



April 16, 2024

TO: MICHIGAN DEPARTMENT OF EDUCATION, OFFICE OF SPECIAL EDUCATION

RE: Comments by Disability Rights Michigan (DRM) on proposed rule changes, R 340.1721b, R 340.1723c, and R 340.1733

Disability Rights Michigan (DRM) is a private, nonprofit, nonpartisan organization advocating for Michigan's disability community. DRM is pleased to comment on changes proposed to R 340.1721b ("Timelines," changed to "Public agency responsibilities and timelines.") and R 340.1723c ("Right to independent educational evaluation.")

- Regarding R 340.1721b(b), DRM notes the language change appears to have changed the meaning of the rule. The new language states, "The parent *shall* provide the public agency with written parental consent to provide initial special education programs and services within 10 school days of the receipt of notice of an initial offer of a free appropriate public education." This appears to suggest that the parent *must* give their consent to the initial IEP.

That contradicts the federal law, which explicitly states that a parent may delay or withhold consent for an initial IEP, in order to prevent its implementation, and the district may not use procedures for due process nor mediation to obtain a ruling or agreement that the initial IEP services may be provided. *34 CFR 300.300(b)*

DRM suggests adding clarifying language that explains the initial IEP cannot be implemented without parental consent, but makes it clear the parental consent must be informed and voluntary, as required by federal law. *34 CFR 300.9*



- **Regarding R 340.1723c**, DRM understands and supports the concerns that the rule must align with the federal rule and must not impose additional conditions or barriers on parents seeking an Independent Educational Evaluation (IEE), an important procedural safeguard. However, our experience in working with families across Michigan suggests that removing the requirement that the request be in writing, signed, and dated will result in a decreased ability for MDE-OSE to ensure districts comply with the timelines in the rule. We anticipate the proposed change to this rule, absent any additional protections for parents, will result in miscommunication, confusion, and delays that will, in fact, create new barriers to timely access to an IEE.

DRM suggests that MDE-OSE address the need to hold districts accountable to the timeline, while ensuring parents are not subjected to requirements that are not permitted under federal law, by expanding the rule. We suggest, as an addition to this rule, creating a requirement that each Intermediate School District set up and monitor a phone line/message system where parents can make a verbal request for an IEE. The message system must record and date-stamp each call. The call line information must be provided to the parent in writing at the conclusion of any review of evaluations, including the REED and the MET.

Alternatively, MDE-OSE should adopt language addressing how it will resolve disputes regarding the date the parent requested the IEE. That language should support the presumption that the date the parent provides to MDE-OSE as the date the request was made verbally will be accepted as accurate, unless the district can prove that date is incorrect.

Thank you for the opportunity to comment. Please contact Kris Keranen, [kkeranen@drmich.org](mailto:kkeranen@drmich.org), 906-228-5910, if you have any questions.

April 19, 2024

**TO:** Michigan Department of Education, Office of Special Education

**RE:** Arc Michigan comments on proposed rule changes, R 340. 1721b, R 340.1723c, and R 340.1733

The Arc Michigan is a statewide organization of over 10,000 members and 28 local chapter affiliates that advocate with, and on behalf of, citizens with developmental disabilities and their families. We appreciate the opportunity to comment on the proposed changes to the Michigan Administrative Rules for Special Education.

**R 340.1721 Rule 21b. (1) (a) Time lines**

We suggest adding wording that if a parent requests an evaluation verbally to the public agency, the public agency must document the verbal request and issue a written statement to the parent acknowledging the date they received the request for an evaluation.

We understand that MDE OSE has explained to public agencies that if a parent makes a verbal request for an evaluation that they must document the request to show compliance with the timelines. Parents are reporting that they are making verbal requests for evaluations and schools are ignoring the requests. Parents are not receiving written notice about whether the school will complete the evaluation or the request for the evaluation is being denied.

