explanation and detail given by the therapist during his visits. While it may be as simple as a budget cut or adjustment for others, a change in what we have going on could be one of the single biggest influences in our child's future trajectory in life. The way the Children's Center is structured now is doing wonders for our child. Please, don't take this from us. Thank you for taking time to read my letter.</p>	
<p>Miranda Carter – Parent of student attending the Children’s Center for Communication and Development As a parent, you will always remember hearing your child say “mama” or “dada” for the first time. Sadly, for some parents, that isn’t reality. As our baby missed milestone after milestone, no babbling, no words, no sounds we were puzzled. We felt defeated hearing private therapy would cost \$2,400/month. We cried, we prayed, and we submitted an application to the Children’s Center for Communication and Development. I’ll always remember the day we received the call that [REDACTED], our [REDACTED] year old son, had been admitted. to The Children’a Center. We rejoiced and praised God. We continue to thank God for the difference the Children’s Center has made in our lives. There is no \$2,400 private insurance cost for speech and occupational therapy, as all therapy is FREE for families. The Children’s Center offers families an opportunity to work hand-in-hand to train parents, as we couldn’t support Hutson at home without the parent training we receive at the Children’s Center. [REDACTED] was given an AAC device to communicate his wants and needs. We could not provide this device for [REDACTED], as they cost thousands of dollars. However, because of the Children’s Center our son has the ability to communicate with us using his AAC device. This has changed our</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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Comment	MDE Response
<p>family for the better. The Children’s Center has blessed us in so many ways, as I heard my son verbally say “mama” for the first time and my husband hears “Daddy” through ██████’s AAC device. The proposed changes would adversely affect children and families receiving services at the Children’s Center. Our family would be directly affected by these proposed changes, our son would no longer have a means of communication and there would be no parent training to support our son outside of therapy. Please hear the voices of families receiving services at The Children’s Center. Thank you for your consideration.</p>	
<p>██████ – Parent of a student attending the Children’s Center for Communication and Development I’m writing to express my gratitude for the work the children’s center has done with my son ██████. My husband and I appreciate Donna (OT), Hannah (ST), and Lane (COTA) more than we can possibly express. They are the sole reason my son was able to walk and have been working towards our next goal which is speaking. His therapy team works together so flawlessly and supports not only his physical and mental development but us as parents. The pandemic brought us so many obstacles as new parents but our team was consistently with us through it all. ██████’s therapy team was even there when my husband was away for five months with the National Guard on Covid orders. We’ve been able to receive equipment and critical advice that made a major difference in our sons abilities. Programs like this helps so many families and have the ability to change children’s lives.</p>	<p>No proposed changes to policy recommended. No change needed.</p>
<p>██████ – Parent of students attending the Children’s Center for Communication Disorder After receiving an email from The Children’s Center this morning, I have decided to reach out to you about the funding changes proposed. I have two boys who have been diagnosed with autism, and they have both received services through the Children’s center. The services they offered, have been life changing for our whole</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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Comment	MDE Response
<p>family. Not only have they helped our sons a tremendous amount, but they have guided us on how to be better parents. They have taught us how to help accommodate our own children. A public school WOULD NOT be able to help most of these children with their needs. They provide one on one lessons with these kids, and that's what most of them require to learn. The state of Mississippi already doesn't offer enough services for any disabled child. Defunding one of the only schools that we do have would be absolutely ridiculous. The ladies that work endlessly to meet the needs of these children are heaven sent. I pray that this proposal is reconsidered. Many families feel completely hopeless when searching for services for their child. Until my children started going there, I thought we were never gonna get the help that we very much needed and they deserved. This is one of the states BEST schools. They go above and beyond for OUR children.</p>	
<p>██████████ – Parent of student attending a University-Based Program The program has help my family tremendously. Especially being low income with more than one child with disabilities.</p>	<p>No proposed changes to policy recommended. No change needed.</p>
<p>██████████ – Grandparent of student attending the DuBard School of Language Disorders As a grandparent of a child with special needs, I cannot express how much DuBard School has meant to us. My child, at the end of pre-school year, didn't know that his name started with a "C". We knew then that he had a problem. We were on the waiting list for one hear. Once he was accepted, he really blossomed. DuBard school has a curriculum that works for special needs children. Teachers and staff are wonderful. They not only work with your child for the betterment of that child, but they work with the parents also. There is such a great need for these children to receive the help they need. It really saddens me that DuBard is</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>limited to the number of children they help at one time. They do such amazing work there. I wish that my child could be there until he graduates from high school. Parents of special needs children need DuBard School. A place where they know their child can learn and can grow. A place that works on each child needs at the level that “THAT: child needs. Without DuBard School, I really don’t know where he would be at today. DuBard has done wonders for him. He will always be a “special needs child” but he grew so much, and learned so much at DuBard. We are so thankful, and forever grateful for all at DuBard School There is a great need for DuBard School. They help so many families, like mine.</p>	
<p>Steve Jones – Grandparent of student attending the DuBard School for Language Disorders I am the grandfather to a █ year old girl enrolled at DuBard School of Language Disorders. Our family is beyond grateful that our state can offer a school which specializes in intense speech and language skills. I have been made aware that there is a proposal which could hinder the availability of funding, teachers and acceptance into the program they offer. The confirmation that you never know what mountains others face is so true . This school offers so much for those which have a disability in language to learn and improve. I want every person to know what having this opportunity has meant to our child and so many others. She has made vast improvements that probably could not have occurred in the regular classroom. I cannot stress enough how much value it has for the children to be in smaller classes for more individualized instruction. In our case, she has done speech therapy since it became apparent that she had a problem. DuBard has been a game changer for her. The program offered at DuBard is critical for many. Please help us help our children and vote against this proposal.</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>██████████ – Grandparent of a student attending the DuBard School for Language Disorders In reference to the above proposed policy changes concerning UBP, DuBard School for Language Disorders would be affected to the possible detriment of many young children who are receiving specialized education. I have a granddaughter currently enrolled as a full-time student. It is her first year to attend. Prior to being accepted for this program, from age 2 until age █, she has been in speech therapy (as well as physical and occupational therapy). I can personally assure anyone that has not experienced having a child in need of help to learn to communicate coherently, having a short speech session once per week for 30-45 minutes is definitely not sufficient. DuBard's teaching method and staff has changed her life and subsequently, all of those around her. My concern is that the proposed cut in teacher units AND the decision for acceptance into such programs being given to the local and none-specialized person will in fact result in the loss of crucial components to give these children their opportunity to succeed. As a parent/grandparent, all we desire is for our children to be given the same chance as any other child regardless of their special needs. I feel that it would be practically impossible for this to occur in the regular classroom setting. Mississippi is a less populated and more rural state. Therefore, gaining access to specialized education is not readily available. We gladly drive 280 miles per day in order to take advantage of the opportunity for our granddaughter to be at DuBard School. Please consider voting against these changes and please continue to support the program at DuBard for the sake of these children. Thank you for your attention to this immediate concern.</p>	<p>No proposed changes to policy recommended. No change needed.</p>
<p>██████████ – Great Aunt of a student attending the DuBard School for Language Disorders I am writing in response to a request from Chelsie Bradberry</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>asking me to put in words how Dubard has helped my great nephew, [REDACTED]. I have been thinking about what to say for several days. It's difficult and emotional to put into words the remarkable journey I have watched [REDACTED] take over the last several years. When he first started Dubard, I went with [REDACTED] for [REDACTED] to do his evaluation. I was impressed from the moment I walked through the doors. We were able to watch as he did this process, and I'll be honest, I would have struggled to answer some of the questions he was being asked. I really wasn't sure if he needed to go to a "special" school, but the changes in him since he started are nothing short of amazing. It was difficult to always understand what he was saying, and this made him withdraw some. He was shy, and lacked in self-confidence. Today, he is the total opposite of this. He's no longer like a little turtle in a shell. There is no issue understanding anything he says at all, and he definitely has a lot to say now! He is no longer the little shy kid when we have family get togethers. He's the one in front, taking charge, and talking his head off with his cousins. Truly a blessing to watch. So for me, there just isn't enough I can say about Dubard. It has brought about positive change for [REDACTED] that will be with him for the rest of his life. For this, thank you.</p>	
<p>[REDACTED] – Grandparent of student attending the DuBard School for Language Disorders I am writing to you today as a plea for children with language disorders like my Grandson, Spencer Smith. Spencer began his journey at Dubard 3 years ago. When he started he was almost completely nonverbal, either jibberish or signing. A lot of melt downs as well as he became frustrated in not being able to communicate. I'll never forget the day he called me and plainly said, I love you MiMi and I miss you MiMi. The progress he has made is nothing short of miraculous. I cannot even express how great it is to be able to talk with him and understand what he is saying. I live in Florida so being apart is difficult at best. However</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>now we can face time and get caught up. It's wonderful to see the friendships he has formed and the life I have hope for him to realize is now within his grasp if he continues at Dubard. His level of learning is beyond his grade and he is excelling in all subjects. His reading and spelling and math are amazing for a 10 year old! This school has done so much for our entire family. Please I am pleading with you, do not diminish this bright light Dubard has shown on these special students. These children are at your mercy and their future hangs in the balance. Our family will continue to fund raise as we have in the past and do whatever it takes to help Dubard continue the good work it started in these bright minds. A decision that allows Dubard to prevail must be made. Our children's future depends on it.</p>	
<p>██████████ – Family friend of a student attending the DuBard School for Language Disorders I am writing on behalf of ██████████, a student at DuBard School. I have known ██████████ since birth and have had the privilege of watching her grow up and develop. In the past year, she has made great strides in her communication abilities. We interact with ██████████ regularly, and the expansion of her vocabulary has been noticeable and impressive. She is learning to engage in a conversation when communicating her needs, and word repetition in her conversation has significantly reduced. Her social interactions are more engaging, with a noticeable difference in how she plays and interacts with her peer group. I am writing in support of the DuBard School as I have seen firsthand the intense benefit for children with developmental needs. I would request a reconsideration of the proposed changes in State Board Policy 74, Rule 74.8, University-Based Programs. As an alumna of the University of Southern Mississippi and a family friend of a current student, I hope that the DuBard School can continue to provide much-needed services to students with</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>significant speech, language, hearing and/or academic disorders in our community. Thank you for your time and consideration.</p>	
<p>██████████ – Family friend of a student attending the DuBard School for Language Disorders Over the past three years I have had the pleasure of working with a child that attends the Dubard school. I was her K4 teacher, and I also helped with her distant learning during the times the school was closed due to quarantine. The progress that this student has made during her time at the DuBard school has been remarkable. Unfortunately, the small town that we live in does not offer any type of academic assistance that compares to that of the DuBard school. As someone who has worked in the field of education for close to ten years in both the regular and special education setting, I can honestly say that the services offered by the DuBard school is far more than anything this student would receive in the local public school setting. The DuBard school is able to offer targeted instruction, as well as specific teaching strategies that are directed for each student as an individual. It would be an incredible disservice for the DuBard school to lose funding, that would result in changes to how they place students and/or operate the school. I know it is an answered prayer for those in areas without these types of facilities. The impact that the faculty and staff of the DuBard school has on its' students is immeasurable.</p>	<p>No proposed changes to policy recommended. No change needed.</p>
<p>██████████ – Hattiesburg Sertoma Club President, Emeritus and parent of former students of the DuBard School for Language Disorders In respectfully requesting your rejection of proposal State Board Policy 74, Rule 74.8, University-Based Programs, I hope you will consider my explanation below on the legacy and success of the DuBard School and need to retain the current stewardship process.</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>As Hattiesburg Sertoma Club President, I worked 10 years spearheading several fundraising activities to benefit the DuBard School and the School of Speech and Hearing at Southern Miss. During this time I participated in various functions and activities not only as our club president (now emeritus) but also in my current professional position as Associate Director at the University of Southern Mississippi, Physical Plant Division. In both roles my continued experience has been that the DuBard School has remained well managed and successful. I have concerns that a change to this legacy will be detrimental on several levels. The roots of my interest and connection with the DuBard School and USM Speech and Hearing began many years ago when both of my daughters were evaluated by USM. The professional testing and guidance my daughters received was instrumental in their educational foundation. Success is measured in many ways. Our story moved from those early informative years to both daughters graduating from The University of Southern Mississippi, one in education and the other in communication. I had to find a way to give back to the University, so this is why I joined the Hattiesburg Sertoma Club over 20 years ago and continue to support the DuBard School in every way. I would welcome an opportunity to answer questions or further discuss this subject in any way. My hope is that the DuBard School will be rewarded in continuance of their successful stewardship and that proposal State Board Policy 74, Rule 74.8, University-Based Programs will be swiftly rejected. Thank you for your consideration. Please feel free to contact me at your discretion.</p>	
<p>██████████ – Parent of former student at the Dubard School for Language Disorders I am writing this letter as a recent, former parent of The Dubard School for Language Disorders. With the potential change to APA/Public Comment, State Board Policy 74, 74.8, University-</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>Based Programs, I'd like to take a moment and share the life-changing experience my son, [REDACTED], had while attending The Dubard School.</p> <p>When [REDACTED] was three years old, he still could not speak. We were told by medical professionals that not only was he non-verbal, but that he would likely be dependent upon us (his parents) his whole life. My husband and I disagreed with this prognosis; we knew our son was bright but could not communicate his wants or needs at the time.</p> <p>A speech therapist recommended that we look into The Dubard School. We went through the application process, and [REDACTED]'s name was placed on their waiting list. In the meantime, my husband was offered a fantastic job opportunity in Tupelo, MS. We moved to Tupelo, and a few months later, we were contacted by The Dubard School and began the admission process.</p> <p>We learned that [REDACTED] was incredibly gifted throughout the application and testing process and that the gap was between his high IQ and his current language score at the time (a gap of 40+) points. [REDACTED] was admitted into The Dubard School for the next academic school year.</p> <p>My husband and I felt so strongly about [REDACTED] attending The Dubard School that I moved back to Hattiesburg with our three children, while my husband remained working in Tupelo during the week. We would happily repeat this sacrifice because the result of this school's curriculum, methods, and incredible faculty is unmatched.</p> <p>The IEP process between our local school district and The Dubard School was simple and supported. Local school districts appreciate The Dubard School because they offer such successful and extensive speech and academic services that cannot be provided in a traditional public school setting.</p>	

