

**Comparative Review of Washington State
Schools for Students With Sensory Disabilities**

Version 2

**Annie Pennucci
With
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February 2006

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WASHINGTON STATE INSTITUTE FOR PUBLIC POLICY

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EXECUTIVE SUMMARY

The Washington State School for the Blind (WSB) and Washington School for the Deaf (WSD) have provided educational and residential services to students with sensory disabilities since 1886. Both schools are independent state agencies with campuses located in Vancouver. As of the 2004-05 school year, WSB enrolled 70 students and WSD enrolled 96 students on-campus; each school also operates an outreach program that provides support services to students and teachers in local public schools. WSB and WSD students who live more than an hour away from Vancouver reside on campus during the week and travel home each weekend.

In recent years, declining enrollment, concerns about student safety, and capital funding requests have contributed to increased attention to WSD by state policymakers.

Study Direction

The 2005 Washington State Legislature directed the Washington State Institute for Public Policy (Institute) to:

- compare governance, financing, and service delivery at WSB and WSD.
- recommend how the schools could configure service delivery to complement and support school district programs.
- examine which state agency should have responsibility for governance and oversight of the schools.

Background: Students With Sensory Disabilities

Sensory disabilities are considered “low incidence”: fewer than 2 out of every 1,000 students have a hearing or vision loss. Local school districts have difficulty grouping students for instruction due to this low incidence rate. Sensory disabilities impact learning, and students with hearing and vision losses often require specialized instruction.

Federal law requires school districts to make a range of educational placements—e.g., mainstream classroom, special education classroom, or residential school—available to special education students. An appropriate educational placement is defined as being “least restrictive,” which is often interpreted as placing children in mainstream classrooms in local schools when possible. Student learning needs vary widely, however, and the need for intensive, expert services sometimes leads to placement in a residential setting. While not required by federal law, 46 states have at least one school for the deaf and 40 have at least one school for the blind.

Washington State School Trends and Student Characteristics

Students with sensory disabilities are sparsely scattered throughout Washington state, except for small concentrations in the populous Puget Sound region and Vancouver area. In the 2004-05 school year, 1,387 deaf and hard of hearing and 362 visually impaired special education students attended Washington State public schools. Six percent of deaf and hard of hearing students were enrolled at WSD, and 14 percent of visually impaired students at WSB. Special education students are placed at the schools if their Individual Education Plans (IEPs) conclude such a placement is needed.

Enrollment Trends. Student enrollment at WSD has declined steadily over the last few decades, while WSB's enrollment has remained level. On a per-capita basis, fewer students with both types of sensory disability attend the two schools compared with 25 years ago. Small school districts—those with fewer than ten deaf/hard of hearing or visually impaired students—more frequently send students to WSD and WSB, in comparison with larger districts.

Student Characteristics. Most students at the state schools are in middle or high school, and a majority reside on campus during the week. Students remain at WSD for about four years and at WSB for three and a half years, on average. WSD has a more ethnically diverse student population than WSB, but in terms of disabilities, most WSD students are deaf with no additional disabilities. WSB students range from partially visually impaired to blind and deaf-blind, and over half have disabilities besides vision loss.

Connections With Local Schools. WSB has provided outreach services for over 15 years and its more extensive program is primarily funded by contracts with local school districts and private grants. WSD began providing outreach services within the last five years and primarily uses state funding to support its smaller program. Both schools' outreach programs have expanded since their inception. WSB provided a monthly average of about 10 services in 1990 and nearly 600 by 2005; WSD provided a monthly average of about 30 services in 2001 and 75 by 2005.

Costs Associated With WSD and WSB

Operating Budgets. Washington State currently provides approximately \$5.1 million to WSB and \$8.4 million to WSD for annual operating expenses. Local school districts do not pay for tuition or transportation when students are placed at the statewide schools. On a per-student basis, WSD and WSB are both more costly to operate in comparison with the average cost of services for special education students in local public schools. These higher average costs are driven by enrollment of students with cost-intensive learning needs, operation of a 24-hour residential program, provision of weekend transportation, and relatively small student populations. While on average local programs are less costly, there is a wide range of student learning needs and associated costs; local school students who have severe disabilities can cost more to educate than the annual per-student cost at WSB and WSD.

Residential per-student costs at WSD are higher than at WSB due to stricter staffing requirements.

Capital Plans. The recent history of capital requests for the two schools has varied, with more uncertainty about WSD's capital plans. In 2002, as part of a series of studies on WSD, the Joint Legislative Audit and Review Committee (JLARC) found that WSD's campus needed substantial capital investment. The JLARC study noted, however, that administrators were planning a campus for up to 300 students, more than double the school's enrollment level. State funding for those campus plans was never provided. WSD has since scaled back the planned capacity and is designing a campus for 100 to 120 students.

In the 2005 legislative session, state funding for construction of new buildings on both the WSD and WSB campuses was withheld pending the outcome of this study. Over the next decade, anticipated capital requests total \$12.9 million for WSB and over \$15 million for WSD.

Governance History

Historically, the Department of Social and Health Services and predecessor agencies provided oversight of WSD and WSB. Increasing emphasis on their educational role (rather than viewing them as "institutions") led to the establishment of the schools as separate state agencies in 1985, each with an advisory board of trustees. The schools remain independent state agencies under oversight of the governor's office. The most recent governance change occurred in 2002, when the Legislature authorized the WSD board to direct, and not simply advise, school policies and procedures following a series of student safety incidents.

Comparison Data Summary

Exhibit 1 summarizes the comparison data presented in this report.

Exhibit 1
State Residential Schools Comparison Summary

	WSB	WSD
Unique student learning needs	<ul style="list-style-type: none"> • Orientation and mobility • Braille • Social interaction and independent living • Specialized technology 	<ul style="list-style-type: none"> • Language acquisition and literacy • Deaf culture • Social interaction and independent living • Specialized technology
Enrollment trend	Level (70 students in 2004-05)	Declining (96 students in 2004-05)
Per-capita enrollment	Declining	Declining
Geographic range	Statewide	Statewide
Student grade levels	Primarily middle/high school	Primarily middle/high school
Student gender	More boys than girls	Evenly split
Student ethnicity compared with statewide student population	Proportionately more white and American Indian students	Proportionately more Asian and Hispanic students
Student residential status	Majority live on campus during the week, but declining	Majority live on campus during the week, but declining
Student additional disabilities	Over half have disabilities in addition to vision loss	About 13 percent have disabilities in addition to hearing loss
Student length of stay	Three and a half years, remaining steady	About four years, recently declined
Outreach program	Operated for 25 years and expanding; currently nearly 600 services/month. Mostly self-sustaining via fees-for-services.	Operated for about five years and expanding; currently about 75 services/month. Mostly supported by state general funds.
State funding	\$4.6 (FY 2005) to \$5.1 million (FY 2006)	\$7.7 (FY 2005) to \$8.4 million (FY 2006)
Per-student expenditures	\$24,228 (instruction) \$26,449 (residential)	\$23,271 (instruction) \$42,205 (residential)
Anticipated capital funding requests	\$12.9 million through FY 2015	Over \$15 million through FY 2015
Governance structure	Independent state agency with board of advisors	Independent state agency with board of directors

Policy Options

As noted above, the 2005 Legislature directed the Institute to examine service delivery, financing, and governance of WSD and WSB. In December 2005, the Board of Directors of the Washington State Institute for Public Policy reviewed preliminary study findings and requested staff to examine the full range of policy options, including school closure under various scenarios. Based on this direction, policy options for the schools fall into two broad categories, as described below.

- 1. Maintain the schools' instructional, residential, and outreach programs while considering capital funding requests and changes in governance structure.** In addition to the option of maintaining the current governance structure, six governance alternatives were identified including: assigning responsibility of school oversight to the Office of Superintendent of Public Instruction, State Board of Education, Department of Social and Health Services, or local school district; combining school administrations and boards; or recreating the schools as nonprofit entities with the state continuing to provide funding.
- 2. Scale back school operations with partial or full closure of one or both schools.** Five alternatives envisioning closure of one or more of each school's programs were identified under this array of options, including: closing the residential program(s) but maintaining instruction during the day; closing everything but the outreach program(s); shuttering the Vancouver campus(es) but opening regional centers around the state; closing the school(s) entirely; and closing the school(s) while apportioning supplementary special education funding for students returning to local schools.

Under the first set of alternatives, the state would achieve no or minimal cost savings by shifting some administrative functions to other agencies. While oversight may or may not improve, governance changes would not substantially impact either school's service delivery, operating budgets, or capital plans.

The second set of policy options could have significant fiscal and educational impacts. Closing some or all of WSD's or WSB's programs could save the state operating and capital expenditures, but the full extent of impacts on local schools and individual students is unknown. If there were no state residential school(s), local districts would have to take on the cost of educating students who would otherwise be placed at WSD or WSB. Potential expenditure savings could be offset by requests from local districts for supplemental funding if students require exceptionally cost-intensive services or an out-of-state residential placement.

INTRODUCTION

The Washington School for the Blind (WSB) and Washington School for the Deaf (WSD) have provided residential, educational, and support services to students with sensory disabilities since the late 1800s. Originally created by the Territorial Legislature in 1886 to educate deaf, blind, and “feeble-minded” students, the Washington School for Defective Youth was located in Vancouver.¹ The school enrolled students with both hearing and visual disabilities but operated separate educational departments because “each group needed its own special equipment and teaching methods.”² In 1913, the state legislature authorized the split into two separate schools.

Over the past few decades, increasing attention has been paid to the role of WSD in K–12 education, as reflected by nine studies conducted by the state (seven in the past four years) and a spate of recent legislation; Appendix A contains a summary of the studies and legislation. The following factors have contributed to this attention:

- Increasing emphasis on educating students in local schools rather than centralized, residential institutions, in education policy and practice nationwide;
- A lack of data systemically comparing the effectiveness and cost of special education services in local and statewide schools; and
- Concerns about student safety.

Capital funding requests for campus renovation and preservation have also drawn attention to WSD by the state legislature.

Legislative Direction

In 2002, the Washington State Institute for Public Policy (Institute) researched models of service delivery for the Washington School for the Deaf at the request of the Legislature.³ The report presented data on deaf and hard of hearing student characteristics and examined various models of providing education to deaf and hard of hearing students in Washington State.⁴ A companion study by the Joint Legislative Audit and Review Committee (JLARC) focused on the capital implications of each model identified by the Institute.⁵

The 2005 Washington Legislature directed the Institute to update and expand these studies by conducting a comparative review of governance, financing, and service delivery at WSD and WSB.⁶ The review must consider the range of special instructional needs of deaf, hard of

¹ In 1905, the school was renamed the School for the Deaf and Blind. Brelje, W.H. & Tibbs, V.M. (1986). *The Washington State School for the Deaf: The First Hundred Years 1886–1986* (pp. 2 & 15). Vancouver, WA: Washington School for the Deaf.

² *Ibid.*, pp. 15 & 21.

³ SSB 6361, Chapter 125, Laws of 2000.

⁴ McLain, B. & Pennucci, A. (2002). *Washington School for the Deaf: Models of education and service delivery* (Document No. 02-06-2202). Olympia, WA: Washington State Institute for Public Policy. <http://www.wsipp.wa.gov/rptfiles/WSD.pdf>.

⁵ Joint Legislative Audit and Review Committee. (2002). *Washington State School for the Deaf: Capital facilities study* (Report 02-8). Olympia, WA: Joint Legislative Audit and Review Committee. <http://www1.leg.wa.gov/Reports/02-8.pdf>.

⁶ ESSB 6094, Section 709, Laws of 2005.

hearing, blind, and visually impaired students. Both schools' 2005 capital funding requests for new buildings were withheld pending the results of this study.

2005 Legislative Direction

- compare governance, financing, and service delivery at WSB and WSD.
- recommend how the schools could configure service delivery to complement and support school district programs.
- examine which state agency should have responsibility for governance and oversight of the schools.

ESSB 6094, Section 709, Laws of 2005

Study Methods

To address the questions posed by the Legislature, Institute staff analyzed data from the following sources:

- WSB and WSD provided data on enrollment trends, student characteristics, outreach services, school budgets, and capital plans;
- The Washington State Office of Superintendent of Public Instruction (OSPI) provided statewide special education student headcounts;
- Longitudinal budget data were collected from the Washington State Office of Financial Management (OFM) and the Legislative Evaluation and Accountability Program (LEAP) committee; and
- Per-student cost of service data were collected from JLARC and the National Center for Special Education Finance.⁷

Institute staff conducted a 50-state survey collecting information on other states' schools for the deaf and for the blind (see Appendix B for details). Staff from Washington State University's Social and Economic Sciences Research Center (SESRC) was contracted to conduct a literature review of educational needs and placement options for visually impaired students (a parallel review for deaf and hard of hearing students was completed in 2002).⁸ That literature review is included as a separate document.⁹ Finally, Institute staff reviewed study methods and findings with educators and administrators from local, regional, and statewide special education programs.

⁷ The Center for Special Education Finance oversees the Special Education Expenditure Project. <http://www.csef-air.org>.

⁸ Easterbrooks, S.R. (2002). *Washington School for the Deaf: Models of education and service delivery: Modes of communication and education placement of children who are deaf and hard of hearing: A review of the efficacy literature* (Document No. 02-06-2201). Olympia, WA: Washington State Institute for Public Policy. http://www.wsipp.wa.gov/rptfiles/WSD_SE_litr.pdf.

⁹ Mann, C. (2005). *Educational placement options for blind and visually impaired students: A literature review*. (Document No. 06-01-2202). Olympia, WA: Washington State Institute for Public Policy. <http://www.wsipp.wa.gov/rptfiles/06-01-2202.pdf>.

BACKGROUND

This section describes educational and developmental issues associated with sensory disabilities and relevant laws and policies governing special education.

Sensory Disabilities: Educational and Developmental Issues

Both vision and hearing losses present challenges to learning not faced by other students. Sensory disabilities impact the ability to develop language skills and absorb information through “incidental learning”—that is, hearing and seeing what is going on in the world around you.¹⁰ In particular, the presence of sensory disabilities in young children can impede language acquisition, especially among deaf children, and orientation and mobility skills, especially among blind children.

Low Incidence Rates

Sensory disabilities are considered low incidence—very small percentages of children in the United States are deaf, hard of hearing, visually impaired, or deaf-blind (see Exhibit 2). One in about 1,000 children has a hearing loss, and one in 3,000 has a visual impairment. Federal law defines low incidence disabilities as “a visual or hearing impairment, or simultaneous visual and hearing impairments ... for which a small number of personnel with highly specialized skills and knowledge are needed in order for children with that impairment to receive early intervention services or a free appropriate public education.”¹¹

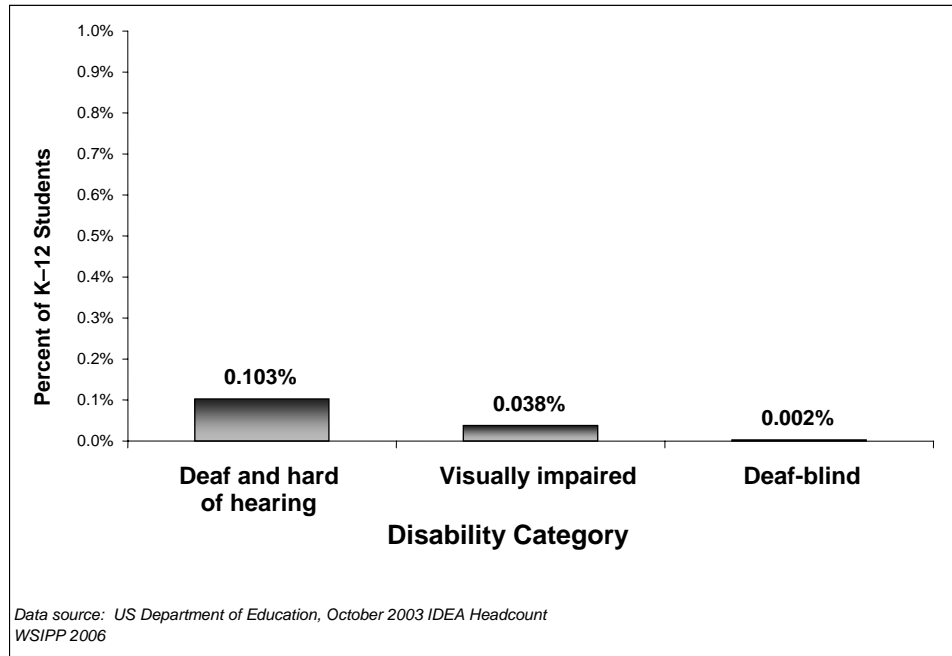
The small number of students with sensory disabilities makes it difficult to group them for specialized instruction, particularly in rural areas.¹² The low incidence rates also make it difficult for local school programs to employ the range of individuals with needed expertise (e.g., specially trained teachers, speech-language pathologists, sign language interpreters, or Braille instructors) for such small populations.

¹⁰ Hindley, P. (2005). Development of Deaf and Blind Children. *Child Psychiatry*, 4(7): 47.

¹¹ 20 U.S.C., 1400 § 673(a)(3)

¹² Easterbrooks (2002), p.21.