In addition to the statement acknowledging the parent's request for an evaluation, the parent should be given written notice and the timeline for the evaluation process, such as the MDE OSE Guidance Document [Initial Evaluation Procedures for Special Education Programs and Services](#)

**R 340.1721 Rule 21b (1) (b) Timelines**

New language states, "The parent shall provide the public agency with written parental consent to provide initial special education programs and services within 10 school days of receipt of notice of an initial offer of a free appropriate public education". This suggests that a parent **must** give their consent to the initial IEP. Federal law states that a parent can refuse to give consent for an initial IEP and the school district cannot use mediation or due process procedures to obtain a ruling or agreement that the initial IEP services be provided. 34 CFR 300.300(b)

We suggest adding wording that states the initial IEP cannot be implemented without informed, voluntary parental consent. 34 CFR 300.9

Thank you for considering these comments. Please contact The Arc Michigan if you have any questions.

Sincerely,

Sherri Boyd, Executive Director, The Arc Michigan  
[sherri@arcmi.org](mailto:sherri@arcmi.org)

Michelle Driscoll, Chair, Education Committee, The Arc Michigan  
[michelle@michiganallianceforfamilies.org](mailto:michelle@michiganallianceforfamilies.org)



**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, March 20, 2024 9:15:26 AM  
**Last Modified:** Wednesday, March 20, 2024 9:23:17 AM  
**Time Spent:** 00:07:50  
**IP Address:** 206.57.189.66

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Page 2: Demographics

**Q1** Respondent skipped this question  
First Name

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**Q2** Respondent skipped this question  
Last Name

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**Q3** Individual  
Are you providing comment as an individual or on behalf of an organization?

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**Q4** Respondent skipped this question  
Email address

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**Q5** Respondent skipped this question  
County of Residence

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**Q6** Teacher  
What role best describes you in taking this survey?

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Page 3: R 340.1721b Timelines

**Q7** Support the change as written  
Do you support the proposed amendment to the title of R 340.1721b?

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**Q8** Respondent skipped this question  
Specific comments about R 340.1721b

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Page 4: R 340.1721b(1)

**Q9** **Support the change as written**  
How would you categorize your support of R 340.1721b(1)?

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**Q10** **Respondent skipped this question**  
Specific comments about R 340.1721b(1)

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Page 5: R 340.1721b(2)

**Q11** **Support the change as written**  
How would you categorize your support of R 340.1721b(2)?

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**Q12** **Respondent skipped this question**  
Specific comments about R 340.1721b(2)

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Page 6: R 340.1723c(2)-(6)

**Q13** **Support the change as written**  
How would you categorize your support of R 340.1723c(2)-(6)?

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**Q14** **Respondent skipped this question**  
Specific comments about R 340.1723c(2)-(6)

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Page 7: R 340.1733(a)-(c)

**Q15** **Support with minor revisions**  
How would you categorize your support of R 340.1733(a)-(c) ?

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**Q16**  
Specific comments about R 340.1733(a)-(c)

Section A: \*heating and cooling conditions

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Page 8: R 340.1733(d)

**Q17**

**Support the change as written**

How would you categorize your support of R 340.1733(d)?

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**Q18**

**Respondent skipped this question**

Specific comments about R 340.1733(d)

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Page 9: R 340.1733(e)-(g)

**Q19**

**Support the change as written**

How would you categorize your support of R 340.1733(e)-(g)?

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**Q20**

**Respondent skipped this question**

Specific comments about R 340.1733(e)-(g)

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Page 10: R 340.1733(h)-(j)

**Q21**

**Support the change as written**

How would you categorize your support of R 340.1733(h)-(j)?

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**Q22**

**Respondent skipped this question**

Specific comments about R 340.1733(h)-(j)

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**COMPLETE**

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**Last Modified:** Thursday, March 21, 2024 10:58:39 AM  
**Time Spent:** 00:08:01  
**IP Address:** 136.228.38.11

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Page 2: Demographics

**Q1**

First Name

Beth

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**Q2**

Last Name

Longshore

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**Q3**

**Individual**

Are you providing comment as an individual or on behalf of an organization?

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**Q4**

Email address

beth.longshore@inghamisd.org

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**Q5**

County of Residence

Eaton

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**Q6**

**Community member**

What role best describes you in taking this survey?

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Page 3: R 340.1721b Timelines

**Q7** **Support the change as written**

Do you support the proposed amendment to the title of R 340.1721b?

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**Q8**  
Specific comments about R 340.1721b

Rule 21b. (2) should specific whether it is the public agency in which the private school is located or the public agency in which the student is a resident.