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<p>Our son is now entering second grade at our local school district in Tupelo. He received straight A's last year and is one of the most talkative and confident students at his school.</p> <p>The Dubard School gave [REDACTED] the gift of language. They gave him confidence, and honestly, they gave him a whole new life—a life where he can easily communicate, learn, and be understood.</p> <p>The Dubard School's funding is an essential and integral part of their school's process. To change this in any way would be altering student's lives and their future. On behalf of my family and many other families, I ask that you please consider the motion to change the funding for University programs, specifically The Dubard School for Language Disorders.</p> <p>Thank you for your time.</p>	
<p>[REDACTED] – Parent of a former student of the DuBard School for Language Disorders I would like to start my letter by stating that my kids have always attended MS public school, I attended and graduated from the MS public school system, and my sister and many friends are educators in the MS public school system. I have nothing but the utmost respect and appreciation for all you do and for each and every educator who gives their heart and soul daily to educate.</p> <p>I would like to introduce you to my child [REDACTED]. She began school at a primary school in MS and it was evident the very first day to the teacher that she would need help beyond the normal classroom instruction – she began the tier system immediately and by January she had an IEP. Wow! It was heartbreaking for a mom, but what outstanding work from the teacher.</p> <p>She attended primary for 3 years with an IEP and all the resources that were available. Hailey then repeated the 1st grade. At the end of her 2nd year of 1st grade she was still not able to read! It was no fault of any of the educators – they tried every resource that was</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>available. They exhausted all of their learning and training. Her learning disability was beyond what they could accommodate. As a parent I knew that she would never be successful and independent in life if she could NOT read!</p> <p>My sister, having been an educator for over 15 years (and now a Dr.) knew on day one that she would need more than could be provided and told me to get on the waiting list at Dubard.</p> <p>Dubard CHANGED ██████'s LIFE FOREVER!</p> <p>I can never speak about Dubard without crying out of gratitude – this school is the reason I can now introduce you to my daughter ██████ who is a thriving high school student with A's & Bs (and sometimes Cs if she is being lazy). She does still have an IEP for certain accommodations such as test taking (she needs more time to process the information due to her language disorder). But she is an independent fluent reader who handles her own grades, does her own homework and is on track to graduate with a regular high school diploma.</p> <p>There is no way we would have been able to afford for ██████ to attend Dubard if her funds were not transferred from the school district. The school taught a specific method that allowed Hailey to learn with her language disorder; no other resource could have done this (all the others had already been tried). The school gladly and willingly helped in a smooth transition to Dubard and when we returned worked with Dubard to ensure that she was successful by collaborating with Dubard on her new IEP.</p> <p>It has been and will always be a team effort. Dubard and the public school had the same goal. They recognized the need that Dubard was filling and truly were thankful for it. They opened their arms back up to ██████ when she was ready to return! I know there are many cases like mine. We met many parents at Dubard who had</p>	

