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Public Comment
Michigan Department of Education
Office of Special Education
P.O. Box 30008
Lansing, MI 48909

To Whom It May Concern,

The purpose of this communication is to provide written comment on the document entitled "Special Education Problem Solving Process" that is proposed to replace the December 2011 document entitled "Resolving Special Education Disputes."

The Michigan Association of Administrators of Special Education (MAASE) is a statewide professional educational organization of over 650 members and is affiliated with the National Council of Administrators of Special Education and the Council for Exceptional Children. The Mission of MAASE is to provide leadership for the development and implementation of quality programs and services for students with disabilities within the total education community. MAASE members' work is dedicated to enhancing the achievement, worth, dignity, and potential of each unique child and youth in Michigan.

Thank you for your consideration of these comments.

For the Executive Board,

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MAASE Comment
March 2013 OSE Document: Special Education Problem Solving Process

Page Number	Item	Comment/Recommendation
Parts 1 & 2	Collaborative Problem-Solving	We support the focus on and the explanation of the collaborative problem-solving process. We also support its location at the front of the document.
Pages 4, 15, 19	Due process is mentioned three times in the document: <ul style="list-style-type: none"> <input type="checkbox"/> p. 4 under common options <input type="checkbox"/> p. 15 as a glossary entry <input type="checkbox"/> p. 19 in comparison with a state complaint 	<ul style="list-style-type: none"> ▪ Recommend labeling it as “due process complaint” on pages 4 and 15; it is already labeled this way on page 19; ▪ Recommend adding language on page 7 that tells who is responsible for due process complaints (DPC) and where the reader can access further information on DPCs; unless DPCs are addressed to a greater extent in the body of the document, it seems strange that there would be an entire chart on the difference between due process and state complaints later in the document.
Page 5	Listing other individuals that may help	Recommend adding the local district ISD PAC representative; PAC parents often have had training in assisting other parents with the IEP process.
Page 8	Wording Concern – at the bottom of the page, next to last bullet point: “A description of the nature of the problem of the student....” This choice of wording makes it sound like the description should be about a student’s problem.	Recommend changing the wording to the following: “A description of the nature of the concerns or issues that involve the student....”
Page 9	Question regarding “The OSE forwards a copy of the state complaint to the public agency.”	Recommend changing to the following: “The OSE forwards a copy of the state complaint to the public agency on the date the complaint is filed.”
Page 9	Filing date	Recommend changing the filing date to the following: “The complaint will not be considered filed until all required information is received by the OSE and the public agency.”
Page 10, first full paragraph	Question regarding “A written request for an extension of the timeline must be submitted to the OSE case manager.”	Who submits this request? It may be helpful to the reader to know who is involved in creating and submitting the request.
Page 10	Question regarding Admission of Noncompliance	In cases of admission of non-compliance, must the investigation of that particular allegation be completed? It may be helpful to the reader to know whether this will take place or not.
Page 11	State Complaint Investigation	Recommend identifying the number of days: “The OSE and the ISD will encourage the complainant and school district (or other public agency accused of the violation) to resolve the complaint during the first ___ days of the state complaint investigation.”
Page 12, Item # 3	What are the steps in a state complaint investigation?	Please clarify why this was added to the steps; it was never discussed at the Complaint Process Work Group meetings and is not current practice.

Page 12, Item #6	Wording Concern – “The OSE and the ISD review paperwork and interviews that were conducted:	Consider changing the wording to the following: “The OSE and the ISD examine evidence from documents that were reviewed and interviews that were conducted:
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