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Page 4: R 340.1721b(1)

**Q9** **Support the change as written**

How would you categorize your support of R 340.1721b(1)?

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**Q10** **Respondent skipped this question**

Specific comments about R 340.1721b(1)

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Page 5: R 340.1721b(2)

**Q11** **Support with minor revisions**

How would you categorize your support of R 340.1721b(2)?

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**Q12**  
Specific comments about R 340.1721b(2)

Rule 21b. (2) - Should specific whether it is the public agency in which the private school is located or the public agency in which the student is a resident.

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Page 6: R 340.1723c(2)-(6)

**Q13** **Support the change as written**

How would you categorize your support of R 340.1723c(2)-(6)?

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**Q14** **Respondent skipped this question**

Specific comments about R 340.1723c(2)-(6)

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Page 7: R 340.1733(a)-(c)

**Q15** **Support with major revisions**

How would you categorize your support of R 340.1733(a)-(c) ?

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**Q16**  
Specific comments about R 340.1733(a)-(c)

All classrooms should be aligned with the age ranges of the school in which they are located regardless of program type (with the exception of High Schools where students must be able to attend until they age out of special education).

More importantly, we should NOT have categorically based special education programs. It is profoundly contradictory to the intent and letter of the IDEA to have special education programs based on disability category.

"Disability do not determine placement! So placements cannot be disability specific!"

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Page 8: R 340.1733(d)

**Q17** **Support the change as written**

How would you categorize your support of R 340.1733(d)?

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**Q18**  
Specific comments about R 340.1733(d)

All classrooms should be aligned with the age ranges of the school in which they are located regardless of program type (with the exception of High Schools where students must be able to attend until they age out of special education).

More importantly, we should NOT have categorically based special education programs. It is profoundly contradictory to the intent and letter of the IDEA to have special education programs based on disability category.

"Disability do not determine placement! So placements cannot be disability specific!"

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Page 9: R 340.1733(e)-(g)

**Q19** **Support with minor revisions**

How would you categorize your support of R 340.1733(e)-(g)?

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**Q20**

Specific comments about R 340.1733(e)-(g)

All classrooms should be aligned with the age ranges of the school in which they are located regardless of program type (with the exception of High Schools where students must be able to attend until they age out of special education).

More importantly, we should NOT have categorically based special education programs. It is profoundly contradictory to the intent and letter of the IDEA to have special education programs based on disability category.

"Disability do not determine placement! So placements cannot be disability specific!"

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Page 10: R 340.1733(h)-(j)

**Q21**

**Support the change as written**

How would you categorize your support of R 340.1733(h)-(j)?

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**Q22**

**Respondent skipped this question**

Specific comments about R 340.1733(h)-(j)

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**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, March 21, 2024 3:24:05 PM  
**Last Modified:** Thursday, March 21, 2024 3:25:59 PM  
**Time Spent:** 00:01:54  
**IP Address:** 174.210.234.54

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Page 2: Demographics

**Q1** Respondent skipped this question

First Name

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**Q2** Respondent skipped this question

Last Name

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**Q3** Respondent skipped this question

Are you providing comment as an individual or on behalf of an organization?

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**Q4** Respondent skipped this question

Email address

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**Q5** Respondent skipped this question

County of Residence

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**Q6** Community member

What role best describes you in taking this survey?

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Page 3: R 340.1721b Timelines

**Q7** Oppose entirely

Do you support the proposed amendment to the title of R 340.1721b?

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**Q8** Respondent skipped this question

Specific comments about R 340.1721b

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Page 4: R 340.1721b(1)

**Q9** **Oppose entirely**

How would you categorize your support of R 340.1721b(1)?

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**Q10** **Respondent skipped this question**

Specific comments about R 340.1721b(1)

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Page 5: R 340.1721b(2)

**Q11** **Oppose entirely**

How would you categorize your support of R 340.1721b(2)?

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**Q12** **Respondent skipped this question**

Specific comments about R 340.1721b(2)

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Page 6: R 340.1723c(2)-(6)

**Q13** **Oppose entirely**

How would you categorize your support of R 340.1723c(2)-(6)?