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<p>stories just like ours and sometimes more extreme. From day one Dubard’s intention was to get ██████ back to public school so she could go on to have a normal school career and flourish – and they did just that.</p> <p>These funds that went to Dubard truly changed the trajectory of my child's life. She has a chance at an independent life, she has a chance at a high school diploma, she has a chance to get a job, she has a chance to live on her own and she could do none of these things without the funds to attend Dubard.</p> <p>These funds and choices matter to these parents who are helpless to help their children. We are not educators and most of the time do not know how to help them. But the expertise found at Dubard (and places like this) change these kids’ lives forever. ██████ went from never being able to complete any assignment to sometimes out scoring her sister on tests – because of Dubard!</p> <p>We know the teachers in the public schools have a tough job, they are teaching kids on all levels with other things besides just learning disorders. I could not do their job and I appreciate and respect all they do. Dubard and places like this lend a hand to the teachers when their hands are full. Their job is to fill the need and work with the schools to transition these kids back into the public school.</p> <p>If you need any more information from me or would like to hear any more of my story I would be happy to speak with you.</p> <p>Thank you for taking time to hear this part of my story and for thoughtfully considering any changes you intend to make in the future regarding this resource. The decisions you make regarding this issue will have a profound impact on the lives of these students and their families – with choices like Dubard we all have hope!</p>	

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<p>██████████ – Parent of former student at the DuBard School for Language Disorders</p> <p>On behalf of my wife, ██████████ and my son, ██████████, I hope this finds you well. I am writing in response to the Mississippi Department of Education’s (MDE) alarming notice of their intent to revise (i.e. completely rewrite) funding policies for university-based programs (UBPs).</p> <p>From age 22 months to 4 ½ years, my son received life-changing speech-language therapy at The Children’s Center for Communication and Development at The University of Southern Mississippi and later received private after-school therapy from DuBard School for Language Disorders. I am blessed to share that, two weeks ago, ██████████ graduated from Oak Grove High School with Honors. This fall, he will attend USM with 80% of his tuition covered by academic scholarships. Like many children who do not receive these services, he would have been on his way to becoming a ward of the state or homebound collecting some type of disability benefit/compensation from the government. In short, like them, he too would’ve become a tax burden on society.</p> <p>The proposed revisions bring about many fears and objections – too many to name here. However, I will speak to a couple that are most glaring to me.</p> <ul style="list-style-type: none"> • Redirecting funds to school districts instead of simply forwarding straight to the UBP. I will be amazed if any of these LEAS (already struggling for money) will approve the release of funds, or rather, “pay” for UBP services. • An M.O.U., as stated in the proposed language, is now required for every single child to be released to the UBP. Why is the addition of an M.O.U. necessary when everything concerning the child’s placement is detailed <i>ad nauseum</i> in their IEP? The IEP process alone is daunting – 	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>especially for the parent. I cannot imagine the additional stress and anxiety this would put on the parents, not to mention what the additional workload will do to the education professional who are most assuredly already undermanned and overworked.</p> <p>For the sake of the parents who have yet to travel the road my wife and I traveled years ago, I implore you, MDE officials and board members to not complicate a process that works well and is not broken. These policy changes will prevent children from receiving the intensive services they cannot get from their LEA, and could likely close two programs that have changed the lives of thousands <i>for over 100 years combined</i>. That will be a highly visible stain on MDE and the Office of Special Education that will not be easily overlooked for years to come.</p> <p>Thank you for your time and consideration, and please know you have our deepest appreciation for the work you and your office are doing on behalf of children with special needs throughout the great state of Mississippi.</p>	
<p>██████████ – Grandparents of former student of the Children’s Center for Communication and Development and the DuBard School for Language Disorders and former Professor of Audiology and Chair of the Department of Speech and Hearing Sciences at The University of Southern Mississippi ██████████</p> <p>We are writing to express our profound concern about the proposal to change the flow of state funding to the Dubard School for language Disorders and the Children's Center for Communication & Development, university-based programs (UBP's), also know as USM Statewide Schools # 1808. These programs, which combined have over 100 years of service, are beacons of hope to families of children with significant disabilities. Our experience with them is</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>both personal and professional. We are grandparents of a young man who received services in both programs. As a result, he now is a accomplished, independent, and employed adult with a future that is very promising. Professionally, I (██████) served as Professor of Audiology and Chair of the Department of Speech and Hearing Sciences, the location of the programs being within The University of Southern Mississippi and know first-hand the effectiveness of the UBPs.</p> <p>The plan to route state funding through local school districts to the university-based programs, as indicated in a November 6, 2020, Mississippi Department of Education memo, will lead to the destructions of the programs and a loss of these resources to our most vulnerable children. Public school students have received services without cost to their local school districts or parents for decades. This proposed change of funding will, in effect, put the districts in a position to "pay tuition" for students to attend UBPs. Without a doubt, it will create undue administrative burdens and result in fewer children having access to the critical interventions on which their entire futures depend. We strongly encourage the Mississippi Department of Education to continue funding the UBPs in the manner which has worked so well for decades.</p>	
<p>██████ – Parent of former student of The Children’s Center for Communication and Development I am writing today to tell you about my families experience at The Children’s Center for Communication and Development in Hattiesburg. When my daughter, ██████, was born with a rare chromosome disorder, Jacobsen Syndrome, we were told by doctors that they were not sure when (if) she would walk or talk. I was a devastated and terrified first-time mother. The next Monday, I gathered myself and started researching and calling. I first found the First Steps program through the MS Dept. of Health. Then, I found the Children’s Center and that call was life changing for my</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>family. While I am thankful for programs like First Steps, nothing could compare to [REDACTED]'s five years at TCC.</p> <p>I could go on and on about all she accomplished during those years at TCC but I would rather tell you about her now. [REDACTED] just finished first grade at [REDACTED] Elementary and she is thriving! She is learning to read and write, and she is keeping up with her classmates. We are incredibly fortunate to be in the [REDACTED] County School District and I cannot say enough good things about the educators at OGLL. They have all poured into my daughter. But I truly believe her time at TCC prepared her for where she is now. Not only did TCC prepare [REDACTED] to start her public school journey, most importantly, they prepared me. With their help, I was educated, organized and ready to take on our first IEP meeting. The transition into "real" school was very, very tough on me (not at all for [REDACTED]) but the wonderful staff of TCC held my hand every step of the way. They even followed [REDACTED] throughout her first year at [REDACTED] and helped her teachers with any concerns and modifications.</p> <p>We paid nothing for [REDACTED]'s years at TCC. Nothing. Our family is fortunate to have very good medical insurance but even our good plan limits therapy services. [REDACTED] is cut off from speech services and occupational therapy services at 20 visits. That works for us now as she also receives those services via her IEP at OGLL. However, I cannot imagine if she had not been able to receive those services year around during those very crucial preschool years. I have checked the out-of-pocket costs for those services and even as a middle-income family, we could not have paid for an additional 30 weeks of therapy for Layla during those five years.</p> <p>Please do not limit or change the way The Children's Center operates. If you could visit and see the diversity of TCC families, you could really see how important this place is for so many developmentally delayed preschool children. Let TCC continue to serve the special needs families of South MS as they have for over</p>	