Exhibit 2
The Low Incidence Rates of Sensory Disabilities



Deaf and Hard of Hearing Children

Any hearing loss—from mild hearing losses to total deafness—can have educational impacts on students.¹³ Children born with hearing losses are not exposed to spoken language as hearing children are, and without early, consistent intervention and parental involvement in communication, deaf and hard of hearing children are vulnerable to substantial language delays.¹⁴ For many students, such delays contribute to poor academic performance and social isolation later in life. Educational issues can also arise for students whose hearing losses occur at older ages, such as difficulties hearing faint or distant speech, following classroom discussions, or recognizing subtle language complexities. These obstacles can impact literacy and academic performance as well as social development.¹⁵

¹³ Individuals with hearing loss are typically identified as hard of hearing or deaf. Audiological guidelines distinguish between the two based on degree of hearing loss; the distinction is also based on how individuals identify themselves and how they choose to communicate. Deaf individuals have more severe hearing losses and tend to rely on signed language; hard of hearing individuals have a broad range of hearing losses and typically rely on a combination of both signed and oral communication. National Association of the Deaf. (n.d.) *What is the difference between a deaf and a hard of hearing person?* Retrieved November 11, 2005, from <http://www.nad.org/site/pp.asp?c=fo1NKQMBF&b=180410>. See also: Center for Assessment and Demographic Studies, Gallaudet University. (1994). *Relationship of communication mode in the classroom to level of hearing loss: 1992-1993 annual survey of deaf and hard of hearing children and youth*. Retrieved November 11, 2005, from <http://gri.gallaudet.edu/AnnualSurvey/combyaud.html>.

¹⁴ Carney, A.E. & Moeller, M.P. (1998). Treatment efficacy: Hearing loss in children. *Journal of Speech, Language, and Hearing Research*, 41: S63.

¹⁵ Lace, J. (2000). Minimal losses...major implications. *SEE/HEAR Newsletter, Summer*. Retrieved from <http://www.tsbvi.edu/Outreach/seehear/summer00/minimal.htm>.

Communication Options. A complicating issue regarding language development for deaf and hard of hearing children is the ongoing debate over which approach to communication is most beneficial. This debate primarily centers around whether oral (spoken) versus manual (signed) communication is preferable. Parents typically choose the child's mode of communication, although this choice may change over time.¹⁶ Educational programs for the deaf and hard of hearing often specialize in a particular mode of communication; for example, American Sign Language (ASL) or an oral approach. Under federal law, students' Individual Education Plans (IEPs) determine the mode of communication and related educational supports needed, such as sign language interpreters or speech teachers.¹⁷ Exhibit 3 summarizes the range of communication options for deaf and hard of hearing students.

Exhibit 3
Communication Options for Deaf and Hard of Hearing Students

American Sign Language (ASL): ASL is a visual-gestural language, one of many signed languages in the world, that follows complex grammatical rules just as spoken language does. It is not English, but a separate and distinct language.

Signed English: Signed English is not considered a true language but a way to reproduce spoken English manually using vocabulary signs from ASL and other signs to represent English grammar and syntax. There are a variety of different signed English systems, but their common aim is to expose students to the structure of English.¹⁸

Oral: Oral approaches to communication focus on teaching deaf and hard of hearing children to comprehend spoken English and speak it themselves. There are different methods of teaching oral communication, but each emphasizes the use of any residual hearing

students may have (through hearing aids or other amplification devices) and intensive speech-language therapy to develop aural (hearing comprehension) and oral (speech production) skills.¹⁹

Sign and Speech: This approach (also called Simultaneous Communication) simply refers to the use of sign (ASL or Signed English) and spoken English simultaneously.

Total Communication: Total Communication (TC) is a philosophy rather than a mode of communication. TC refers to the practice of using a variety of methods, depending on the needs of the child, to communicate. This can include speech, ASL, Signed English, finger spelling, pantomime, lip reading, or any combination of options. Educators sometimes say they use "whatever mode works for the child at any given time."²⁰

As discussed below under legal issues, students' mode of communication can influence whether they enroll at a residential school. Other factors impacting education for deaf and hard of hearing children include cultural issues and technological change.

¹⁶ Easterbrooks (2002), p.10.

¹⁷ Code of Federal Regulations 34 §300.346.

¹⁸ Gustason, G. (1997). Educating children who are deaf or hard of hearing: English-based sign systems. *ERIC Digest*, 556. (ERIC No. ED414674).

¹⁹ Stone, P. (1997). Educating children who are deaf or hard of hearing: Auditory-oral. *ERIC Digest*, 551, (ERIC No. ED414669); Goldberg, D. (1997). Educating children who are deaf or hard of hearing: Auditory-verbal. *ERIC Digest*, 552. (ERIC No. ED414670).

²⁰ Hawkins, L. & Brawner, J. (1997). Educating children who are deaf or hard of hearing: Total communication. *ERIC Digest*, 559. (ERIC No. ED414677); Easterbrooks (2002), p. 4.

Deaf Culture. Some individuals identify themselves as members of a Deaf culture (usually signified with a capital “D”) with a distinct “heritage, language, and a set of customs and values shared by its members and transmitted from one generation to the next.”²¹ Members of Deaf culture view deafness not as a disability but rather as creating a language minority of ASL signers within an English-speaking society. Residential schools for the deaf play an important role in Deaf culture, providing socialization into Deaf culture as well as a “fully-accessible language environment” for Deaf students.²²

Technology. A wide range of technology, rapidly changing over the last few decades, provides support to deaf and hard of hearing students, including closed captioning, email and the Internet, two-way pagers, text telephones, telecommunications relay services, video interpreting services, visual alerting devices, vibro-tactile devices, hearing aids, amplification devices, and audio loop and listening systems.²³ A high-profile technology impacting deaf education is the cochlear implant, which has proliferated over the past 15 years. Exhibit 4 summarizes information about cochlear implants.

Exhibit 4 **Cochlear Implants and Deaf Education**

*Cochlear implants are surgically implanted electronic devices that partially restore hearing for people with severe hearing losses affecting their cochlea (part of the inner ear). Before 1990, children were not eligible to receive cochlear implants except in clinical trials. Since then, eligibility has expanded, and, as of 2002, approximately half of the 45,000 individuals in the United States with cochlear implants are children—a dramatic increase since 1990.*²⁴

*The objective of cochlear implants in children is to restore enough hearing to be able to hear speech and potentially develop oral skills.*²⁵ *However, success rates vary widely. Not all children who receive an implant communicate orally, and those who do may still have language delays. Outcomes of cochlear implants are affected by the age of implantation (the younger, the better), level of family commitment to and participation in speech training, and the presence of additional disabilities.*²⁶

*When implants are successful, children who were deaf become functionally hard of hearing (i.e., they may respond to auditory clues, communicate orally, and become more likely to attend mainstream classes).*²⁷ *There is an ongoing debate over whether children with cochlear implants should communicate via oral or signed language, or both.*²⁸ *In any case, students with cochlear implants need specialized instruction focused on language development and require continuous follow-up to ensure the implant is functioning properly.*

²¹ Gilliam, J. & Easterbrooks, S. (1997). Educating children who are deaf or hard of hearing: Residential life, ASL, and Deaf culture. *ERIC Digest*, 558. (ERIC No. ED414676).

²² Stinson, M. & Whitmire, K. (2000). Adolescents who are deaf or hard of hearing: A communication perspective on educational placement. *Topics in Language Disorders*, 20: 60.

²³ National Association of the Deaf. (n.d.). *Cochlear implants: NAD position statement*. Retrieved November 11, 2005, from <http://www.nad.org/site/pp.asp?c=foINKQMBF&b=138140>.

²⁴ In 1990, only 10 percent of individuals with cochlear implants were under age 18. Christiansen, J.B. & Leigh, I.W. (2002). *Cochlear implants in children: Ethics and choices* [PowerPoint presentation]. Retrieved November 11, 2005, from <http://clerccenter.gallaudet.edu/CIEC/conf-presentationsA.ppt>.

²⁵ Laughton, J. (1997). Educating children who are deaf or hard of hearing: Cochlear implants. *ERIC Digest*, 554. (ERIC No. ED414672).

²⁶ Samson-Fang, L., et al. (2000). Controversies in the field of hearing impairment: Early identification, educational methods, and cochlear implants. *Infants and Young Children*, 12: 84-85.

²⁷ Daya, H., Ashley, A., Gysin, C., & Papsin, B. (2000). Changes in educational placement and speech perception ability after cochlear implantation in children. *The Journal of Otolaryngology* 29(4): 224-228.

²⁸ See Connor, C.M., Hieber, S., Arts, H.A., & Zwolan, T.A. (2000). Speech, vocabulary, and the education of children using cochlear implants: Oral or total communication? *Journal of Speech, Language and Hearing Research* 43(5): 1185-1204.

Special educational considerations for all students with hearing losses, including those who have cochlear implants or hearing aids, include preferential seating, attention to classroom acoustics, establishment of classroom communication guidelines, auditory and speech training, and utilization of visual supports and/or sign language interpreters.²⁹

Blind and Visually Impaired Children

Blind and visually impaired children experience similar barriers to incidental learning, in this case related to the visual, rather than auditory, environment. Special instructional methods emphasizing tactile experiences are often used with visually impaired children. Students with low visual acuity deal with orientation and mobility issues, that is, challenges to learning about and moving within physical space and objects; such challenges also complicate social and academic development, as summarized below.

- **Orientation and Mobility:** A challenge particularly for children with severe visual impairments, orientation and mobility skills are defined as the ability to “travel safely, independently, efficiently, and confidently”³⁰ through the physical environment. Learning how to develop organizational systems is a part of acquiring physical independence.
- **Social Interaction:** Because children with visual impairments cannot model social interactions based on observing others, specialized instruction in social interaction is often needed.
- **Independent Living:** Also known as daily living skills, independent living strategies must be specifically learned by students with sensory disabilities. Such skills include “personal hygiene, money management, food preparation, time monitoring, and self-advocacy.”³¹
- **Braille:** Students with very low visual acuity may learn Braille—a system of writing that uses patterns of raised dots to represent letters and numbers—for reading, writing, and math.

Recreation, leisure skills, and career education are other areas of specialized instruction typically needed by students with sensory disabilities. Also, similar to teaching hard of hearing students how to use their residual hearing, visually impaired students who retain some visual acuity can learn to use that vision and reduce their reliance on technology and support services.

²⁹ Nussbaum, D. (2004). In *the classroom ... children with a cochlear implant*. Retrieved November 11, 2005, from the Cochlear Implant Education Center, Laurent Clerc National Deaf Education Center, Gallaudet University website <http://clerccenter.gallaudet.edu/CIEC/counterpoint-2004-04-21.html>.

³⁰ Shon, K.H. (1999). Access to the world by visually impaired preschoolers. *RE:view*, 30.; cited in Mann (2005), p. 14.

³¹ Mann (2005), p. 17.

Technology. Visually impaired students can benefit from technological developments. Historically, the primary technological accommodation for students with vision losses was the transcription of written materials into Braille.³² Recent advances in computer technology now play a large role in educating blind and visually impaired students; computer technologies for the visually impaired are typically classified as “input” and “output” devices.

- **Input devices** include adapted keyboards and mice, touch screens, speech recognition software, and optical character recognition devices (a method of translating written materials into electronic text files for output).
- **Output devices** include internally lighted monitors, screen magnification, software that reads computer screen text aloud, Braille translation software, and Braille printers and displays.

Some devices are combined input/output technologies, such as portable hand-held digital technologies designed for Braille type and print. Together, computerized technologies provide students with sensory disabilities access to academic texts, enhance communication with teachers and peers, and are believed to increase students' independence.

The Importance of Early Intervention

Researchers agree that early intervention is critical to mitigate language and other developmental delays. According to the research, language, social, academic, and physical mobility development are inter-dependent, and the earlier disabilities are identified and services provided, the better outcomes children will achieve.³³

For deaf and hard of hearing students, early intervention focuses on learning a mode of communication and language acquisition. Because the critical period for language acquisition is the first five years of life, early identification of hearing losses is important. Increasing attention has been paid to universal newborn hearing loss screening and intervention, nationally and in Washington State.³⁴

For visually impaired students, early intervention focuses on communication as well as orientation and mobility skills. Early identification is considered crucial for progressive vision conditions because it “provides opportunity for therapeutic interventions, allowing children to avoid further vision loss.”³⁵

Parent training is a critical component of early intervention, because for young children, parents are the primary individuals who communicate with them and are responsible for organizing children's physical and social environments.

³² This discussion of technology is summarized from Mann (2005), p. 30-32.

³³ The importance of early intervention was a clear conclusion in both the Mann (2005) and Easterbrooks (2002) literature reviews.

³⁴ In 2003, the House Children and Family Services Committee Workgroup on Deaf Education in Washington recommended that the state mandate universal newborn screening.

³⁵ Mann (2005), p. 14

Law and Policy: Educational Placements

The unique educational needs of deaf, hard of hearing, blind, and visually impaired students are recognized in special education policy in the United States. The federal Education for All Handicapped Children Act (now known as the Individuals with Disabilities Education Act or IDEA) states that every child is entitled to a “free appropriate public education” (FAPE) in the “least restrictive environment” (LRE) possible. This is usually interpreted to mean that, whenever possible, children with disabilities should attend mainstream classes in local public schools.³⁶ The law also recognizes that students with disabilities have a wide range of educational needs and mandates that school districts make available a spectrum of educational placements.³⁷ Students’ IEPs dictate which placement is most appropriate.

“Least restrictive placement” is not always defined the same for all students. In particular, the assumption that deaf children should be educated among hearing students has been questioned by some educators, researchers, and parents. Providing instruction to deaf children in a mainstream classroom through sign language interpreters or other communication means is not always considered the “least restrictive” setting. The need for direct communication with teachers and staff, as well as opportunities for social interaction with peers, are factors in determining the most appropriate placement for deaf students.³⁸

Likewise, for students with visual impairments, while emphasis is placed on LRE in mainstream settings for many students, recognition of students’ needs for social interaction, as well as specialized orientation and mobility training, can lead to a placement at a residential school. Courts generally defer to school district placement recommendations and instructional methods via the IEP process, so long as the child is receiving some educational benefit.³⁹

Research Is Inconclusive

Due to limitations in research design when studying such low incidence disabilities, research is inconclusive regarding what educational placement is most academically beneficial for students with sensory disabilities. Both literature reviews commissioned for the Institute’s studies of educational services for deaf, hard of hearing, and visually impaired students concluded that no particular type of educational placement (e.g., mainstream classroom, special education classroom, or residential school) has been found to be beneficial for all students.⁴⁰ The research consensus is reflected in federal law: a range of placements is required to meet the variety of needs among students with sensory disabilities.

³⁶ Cohen, O.P. (1994). Introduction. In Implications and complications for deaf students of the full inclusion movement, 2-3. *Occasional Paper, 94-2*. Gallaudet Research Institute.

³⁷ U.S. Department of Education. (1992). *Notice of Policy Guidance*; 34 CFR § 300.551.

³⁸ Innes, J. (1994). Full inclusion and the deaf student: A deaf consumer’s review of the issues. *American Annals of the Deaf* 139: 155. In 1992 the federal Department of Education issued a notice of policy guidance to clarify the LRE principle for deaf students, noting that a child’s mode of communication, language development, degree of hearing loss, age, and social, emotional, and cultural needs must be considered. U.S. Department of Education. (1992). *Notice of policy guidance: deaf students education services*. (FR Doc. 92026319). Retrieved from <http://www.ed.gov/about/offices/list/ocr/docs/hq9806.html>.

³⁹ Pittman, P. & Huefner, D.S. (2001). Will the courts go bi-bi?: IDEA 1997, the courts, and deaf education. *Exceptional Children* 67(2): 187-198. In November 2005 the Supreme Court strengthened this deference by ruling that parents, rather than school districts, bear the burden of proof for demonstrating that instruction provided in a student’s IEP is inadequate and requires a change in placement or methods. *Schaffer v. Weast*, 04-698.

⁴⁰ Easterbrooks (2002) and Mann (2005).

Are States Required to Operate Residential Schools for the Deaf and Blind?

While federal law mandates that school districts make available a continuum of educational placements, it does not require states to operate residential schools for students with sensory disabilities. Most states do, however, operate such schools. As of 2005, 40 states operated at least one school for the blind, and 46 operated at least one school for the deaf.⁴¹ States that do not operate such schools must send students to schools in other states or private in-state facilities if their IEP dictates a residential placement; in these cases, tuition and transportation costs are usually paid by the local school district.⁴²

Summary

- **Sensory disabilities** are considered “low incidence”; deaf, hard of hearing, visually impaired, blind, and deaf-blind students represent less than one-half percent of public school students. Such disabilities impact students’ abilities to develop language skills and absorb information through incidental learning, which is second nature to students without sensory disabilities.
- **Hearing losses** especially impact language acquisition and related social and academic development. Debate continues over what communication methods (oral or signed) are most beneficial for deaf and hard of hearing students. The mode of communication is typically selected based on the degree of hearing loss, parental preference, and student abilities.
- **Blind and visually impaired students** also experience linguistic, social, and academic delays. Orientation and mobility—navigating the physical environment—present unique developmental challenges.
- **Technological developments**—such as sound and vision field amplification, Braille production devices, and computer software—have improved students’ access to classroom discussion and academic texts. The increasing prevalence of cochlear implants impacts deaf education by making some students functionally hard of hearing, potentially necessitating different educational supports.
- **Early identification** of sensory disabilities, accompanied by focused **interventions** and training, are considered critical to mitigate language and other developmental delays.
- **Special education law and policy** emphasize early intervention and the provision of a “free, appropriate public education” for all students. Federal law dictates that school districts make a range of educational placements available so that students can be placed in the “least restrictive environment” possible. The unique communication, social, and academic needs of individual students must be considered in determining appropriate placements.