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**Q14** **Respondent skipped this question**

Specific comments about R 340.1723c(2)-(6)

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Page 7: R 340.1733(a)-(c)

**Q15** **Oppose entirely**

How would you categorize your support of R 340.1733(a)-(c) ?

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**Q16** **Respondent skipped this question**

Specific comments about R 340.1733(a)-(c)

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Page 8: R 340.1733(d)

**Q17**

**Oppose entirely**

How would you categorize your support of R 340.1733(d)?

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**Q18**

**Respondent skipped this question**

Specific comments about R 340.1733(d)

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Page 9: R 340.1733(e)-(g)

**Q19**

**Oppose entirely**

How would you categorize your support of R 340.1733(e)-(g)?

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**Q20**

**Respondent skipped this question**

Specific comments about R 340.1733(e)-(g)

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Page 10: R 340.1733(h)-(j)

**Q21**

**Oppose entirely**

How would you categorize your support of R 340.1733(h)-(j)?

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**Q22**

**Respondent skipped this question**

Specific comments about R 340.1733(h)-(j)

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**COMPLETE**

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**Last Modified:** Friday, March 22, 2024 9:45:13 AM  
**Time Spent:** 00:04:51  
**IP Address:** 23.28.156.149

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Page 2: Demographics

**Q1** Respondent skipped this question

First Name

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**Q2** Respondent skipped this question

Last Name

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**Q3** Respondent skipped this question

Are you providing comment as an individual or on behalf of an organization?

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**Q4** Respondent skipped this question

Email address

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**Q5** Respondent skipped this question

County of Residence

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**Q6** Prefer not to answer

What role best describes you in taking this survey?

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Page 3: R 340.1721b Timelines

**Q7** Support the change as written

Do you support the proposed amendment to the title of R 340.1721b?

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**Q8** Respondent skipped this question

Specific comments about R 340.1721b

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Page 4: R 340.1721b(1)

<b>Q9</b>	<b>Support with minor revisions</b>
How would you categorize your support of R 340.1721b(1)?	

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<b>Q10</b>	<b>Respondent skipped this question</b>
Specific comments about R 340.1721b(1)	

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Page 5: R 340.1721b(2)

<b>Q11</b>	<b>Support with major revisions</b>
How would you categorize your support of R 340.1721b(2)?	

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<b>Q12</b>	<b>Respondent skipped this question</b>
Specific comments about R 340.1721b(2)	

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Page 6: R 340.1723c(2)-(6)

<b>Q13</b>	<b>Support the change as written</b>
How would you categorize your support of R 340.1723c(2)-(6)?	

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<b>Q14</b>	<b>Respondent skipped this question</b>
Specific comments about R 340.1723c(2)-(6)	

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Page 7: R 340.1733(a)-(c)

<b>Q15</b>	<b>Support with minor revisions</b>
How would you categorize your support of R 340.1733(a)-(c) ?	

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<b>Q16</b>	<b>Respondent skipped this question</b>
Specific comments about R 340.1733(a)-(c)	

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Page 8: R 340.1733(d)

**Q17**

**Respondent skipped this question**

How would you categorize your support of R 340.1733(d)?

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**Q18**

**Respondent skipped this question**

Specific comments about R 340.1733(d)

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Page 9: R 340.1733(e)-(g)

**Q19**

**Respondent skipped this question**

How would you categorize your support of R 340.1733(e)-(g)?

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**Q20**

**Respondent skipped this question**

Specific comments about R 340.1733(e)-(g)

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Page 10: R 340.1733(h)-(j)

**Q21**

**Respondent skipped this question**

How would you categorize your support of R 340.1733(h)-(j)?

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**Q22**

**Respondent skipped this question**

Specific comments about R 340.1733(h)-(j)

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**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
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**Last Modified:** Monday, April 01, 2024 9:42:35 AM  
**Time Spent:** 00:40:36  
**IP Address:** 216.11.96.171

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Page 2: Demographics

**Q1**

First Name

Shelley

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**Q2**

Last Name

Dickerson

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**Q3**

**Individual**

Are you providing comment as an individual or on behalf of an organization?

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**Q4**

Email address

shelley.dickerson@oakland.k12.mi.us

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**Q5**

County of Residence

Macomb

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**Q6**

What role best describes you in taking this survey?