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<p>45 years. I am confident, they will have them as prepared to start the MS Public School System as we were.</p>	
<p>██████████ – Parent of former student at The Children’s Center for Communication and Development I hope this email finds you well. As a lifelong resident of Petal, Mississippi, I wanted to reach out to you concerning changes MDE is proposing to implement at The Children’s Center for Communication and Development in Hattiesburg, MS. It is my understanding that the proposed changes would place more decision making power in the hands of local school districts and expect tuition based attendance. Sharon, I urge you not to make these changes. Let me share how this would have been detrimental to my child 3 years ago. My son, ██████████, is █ years old and graduated from TCC (The Children’s Center for Communication and Development) in May. ██████████ was diagnosed with Verbal Apraxia of Speech, which is a neurological disability that impacts the motor planning required for speech and other motor processes. When ██████████ was 2 years old he wasn’t reaching milestones for speech. We sought out every early intervention we could find. ██████████ was evaluated by the state three times as he grew and each time he did not qualify for speech services or any therapies because he was advancing in milestones in other areas. They required that he have a 33% delay and he only tested for a 29% delay. When tested by our local school district, the number one school district in the state, we were again denied services. I implore you not to allow school districts to retain any control whatsoever over who attends the Children Center. If this measure had been in place when we applied, my son who has a neurological disability would have been denied services. But he wasn’t denied services by TCC. The Children’s Center accepted ██████████ at almost 3 years old. He was completely unable to speak or communicate. At 4.5 years old, after intensive therapies from TCC, he was diagnosed with verbal apraxia, dyspraxia, and</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>sensory processing disorder. He graduated the Children’s Center in May with the hard earned ability to speak effectively without assistance, play with peers, and regulate his own sensory needs thereby completely changing the trajectory of his life. Should my son have been denied the opportunity to speak because of tuition cost? Should [REDACTED] have been denied help, critical speech therapy and occupational therapy, because of our local school district? Unequivocally no.</p> <p>I would love to buy you coffee and talk further. May you never forget to consider the future and lives you impact with these heavy and important decisions you have been charged with making.</p>	
<p>[REDACTED] – Parent of former student at The Children’s Center for Communication and Development</p> <p>It has come to my attention that possible changes are being considered for the way children are enrolled and funding flows to The Children's Center. My understanding is the two main changes would require 1) an agreement to be in place for every child outlining the cost of tuition the parent or school district must pay and then 2) require all ESY services and transportation support services to go thru the school district. I do not support the involvement of the school district at all.</p> <p>My son started attending The Children's Center at two years old. [REDACTED] never babbled on time. He started First Steps at 12 months old and it was then recommended that he start at The Children's Center. He attended for three wonderful years. The Children's Center held our hand thru every step and routinely met with us to explain progress and areas we could work on. There is no other center in the area with therapists that are as dedicated. They were willing to work with our family as a whole to make sure our child succeeded. The Children's Center zoomed with us during the pandemic so [REDACTED] was able to continue services. They also came into his K4 school this year to help supplement the education he was receiving. Any help his K4 teacher may have needed was</p>	<p>No proposed changes to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth through twenty-one. The revised policy has been updated to reflect this change. Additional clarification will be provided through training and technical assistance.</p> <p>IDEA funds authorized under §300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, an agency must meet the State’s definition of LEA <i>and</i> must meet the requirements under § 300.200, including submitting a plan that provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201.</p> <p>The MDE is requiring a MOU or Collaborative agreement between the LEA and the UBP to outline how state and federal funds will be utilized to cover special education and related services at the university-based programs to ensure the student receives a FAPE. The collaborative agreement will delineate</p>

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<p>readily available. She helped with his schedule at school and was always willing to meet with his teacher when ██████ would be struggling in an area in school. His speech therapist from this year attended his IEP meeting in May at ██████ Elementary and was there to help make sure all of the proper accommodations were listed on his IEP and that there would be a smooth transition to his new speech teacher. To say we are sad that ██████ has now aged out of their services is an understatement. We will truly miss every therapist who taught ██████ and got him ready for kindergarten. They went above and beyond to advocate for ██████ and to make sure we are the best advocates for our child going forward.</p> <p>In regards to the new proposal: It has been my experience that the school district is already overwhelmed with the needs of children age K4 and older and anyone below that age gets lost in the mix. I am very educated and I still had trouble navigating how to find the proper program for my child. It is not straight forward to find services for your child once you realize there is a delay. I had to repeatedly call the pediatrician, the health department, and the school district to figure out what services were available for my son and who I needed to contact. Every time I spoke to someone they would direct me to another department. I can't imagine how parents navigate this system that have fewer resources than I do. The fact that The Children's Center has autonomy from the school district is a great thing. It gives them more time to work with the families. Families who cannot afford to drive their children to the center are promptly reimbursed for their gas expenses. In addition, our school district was repeatedly invited to ██████'s IEP meetings and never once attended until he was entering K5 and had to schedule it for their own campus. It is no fault of the school district. They are dealing with children that are on their own campuses. It is not practical to involve the school districts in every decision for children who are too young to attend school. In</p>	<p>individualized services, responsibilities, and other costs related placement of students in the university-based programs.</p>