⁴¹ See Appendix B for details. These figures include ten states that operate combined schools for the deaf and blind. Most of the schools operate a residential program.

⁴² Because such arrangements are made at the district, rather than state, level, we were unable to collect statistics on their prevalence in the 50-state survey.

- **The research literature** does not provide conclusive evidence of the relative effectiveness of various placements for students with sensory disabilities.
- While federal law does not require them to do so, **47 out of 50 states operate residential schools** for deaf and/or blind K–12 students.

WASHINGTON STUDENTS WITH SENSORY DISABILITIES

This section summarizes data covering Washington students with sensory disabilities, including characteristics of students attending the Washington School for the Deaf (WSD) and School for the Blind (WSB). Also included is a description of outreach services each school provides to students in local public schools.

Due to data limitations, all references to numbers of deaf, hard of hearing, visually impaired, and deaf-blind students are based only on students receiving special education services in Washington public schools. As described in the inset below, the data are likely an undercount of students with sensory disabilities but are the only systematic statewide data available.

Limitations of Available Data

*In Washington, the only systematic source of data on children with disabilities comes from annual headcounts of students receiving special education services in public schools. However, using special education data **undercounts** the true number of students with sensory disabilities in three ways:*

- 1. Some Students Are Not in Special Education.** *Some students have sensory disabilities but do not require individually tailored instruction that qualifies as special education.⁴³*
- 2. Some Students Have Multiple Disabilities.** *The annual headcount groups all students with more than one type of disability into the category “multiple disabilities.” National research and a 2001 survey conducted by the Institute suggest that between 30 and 40 percent of deaf and hard of hearing students may have additional disabilities.⁴⁴ Similarly, data provided by WSB indicate that in the last ten years, between a quarter to over half of students enrolled at the school had multiple disabilities.*
- 3. Some Students Attend Private Schools.** *The annual headcount does not include students enrolled in private schools. No private schools for visually impaired students exist in Washington State but there are three schools that enroll deaf and hard of hearing children.⁴⁵*

⁴³ Students with sensory disabilities may receive assistance such as sound amplification or note-taking under the terms of Section 504 of the Rehabilitation Act (Section 504, 29 U.S.C. 794). This assistance is not considered “special education.” Section 504 is intended to eliminate barriers to full participation in school and other federally financed activities for persons with disabilities. Rosenfeld, S.J. (2002, April). Section 504 and IDEA. *LD On-Line Newsletter*. Retrieved from http://www.ldonline.org/ld_indepth/legal_legislative/edlaw504.html.

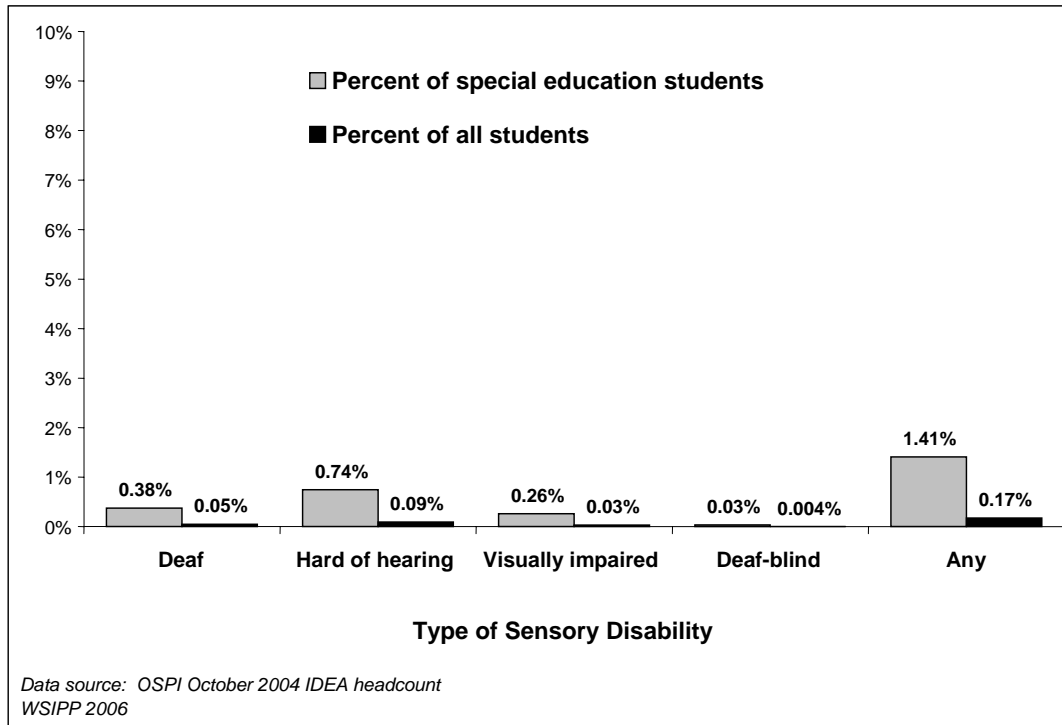
⁴⁴ Pollack, B.J. (1997). Educating children who are deaf or hard of hearing: Additional learning problems. *ERIC Digest*, 548. (ERIC No. ED414666). See McLain & Pennucci (2002) for details on the Institute’s 2001 survey.

⁴⁵ Two private schools in Washington enroll deaf and hard of hearing students: Listen & Talk in Bothell serves pre–K through grade 12 students, as well as infants and parents, and the Northwest School for Hearing Impaired Children in Seattle enrolls students from pre–K through middle school. The Tucker Maxon school in Portland, OR also enrolls some students from Washington State. In fall 2005, the two Washington schools enrolled 108 students and Tucker Maxon enrolled four students from Washington State and provided itinerant teaching services to five students at Evergreen High School (in Vancouver).

Statewide Student Counts

In Washington State, approximately 12 percent of public school students receive special education services. In October 2004, there were 466 deaf, 921 hard of hearing, 321 visually impaired, and 41 deaf-blind students in special education statewide. Thus, students with sensory disabilities represent less than 2 percent of students in special education, and less than two-tenths of one percent of all Washington public school students (see Exhibit 5).

Exhibit 5
Small Percentages of Washington Students Have Sensory Disabilities



Geographic Distribution

In Washington State, most students with sensory disabilities live in the Puget Sound region or Vancouver area (see Exhibit 6).

Exhibit 6
Students With Sensory Disabilities by Educational Service District

ESD#	Educational Service District	Deaf	Hard of Hearing	Visually Impaired	Deaf-Blind
121	Seattle/Central Puget Sound Region	176	324	104	13
112	Vancouver/Southwest*	114	87	43	9
189	North Puget Sound	70	143	55	6
101	Spokane/Northeast	28	87	28	3
114	Northwest/Peninsula	17	85	12	4
123	Walla Walla Area	13	60	26	0
113	Grays Harbor/Central Peninsula	15	55	22	3
105	Yakima Valley	21	47	19	2
171	Northeast Central WA	12	33	12	1

* Includes students enrolled at WSB and WSD. Data source: OSPI October 2004 IDEA Headcount. The data exclude students with multiple disabilities, some of whom have vision or hearing losses.
 WSIPP 2006

Because sensory disabilities are low incidence, few school districts in Washington have substantial concentrations of students with similar disabilities (see Exhibit 7).

Exhibit 7
Most Washington School Districts Enroll Fewer Than Ten Students With a Sensory Disability

Type of Sensory Disability	Percent of school districts with		
	Zero	1 to 10	More than 10
Deaf	70.3%	26.0%	3.7%
Hard of Hearing	48.3%	43.6%	8.1%
Visually Impaired	64.9%	33.8%	1.4%
Deaf-Blind	89.2%	9.8%	1.0%
Any	39.9%	44.6%	15.5%

Data source: OSPI October 2004 IDEA Headcount. The data exclude students with multiple disabilities, some of whom have vision or hearing losses.
 WSIPP 2006

Data on Washington Schools for the Blind and for the Deaf

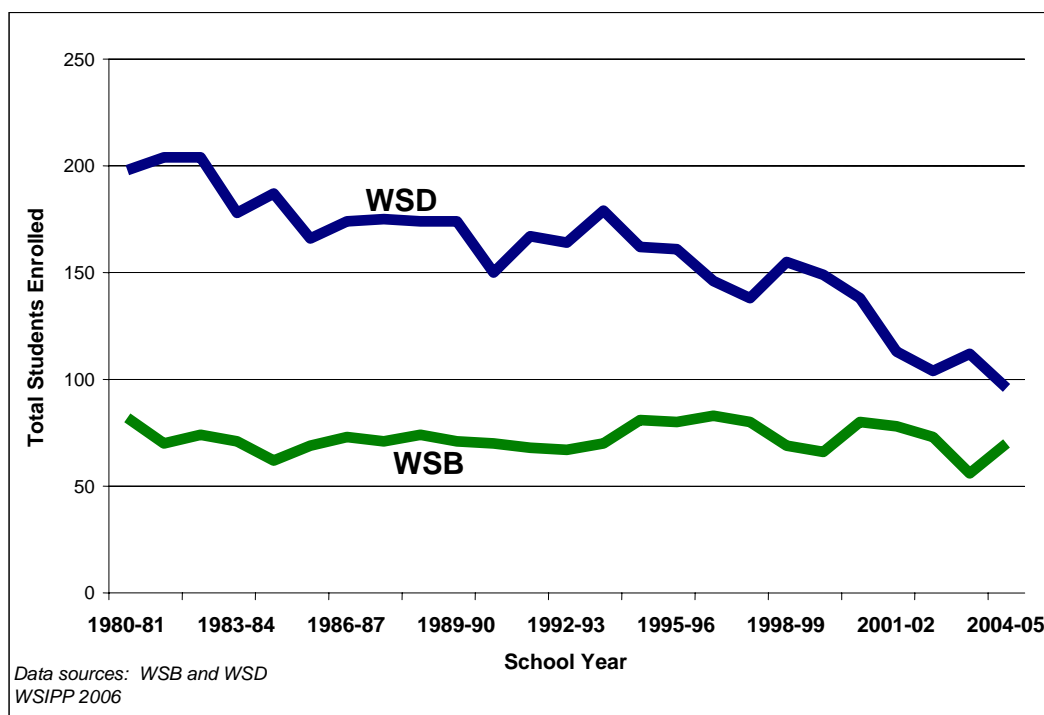
Both WSB and WSD provide on-campus educational services for students with sensory disabilities in grades pre-K through 12, as well as post-high school and birth-to-three services. The schools each operate a residential program for students who live more than one hour commuting distance from the campuses. Residential students live on campus during the week and are transported home each weekend.

State Schools' Enrollment

For this report, WSD and WSB provided historical enrollment figures as well as details on where students are from and their ages, gender, ethnicity, residential status, additional disabilities, and length of stay for the 2001-02 and 2004-05 school years.

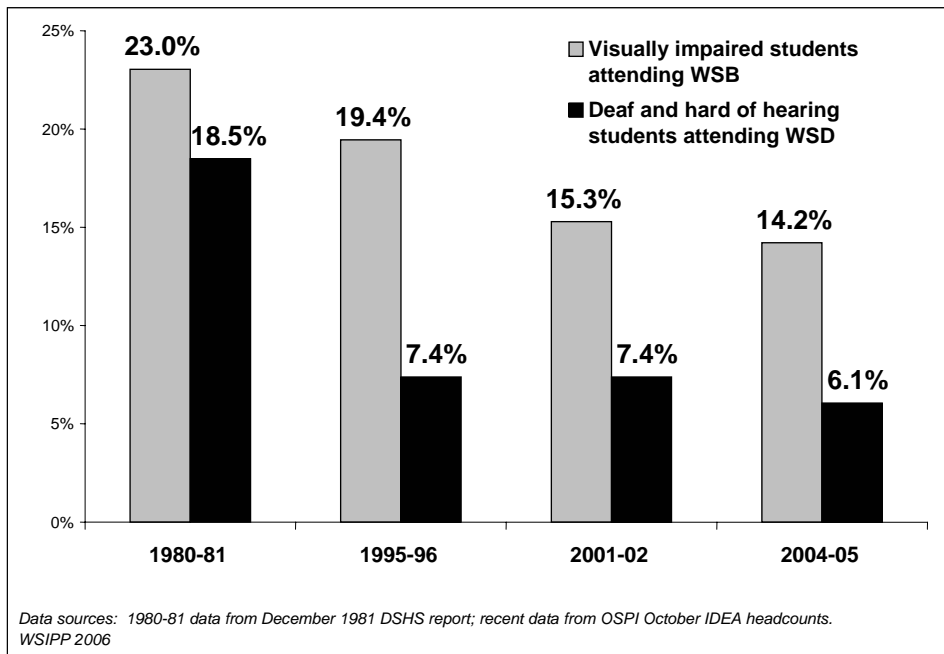
Historical Enrollment. There are more deaf and hard of hearing students statewide than there are visually impaired students, and enrollment at WSD has always been larger than at WSB. Declining enrollment at WSD has brought the two schools closer together in terms of size (see Exhibit 8).

Exhibit 8
Washington Schools for the Deaf and for the Blind: Historical Enrollment



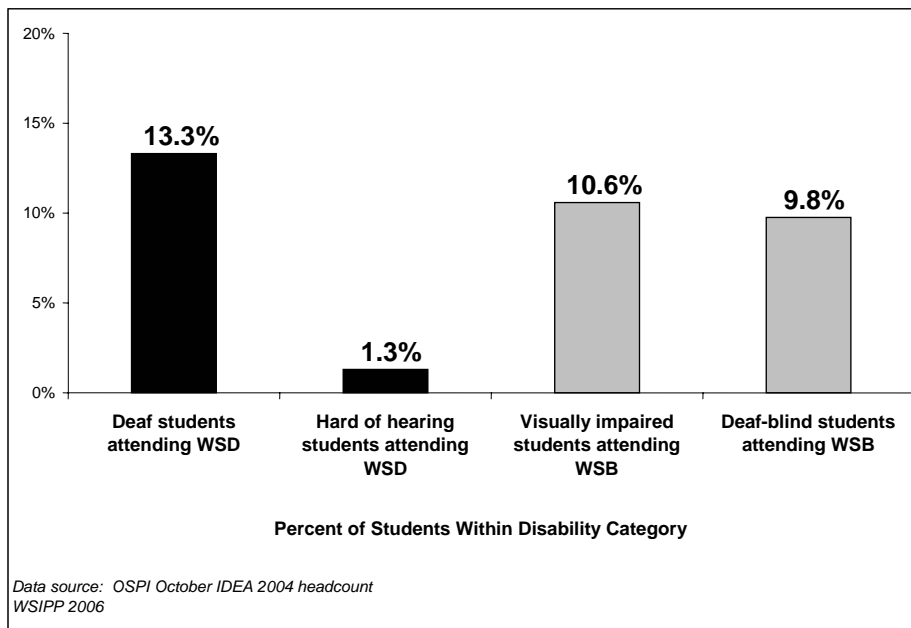
Percent of Students Attending the State Schools. The passage of the federal IDEA in 1975 had a strong influence on per-capita enrollment at WSD and WSB. A decreasing proportion of students with hearing and visual disabilities attend the state residential schools (see Exhibit 9). In addition to the IDEA's emphasis on providing instruction in local schools, school administrators attribute enrollment declines in the early 2000s to publicized concerns about student safety at WSD. Recently, WSD implemented a new admissions protocol to screen out students who might pose a threat to others, which has, according to school administrators, increased the number of rejected and withdrawn applications. Administrators at WSB indicate the school's enrollment remains level intentionally; potential students are placed on a wait list if the residential or instructional capacity is full at their grade levels.

Exhibit 9
A Declining Percentage of Students With Sensory Disabilities
Attend the State Residential Schools



At WSD, deaf students enroll in greater proportions than hard of hearing students. At WSB, visually impaired and deaf-blind students have similar enrollment rates (see Exhibit 10).

Exhibit 10
Students Attending Washington's
Residential Schools by Type of Disability



Geographic Range of the Schools. Both WSD and WSB enroll students from throughout the state (see Exhibit 11). At each school, slightly over half of students are, however, from the local Educational Service District (ESD 112). It is unknown how many of these students' families moved to the area for the purpose of enrolling their children at the state schools.

