



October 29, 2019

Johnny W. Collett  
Assistant Secretary  
Office of Special Education and Rehabilitative Services  
Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202

RE: Docket ID ED-2019-OSERS-0111

Dear Assistant Secretary Collett:

The National Federation of the Blind appreciates the opportunity to comment on the notice of proposed interpretation regarding section 674(e)(3)(C) of the Individuals with Disabilities Education Act to include digital instructional materials in the definition of “print instructional materials.”

The National Federation of the Blind is pleased that the Office of Special Education and Rehabilitation Services (OSERS) is expanding its definition of “print instructional materials” to allow digital instructional materials to be submitted to the National Instructional Materials Access Center (NIMAC). The rapid proliferation of twenty-first century classrooms has established, and continues to establish, unique opportunities for students to enrich their education at all levels of elementary and secondary education. In that aspect, we encourage developers to provide educators and students alike a plethora of interactive digital instructional materials, and believe that such avenues will make the idea of learning more engaging and enjoyable for all. OSERS should take care to ensure that publishers understand that digital instructional materials submitted to the NIMAC should not take precedence over their efforts to create digital educational content that is fully accessible from the outset. OSERS has an opportunity to use this interpretation to advance the best practice that digital instructional materials be developed with accessibility practices from the beginning rather than expecting a second-class alteration later.

However, we do believe it is necessary to place an emphasis on the continued instruction and utilization of Braille in conjunction with the emerging digital classroom by ensuring that one of the accessible formats digital instructional materials are converted to is electronic Braille. In a 2013 study, print was found to be the primary reading medium for 73 percent of blind and low-

vision K-12 students, whereas Braille was the primary reading medium for only 13 percent.<sup>1</sup> By contrast, expert evaluators assessed that just over 35 percent of students in the study should be using Braille as their primary reading medium.<sup>2</sup> Far too few students are being taught Braille as it is, and while we are supportive of the proposed interpretation change, we absolutely do not wish for that support to be construed as a weakening of our stance on Braille instruction in elementary and secondary classrooms.

Thank you again for considering our comments, and we are happy to provide any additional information should it be needed.

Sincerely,

A handwritten signature in black ink that reads "Mark A. Riccobono". The signature is written in a cursive style with a long, sweeping tail that extends to the right.

Mark A. Riccobono, President  
National Federation of the Blind

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<sup>1</sup> Bell, Edward C., Jessica V. Ewell, and Natalia M. Mino. "National Reading Media Assessment for Youth with Visual Impairments: Research Report." *Journal of Blindness Innovation and Research* 3, no. 2 (2013).

<sup>2</sup> Ibid.