Other (please specify):  
ISD Compliance Monitor

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Page 3: R 340.1721b Timelines

**Q7** **Support the change as written**

Do you support the proposed amendment to the title of R 340.1721b?

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**Q8** **Respondent skipped this question**

Specific comments about R 340.1721b

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Page 4: R 340.1721b(1)

**Q9** **Support the change as written**

How would you categorize your support of R 340.1721b(1)?

---

**Q10** **Respondent skipped this question**

Specific comments about R 340.1721b(1)

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Page 5: R 340.1721b(2)

**Q11** **Support with major revisions**

How would you categorize your support of R 340.1721b(2)?

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**Q12**

Specific comments about R 340.1721b(2)

The separation of private and public school students is appreciated, particularly the removal of obligation to offer FAPE and to simply provide Prior Written Notice of a child's IDEA eligibility or ineligibility - in cases where the district of location is not the district of residence.

It would be helpful if there was delineation between the obligation of the district of residence and district of location and their differing obligations. If this is not achieved through the MARSE rule, then perhaps statewide procedures can be developed and shared.

MARSE should include a section for reevaluation requirements.

MARSE should include a section on Nonpublic Services Plan development.

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Page 6: R 340.1723c(2)-(6)

**Q13** **Support with major revisions**

How would you categorize your support of R 340.1723c(2)-(6)?

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**Q14**

Specific comments about R 340.1723c(2)-(6)

Much like a request for a school based evaluation, districts should respond to verbal requests by notifying parent to put request in writing. If needed, districts can support parents with developing a written request. It would be very difficult for anyone to measure the timeline of a verbal request that is not in writing. Proposal to keep the "written" language in the rule.

It is also requested that the seven calendar day timeline be changed to a 10 school day timeline; again, consistent with the requirements of a school based evaluation request.

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Page 7: R 340.1733(a)-(c)

**Q15**

**Support the change as written**

How would you categorize your support of R 340.1733(a)-(c) ?

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**Q16**

**Respondent skipped this question**

Specific comments about R 340.1733(a)-(c)

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Page 8: R 340.1733(d)

**Q17**

**Support the change as written**

How would you categorize your support of R 340.1733(d)?

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**Q18**

**Respondent skipped this question**

Specific comments about R 340.1733(d)

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Page 9: R 340.1733(e)-(g)

**Q19**

**Support the change as written**

How would you categorize your support of R 340.1733(e)-(g)?

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**Q20**

**Respondent skipped this question**

Specific comments about R 340.1733(e)-(g)

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Page 10: R 340.1733(h)-(j)

**Q21**

**Support the change as written**

How would you categorize your support of R 340.1733(h)-(j)?

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**Q22**

**Respondent skipped this question**

Specific comments about R 340.1733(h)-(j)

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**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
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**Last Modified:** Wednesday, April 03, 2024 11:57:27 AM  
**Time Spent:** 00:02:58  
**IP Address:** 66.219.112.2

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Page 2: Demographics

**Q1**

First Name

Matthew

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**Q2**

Last Name

Smith

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**Q3**

**Individual**

Are you providing comment as an individual or on behalf of an organization?

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**Q4**

Email address

mts3234@hotmail.com

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**Q5**

County of Residence

Clare

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**Q6**

**Community member**

What role best describes you in taking this survey?

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Page 3: R 340.1721b Timelines

**Q7** **Support the change as written**

Do you support the proposed amendment to the title of R 340.1721b?

---

**Q8** **Respondent skipped this question**

Specific comments about R 340.1721b

---

Page 4: R 340.1721b(1)

**Q9** **Support the change as written**

How would you categorize your support of R 340.1721b(1)?

---

**Q10** **Respondent skipped this question**

Specific comments about R 340.1721b(1)

---

Page 5: R 340.1721b(2)

**Q11** **Support the change as written**

How would you categorize your support of R 340.1721b(2)?

---

**Q12** **Respondent skipped this question**

Specific comments about R 340.1721b(2)

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Page 6: R 340.1723c(2)-(6)

**Q13** **Support the change as written**

How would you categorize your support of R 340.1723c(2)-(6)?

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**Q14** **Respondent skipped this question**

Specific comments about R 340.1723c(2)-(6)

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Page 7: R 340.1733(a)-(c)

**Q15**

**Support the change as written**

How would you categorize your support of R 340.1733(a)-(c) ?