Exhibit 11
WSB and WSD Students by Educational Service District

Educational Service District		WSD Students from ESD	WSB Students from ESD
101	Spokane/Northeast	1	2
105	Yakima Valley	1	2
112	Vancouver/Southwest	51	35
113	Grays Harbor/Central Peninsula	7	2
114	Northwest/Peninsula	1	2
121	Seattle/Central Puget Sound Region	14	9
123	Walla Walla Area	8	1
171	Northeast Central WA	5	0
189	North Puget Sound	7	13

This analysis is based on 66 students at WSB and 95 students at WSD for whom sending district information was available. Data sources: WSD and WSB WSIPP 2006

As noted earlier, many Washington school districts have fewer than 10 students with sensory disabilities. While the majority of *students* at WSD and WSB are from larger districts, an analysis of sending *districts* reveals that, in the 2004-05 school year, 54 percent of school districts placing students at WSD, and 79 percent of districts sending students to WSB had fewer than ten students with similar disabilities (see Exhibit 12).

Exhibit 12
Proportionately More Small School Districts Send Students to WSB and WSD

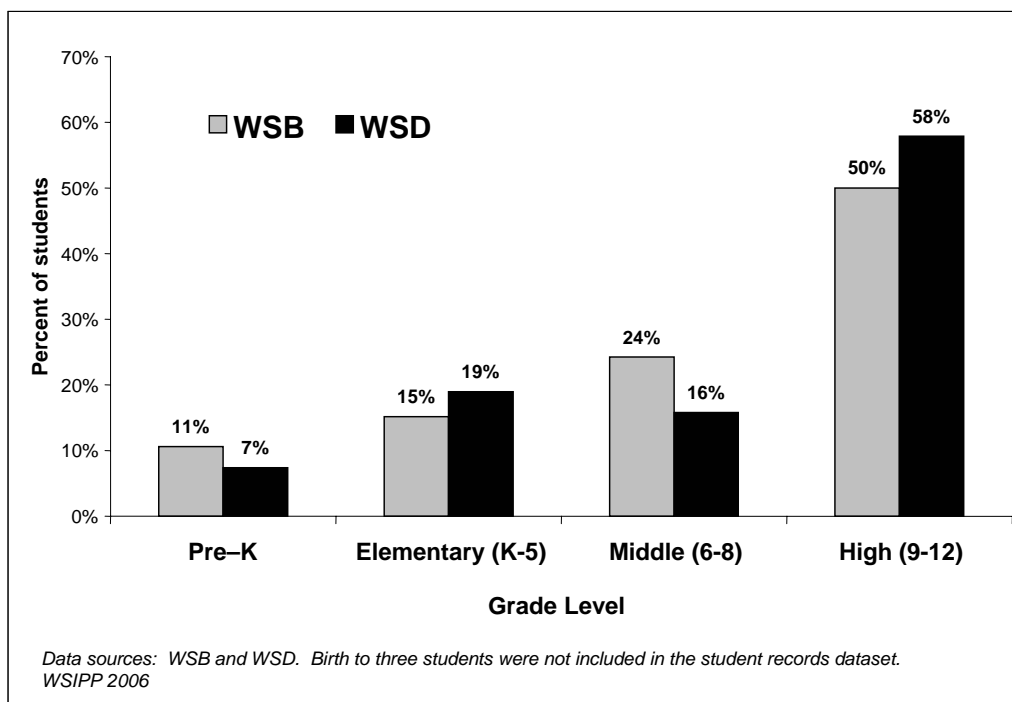
2004-05 School Enrollments		WSB	WSD
Local school districts sending students to WSD and WSB			
	Number*	33	39
	Number with fewer than 10 deaf/hard of hearing (WSD) or visually impaired (WSB) students	26	21
	Percent with fewer than 10 deaf/hard of hearing (WSD) or visually impaired (WSB) students	79%	54%
Students attending WSB and WSD			
	Number*	66	95
	Number from districts with fewer than 10 deaf/hard of hearing (WSD) or visually impaired (WSB) students	31	26
	Percent from districts with fewer than 10 deaf/hard of hearing (WSD) or visually impaired (WSB) students	47%	27%

**This analysis is based on 66 students at WSB and 95 students at WSD for whom sending district information was available. Data sources: WSD, WSB, and OSPI October 2004 IDEA Headcount. WSIPP 2006*

Grade Levels. At both schools, most students are in middle or high school (see Exhibit 13). Two factors contribute to this trend:

- 1) Social issues: As children enter adolescence, social isolation of students with sensory disabilities may become more pronounced. Making friends and enriching their social experiences (such as participating in athletics or after-school clubs) are common reasons cited by teenagers for attending state residential schools.⁴⁶ As noted earlier, federal law recognizes social development as a factor to be considered in determining educational placements.
- 2) Student maturity and parental comfort: Some parents are unwilling to send younger children to live at the residential school during the week.⁴⁷

Exhibit 13
Most WSB and WSD Students Are in Middle or High School

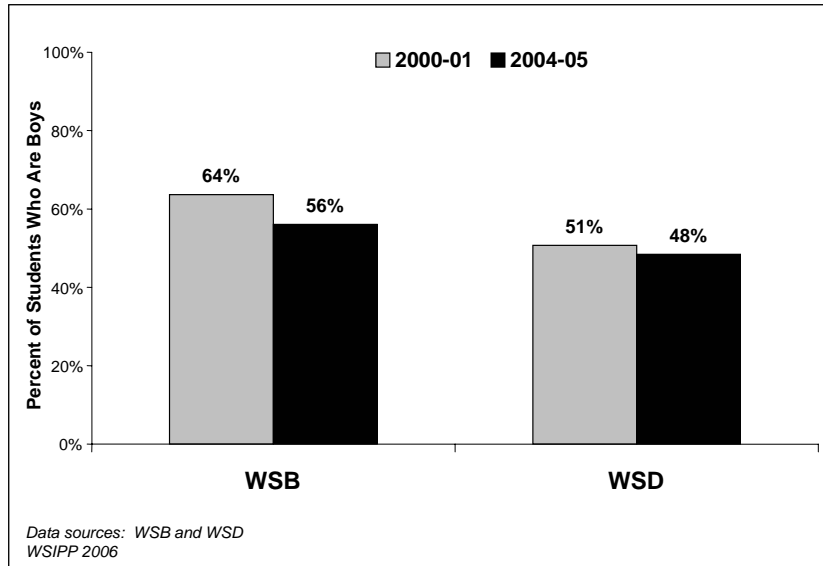


Gender. WSB enrolls a slightly higher proportion of boys than WSD, although this proportion has decreased since 2001 (see Exhibit 14).

⁴⁶ See Phillips, J. & Corn, A. (2003). An initial study of students' perceptions of their education placement at a special school for the blind. *Re:View* 35(2): 89-95. And Cartledge, G. & Cochran, L. (1996). Social skill self-assessments by adolescents with hearing impairment in residential and public schools. *Remedial and Special Education* 17: 30-36.

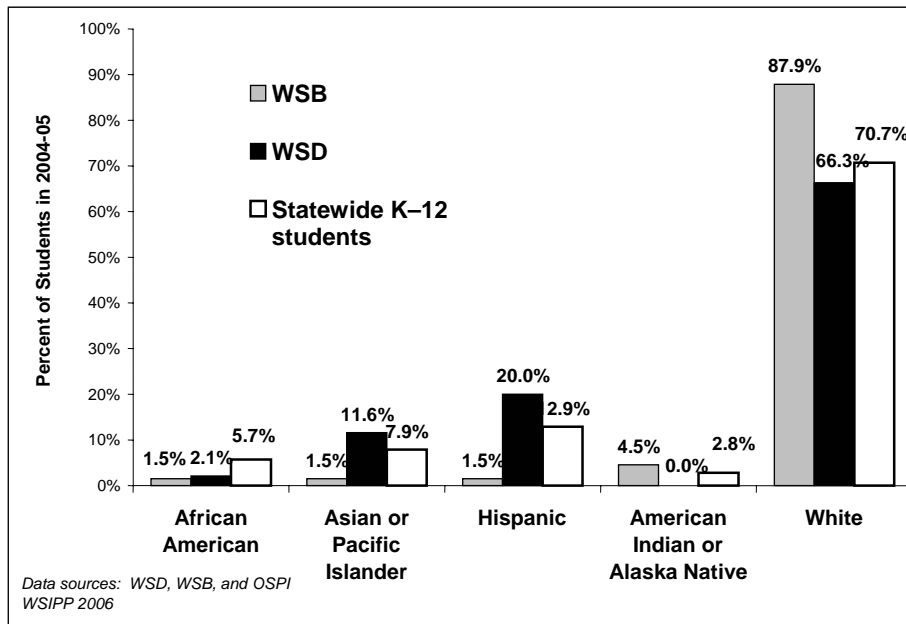
⁴⁷ Based on interviews with staff in local and statewide schools.

Exhibit 14
WSB Enrolls Slightly More Boys Than Does WSD



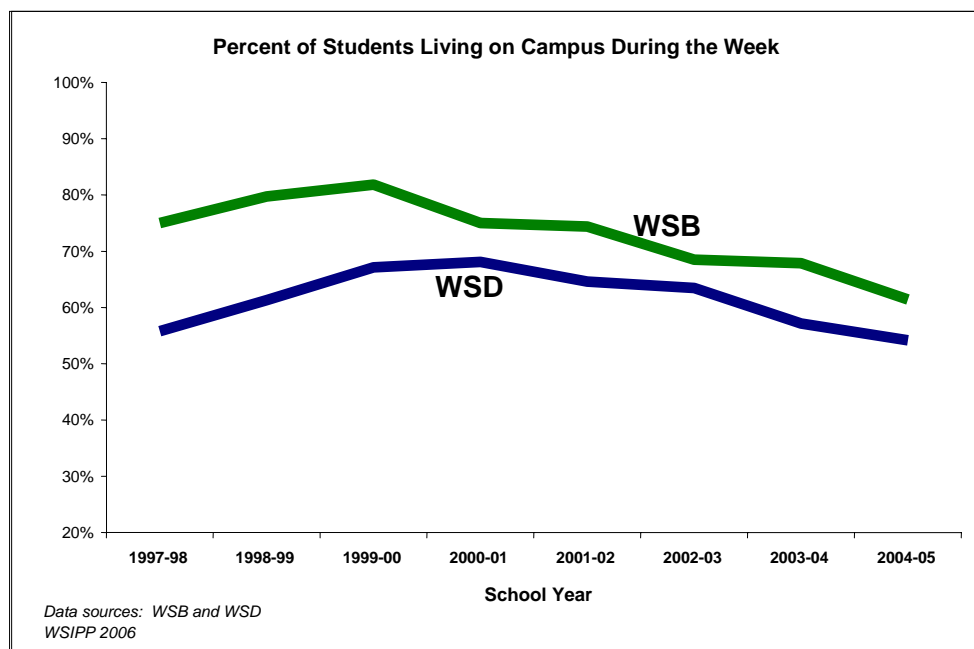
Ethnicity. WSD has a more ethnically diverse population than does WSB (see Exhibit 15). In comparison with public K-12 students statewide, more WSD students are Asian or Hispanic, and more WSB students are white or American Indian.

Exhibit 15
WSD Has a More Ethnically Diverse Population Than WSB



Residential Status. WSB houses proportionately more students on campus during the week than WSD; for both schools, those proportions have declined in recent years (see Exhibit 16). WSB’s residential program groups students by age, and residential staff provide after-school supervision and intensive training in “CORE Competencies” (specialized training for the blind in orientation/mobility and other skills). WSD’s residential program is based on a model of “family living,” grouping students by sex, with older students mixed with younger students to serve as social and academic role models; staff provide after-school supervision and reinforce students’ language development primarily through ASL-based communication.

Exhibit 16
A Declining Percentage of Students at Both Schools
Live On Campus During the Week



Additional Disabilities. WSB enrolls proportionately more students with multiple disabilities than WSD. In the 2004-05 school year, 55 percent of WSB students had disabilities in addition to vision loss, while 13 percent of WSD students had additional disabilities. Over a quarter of WSB students had more than two identified disabilities (see Exhibit 17). Another indicator of this trend is that WSB is the destination school for deaf-blind students in Washington State.⁴⁸

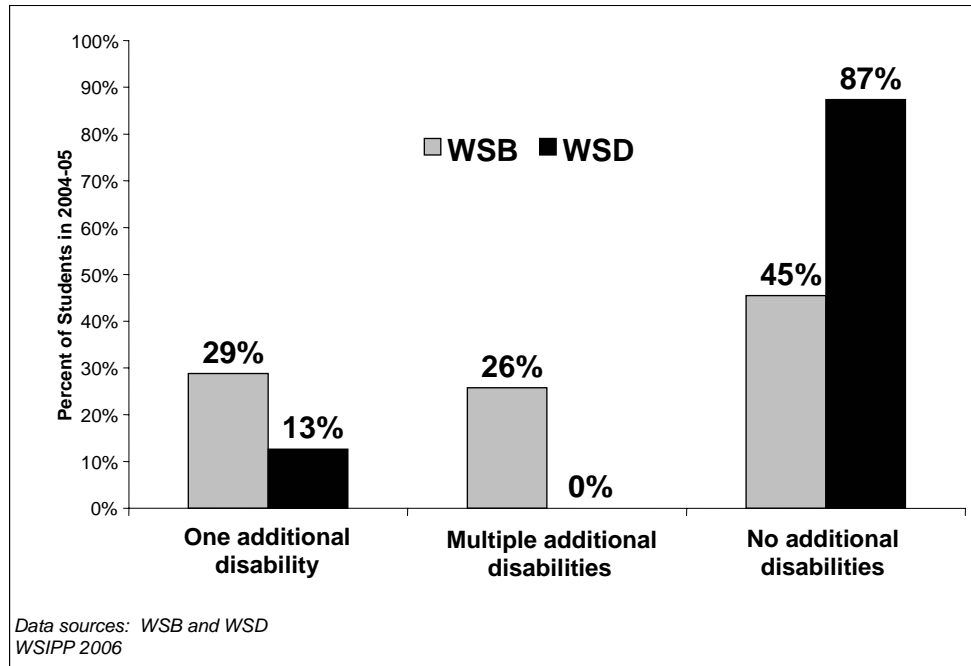
These data should be interpreted with caution, however, due to difficulties in distinguishing language delays from other disabilities impacting learning. Federal regulations prohibit schools from identifying a specific learning disability if assessment tests cannot separate the impacts of deafness from those of learning disabilities, which can lead to underestimates of additional disabilities among students with hearing losses.⁴⁹

⁴⁸ Over the past ten years, 24 deaf-blind children enrolled at WSB compared with three at WSD, according to statewide special education headcounts.

⁴⁹ 34 CRF §300.541 (b)(1).

Exhibit 17

WSB Enrolls Proportionately More Students With Multiple Disabilities Than WSD



This difference is found among state residential schools nationwide. According to the research literature, schools for the blind began enrolling students with multiple disabilities in substantial numbers in the 1960s.⁵⁰ State schools for the deaf, on the other hand, have typically enrolled mostly deaf-only students seeking greater ease in communication and social interactions, as well as academic support.⁵¹

Length of Stay. Students remain at WSD slightly longer than at WSB. Students' average length of stay at WSD decreased slightly between 2001 and 2005, dropping from 4.3 years to about 3.9, approaching the WSB average of approximately 3.5 years (see Exhibit 18).⁵² Length of stay for students varies widely, and, on average, day students who live nearby attend longer than residential students.⁵³

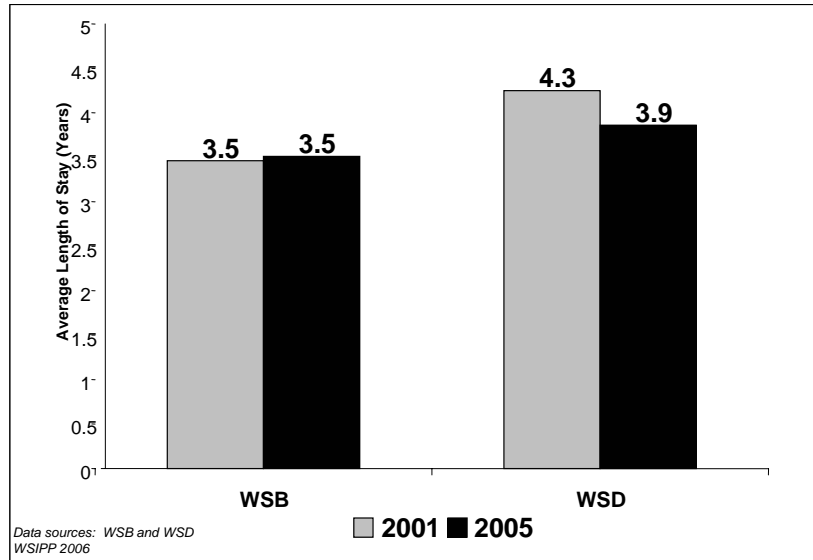
⁵⁰ Described in Mann (2005), p. 7.

⁵¹ Gilliam, J. & Easterbrooks, S. (1997).

⁵² These figures are broad estimates intended for comparison purposes only. In student records data provided for this study, WSB and WSD indicated the year each student initially enrolled at the school. In most cases, the data format was a single year (e.g., 1999 or 2002). We subtracted the year of enrollment from the current school year to calculate number of years enrolled. The data do not account for stays shorter than a half year and, therefore, likely overestimate the average amount of time students remain at the schools.

