

DRAFT

May 17, 2012

The Honorable Arne Duncan
Secretary, U.S. Department of Education
400 Maryland Avenue, Southwest
Washington, D.C. 20202-1475

Dear Secretary Duncan:

Kindly consider this letter as an addendum to the letter you received from 26 U.S. Senators regarding the provision of instruction in braille for students with visual impairments and blindness. As professor emerita from Vanderbilt University, specializing in research and personnel preparation in visual disabilities (blindness and low vision), I find one issue omitted from the letter that is worthy of your attention and consideration. I have enlisted colleagues to co-sign this letter. As we are not located in the same city (as are senators), kindly accept their names and affiliations; each has sent me an email indicating their willingness to sign this letter. I can also request from each a signed copy of this letter if requested.

The major omission from the letter is a lack of acknowledgement of the benefits of ensuring students with low vision a clinical low vision evaluation, prescribed optical devices, and instruction in their use. Since 1957 these components have been included in rehabilitative services for our veterans. The National Eye Institute has also acknowledged the need for this rehabilitative approach. Today, however, students with low vision have no guarantee that this form of assistive technology that allows access to the general education curriculum will be an option because there are no regulations in IDEA. Clinical low vision evaluations are performed and optical devices prescribed by ophthalmologists or optometrists with a low vision specialization while instruction is delivered in local and special schools by teachers of students with visual impairments (TVIs) and by certified orientation and mobility specialists (COMS) While standard pairs of glasses may correct such issues as astigmatism and refractive errors, optical devices are designed with magnification, prisms, light control, and so forth, to maximize the visual functioning of each student.

The need for instruction in the use of optical devices has been documented in such publications as: *Instruction in the Use of Optical Devices for Children and Youths* (Coy & Andersen, 2010), *The Role and Function of the Teacher of Students with Visual Impairments* (Spungin & Ferrell, 2007), *Educating Blind and Visually Impaired Students: Policy Guidance* (U.S. Office of Special Education Programs - OSEP, 65 FR 36586, 2000,), *Blind and Visually Impaired Students: Educational Service Guidelines* (Pugh & Erin, Eds.1999), a publication of the National Association of State Directors of Special Education - NASDSE.

Without a clinical low vision evaluation and the prescribed optical lenses identified for creating the accurate “image size,” or for providing light control for individual children, teachers are left with few comparisons for their learning media assessments (LMA). Comparing braille with standard print is not appropriate; even the large print provided by the American Printing House for the Blind (that typically uses 16 pt. print) is not a fair comparison. A student who cannot read 16 point print would only have the option of braille. Students, however with optical devices that provide access to standard print texts and materials as well as to distance information, e.g., white boards and street signs could become visually independent while some may become dual-media readers (students who are learning and/or using both print and braille). These children include those who may be considered “legally blind”, a term coined in 1934 and that became part of the Social Security Act of 1935. There are many children with low vision who can increase their reading speeds, reduce fatigue, have immediate access to general education materials, and be able to function in daily living environments where enlargement or braille is not available, e.g., grocery stores, during travel. Without these options, a student’s literacy skills, and access to information may be extremely limited.

Unless a child is under age 3, totally or functionally blind, all assessments for determining the learning medium or media should follow the functional vision assessment (FVA) to determine how the child is functioning in school and outdoor settings), the clinical low vision evaluation, the provision of prescribed optical devices, and instruction in their use. All LMAs should also meet the standards of other accepted assessments in special education with reliability and validity measures available. Follow-up research is also needed as mentioned below.

This letter calls for 3 additions to the information found in the letter put forth by the 26 senators:

1. Add the requirement that all children with low vision receive a clinical low vision evaluation, their optical devices (assistive technology), and educational instruction in the use of any prescribed devices before receiving a learning media assessment (determining if braille is an appropriate medium or part of a dual media literacy program).
2. Assure that all assessments for determining a child’s reading medium or media meet standards for assessments with reliability and validity measures.
3. Ensure that there are funds for the study the various methods of teaching braille to students with low vision and to determine which methods are most effective and for which students with certain characteristics.

Attached please find a list of research articles and other references that have relevance to this letter.

Thank you for your time and consideration. Each of us, listed below will be available to you as you make recommendations for reauthorization of IDEA.

Sincerely,

Anne L. Corn Ed.D.
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ADDITIONAL NAMES AND AFFILIATIONS HERE

References

*Coy, J., & Andersen, E. (2010). Instruction in the use of optical devices for children and youths. In A. L. Corn & J. N. Erin (Eds.). *Foundations of Low Vision: Clinical and Functional Perspectives, Second Edition*. New York: AFB Press.

*Division on Visual Impairments, Council for Exceptional Children. (2007). *The role and function of the teacher of students with visual impairments*. Retrieved May 11, 2012, <http://www.cecdvi.org/positionpapers.html>

*Office of Special Education and Rehabilitative Services, U.S. Department of Education. (2000). *Educating blind and visually impaired students: policy guidance*. Retrieved May 11, 2012, <http://www.afb.org/section.aspx?FolderID=3&SectionID=3&TopicID=138&DocumentID=720>

*Pugh, G. S., & Erin, J. (Eds.). (1999). *Blind and Visually Impaired Students: Educational service guidelines*. Alexandria, VA: National Association of State Directors of Special Education.

* These documents were referenced within the letter.