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<p>addition, the beauty of The Children's Center is that every child and parent is treated the same. Involving different school districts will allow a child to be treated differently based off of what district the child lives in. Please think long and hard before making this decision. It sounds like a good idea in theory but the paperwork and practicality of it will make it harder for children to receive services.</p> <p>Thank you for taking the time to read my thoughts.</p>	
<p>██████████ – Former student of The DuBard School for Language Disorders</p> <p>The Dubard School is so important. It has benefited me personally in so many ways. First of all, my father attended the Dubard School when he was a child for his Dyslexia. He is now a CWI at his current job working construction. Dyslexia unfortunately is genetic. So, I have it as well. I couldn't talk, had no personality, nothing came easy for me when it had come to learning. My parents put me in the Dubard school at the early age of 2, almost 3. I went for 6 years before i graduated. When I went to public school at McLain Attendance Center, fortunately I had a small class of 14 students in my grade, so I continued to get 1 on 1 learning when I needed it. I was in Beta Club making A's and B's throughout the rest of my public schooling. In High school i was accepted into Advanced classes and graduated number 9 in my class! I am now a Respiratory Therapist and am in School for Physical Therapist Assistant. With that being said, without the Dubard school, I would have been in special ed classes in public school , being pushed from one grade to the next. I wouldn't be where I am in life today without it. They taught me a way to learn despite my dislexia, taught me perseverance, to never give up on myself, and boosted my self confidence to know that I can do/learn anything I put my mind to. I am so thankful for the Dubard school and it holds a big meaning to my life. Please continue to fund this incredible school.</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>It helps so many students in so many wonderful ways. And who knows, it may just help my future children one day.</p>	
<p>Terri H Daniels, M.Ed. – Consultant Southern Mississippi Neonatologist The following comments are submitted in response to the Mississippi Department of Education’s (MDE) notice of intent to revise policy regarding children receiving public education services through university- based programs (UBP). After reading the revisions, I request that the MDE not make these changes as currently written that will (unintentionally) negatively impact educational services provided to children and their families.</p> <p>For more than 30 years I have worked in the field of early intervention through public schools, hospital-based programs, University Based Programs, and Department of Defense programs in both the Unites States and in Europe. Moreover, I was one of the 5 individuals selected from Mississippi to be trained specific to the federal IDEA legislation, and provided subsequent workshops throughout Mississippi in the law’s intent for implementation. Since that time, I have closely followed early intervention service delivery in Mississippi.</p> <p>Currently, I am an advisory board member for a superior program with which I have firsthand knowledge: The Children’s Center for Communication and Development at The University of Southern Mississippi. I am also a consultant for Southern Mississippi Neonatology in the area of disability prevention. I have observed this UBP implement best practices in educating infants and toddlers with complex disabilities when the brain and musculoskeletal systems are most pliable. There are countless success stories resulting from these highly specialized education services that benefit students, their families, our communities and ultimately save Mississippi education dollars.</p>	<p>No proposed changes to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth through twenty-one. The revised policy has been updated to reflect this change. Additional clarification will be provided through training and technical assistance.</p> <p>IDEA funds authorized under § 300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, an agency must meet the State’s definition of LEA <i>and</i> must meet the requirements under § 300.200, including submitting a plan that provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201 through 300.213.</p> <p>The MDE is requiring a MOU or Collaborative agreement between the LEA and the UBP to outline how state and federal funds will be utilized to cover special education and related services at the university-based programs to ensure the student receives a FAPE. The collaborative agreement will delineate individualized services, responsibilities, and other costs related placement of students in the university-based programs.</p>

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<p>After months of extensive research, I cannot locate any rationale for the revision changes MDE proposes re: State Board Policy 74, Rule 74.8, as to UBP's. The current proposed changes from MDE are not consistent with the spirit of the law passed years ago, and, specifically the <i>wording</i> of the MOU requirement would ultimately eliminate these UBP that currently and for at least 3 decades have provided least restrictive environments for a specific segment of the disability population.</p> <p>Although there appears to be no harm in having a written agreement (MOU) between the LEA and the UBP as they agree upon services to the children, however, this additional requirement appears to be redundant to the IEP process. If MOUs are now being required by some entity, I'd like to understand the law or policy that requires such change.</p> <p>Further, my most pressing request is that if MOUs are now a requirement, that MDE will continue to allow the monies per child to flow directly from the state to the UPBs which has been successful for over 25 years. Redirecting funds as proposed to the school districts rather than to the UBPs will be cumbersome, add layers of bureaucracy, require administrative management, and will ultimately delay or even prevent service provision for students with disabilities.</p> <p>Thank you for your consideration of this request.</p>	
<p>Judy and Denny Hankins We would ask the department to leave funding of the program as is. Enclosed is a list of why we feel funding should remain the same. University-based programs provide services at no cost to school districts or parents The mechanisms for placing children from over 30 school districts annually has worked well, both legally and financially, for decades. Routing state funds through local school districts to the university-based programs instead of directly from the state to the UBPs will</p>	<p>No proposed changes to policy recommended. No change needed.</p> <p>Mississippi Adequate Education Program (MAEP) Special Education teacher units and Transportation funds will continue to flow directly to University-Based Programs for students birth through twenty-one. The revised policy has been updated to reflect this change. Additional clarification will be provided through training and technical assistance.</p>

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<p>kill the programs. School districts will then, in effect, be seen as “paying tuition” and will be reluctant to place children in UBPs. UBPs maintain outstanding working relationships with Special Education Directors in local school districts. Those SPED directors do not want these changes which will increase their already demanding administrative burdens. Why are we trying to fix something that clearly is not broken?</p>	<p>IDEA funds authorized under § 300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, an agency must meet the State’s definition of LEA <i>and</i> must meet the requirements under § 300.200, including submitting a plan that provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201 through 300.213.</p>
<p>LCDR Michael S. Longmeier, USN, Ret. – Honor Club USM Foundation and Charter Member, Aubrey K. Lucas Society This e-mail is in reference to APA/Public Comment – State Board Policy 74, Rule 74.8, University-Based Programs (UBP). I understand that the Office of Special Education, starting in the 2021-2022 school year, intends to redirect funds from UBPs to local school districts which will then direct funds as seen fit to the UBPs. Why the change? The Dubard School for Language Disorders (Dubard School) has been receiving funds directly through UBPs for nearly half a century. Why would any entity want to direct funds away from a nationally recognized school, IMSLEC accredited since 1998? The Dubard School, having been so identified, provides outstanding education for children and young adults with language and hearing disorders. Making this change brings to mind several issues:</p> <ul style="list-style-type: none"> · Which local school districts have the expertise (clinical competency) to accurately evaluate potential students for the Dubard School? · Which local school districts have clinicians versed in the Dubard Association Method, a nationally recognized method of remediation for dyslexic patients, who could assist in such evaluations? 	<p>Policy updated to address this concern.</p>