⁵³ Length of stay at the schools varies from six months to 15 years. Day students remain enrolled at the schools an average of 1.5 years longer than residential students.

Exhibit 18
Students Attend WSD Slightly Longer Than WSB, on Average



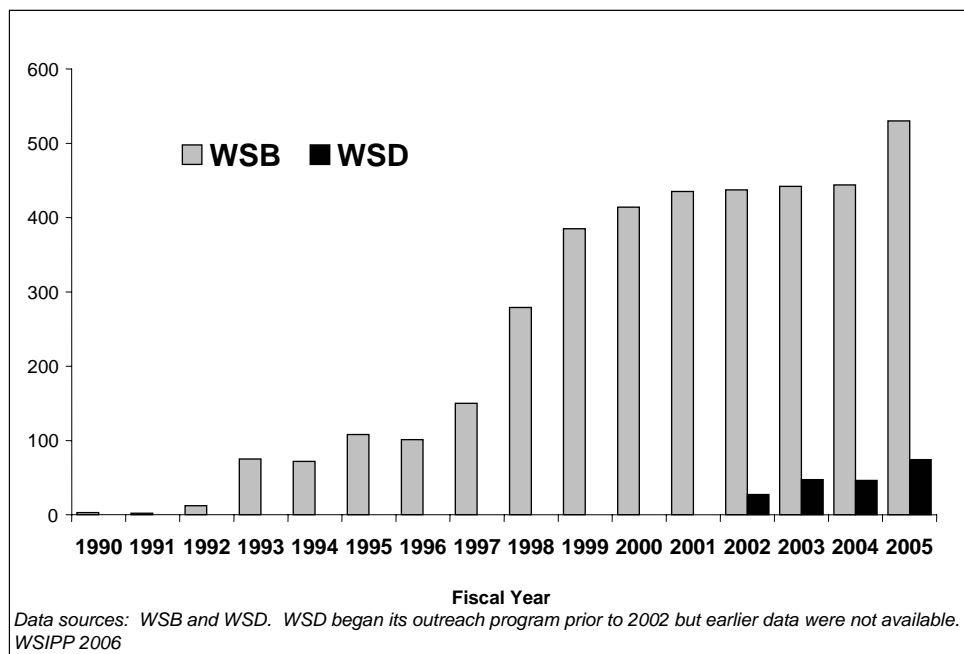
Outreach Services

WSB and WSD assist local school districts in making student placement decisions and conducting transition planning for students returning to local schools. Each of the schools also provides direct and consultative services—collectively termed “outreach”—to students and teachers in local schools.

WSB has provided outreach services since at least 1989 while WSD has more recently entered this arena of service provision. As Exhibit 19 shows, WSB has gradually expanded its outreach services and currently provides an average of nearly 600 units of service each month.⁵⁴ WSD’s outreach program is also expanding but remains relatively new; the program currently provides a monthly average of 75 services to students and teachers statewide.

⁵⁴ “Average monthly services provided” is the best available measure of the scope of outreach services provided by each school. WSB and WSD were unable to provide comparable counts of the number of students served or hours of service provided.

Exhibit 19
Annual Average Number of Outreach Services Provided Each Month



Again, similar patterns are found across the nation. State schools for the blind were comparatively early providers of outreach services to students in local schools, beginning in the mid-20th century.⁵⁵ Schools for the deaf, on the other hand, have more recently begun to partner with public school programs. The Institute’s survey of state schools for the deaf and blind across the nation found that schools for the blind more frequently operate outreach programs and serve more students via outreach, on average, than schools for the deaf (see Appendix B for details).

Types of Outreach Services Provided. Each school provides assessment and consultation services in their areas of expertise. The various services described in Exhibit 20 are provided to teachers and students in local school districts, as well as the general public.

⁵⁵ Mann (2005) contains a literature review summarizing the history of schools for the blind in the United States, including their role in providing outreach services.

Exhibit 20

Outreach Services Provided by the State Residential Schools

WSB	WSD
<ul style="list-style-type: none"> • Itinerant teaching services to local school districts • Short-term on-campus evaluations • Low-vision assessments (free public clinic offered twice weekly) • In-service training for local school teachers and university partnerships for teachers-in-training • Consultation with local school districts on student assessments • Technology Center, including training, lending, and software licensing assistance • Career development summer program • Digital learning options for students 	<ul style="list-style-type: none"> • Academic, speech/language, and audiological student assessment and consultation • ASL/communication training • Educational interpreter consultation and training • Psycho-educational evaluation and referrals • School-to-work transition planning • Expanded Total Immersion (in ASL communication) summer camps for students and adults • Birth to age three services

WSB also provides space and oversight for the **Braille Access Center**, which produces brailled materials for visually impaired people in Washington State. The materials are provided on a fee-for-service basis and the center is financially self-sustaining. Also on the WSB campus is the Washington **Instructional Resource Center** which provides accessible educational materials for public school students, including assessment tests such as the Washington Assessment of Student Learning (WASL).

WSD has also recently (in 2005 or planned for 2006) taken on the following outreach projects:

- **Shared Reading Video Outreach Project:** WSD is taking over management of the SRVOP from Washington Sensory Disabilities Services (WSDS), because the school has expertise in providing direct instruction to students. The SRVOP helps parents and teachers read books to young deaf children in remote parts of the state through interactive desk-top video teleconferencing. Each bi-weekly training session uses a new book and provides suggestions on how to explain the pictures and convey concepts and vocabulary. Over 100 students currently participate in the project.
- WSD has also **contracted with Listen and Talk** (a private school providing oral communication training to deaf and hard of hearing students) to provide support services to local school districts.

Mechanisms for Providing Outreach. All WSB outreach services provided by itinerant teachers are self-sustaining, supported by contracts with local school districts. WSB also provides outreach services to local education agencies with state funds—in the form of staff salaries—and private funding (primarily for equipment). WSD’s newer outreach program is state-supported, and school administrators indicate that they are currently gauging demand for and use of services.

The next chapter includes details on the schools’ budgets, including the outreach programs.

Summary

- **Statewide Student Headcounts:** Deaf, hard of hearing, and visually impaired students are sparsely scattered throughout Washington State except for small concentrations in the Seattle and Vancouver areas.
- **School Enrollment Trends:** Student enrollment at WSD declined steadily over the past few decades while WSB’s enrollment remained level. On a per-capita basis, proportionately fewer deaf, hard of hearing, and visually impaired students attend the state residential schools compared with 25 years ago.
- **Student Characteristics:** While many WSD and WSB students are from the populous Vancouver and Puget Sound areas, many also come from school districts throughout the state. Proportionately more small school districts (those with fewer than ten deaf/hard of hearing or visually impaired students) than large districts send students to WSB and WSD.

Most students at the state schools are in middle or high school, and just over half reside on campus during the week. Students remain at the schools for an average of three and a half to four years. WSD has a more ethnically diverse student population, but in terms of disabilities, most WSD students are deaf with no additional disabilities. WSB students range from partially visually impaired to blind and deaf-blind, and over half have disabilities in addition to vision loss.

- **Outreach Services:** WSB has an older and larger outreach program and provides a wide range of support services to local public schools, including Braille translation, student assessment, and teacher training. Most WSB outreach services are self-supporting, generating revenue on a fee-for-service basis. WSD’s smaller, but expanding, outreach program was initiated within the past five years and is primarily supported by state funding.

SCHOOL BUDGETS, CAPITAL PLANS, AND GOVERNANCE

Costs associated with the statewide schools, including student transportation and residential and instructional services, are covered by the WSD and WSB budgets. Local school districts do not pay for tuition or transportation when students are placed at the residential schools.

The operating budgets, capital plans, and governance structures for WSB and WSD are described and compared below.

School Operating Budgets

This section details the current operating budgets for WSB and WSD, trend data on state general fund allocations for the schools, and comparative per-student cost data based on state and national studies.

Current Operating Budgets. WSD has a larger operating budget and enrolls more students than WSB. Exhibit 21 details the fiscal year (FY) 2005 expenditures for each school.⁵⁶

Exhibit 21
FY 2005 Expenditure Budget Detail

	WSB	% of total	WSD	% of total
Administration	\$738,924	14%	\$1,409,617	18%
Facilities	\$531,145	10%	\$970,239	13%
Instruction	\$1,695,968	33%	\$2,234,030	29%
Residential	\$1,137,289	22%	\$2,194,641	29%
Outreach	\$822,162	16%	\$718,772	9%
Technology	\$213,008	4%	\$158,350	2%
Total	\$5,138,496		\$7,685,649	

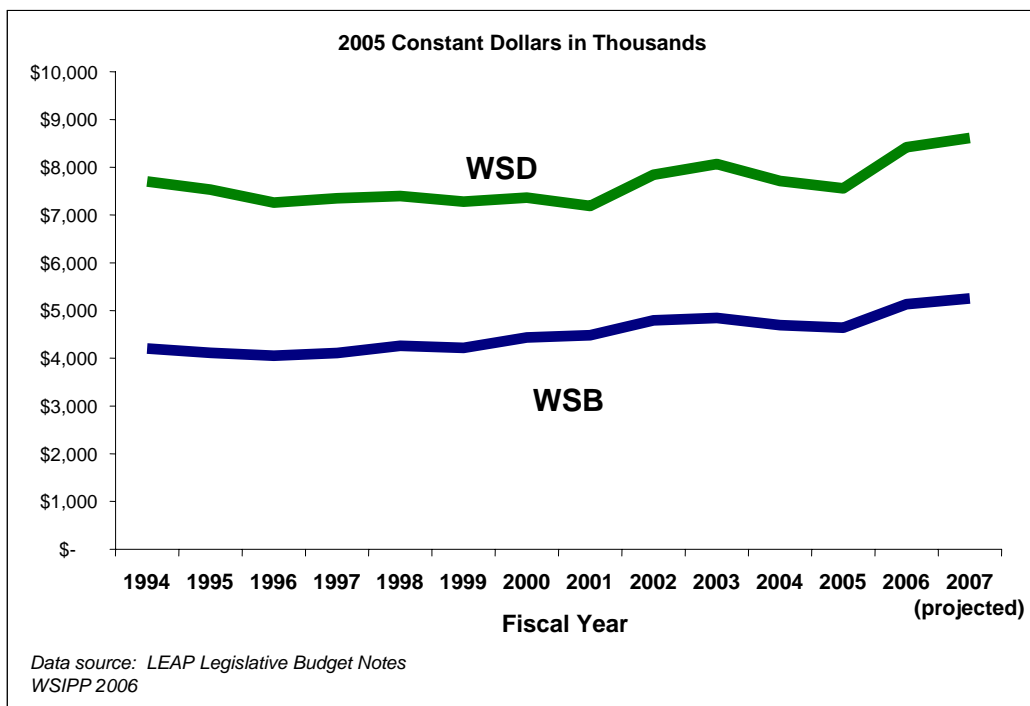
These expenditure budgets include funding from non-state general fund sources (i.e., contracts with local school districts and private grants). Data sources: WSB and WSD WSIPP 2006

⁵⁶ WSB and WSD provided detailed FY 2005 budget data to compare their operational costs. The schools use different expenditure breakdowns and methods for allocating shared costs (such as how facility costs are allocated). To maintain internal consistency in budget comparisons, Institute staff recast the data as follows: *Administration* includes administration staff salaries and benefits, training, and board costs; *Facilities* includes utilities, maintenance, buildings and grounds, and related staff salaries and benefits; *Instruction* includes any direct instruction costs, including teacher and aide salaries and benefits, and instructional materials (excluding technology); *Residential* includes residential staff salaries and benefits, direct program costs, evening meals, recreation (when outside of regular school day), and student transportation; *Outreach* includes outreach staff salaries and benefits, cost of materials, and travel (for off-campus provision of services); and *Technology* includes direct expenses for technology and media materials, for both instruction and administration.

Some School Funding Comes From Non-State Sources. The operating budgets summarized above include revenue from the state general fund, contracts with local schools districts, and private grants. In FY 2005, over 10 percent of WSB's operating budget was from local districts and private grants; approximately 1 percent of WSD's operating budget came from non-state general fund sources. This difference reflects WSB's longer history in providing outreach services; WSD is currently assessing and building up demand for its outreach services and, in most cases, provides services without charging local school districts.⁵⁷

State General Fund Allocation Trends. From FY 1994 to 2005, state general funding for both schools increased slightly. State funds appropriated for WSB increased from \$4.2 to \$4.6 million and for WSD from \$7.6 to \$7.7 million (measured in 2005 constant dollars to control for inflation). During this period, WSB's student enrollment fluctuated slightly, remaining about even, while WSD's enrollment dropped steadily (see Exhibit 8); at the same time both schools, especially WSB, expanded their outreach programs (see Exhibit 19). More recently, state funding for both schools has increased, with \$5.1 million for WSB and \$8.4 million for WSD in FY 2006 and \$5.3 (WSB) and \$8.6 million (WSD) projected for FY 2007 (see Exhibit 22).

Exhibit 22
State General Fund Appropriations for WSB and WSD, FY 1994-2007



Per-Student Cost Data. Few rigorous studies detail special education costs by type of disability, and especially for low-incidence disabilities, small sample sizes tend to limit the

⁵⁷ 1.3 percent of WSD's outreach services are funded via fee-for-service. WSD administrators indicate they plan to introduce fees on a larger scale if the cost of outreach services exceeds existing budget capacity.

ability to generalize study findings. Most studies have found a wide range of costs among students with sensory disabilities.

Exhibit 23 displays per-student costs at WSB and WSD, based on FY 2005 expenditures. The residential per-student costs at WSD are substantially higher than at WSB, in part due to recent decreases in WSD’s enrollment and stricter residential staffing requirements.⁵⁸

Exhibit 23
Washington Residential Schools Average Per-Student Expenditures

FY 2005	WSB	WSD
Total student enrollment	70 students	96 students
Instructional cost per student	\$24,228	\$23,271
Residential students	43 students	52 students
Residential cost per residential student	\$26,449	\$42,205
Combined cost per residential student <i>(instruction plus residential)</i>	\$50,677	\$65,476

Data sources: WSD and WSB expenditure budgets, including funds from non-state general fund sources (e.g., contracts with local school districts or private grants). Per-student estimates do not include expenditures on administration, outreach, technology, or facilities.
WSIPP 2006

A 2001 study by the Washington State Joint Legislative Audit and Review Committee (JLARC) provides estimates of special education costs by type of disability.⁵⁹ These figures are not directly comparable to cost estimates for WSB and WSD because they:

- Estimate “excess costs” related to special education and do not include basic education allotments;
- Are based on a six-hour school day, whereas most students at WSB and WSD have around-the-clock IEPs, including residential and after-school services;⁶⁰
- Exclude weekend transportation; and
- Are based on actual services provided to each individual student rather than dividing a flat budget by total enrollment.⁶¹

⁵⁸ Following the 2001 review of its residential program, the Washington Administrative Code (WAC 388-180-220) covering WSD was changed to require a staffing ratio of 1 staff per 7 residential students.

⁵⁹ Joint Legislative Audit and Review Committee. (2001). *K-12 special education study* (Report 01-11). Olympia, WA: Joint Legislative Audit and Review Committee. <http://www1.leg.wa.gov/Reports/01-11.pdf>. The JLARC study is based on a sample of 9,171 students in 15 Washington school districts. Students with sensory disabilities represented 1.6 percent (143 students) of special education students included in the study. To develop cost estimates, JLARC staff surveyed teachers, asking them to detail the number and type of staff and the number of minutes students receive services specified in their IEP each week.

⁶⁰ According to the JLARC data, the amount of time students with sensory disabilities in local schools receive special education services varies, from about 5 percent of the time to 100 percent. Higher costs are associated with students who receive specialized instruction for all or most of the school day.

The 2001 JLARC estimates are, however, the only detailed cost data by disability available for special education students attending local public schools in Washington State. Students with sensory disabilities are, on average, more costly to educate than the typical special education student (see Exhibit 24).⁶² Examining the minimum and maximum instructional costs for students included in the JLARC sample reveals a wide range of cost of services, which is driven by different student learning needs and the types and amounts of services provided to meet those needs.

Exhibit 24
Annual Cost of Special Education Instruction in Washington State Local Public Schools (Excluding Basic Education Funding)

	Deaf (N=33)	Hard of Hearing (N=65)	Visually Impaired (N=38)	Deaf-Blind (N=7)	Special Education Overall (N=9171)
Mean	\$24,066	\$6,601	\$13,045	\$16,200	\$6,998
Median	\$24,903	\$5,247	\$5,228	\$16,017	\$5,053
Minimum	\$1,954	\$1,837	\$1,522	\$3,287	\$706
Maximum	\$60,790	\$24,819	\$130,939	\$28,588	\$154,755

Estimates are based on a non-random sample of students and do not necessarily represent the statewide mean. Annual figures assume a 36 week school year. Estimates are presented in 2005 dollars for comparability. Data source: JLARC 2001 Special Education Cost Study. WSIPP 2006

A 2003 national study of special education costs corroborates these estimates; the study found that students with sensory disabilities incur costs higher than the average special education student, both in local public and state residential schools.⁶³

Staffing. Corresponding with its smaller operating budget and lower enrollment levels, WSB has a smaller staff than WSD, especially residential staff (see Exhibit 25).⁶⁴

⁶¹ Per-student costs at the state schools are calculated by dividing the budget by enrollment, so estimates of per-student expenditures tend to fluctuate more than for local public schools, where the sum of full-time equivalent (FTE) students and associated staffing patterns determine the overall budget.