---

**Q16**

**Respondent skipped this question**

Specific comments about R 340.1733(a)-(c)

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Page 8: R 340.1733(d)

**Q17**

**Support the change as written**

How would you categorize your support of R 340.1733(d)?

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**Q18**

**Respondent skipped this question**

Specific comments about R 340.1733(d)

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Page 9: R 340.1733(e)-(g)

**Q19**

**Support the change as written**

How would you categorize your support of R 340.1733(e)-(g)?

---

**Q20**

**Respondent skipped this question**

Specific comments about R 340.1733(e)-(g)

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Page 10: R 340.1733(h)-(j)

**Q21**

**Support the change as written**

How would you categorize your support of R 340.1733(h)-(j)?

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**Q22**

**Respondent skipped this question**

Specific comments about R 340.1733(h)-(j)

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**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, April 09, 2024 8:55:44 AM  
**Last Modified:** Tuesday, April 09, 2024 9:02:21 AM  
**Time Spent:** 00:06:37  
**IP Address:** 207.179.104.195

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Page 2: Demographics

**Q1**

First Name

Julie

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**Q2**

Last Name

Gordon

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**Q3**

Are you providing comment as an individual or on behalf of an organization?

Organization, including non-profits, advocacy groups, Local Education Agencies, or Intermediate School Districts (Please provide name of organization below):  
Northwest Education Services

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**Q4**

Email address

jgordon@northwested.org

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**Q5**

County of Residence

29

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**Q6**

**School administrator and support**

What role best describes you in taking this survey?

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Page 3: R 340.1721b Timelines



**Q7** **Support with minor revisions**

Do you support the proposed amendment to the title of R 340.1721b?

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**Q8**  
Specific comments about R 340.1721b

In 347 21 b.(2) (e)(a) at the bottom of page 2 of the strikethrough copy, it discussed an evalaution "when appropriate." Could "when appropriate" be more specific?- maybe 'if the REED team detemines there is a need for an evaluation'.

Also, it was unclear what the difference was between 'shall' vs. 'must'. Was there a grammar rule where 'shall' was kept vs. when it was replaced by 'must'?

---

Page 4: R 340.1721b(1)

**Q9** **Support the change as written**

How would you categorize your support of R 340.1721b(1)?

---

**Q10** **Respondent skipped this question**

Specific comments about R 340.1721b(1)

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Page 5: R 340.1721b(2)

**Q11** **Support with minor revisions**

How would you categorize your support of R 340.1721b(2)?

---

**Q12**  
Specific comments about R 340.1721b(2)

In 347 21 b.(2) (e)(a) at the bottom of page 2 of the strikethrough copy, it discussed an evalaution "when appropriate." Could "when appropriate" be more specific?- maybe 'if the REED team detemines there is a need for an evaluation'.

Also, it was unclear what the difference was between 'shall' vs. 'must'. Was there a grammar rule where 'shall' was kept vs. when it was replaced by 'must'?

---

Page 6: R 340.1723c(2)-(6)

**Q13** **Support the change as written**

How would you categorize your support of R 340.1723c(2)-(6)?

---

**Q14** **Respondent skipped this question**

Specific comments about R 340.1723c(2)-(6)

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Page 7: R 340.1733(a)-(c)

**Q15** **Support the change as written**

How would you categorize your support of R 340.1733(a)-(c) ?

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**Q16** **Respondent skipped this question**

Specific comments about R 340.1733(a)-(c)

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Page 8: R 340.1733(d)

**Q17** **Support the change as written**

How would you categorize your support of R 340.1733(d)?

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**Q18** **Respondent skipped this question**

Specific comments about R 340.1733(d)

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Page 9: R 340.1733(e)-(g)

**Q19** **Support the change as written**

How would you categorize your support of R 340.1733(e)-(g)?

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**Q20** **Respondent skipped this question**

Specific comments about R 340.1733(e)-(g)

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Page 10: R 340.1733(h)-(j)

**Q21** **Support the change as written**

How would you categorize your support of R 340.1733(h)-(j)?

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**Q22**

**Respondent skipped this question**

Specific comments about R 340.1733(h)-(j)

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