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<ul style="list-style-type: none"> · Will the Dubard School be intimately involved with evaluating potential students with the local school districts or be forced to sit on the side lines? · Placing another layer of bureaucracy in the distribution of funds will increase the cost of any program going forward, hence less funds for the Dubard School. <p>Therefore, as a Mississippi Tax Payer and Benefactor of the Dubard School, I believe the redirection of funds away from UBPs to local school districts to be a terrible idea. In no way am I able to agree with such a decision. I trust the MDE will reconsider its decision on this issue.</p>	
<p>Joe Kinnan, Ph.D. and Sandy Kinnan, MSN, RN, FPMH-NP (Ret.)</p> <p>It has come to our attention that MDE is considering the most appropriate means of funding the services provided by the USM DuBard School for Language Disorders. We urge you to continue supporting the DuBard School with funds flowing directly from the State of Mississippi, rather than distributing them through the local school districts. The present system of funding ensures that the school's superior services reach the optimum number of students with language disorders in our state. If the funding is allowed to flow through the local schools, there is a strong possibility that the special needs students' learning will diminish due to inconsistent instructional programs and a lack of highly skilled teachers of the proven DuBard Method.</p> <p>We urge you and your staff to continue to fund the DuBard School and other university-based centers of excellence directly from the state. We are well acquainted with the amazing success of the DuBard program as we have witnessed the school's students and graduates excel for many years.</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>Thomas Lewis</p> <p>I am writing to express my opinion regarding a MDE memo from Robin Lemonis, State Director of Special Education, dated November 6, 2020, specifically State Board of Education Policy 74, Rule 74.8 which changes the working relationship between local school districts and University-Based Programs (UBPs). To be blunt, that memo which was issued without consultation and which to this day has not been retracted jeopardizes the very existence of university based programs such as the DuBard School for Language Disorders (DuBard) and The Children’s Center (TCC), both at the University of Southern Mississippi.</p> <p>The referenced rule <u>tries to fix a system that isn’t broken</u>. The two programs at USM have an excellent working relationship with around 39 school districts statewide, and provide critical services which are unavailable from local school districts. The proposed Rule 74.8 has already disrupted those relationship and threatened the services available to hundreds of children. Miracles happen at TCC and DuBard, but they only happen if local districts place children there.</p> <p>Rule 74.8 proposes to so complicate the placement of children at DuBard and TCC that local districts likely will not even attempt to do so. Such an outcome would be a tragedy for those children and our state. I personally know several adults who lead productive lives who credit DuBard with making their success possible. One is a spokesman for a nationally recognized local industry leader who as a child had severe speech problems. Today he speaks before hundreds of people at a time and credits DuBard for his professional life. Another is a successful CPA who was given the gift of language at DuBard. Who knows what his life would have been like without the services he received (which weren’t available</p>	<p>No proposed changes to policy recommended. No change needed.</p> <p>IDEA funds authorized under § 300.705 can only be distributed to an eligible LEA. In order to be an eligible LEA, an agency must meet the State’s definition of LEA <i>and</i> must meet the requirements under § 300.200, including submitting a plan that provides assurances to the SEA that the LEA meets each of the conditions in §§ 300.201 through 300.213.</p>

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<p>from his local school district). He certainly would not be the successful professional that he is today. Neither of these men would have reached their full potential in life were it not for the DuBard School. Their stories are but two of hundreds. Does the MDE really want to have a segment of population as government dependents rather than functioning, productive members of society. If Rule 74.8 is not rescinded, that is exactly what you are advocating.</p> <p>The two USM programs are by definition public schools which augment the services available from local school districts. They provide specialized services to children from 39 school districts statewide and have been doing so for about 50 years. The funding policies have been working for the school districts and the UBPs for thirty years, yet here comes a bureaucrat who knows little of the history of these programs and with the stroke of a pen changes the funding mechanism without any concern for the history or the working relationships between the UBPs and local school districts. That memo of November 6, 2020 is still in effect to this day and has sown confusion among parents, school districts, and the UBPs. The fate of hundreds of children who depend on the USM UBPs for vital services which are not available from their local school districts is at risk.</p> <p>I thought that the function of the MDE was to facilitate the education of all of Mississippi’s children, but Rule 74.8 flies in the face of that. The Department of Education needs to quit trying to fix what is not broken (UBPs) and focus attention on the very real problems in our state’s educational system. We are consistently 50th among the states in most categories, but families actually move from other parts of the country to have their children placed at DuBard. How dare you threaten the existence of a shining star of hope for children with language disorders. You have caused</p>	

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<p>consternation among parents, local districts, and the UBPs. You have threatened to take away a vital lifeline from children who struggle. You have caused large expenditures of time and money on the part of the UBPs to oppose this asinine rule.</p> <p>Please reverse this rule and let the UBPs spend their time and money doing what they do so well, giving children the gift of language, rather than dealing with unnecessary, asinine bureaucratic bungling.</p>	
<p>Melinda Koerber I am writing to you in reference to APA/Public Comment-State Board Policy 74 Rule 74.8 University-Based Programs. It is evident that enacting this policy would be detrimental to the school districts and students that the UBP serve. This also would impact the university students that benefit from an excellent opportunity to train in these university settings. Please leave the established funding channel in place.</p>	<p>No proposed changes to policy recommended. No change needed.</p>
<p>Scott Berry – Head Baseball Coach, The University of Southern Mississippi I am writing to you on behalf of the children, families, and staff of the Dubard School for Language Disorders and The Children’s Center for Communication and Development (USM Statewide Schools #1808). These University-Based Programs are a direct lifeline to many children and families with significant speech language, hearing and/or academic disorders in our community. I sincerely ask that you do not change the funding for our university-based programs. Rerouting the funding through public schools will only hinder and create more obstacles for these precious children and their families. As educators, we know there is a crucial window in development and often, if not seized upon, that window will close. By rerouting monies, you are essentially closing the opportunities to many children and their families. As the baseball</p>	<p>No proposed changes to policy recommended. No change needed.</p>

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<p>coach and employee at USM for the past 21 years, I have seen firsthand how these services have benefitted many children and given much- needed hope to their families. These families do not have to worry about cost. They do not have to go through numerous hoops to provide help for their child. As a parent, knowing a potential hardship is met with a direct solution is invaluable. We all want happy, thriving children. We know we will all face challenges; however, “rerouting,” “recreating the wheel,” “burdening public schools with more to do,” “lacking clarity,” only creates confusion and keeps us from fulfilling our primary mission to serve and help. Please continue to directly fund the DuBard School for Language Disorders and The Children’s Center for Communication and Development. Change occurs when something is broken or needs improvement. The funding is not broken, and our University-Based Programs continue to improve the lives of children and their families every single day. Direct funding is the lifeline for these tremendous resources.</p>	

Chapter 74: Special Education

Rule 74.8 University Based Programs. The University-Based Program is authorized in Miss. Code Ann. §§ 37-23-31 through 37-23-35. Any state supported university or college may apply for minimum program funds under these regulations.