⁶² These estimates are based on 2001 data but have been converted to 2005 dollars here for comparison purposes.

⁶³ Chambers, J., Shkolnik, J., & Perez, M. (2003). *Total expenditures for students with disabilities, 1999-2000: Spending variation by disability*. Palo Alto, CA: American Institutes for Research in the Behavioral Sciences, Center for Special Education Finance, Special Education Expenditure Project (SEEP).

⁶⁴ As noted above, WSD has a stricter residential staffing requirement than WSB.

Exhibit 25
School Staffing Patterns, Fiscal Year 2005

	WSB		WSD	
	Headcount	FTE	Headcount	FTE
Administration	9	8.9	9	9.0
Instruction, including outreach	54	45.3	49	47.3
Residential	31	20.6	47	34.8
Other	13	10.9	28	23.2
Total	107	85.7	133	114.3

NOTE: Total may not add accurately due to duplication of individuals who split their time across duties. "Other" includes custodians, food service, and maintenance staff.

Data sources: WSD and WSB

WSIPP 2006

Capital Plans

Capital funding for the state residential schools is provided separately from the operating budget. This section provides background and describes future plans for investments in the two Vancouver campuses.

The WSB and WSD campuses were originally developed in the early 1900s. WSB's campus occupies 12.5 acres and contains 11 buildings; WSD's campus occupies 27.5 acres and contains 15 buildings.⁶⁵ At both campuses, the average age of the buildings approaches 50 years; 80 percent of the buildings were constructed prior to 1970. The most recent construction at WSB was the Ogden Resource Center in 2003 and, at WSD, the residential cottages in 1999.

Prior Review of WSD Campus. The 2002 capital facilities study conducted by JLARC described WSD's process of redesigning its campus, finding that many buildings were "older and in various stages of disrepair," and basic infrastructure upgrades were needed.⁶⁶ The study noted that pre-design plans for a new campus included capacity for up to 300 students, more than twice the school's enrollment. JLARC recommended that WSD acknowledge the decline in student enrollment in its capital plans. WSD has since scaled back the planned capacity and is currently designing a campus for 100 to 120 students.⁶⁷

Current Capital Plans. As noted earlier in this report, in the 2005 legislative session neither WSB or WSD were allocated requested funding for construction of new buildings pending the outcome of this study. WSB did not receive \$8.9 million⁶⁸ in requested capital funds and WSD, \$10 million. Both schools shifted those requests to future biennia.

⁶⁵ Eleven acres of the WSD campus encompass a playing field adjacent to the main school campus.

⁶⁶ Joint Legislative Audit and Review Committee, Report 02-8 (2002), p. 1.

⁶⁷ Over the past five years, WSD enrollment has averaged 113 students.

⁶⁸ Exhibit 26 and Appendix C list WSB's unfunded amount, which the school plans to request again in 2006, as totaling \$9.4 million. This amount is higher than the \$8.9 million requested in 2005 because administrators predict higher future costs due to inflation.

As detailed in Exhibit 26, WSB anticipates requesting \$12.9 million in capital funding over the next five biennia, and WSD, more than \$15 million (with construction costs for three new buildings to be determined). WSB plans to build a new gymnasium to replace the seismically unstable Kennedy Building (built in 1963) and also an independent living center for students transitioning to adulthood. In addition to current requests for a physical plant/cafeteria building, WSD is planning a new school building, gymnasium, and Clarke Hall/auditorium to replace buildings assessed as “poor to fair—replace” in 2002.⁶⁹ Both schools’ 10-year capital plans include funding requests for general campus preservation and maintenance.

Exhibit 26

Anticipated Capital Funding Requests for WSB and WSD: 10-year Capital Plans

WSB	WSD
<ul style="list-style-type: none"> • \$700,000/biennium (general campus preservation) • \$8,800,000 (construct physical education building)* • \$600,000 (independent living center)* 	<ul style="list-style-type: none"> • \$1,000,000/biennium (general campus preservation) • \$900,000 (designs for new school building, gymnasium, and Clarke Hall/auditorium) • \$10,000,000 (construct physical plant/cafeteria building)* • \$ to be determined (construct new school building, gymnasium, and Clarke Hall/auditorium)
Total: \$12.9 million	Total: over \$15 million

**Legislature declined funding in 2005 session. Data sources: WSB and WSD. WSIPP 2006*

Appendix C provides a visual representation of each campus as well as building details and a breakdown of the 10-year capital plans by biennium.

Governance

In addition to service delivery and capital plans, the Legislature directed the Institute to examine governance of the state schools. This section describes the schools’ governance history, current governance structures, and governance structures nationwide.

Governance History. As noted in the Introduction of this report, WSD and WSB were originally created by the territorial Legislature as a single educational institution enrolling deaf and blind students. The enacting legislation provided for a board of trustees to manage the institution and outlined the qualifications and responsibilities of the school superintendent. The school operated as a separate state agency with oversight by the governor.⁷⁰

⁶⁹ Joint Legislative Audit and Review Committee, Report 02-8 (2002), p. 7.

⁷⁰ Brelje & Tibbs (1986), p. 2.

In 1901, the state Legislature created the State Board of Control, which oversaw all of Washington's residential institutions, including reformatory and penal institutions, as well as the State School for the Deaf and the Blind. The school's board of trustees, however, was kept in place; when they were split into two separate schools in 1913, each had its own board.⁷¹ From 1901 to 1955, the State Board of Control, later renamed the Department of Institutions, governed the schools; in 1955, the Washington Department of Social and Health Services (DSHS) was created and assumed oversight.⁷²

DSHS oversaw the schools until 1985. Reflecting changing attitudes about the role of the schools, with increasing emphasis on education rather than their residential/institutional role following the passage of the IDEA, the schools were removed from DSHS governance and legislatively re-created as independent state agencies under oversight of the governor's office. Each school retained its own board of trustees. State general fund appropriations are provided directly to the schools and do not pass through any other state agency.⁷³

In 2002, the Legislature modified the WSD board to become a board of *directors* rather than *advisors*, as had previously been the case.⁷⁴ DSHS was charged with monitoring the residential program at WSD under legislation clarifying child abuse reporting and investigation requirements.⁷⁵ These changes followed the series of studies on WSD conducted by legislative and executive agencies after concerns about student safety and school management were raised by policymakers.⁷⁶

Current Governance Structures. Exhibit 27 outlines the make-up of each school's board since 2002. While both boards have 9 voting members, one from each congressional district, appointed by the governor and confirmed by the Senate, WSD's governance statute has more detailed requirements for the types of voting members included. WSD's statute gives the board powers to direct the development and implementation of all policies, rules, and regulations at the school.⁷⁷ WSB's statute authorizes its board to monitor, inspect, and recommend school policies and operations and gives the school superintendent ultimate decision-making authority.⁷⁸

⁷¹ Ibid., pp. 14 & 20.

⁷² Washington State Department of Corrections. (n.d.). *History*. Retrieved from <http://www.doc.wa.gov/general/History.htm>.

⁷³ RCW 72.40.120

⁷⁴ ESSB 6558, Chapter 209, Laws of 2002. RCW 72.40.010

⁷⁵ HB 2568, Chapter 208, Laws of 2002. RCW 72.40.280.

⁷⁶ See Appendix A for details on the WSD studies and legislation in 2001-02.

⁷⁷ RCW 72.42.041

⁷⁸ RCW 72.41.040

Exhibit 27

Legislative Provisions for WSB and WSD Boards of Trustees

WSB: Board of Advisors	WSD: Board of Directors
<p>Nine members, one from each congressional district, appointed by the governor with consent of the Senate. Terms run for five years.</p> <p>Non-voting WSB board members include representatives of the following:</p> <ul style="list-style-type: none"> • WSB parent-teacher association (1); • Washington Council of the Blind (1); • National Federation of the Blind in WA (1); • Teacher Association of WSB (1); and • WSB classified staff (1). <p align="right"><i>RCW Chapter 72.41</i></p>	<p>Nine members, one from each congressional district, appointed by the governor with consent of the Senate. Terms run for five years.</p> <p>Voting members include representatives of the following:</p> <ul style="list-style-type: none"> • Deaf or hard of hearing community (1); • Experienced educational professionals (2); • Experienced residential services professional (1); and • Parent of a deaf or hard of hearing student (1); <p align="right"><i>RCW Chapter 72.42</i></p>

As directed by state law, each board meets at least quarterly.⁷⁹ Board functions, including members' travel, are supported by state general funds as part of the schools' operating budgets. In FY 2005, WSB spent \$5,137 in board functions; WSD spent \$30,000. The more hands-on nature of WSD's board of directors contributes to its higher costs, according to school superintendents.

Governance Structures: National Research. The Governor-directed 2001 report⁸⁰ on governance structures at schools for the deaf in the United States identified key distinctions among various models, including whether:

- school boards are advisory or directing;
- the schools operate as independent agencies or as departments within a state education agency;
- the boards are exclusive to the schools or part of a larger education oversight board; and
- departments of social and health services are involved in governance.

No one model was found to be most beneficial for school oversight; advantages and disadvantages were identified for each. According to the Institute's national survey conducted for this report, most other states operate their schools for the deaf and blind as independent agencies (17 states) or as departments within state education agencies (23 states).

⁷⁹ RCW 72.41.070 and 72.42.070.

⁸⁰ Randall, K.D. (2001). *Governance of the Washington School for the Deaf* Olympia, WA: Office of the Governor.

Summary

Washington State currently provides approximately \$5.1 million to WSB and \$8.4 million to WSD from the general fund for annual operating expenses.

- **Operating Budgets:** Both schools are more costly to operate on a per-student basis compared with the average cost of services for special education students in local public schools, although those costs vary widely. The schools' higher average costs are driven by the following factors: enrollment of students with learning needs requiring more intensive services; operation of a 24-hour, rather than six-hour, program for most students; provision of residential services and weekend transportation; and operation of campuses for small student populations.
- **Capital Plans:** Capital funding for new construction at each the schools was withheld during the 2005 Legislative session pending the completion of this report. Planned capital funding requests for the next ten years total \$12.9 million for WSB and over \$15 million for WSD.
- **Governance:** Historically, until the 1980s, both WSD and WSB operated under oversight of DSHS (and predecessor agencies) with advisory boards for each school. Increasing emphasis on their educational role led to the establishment of the schools as separate state agencies in 1985. In 2002, the Legislature authorized the WSD board to direct and implement, and not simply advise, school policies and procedures to increase oversight following a series of student safety incidents.

The following section presents options related to the future role of WSB and WSD in K-12 education, including modifications to the governance structure and the capital and fiscal implications of each option.

POLICY OPTIONS

As noted earlier, the 2005 Washington State Legislature directed the Institute to “examine which state agency should have responsibility for governance and oversight of the schools.” The Institute was also asked to examine alignment between service delivery and capital plans. In December 2005, the Board of Directors of the Washington State Institute for Public Policy reviewed preliminary study findings and requested staff to examine the full range of policy options, including school closure under various scenarios.

Exhibit 28 presents policy options for WSB and WSD identified by individuals consulted for this report. The options are framed as two broad categories: (1) maintain the schools’ instructional, residential, and outreach programs while considering capital funding requests and changes in governance structure; and (2) scale back school operations with partial or full closure of one or both schools. The table includes Institute-developed estimates of fiscal impacts⁸¹ as well as summaries of arguments that have been, or might be, made in favor of or opposition to each option.

In the first set of options, the state would incur no or minimal fiscal savings by either maintaining the current governance structure or by shifting some administrative functions to other agencies. While oversight may or may not improve, governance changes would not significantly impact the schools’ operating costs or requests for capital funding.

In the second set of options, closing various programs within the schools (e.g., student residences, outreach services, or on-campus instruction) could result in state general fund savings. Requests for capital funding could also be reduced. The full extent of fiscal and educational implications for local schools and students is, however, unknown. Under policy options envisioning school closure, local districts would have to take on the cost of educating WSD and WSB students. Projected cost savings to the state could be reduced if these students require intensive services that lead districts to apply for additional state “safety net” special education funding.⁸² Also, because a residential setting may no longer be part of the continuum of placements available, Washington students who currently or might in the future require a residential placement would need to attend an out-of-state school, with the local district paying for tuition and weekly transportation.

⁸¹ Estimates of fiscal impacts were developed by Institute staff based on FY 2005 operating budgets and current student enrollment patterns; details are provided in footnotes for each option that has potential for cost savings. Revenue generated by the schools through fees for outreach services is not included in these estimates. For more information, please contact the author.

⁸² In the 2004-05 school year, Washington State spent \$14.6 million on safety net funding requests for local school districts. For more information on safety net funding, visit the OSPI website: <http://www.k12.wa.us/SpecialEd/SafetyNet.aspx>.

Exhibit 28
Policy Options for Washington State Residential Schools

Option	Potential Arguments in Favor	Potential Arguments in Opposition	Estimated Net Operating Cost Savings to the State	Impact on 10-Year Capital Requests
Option 1: Maintain schools' instructional, residential, and outreach programs; consider capital requests and governance changes.				
1A. No policy change: Remain independent state agencies.	Current boards reflect geographic diversity and represent members of stakeholder groups. Superintendents and boards report directly to the governor and the schools' agendas are not diluted by another agency's priorities.	Schools are viewed as one of many bureaucracies competing for funding and not as part of public education. Per-capita enrollment rates have declined, making the schools less cost-efficient.	None.	None.
1B. Department of Social and Health Services: Place schools under DSHS oversight.	DSHS staff have expertise in overseeing residential institutions. Reporting and oversight of student safety could be streamlined.	A return to the historical view of the schools as institutions rather than as schools. DSHS staff do not have expertise in educational policy and practice. Special needs of small populations could go unnoticed in large bureaucracy.	Minimal to none. DSHS may take on some administrative functions; whether any resulting efficiencies would produce substantial cost savings is unclear.	None.
1C. Office of Superintendent of Public Instruction: Make schools sub-department(s) within OSPI.	OSPI staff have expertise in current state and federal educational policy and practice. Schools would be viewed as educational programs within the larger school system. Local, regional, and statewide educational services may be better integrated.	OSPI staff do not have experience overseeing residential schools and express a disinclination to take on this role. Special needs of small populations could go unnoticed in large bureaucracy.	Minimal to none. OSPI may take on some administrative functions; whether any resulting efficiencies would produce substantial cost savings is unclear.	None.

Option	Potential Arguments in Favor	Potential Arguments in Opposition	Estimated Net Operating Cost Savings to the State	Impact on 10-Year Capital Requests
Option 1: Maintain schools' instructional, residential, and outreach programs; consider capital requests and governance changes.				
1D. State Board of Education: Place schools under oversight of the SBE.	Schools would be viewed as educational programs within the larger school system. SBE reflects geographic diversity and is in a position to influence state policy affecting the schools.	Multiple responsibilities of Board may leave little time/attention for the schools. Transitory nature of board membership may impair oversight. Members may not be easily accessible to parents and other stakeholders. The policy-setting Board has no experience operating schools.	Minimal to none. SBE may take on some administrative functions; whether any resulting efficiencies would produce substantial cost savings is unclear.	None.
1E. Vancouver School District: Place responsibility for school management and oversight on the local school district. ⁸³	Schools would be viewed as educational programs within the local school system. Governance and operations could be modeled after the Juvenile Rehabilitation Administration's (JRA) arrangements with local school districts to provide instruction for youth in JRA facilities.	Multiple responsibilities of school board may leave little time/attention for the schools. Local school board would have to assume responsibility for education of students with sensory disabilities statewide.	Minimal to none. The school district may take on some administrative functions; whether any resulting efficiencies would produce substantial cost savings is unclear.	None.
1F. Combine school boards and administrations into a single state agency.	Some economies of scale may be attained.	Does not reflect different learning needs and educational practices for the two types of sensory disabilities.	Minimal to none. Combining administrative functions may result in increased efficiency; net cost savings are unclear.	Assuming the schools maintain two separate campuses, none.

⁸³ Similar options would be to operate the schools under oversight of the local Educational Service District or a local public college (Clark College or Washington State University in Vancouver). These alternatives are expected to draw the same arguments for and against the options and would likely have similar fiscal impacts.

Option	Potential Arguments in Favor	Potential Arguments in Opposition	Estimated Net Operating Cost Savings to the State	Impact on 10-Year Capital Requests
Option 1: Maintain schools' instructional, residential, and outreach programs; consider capital requests and governance changes.				
1G. Recreate the schools as nonprofit entities supported by state funds.	May improve schools' ability to raise private funds and reduce their reliance on state funds. Could be modeled after New York's "private but state-supported" schools.	Could reduce accountability and public oversight of the schools.	Minimal to none.	None, unless private funds were used for capital projects.