1. Procedures for Enrollment in a University-Based Program (UBP)
 - a. Students with disabilities may be enrolled in a UBP in the following two situations:
 - i. the student is not enrolled in a Local Educational Agency (LEA) and is parentally placed by their parent(s) in the UBP
 - OR**
 - ii. the LEA Individualized Education Program (IEP) committee initiates placement in a UBP because the IEP committee in that district has determined that the UBP is that student's Least Restrictive Environment (LRE) for the purposes of providing that student with a Free Appropriate Public Education (FAPE), the IEP committee shall include UBP personnel. Yearly placement decisions relative to whether a student with disabilities is to be placed in a UBP by an LEA continues to be the responsibility of LEA's IEP committee.
 - b. When the UBP staff is requested by a parent to parentally place a student, the UBP will provide clear notice to the parent that the participating student has no individual entitlement to a FAPE from their home school district, including special education and related services for as long as the student is privately enrolled.
 - c. When a student with disabilities is placed by the IEP Committee in a UBP, the UBP shall enter into a collaborative agreement with the LEA that will require state and federal funds already designated for the student placed to be utilized to cover the costs of special education and related services at the UBP to ensure that the student receives a FAPE. UBP students enrolled in a local school district will generate Mississippi Adequate Education Program (MAEP) base student cost funds in the same manner as all other students. State funds provided through the MAEP Special Education Teacher Units and MAEP transportation funding shall not be included in the collaborative agreement. MAEP Special Education Teacher Units and MAEP transportation funding shall flow through to the UBP directly. Additionally, the collaborative agreement will delineate individualized services, responsibilities, and other costs related to placement of students in the UBP. The collaborative agreement will be a template provided by the Mississippi Department of Education (MDE) and shall reference the IEP developed by the LEA in collaboration with the UBP and their responsibility for IEP implementation.
 - d. The LEA shall remain the district of enrollment for students placed in the UBP by the IEP Committee, or through due process, state complaint process, or binding mediation. The student shall be included in the LEA's December 1 Child Count, and the LEA shall be responsible for ensuring the student receives a FAPE. The UBP

will count all students enrolled in their program on the UBP December 1 child count for the purposes of funding the MAEP Special Education Teacher Units.

- e. The LEA shall be responsible for ensuring that the IEP of each student placed at a UBP includes transportation as a related service. MAEP transportation funds for each student enrolled in a UBP will flow through directly to the UBP regardless of how the student was placed.
- f. The LEA and the UBP must ensure that there is no delay in implementing the student's IEP, including any case in which the payment source for providing or paying for special education and related services to the student is being determined.

2. Teacher Units Approved for UBP

Children counted for the allocation and approval of a university-based teacher unit(s) shall meet the following criteria:

1. Documentation verifying birth date and age from birth through twenty-one (21) years,
2. Documentation confirming residency in the State of Mississippi,
3. Documentation of current eligibility by Early Intervention and/or LEA,
4. Documentation of current IEP or Individualized Family Service Plan (IFSP),
5. Documentation of placement by a local school district IEP committee OR documentation of private parental placement, and
6. Have not finished or graduated from high school.

Documentation of numbers 1-6 above shall be maintained on file for each child served by an approved state funded teacher and be available upon request by the MDE.

The UBP shall submit annual child count data in accordance with the procedures of the Office of Special Education. An assurance from the UBP that data for each child served has been verified and is maintained on file shall be forwarded to the MDE when the teacher unit is requested for approval.

The administrator of the UBP shall submit Teacher Allocation data in accordance with the teacher unit reimbursement request process required by the Office of Special Education. Teacher units shall be allocated based on the teacher certificate requirements of special schools under the Office of Accreditation and each teacher being responsible for the educational instruction of a minimum of fourteen (14) children and maintaining a teacher schedule of 330 instructional minutes daily. Any request for a teacher to serve less than fourteen (14) shall be made in writing to the Office of Special Education and shall include the reason for the request. Request for teachers to serve less than fourteen (14) shall be approved based on the schedule of the teacher and instructional needs of the children. All exemptions of the minimum number of children served by a teacher shall be reviewed and approved by the Deputy State Superintendent, Chief Academic Officer. If a UBP teacher is providing instructional services on a part-time basis (165 instructional minutes daily) based

on the complex needs of individual students, then the UBP may request and be awarded one half of a special education teacher unit.

The administrative head of the facility is responsible for ensuring a teacher approved for a teacher unit shall be paid based on the salary scale, years of teaching experience, and salary schedule requirements found in Miss. Code Ann. §§ 37-19-7, 37-19-9, and 37-19-10.

Teacher units shall be allocated and approved for the regular school session. The number of days the facility will provide a regular school session shall be in accordance with the MDE's regulations and Miss. Code Ann. §§ 37-151- 7(3)(c), 37-3-49, 37-13-61 through 69, 37-151-5(j), and 37-151-7(3)(c). The calendar dates of the beginning and ending of the regular school session shall be submitted to the Office of Special Education when requesting an allocation for a teacher unit.

3. Application Steps for UBP Proposal

The outline for the proposal which is to be submitted to the Office of Special Education is as follows:

- a. Title of the Program
 - b. General Information
 - i. Number, age, and IDEA or Early Intervention eligibility of students
 - ii. Length of School Day (must be full day program to receive full funding)
 - iii. Number of teachers requested, teacher's name (if available), and certification (if available)
 - iv. Location and description of the classroom(s) or educational environment
 - c. A list of program objectives
 - d. An outline of program evaluation criteria
 - e. A copy of the university/college approved policies and procedures as required
 - f. An assurance that the university/college will comply with all applicable State Department of Education regulations relating to programs for students with disabilities. It is the responsibility of personnel who operate this program to be familiar with all regulations.
4. Upon receipt of this proposal, Office of Special Education personnel shall review it and either approve it or provide feedback to university/college personnel and allow for re-submission. The Bureau Director shall provide written notification indicating approval of acceptable proposals and indicating that university/college personnel may proceed with implementation. If teacher certification and number of eligible children is not available when the proposal is submitted, the MDE shall give tentative approval until such time as this information is received. Proposals shall be submitted for renewal every 3 years or any time there are substantial changes to the program.

Source: Miss. Code Ann. §§ 37-1-3, 37-23-31, 37-23-33, 37-23-35, and 37-151-85
(Revised 7/2021).

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OR
 - ii. ~~if a the Local Educational Agency LEA~~ **Individualized Education Program (IEP) committee** initiates a placement **in a UBP** because ~~an the Individualized Education Program IEP committee in that district has~~ determined that the ~~university-based program~~ **UBP** is that student's Least Restrictive Environment (LRE) for the purposes of providing that student with a Free and Appropriate Public Education (FAPE), ~~and the IEP committee shall include UBP personnel.~~ ~~places the student in the university-based program.~~ Yearly placement decisions relative to whether a student with disabilities is to be placed in a ~~university-based program~~ **UBP** by an LEA continues to be the responsibility of LEA's IEP committee.
 - b. When the ~~university-based program~~ **UBP** staff is requested by a parent to ~~enroll~~ **parentally place** a student ~~on a private tuition basis~~, the ~~university-based program~~ **UBP** will provide clear notice to the parent that the participating student has no individual entitlement to a ~~free and appropriate education (FAPE)~~ from their home school district, including special education and related services for as long as the student is privately enrolled.
 - c. When a student with disabilities is placed by the IEP Committee in a ~~university-based program~~ **UBP**, the ~~university-based program~~ **UBP** shall enter into a collaborative agreement with the LEA that will require state and federal funds already designated for the student placed to be utilized ~~to the~~ cover the costs of ~~tuition~~ **special education and related services** at the ~~university-based program~~ **UBP** ~~along with special education and related services~~ to ensure that the student receives a FAPE. **UBP students enrolled in a local school district will generate Mississippi Adequate Education Program (MAEP) base student cost funds in the same manner as all other students. State funds provided through the MAEP Special Education Teacher Units and MAEP transportation funding shall not be included in the collaborative agreement. MAEP Special Education Teacher Units and MAEP transportation funding shall flow through to the UBP directly.** Additionally, the collaborative agreement will delineate **individualized** services, responsibilities, and other costs related to placement of students in the ~~university-based program~~ **UBP**.

The collaborative agreement will be a template provided by the Mississippi Department of Education (MDE) and shall reference the IEP developed by the LEA in collaboration with the ~~university-based program~~ **UBP** and their responsibility for IEP implementation.

- d. The LEA shall remain the district of enrollment for students placed in the ~~university-based program~~ **UBP** by the IEP Committee, or through due process, state complaint process, or binding mediation. The student shall be included in the LEA's December 1 Child Count, and the LEA shall be responsible for ensuring the student receives a FAPE. **The UBP will count all students enrolled in their program on the UBP December 1 child count for the purposes of funding the MAEP Special Education Teacher Units.**
 - ~~e. The LEA shall convene an IEP Committee meeting that would include representatives and staff from the university-based program who would be responsible for providing the services in order to change the student's LRE to the university-based program, develop a transition plan for the student to the university-based program, as well as modify the student's services accordingly based on the new placement. Once the student is transitioned to the university-based program, the IEP Committee must include an Agency Representative from the LEA that will be involved in committee meetings to ensure that the student receives a FAPE at the new placement. The IEP developed for the student shall be reasonably calculated to enable the student to make progress appropriate in light of the student's circumstances.~~
 - f. The LEA shall ~~continue to be responsible for~~ **ensuring that the IEP of each student placed at a UBP includes transportation as a related service.** ~~providing transportation for a student placed in a university-based program through the use of transportation funds from the Mississippi Adequate Education Program (MAEP).~~ **MAEP transportation funds for each student enrolled in a UBP will flow through directly to the UBP regardless of how the student was placed.** ~~Additionally, university-based programs will be eligible to receive MAEP transportation funds for a student that is parentally placed on a private tuition basis.~~
 - g. The ~~LRE~~ **LEA** and the ~~university-based program~~ **UBP** must ensure that there is no delay in implementing the student's IEP, including any case in which the payment source for providing or paying for special education and related services to the student is being determined.
2. Teacher Units Approved for ~~University-Based Program~~ **UBP**

Children counted for the allocation and approval of a university-based teacher unit(s) shall meet the following criteria:

1. Documentation verifying birth date and age ~~of three (3)~~ **from birth** through twenty-one (21) years,
2. Documentation confirming residency in the State of Mississippi,

3. Documentation of current eligibility by **Early Intervention and/or LEA**,
4. Documentation of current IEP or **Individualized Family Service Plan (IFSP)**,
5. Documentation of placement by a local school district IEP committee OR documentation of private parental placement, **and**
6. Have not finished or graduated from high school;

Documentation of numbers 1-6 above shall be maintained on file for each child served by an approved state funded teacher and be available upon request by the ~~Mississippi Department of Education (MDE)~~.

The ~~university-based program~~ **UBP** shall submit annual child count data in accordance with the procedures of the Office of Special Education. An assurance from the ~~university-based program~~ **UBP** that data for each child served has been verified and is maintained on file shall be forwarded to the MDE when the teacher unit is requested for approval.

The administrator of the ~~university-based program~~ **UBP** shall submit Teacher Allocation data in accordance with the teacher unit reimbursement request process required by the Office of Special Education. Teacher units shall be allocated based on the teacher certificate requirements of special schools under the Office of Accreditation and each teacher being responsible for the educational instruction of a minimum of ~~ten~~ **fourteen** (10**14**) children **and maintaining a teacher schedule of 330 instructional minutes daily**. ~~The Maximum number of children served per teacher is fourteen (14).~~ Any request for a teacher to serve ~~less fewer than ten fourteen (1014) or more than fourteen (14) children~~ shall be made in writing to the Office of Special Education and shall include the reason for the request. **Request for teachers to serve less than fourteen (14) shall be** ~~Approved shall be~~ based on the schedule of the teacher and instructional needs of the children. All exemptions of the minimum ~~and maximum~~ number of children served by a teacher shall be reviewed and approved by the Deputy State Superintendent, Chief Academic Officer. **If a UBP teacher is providing instructional services on a part-time basis (165 instructional minutes daily) based on the complex needs of individual students, then the UBP may request and be awarded one half of a special education teacher unit.**

The administrative head of the facility is responsible for ensuring a teacher approved for a teacher unit shall be paid based on the salary scale, years of teaching experience, and salary schedule requirements found in Miss. Code Ann. §§ 37-19-7, **37-19-9**, and ~~37-19-17~~**37-19-10**.

Teacher units shall be allocated and approved for the regular school session. The number of days the facility will provide a regular school session shall be in accordance with the MDE's regulations and Miss. Code Ann. §§ 37-151- 7(3)(c), ~~Miss. Code Ann. § 37-3-49, §§ 37-13-61 through 69, §37-151-5(j), and §37-151-7(3)(c)~~. The calendar dates of the beginning and ending of the regular school session shall be submitted to the Office of Special Education when requesting an allocation for a teacher unit.

3. Application Steps for ~~University-Based Program~~ **UBP** Proposal

The outline for the proposal which is to be submitted to the Office of Special Education is

as follows:

- a. Title of the Program
 - b. General Information
 - i. Number, age, and IDEA or **Early Intervention** eligibility of students
 - ii. Length of School Day (must be full day program to receive full funding)
 - iii. Number of teachers requested, teacher's name (if available), and certification (if available)
 - iv. Location and description of the classroom(s) **or educational environment**
 - c. A list of program objectives
 - d. An outline of program evaluation criteria
 - e. A copy of the university/college approved policies and procedures as required
 - f. An assurance that the university/college will comply with all applicable State Department of Education regulations relating to programs for students with disabilities. It is the responsibility of personnel who operate this program to be familiar with all regulations.
4. Upon receipt of this proposal, Office of Special Education personnel shall review it and either approve it or provide feedback to university/college personnel and allow for re-submission. The Bureau Director shall provide written notification indicating approval of acceptable proposals and indicating that university/college personnel may proceed with implementation. If teacher certification and number of eligible children is not available when the proposal is submitted, the MDE shall give tentative approval until such time as this information is received. Proposals shall be submitted for renewal every 3 years or any time there are substantial changes to the program.

Source: Miss. Code Ann. §§ 37-1-3, ~~Miss. Code Ann. § 37-23-31~~, ~~Miss. Code Ann. § 37-23-33~~, ~~Miss. Code Ann. § 37-23-35~~, and ~~Miss. Code Ann. § 37-151-85~~ (Revised 8/1991; 7/2021).