Option	Potential Arguments in Favor	Potential Arguments in Opposition	Estimated Net Operating Cost Savings to the State	Impact on 10-Year Capital Requests
Option 2: Reconfigure or close one or both schools.				
<p>2A. Close residential programs but maintain day-student enrollment.</p>	<p>High per-student costs are associated with the residential programs, especially at WSD.</p> <p>Student safety concerns could be reduced.</p> <p>Outreach programs would continue to provide support services to students and teachers in local school programs.</p>	<p>Without a residential program, only students who live nearby could attend, and there are too few local high school students to sustain the full high school curriculum.</p> <p>Only elementary and middle school students living nearby would have the school(s) as a placement option (which is opposite of current enrollment trends).</p> <p>Time spent providing instructional and support services to students would be reduced to a six-hour day.</p>	<p>\$2.7 million maximum (WSB)</p> <p>\$4.4 million maximum (WSD).⁸⁴</p>	<p>Unknown. Current requests may not change because neither school has plans for new student residences.</p>

⁸⁴ For option 2A, ongoing costs and projected savings are calculated as follows. At WSB, approximately 22 elementary and middle school students would remain enrolled. By proportionately reducing instructional and other WSB costs and eliminating the residential program, the annual school budget would be an estimated \$1.5 million. Forty-eight WSB students would return to local schools, generating about \$434,000 in state basic education funding and state and federal special education funding (based on FY 2005 apportionments, each student FTE would generate approximately \$9,902 in state and federal funding, with \$4,291 in state basic education funds and \$4,800 in state and federal special education funds). Combined, these changes would reduce WSB-related funding by about \$2.7 million and ongoing costs would be \$1.9 million. At WSD, approximately 25 elementary and middle school students would remain enrolled. By proportionately reducing instructional and other WSD costs and eliminating the residential program, the annual school budget would be an estimated \$2.7 million. Seventy-one WSD students would return to local schools, generating about \$643,000 in state and federal funding. Combined, these changes would reduce WSD-related funding by about \$4.4 million; ongoing costs would be \$3.4 million. Under this option, ongoing state costs could be higher if students returning to local schools require cost-intensive services or out-of-state residential placements (which could lead to applications for additional state safety net funding). These estimates assume continuance of the outreach programs. Per-student FTE apportionment data from: OSPI, 2004-05 Apportionment Reports #1191 and #1220. <http://www.k12.wa.us/SAFS/data/reportformatter.asp>.

Option	Potential Arguments in Favor	Potential Arguments in Opposition	Estimated Net Operating Cost Savings to the State	Impact on 10-Year Capital Requests
Option 2: Reconfigure or close one or both schools.				
<p>2B. Close schools except for outreach programs.</p>	<p>The long-term trend is declining per-capita enrollment at both schools.</p> <p>High per-student costs are associated with the residential campuses.</p> <p>Outreach programs would continue to provide support services to students and teachers in local school programs.</p>	<p>Local school districts would have to take on costs of educating students from WSD and WSB.</p> <p>Residential school(s) would no longer be a placement option within the state (how many students would be sent out of state is unknown).</p> <p>Students with sensory disabilities would have fewer social and recreational opportunities (e.g., summer camp, participation in athletics).</p>	<p>\$4 million maximum (WSB)</p> <p>\$6.2 million maximum (WSD).⁸⁵</p>	<p>Current 10-year capital funding requests would be reduced from \$12.9 million (WSB) and over \$15 million (WSD) to the cost of “mothballing” one or both of the campuses.</p>
<p>2C. Close schools and create regional centers providing instruction (but no residential programs).</p>	<p>The long-term trend is declining per-capita enrollment at both schools.</p> <p>High per-student costs are associated with the residential campuses.</p>	<p>Local school districts would have to take on costs of educating students from WSD and WSB; no support from outreach programs would be available.</p> <p>Residential school(s) would no longer be a placement option within the state (how many students would be sent out of state is unknown).</p> <p>Students with sensory disabilities would have fewer social and recreational opportunities (e.g., summer camp, participation in athletics).</p>	<p>Unknown. Operating costs depend on how many regional centers are created, who operates them (local, regional, or statewide entity), how many students attend, and what kinds of support services those students need.⁸⁶</p>	<p>Current 10-year capital funding requests would be reduced from \$12.9 million (WSB) and over \$15 million (WSD) to the cost of “mothballing” one or both of the campuses.</p> <p>Capital needs for regional centers are unknown.</p>

⁸⁵ Under option 2B, 70 WSB students would return to local schools, generating \$636,000 in state and federal basic and special education funding. The outreach program would continue to be funded primarily via fees-for-service. This option could reduce WSB-related funding up to \$4 million; ongoing state-funded costs would be \$636,000 (or more; for this option, outreach program costs are estimated as minimum funding amounts because additional funding may be needed to offset school-wide staff reductions. Many on-campus instructional and support staff also provide outreach services). Ninety-six WSD students would return to local schools, generating \$873,000 in state and federal basic and special education funding. The outreach program would continue to be funded at a minimum of \$730,000 annually. Combined, these changes would reduce WSD-related funding by about \$6.2 million; ongoing costs would be \$1.6 million. Again, ongoing state costs could be higher if students returning to local schools require cost-intensive services or out-of-state residential placements (which could lead to applications for additional state safety net funding).

⁸⁶ The 2002 Institute report on WSD estimated an annual cost of \$576,000 to \$895,000 to operate a regional day program for deaf students, based on enrollment of 25 students and in 2005 dollars (for a per-student annual cost of \$29,426 based on the

Option	Potential Arguments in Favor	Potential Arguments in Opposition	Estimated Net Operating Cost Savings to the State	Impact on 10-Year Capital Requests
Option 2: Reconfigure or close one or both schools.				
<p>2D. Close schools without continuing outreach services or creating regional programs.</p>	<p>The long-term trend is declining per-capita enrollment at both schools.</p> <p>High per-student costs are associated with the residential campuses.</p>	<p>Local school districts would have to take on costs of educating students from WSD and WSB; no support from outreach programs would be available.</p> <p>Residential school(s) would no longer be a placement option within the state (the number of students who would be sent out of state is unknown).</p> <p>Students with sensory disabilities would have fewer social and recreational opportunities (e.g., summer camp, participation in athletics).</p>	<p>\$4 million maximum (WSB)</p> <p>\$6.9 million maximum (WSD).⁸⁷</p>	<p>Current 10-year capital funding requests would be reduced from \$12.9 million (WSB) and over \$15 million (WSD) to the cost of “mothballing” one or both of the campuses.</p>

mid-point of that estimate). The report noted that this estimate is speculative, however, because there has been no measure of demand for or cost of such a regional program, and demand may depend on whether the state or participating local school districts fund the program.

⁸⁷ The same as in option 2B, 70 WSB students would return to local schools, generating \$636,000 in state and federal funding. Ninety-six WSD students would return to local schools, generating \$873,000. Again, the number of students requiring cost-intensive services or out-of-state residential placements, subsequently leading to safety net funding requests, is unknown. Outreach program costs would be eliminated.

Option	Potential Arguments in Favor	Potential Arguments in Opposition	Estimated Net Operating Cost Savings to the State	Impact on 10-Year Capital Requests
Option 2: Reconfigure or close one or both schools.				
<p>2E. Close schools but alter funding formula to provide additional funding for special education students with sensory disabilities.</p>	<p>The long-term trend is declining per-capita enrollment at both schools.</p> <p>High per-student costs are associated with the residential campuses.</p> <p>Special funding formula could reduce fiscal impacts on local schools and create incentives to offer programs.</p>	<p>Using different funding formulas for various disabilities could be viewed as unfair.</p> <p>Special education safety net funding is already available for districts enrolling students requiring cost-intensive services.</p> <p>Residential school would no longer be a placement option within the state (the number of students who would be sent out of state is unknown).</p> <p>Students with sensory disabilities would have fewer social and recreational opportunities (e.g., summer camp, participation in athletics).</p>	<p>Unknown. Under one possible scenario where additional state funding provided for deaf and blind students is calculated as the difference between current apportionments and average cost of service, \$3.7 million (WSB) to \$5.4 million (WSD) could be saved annually.⁸⁸</p>	<p>Current 10-year capital funding requests would be reduced from \$12.9 million (WSB) and over \$15 million (WSD) to the cost of “mothballing” one or both of the campuses.</p>

⁸⁸ The state could consider many different funding formulas, each of which could result in different net fiscal impacts. If the difference between average cost of service and current apportionments is used to determine additional funding amounts, the calculations would be as follows. As noted in previous options, the 70 WSB students returning to local schools would generate \$9,902 each in state and federal basic and special education apportionments, for a total of \$636,000. Based on the 2001 JLARC study of special education costs, the average cost of services for visually impaired students in local schools is \$13,045; subtracting \$9,902 from that amount equals an additional \$3,953 provided to local schools per visually impaired student for a total of \$277,000. Combined, this funding formula change would reduce WSB-related funding by about \$3.7 million and ongoing costs would be about \$913,000. For the 96 WSD students returning to local schools, \$873,000 in state and federal basic and special education funding would be apportioned. The 2001 JLARC study estimated average cost of services for deaf students in local schools was \$24,903; subtracting \$9,902 from that amount equals an additional \$15,811 provided to local schools per deaf student for a total of \$1.5 million. Combined, this funding formula change would reduce WSD-related funding by approximately \$5.4 million and ongoing costs would be \$2.4 million. These estimates include only WSD and WSB students returning to local schools; costs to the state under this option would be considerably higher if additional special education funding is provided for all students with sensory disabilities.

CONCLUSION

Sensory disabilities (hearing and vision losses) can lead to language, academic, and social developmental delays among children and often require specialized educational expertise. Grouping students with sensory disabilities for instruction in local schools is difficult, because the disabilities are low incidence.

Federal law requires local school districts to offer students a continuum of educational placements to meet different learning needs but does not explicitly require states to operate residential schools. Washington and most other states, however, have historically operated statewide schools for deaf and blind K–12 students.

The legislative direction for this study asked for a comparison of student characteristics and learning needs at WSB and WSD. The two schools share a history and have many characteristics in common, but there are key differences besides serving students with different learning needs. WSB enrolls students with a broader range of disabilities and, through its more extensive outreach program, has more interaction with local public schools. WSD has historically been more isolated from the public K–12 education system, but this trend is changing; their relatively new outreach program increasingly provides support for students and teachers in local schools.

Since the 1970s, when federal special education policy first began to emphasize “least restrictive environment,” Washington students with sensory disabilities have increasingly received instruction in local schools. This trend, coupled with requests for substantial investment in the two campuses, has led state policymakers to a decision point: whether to invest more capital funds in the campuses or to pursue alternatives in providing instructional and support services to Washington students with sensory disabilities.

The two broad policy options presented in the previous section envision changes in governance and the instructional role of the schools. Minimal, if any, cost savings are likely to be achieved with any governance changes or by maintaining the current governance structure.

The second set of policy options that includes full or partial school closure has significant fiscal and educational impacts. Closing some or all of WSD’s or WSB’s programs could potentially save the state operating and capital expenditures, but how local schools and individual students would cope with the loss of the statewide residential, instructional, and/or outreach programs is unknown. Fiscal savings could be reduced if the state used some portion of those savings to reimburse local districts for their increased costs.

APPENDIX A: RELEVANT STATE STUDIES AND RECENT LEGISLATION

The Washington School for the Blind (WSB) and, especially, the Washington School for the Deaf (WSD) have been studied periodically by various Washington State agencies. Exhibit A-1 summarizes the history of these studies since 1970, and Exhibit A-2 describes recent state legislation covering the schools. Key questions that have resurfaced include the schools' roles in providing education and support services to K–12 students with sensory disabilities, the comparative cost of services, student safety, teacher and interpreter training, and governance of the schools.

Exhibit A-1
State-Directed Studies of WSD and WSB (1970–2002)

Report Date	Conducted By	Title	Major Topics Addressed
May 1970	Louis Bruno, State Superintendent of Public Instruction	The Education of the Hearing Impaired in Washington's Public Schools	Reviews educational services for deaf and hard of hearing students: <ul style="list-style-type: none"> • Special learning needs • Number and geographic location of students • Existing programs • Teacher certification • Costs
December 1981	Department of Social and Health Services, Division of Administration, Office of Research and Data Analysis, Program Research and Evaluation Section	An Examination of Educational Programs for the Sensory-Impaired in the State of Washington	Reviews services provided by WSD and WSB: <ul style="list-style-type: none"> • Student characteristics compared with those attending local public schools • Comparative cost of service • Alternative models of service delivery
May 2001	Dr. Henry Klopping, California School for the Deaf, Fremont (Directed by Governor Locke)	A Review of the Residential Program of the Washington School for the Deaf	Reviews the residential program at WSD: <ul style="list-style-type: none"> • Residential staffing ratios and qualifications • Residential policies and procedures • Student development programs • Student supervision • Residential environment • Family involvement
June 2001	Dr. Kenneth Randall, Arizona State Schools for the Deaf and Blind (Directed by Governor Locke)	Governance of the Washington School for the Deaf	Examines governance of WSD with the objective of increasing responsibility and accountability, including roles of the governor, WSD superintendent, and WSD Board of Trustees.

State-Directed Studies of WSD and WSB (1970–2002), *continued*

Report Date	Conducted By	Title	Major Topics Addressed
September 2001; January 2002	Governor's WSD Safety Changes Monitoring Panel (A six-person panel appointed by Governor Locke)	Feedback to Governor Locke and the Washington School for the Deaf on Progress in Implementing the June 25, 2001 Safety Changes Directive (Sept. 2001) Final Report to Governor Locke (Jan. 2002)	Reviews and monitors implementation of changes ordered by the Governor to increase student safety: <ul style="list-style-type: none"> • Admission and expulsion policies • Staffing models to ensure supervision • Training and curriculum on emotional and behavioral disturbances and abuse • Behavioral management policies • Incident documentation
November 2001	Office of the Family and Children's Ombudsman	Review of the Washington School for the Deaf	Investigates sex-related incidents involving WSD students from 1995–96 through 2000–2001 school years.
January 2002	Department of Social and Health Services, Division of Licensed Resources	First Annual Review of the Washington School for the Deaf's Residential Program	Describes the first annual review (directed by the governor) of operations and staffing in the residential program and incident reporting.
June 2002	Washington State Institute for Public Policy	Washington School for the Deaf: Models of Education and Service Delivery	Reviews the role of WSD in service delivery: <ul style="list-style-type: none"> • Special learning needs • Student characteristics • Current models of service delivery • Potential alternatives to current models, including cost comparisons
August 2002	Joint Legislative Audit and Review Committee	Washington State School for the Deaf: Capital Facilities Study	Reviews capital facilities planning at WSD: <ul style="list-style-type: none"> • Historical enrollment trends • Current plans • Capital implications of alternative service delivery models outlined in the June 2002 Washington State Institute for Public Policy report

Exhibit A-2
Recent Legislation Impacting WSD and WSB

Year	Bill Number	Brief Description	Brief Summary of Bill
2000	SSB 6361	Child abuse reporting	Directs WSB and WSD to: train staff and students regarding student safety and abuse and neglect; establish written procedures for employees and volunteers in contact with students; develop a process to assess children's risk for sexual aggression and victimization.
2001	SHB 1120	Sign language instructor certification	Directs the State Board of Education to consult with the National Association of the Deaf, the "sign instructors' guidance network" (s.i.g.n.), and the Washington State Association of the Deaf in establishing rules regarding qualifications, evaluation, and certification of American Sign Language instructors.
2001	ESSB 5606	Background checks	Authorizes WSB and WSD to conduct Washington State Patrol and a Federal Bureau of Investigation records checks for applicants to positions involving otherwise unsupervised contact with students.
2001	ESSB 6153	Budget studies	Directs the Washington State Institute for Public Policy to examine service delivery models for WSD and JLARC to analyze the school's capital plans.
2002	SHB 2568	DSHS relationship	Authorizes DSHS to investigate reports of child abuse incidents at WSD, oversee the residential program, and conduct periodic health and safety reviews.
2002	ESSB 6558	WSD governance	Modifies WSD's advisory board into a board of directors, dissolving the previous board and creating a new board with representatives from the nine congressional districts; five must have a required area of expertise.
2003	SSB 5105	Educational interpreters	Directs the Professional Educator Standards Board (PESB) to recommend options to increase the availability of educational interpreters for deaf and hard of hearing students.
2004	HB 2765	Advisory council	Establishes a DSHS advisory council to develop statewide standards for early intervention services for deaf and hard of hearing children.
2005	SHB 1893	Teacher certification	Directs the PESB to develop a teaching endorsement for teachers of students who are deaf or hard of hearing.

APPENDIX B: NATIONAL SURVEY OF SCHOOLS

This appendix describes the configurations of schools for the deaf and for the blind throughout the United States, based on a survey conducted by the Washington State Institute for Public Policy (Institute).⁸⁹ Also included is a section detailing comparative characteristics among the different types of schools.

Four types of schools are reviewed in this section: (1) schools for the deaf, (2) schools for the blind, (3) schools for both the deaf and the blind, and (4) schools for the deaf-blind. The phrase “schools for students with sensory disabilities” refers to these schools collectively.

This analysis also employs three general labels for the schools studied: state operated, state supported, and state funded. State operated refers to schools directly administered by a governmental agency or body at the state level. State supported indicates the school receives state funding but is managed either privately or at another level of government, such as by a local school district. State funded encompasses both state-operated and state-supported schools.

State Comparisons

This section examines the configurations of schools for the deaf and the blind, including the number and type of schools in the United States and the governance structures in place for school oversight.

Most States Contain Schools for Students With Sensory Disabilities. Thirty-nine states (including Washington D.C.) have at least one state-funded school for the deaf. Some states operate multiple schools; in total, there are 57 state-funded schools for the deaf and hard of hearing in the United States. Thirty states have at least one school for the blind or visually impaired, with a total of 33 schools nationwide.

Additionally, ten states operate 13 combined schools enrolling both deaf and blind students. Alabama and Illinois each operate a school specifically for deaf-blind students.⁹⁰ Exhibit B-1 shows the number of states with each type of school, and Exhibit B-2 shows how many of each type operate in the United States.

⁸⁹ The Institute’s survey of state schools for the deaf and for the blind was conducted via email and telephone from June 15, 2005, to July 15, 2005. Missing data were filled in wherever possible by website searches and through contact with state department of education staff.

⁹⁰ The two schools for the deaf-blind are not included in this analysis because they serve a small, unique population.

Exhibit B-1
Number of States With Schools, by Type

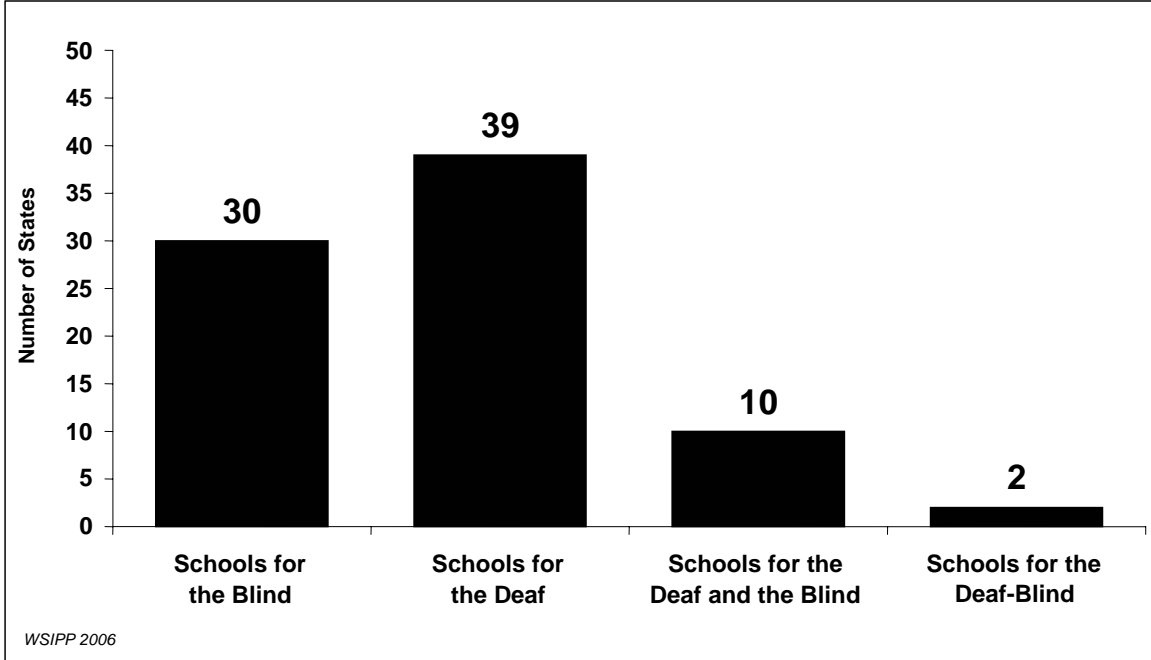
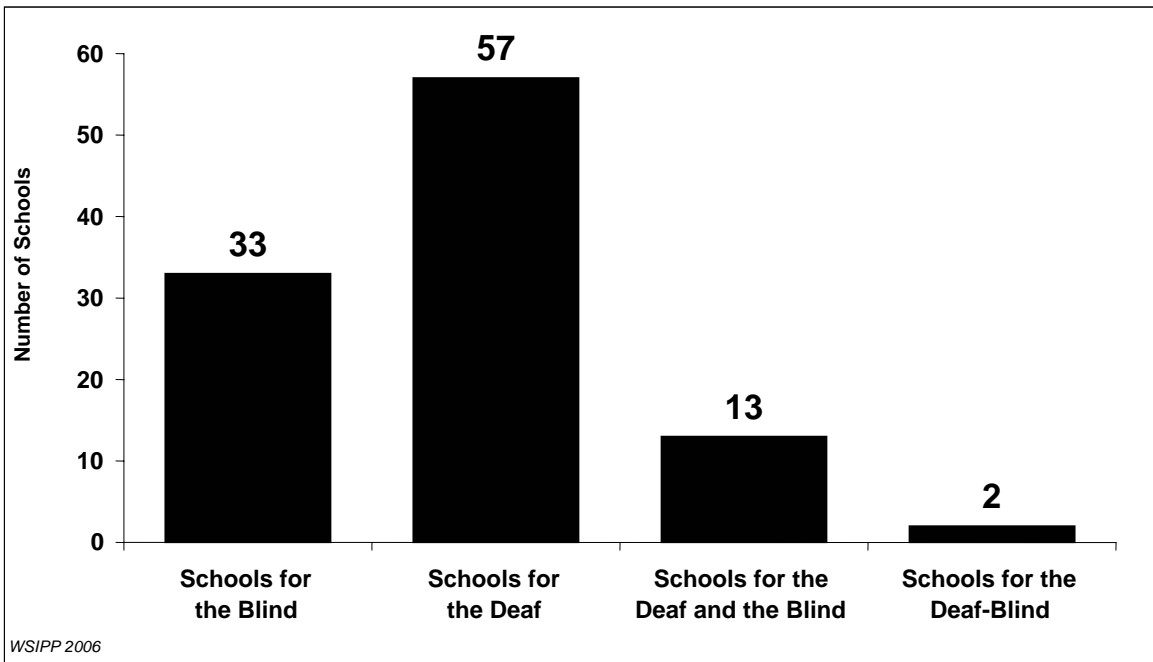


Exhibit B-2
Number of State-Funded Schools, by Type



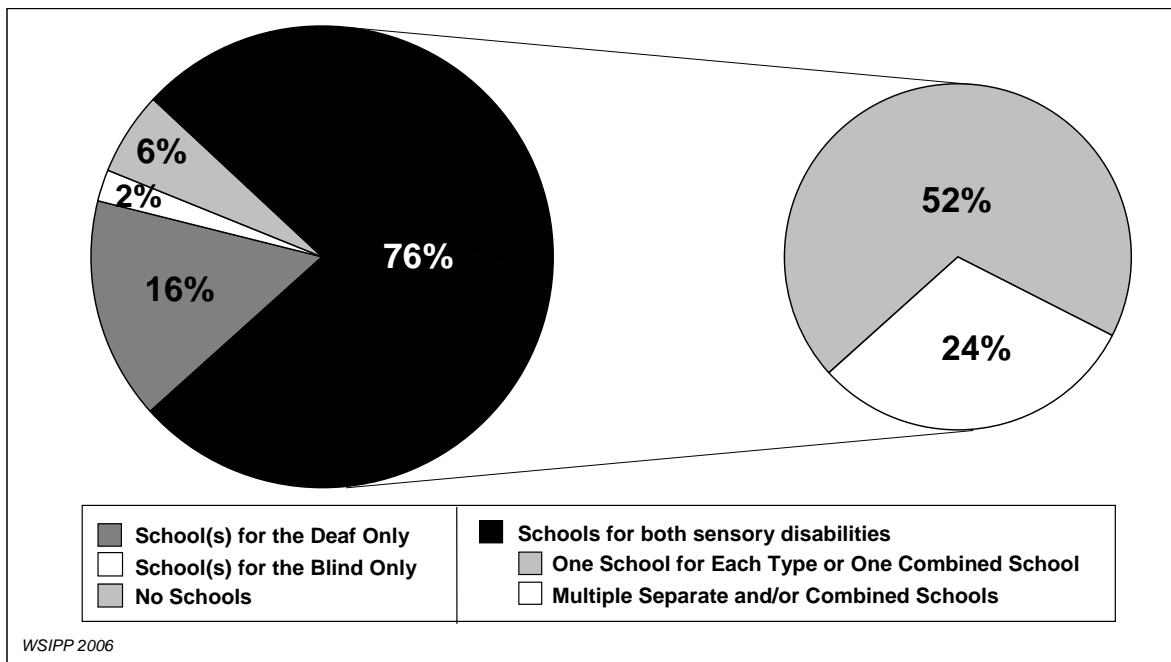
More Schools for the Deaf Than for the Blind Operate in the U.S. There are 24 more schools for the deaf than schools for the blind (see Exhibit B-2). This is likely because there are more deaf and hard-of-hearing students in the United States than there are visually impaired students. While both visual impairments and deafness/hearing disability are low incidence among children, the latter occurs nearly three times as often.⁹¹

Most States Support Schools for Both Student Populations. While variation exists among the number and type of state-funded schools for sensory disabilities in each state, the majority of states, over 75 percent, operate schools for both types of sensory disabilities (see Exhibit B-3). Most states have at least one school for the deaf and one school for the blind and/or at least one combined school for the deaf and the blind.

Twenty-seven states (52 percent) have either a separate school for each sensory disability or one combined school for both student populations (see Exhibit B-3). A small number of states (24 percent) contain multiple separate schools or multiple combined schools; for example, in New York there are three schools for the blind and nine schools for the deaf. In all states with multiple schools, schools for the deaf outnumber schools for the blind.

States with multiple schools tend to be geographically large and/or densely populated. The schools are dispersed around the state to enroll students from different regions. Nine states have separate schools for just one of the student populations, eight with only a school for the deaf, and one with only a school for the blind. Exhibit B-3 displays the percentage of states containing each broad configuration of schools for the deaf and for the blind.

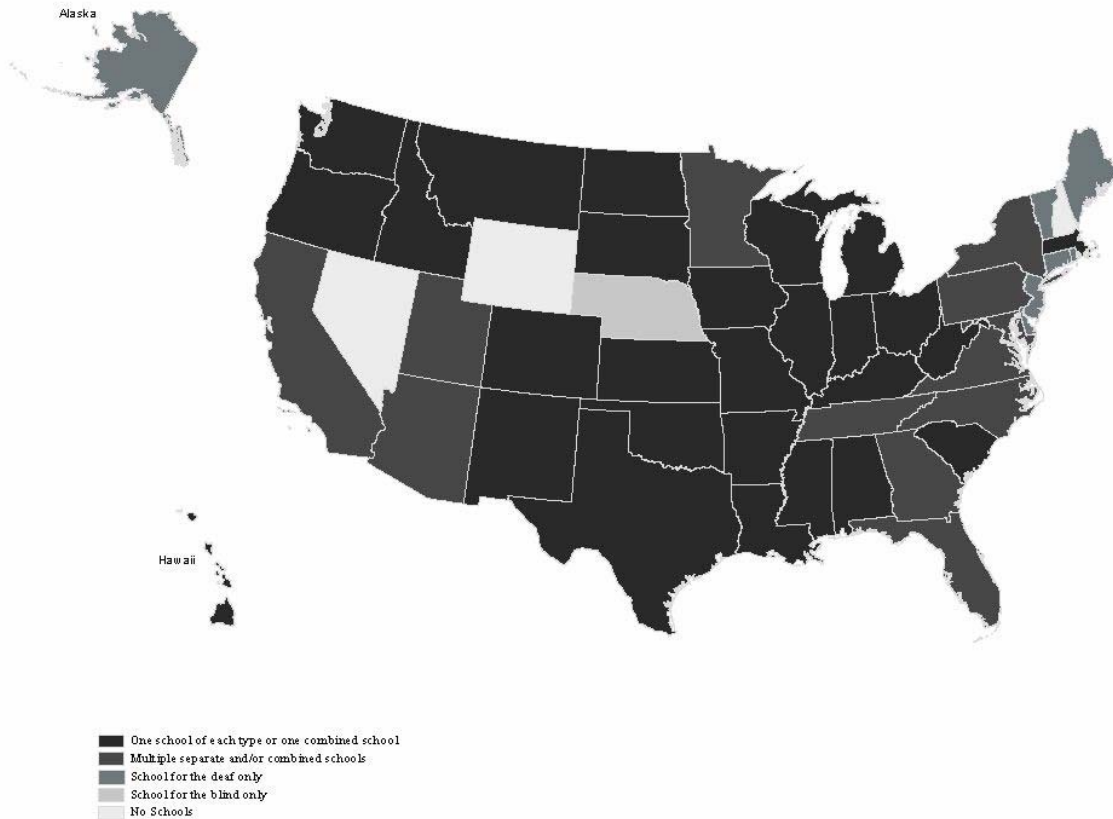
Exhibit B-3
School Combinations by State



⁹¹ See Exhibit 2, page 10, for incidence rates.

Exhibit B-4 illustrates how each state's schools are configured.

Exhibit B-4
Geography of School Combinations



Not Every State Supports a School for One or Both Student Populations. Three states (Nevada, New Hampshire, and Wyoming) do not currently operate any schools for students with sensory disabilities. Nebraska is the only state that supports a school for the blind but does not have a school for the deaf. Another seven states (Alaska, Connecticut, Delaware, Maine, New Jersey, Rhode Island, and Vermont) and Washington D.C. do not operate schools for the blind. Exhibit B-5 reviews the status of schools in these states.⁹²

⁹² The information contained in Exhibit B-5 was gathered through interviews and conversations with school administrators and staff at state education agencies.

Exhibit B-5
States That Do Not Fund a School for One or Both Types of Sensory Disabilities

State	Schools for the Blind	Schools for the Deaf
No Schools for Either Sensory Disability		
Nevada	Never Operated	Never Operated
New Hampshire*	Never Operated	Never Operated
Wyoming	Never Operated	Closed in 2001
No Schools for the Deaf		
Nebraska	Open	Closed in 1998
No Schools for the Blind		
Alaska	Never Operated	Open
Connecticut	Never Operated	Open
Delaware	Never Operated	Open
Maine	Never Operated	Open
New Jersey	Never Operated	Open
Rhode Island	Never Operated	Open
Vermont	Never Operated	Open
Washington D.C.	Never Operated	Open

* The Laurent Clerc Academy, a public charter day school for the deaf and hard of hearing serving grades 1–8, opened in New Hampshire in January 2005.

The Nebraska School for the Deaf closed due to decreasing enrollment and increasing costs. The state created regionally administered day programs for deaf students in place of the school. The Wyoming School for the Deaf also closed because of low enrollment (less than six percent of deaf and hard of hearing students) but still exists as an outreach agency providing support, although not instruction, to students and teachers throughout the state.⁹³

The majority of students with sensory disabilities in these states receive services from their local school, school district, or at regional cooperatives. Students whose Individualized Education Plan (IEP) requires instruction in a residential setting are sent, at state or district expense, to out-of-state or private in-state residential schools.

Most Schools for Sensory Disabilities Offer a Residential Option. Of the 57 state-funded schools for the deaf throughout the country, over 75 percent provide residential services to students, meaning that students have the option to live at the school during the school week. Over 90 percent of schools for the blind, and all of the combined schools, offer residential options.

⁹³ These school histories, originally collected for the Institute's 2002 study, were confirmed through interviews with school and state staff. Barbara McLain and Annie Pennucci, 2002, *Washington School for the Deaf: Models of Education and Service Delivery*, Olympia: Washington State Institute for Public Policy, Document No. 02-06-2203.

Almost All States Have at Least One Residential School. Of the 48 states with at least one school for students with sensory disabilities, all but Rhode Island include a residential component.⁹⁴

Most Day Schools Serve Deaf and Hard of Hearing Students and Operate in States With Other Residential Schools. There are 16 state-funded day-only or non-residential schools for a sensory disability in the United States.⁹⁵ Of these, 13 serve deaf and hard of hearing students. Most of these 13 day schools for the deaf operate in states where there is also a residential school. Two states, however, have only a day school for the deaf and do not have a state-funded school for the deaf that offers a residential option: Rhode Island and Massachusetts.

Of the three non-residential schools for the blind, only one, the Lavelle School in New York City, is a traditional day school and operates in a state containing a residential school for the blind. The other two schools (Michigan and South Dakota) primarily offer instruction through outreach.

At one time, Rhode Island had a residential school for the deaf, but it was converted to a day program in 1974 due to declining enrollment.⁹⁶ Massachusetts pays to enroll deaf and hard-of-hearing students in either of the two private residential schools for the deaf operating within the state, should students require it.

The state-operated school for the blind in Michigan converted exclusively to outreach services in which blind and visually-impaired students receive services and instruction on a day-to-day basis in their home school districts through outreach provided by Michigan's School for the Blind/Low Incidence Outreach. The North Dakota School for the Blind (also called ND Vision Services) offers similar outreach programming, except the school also offers short-term residential placement for instruction in specific skills. Short-term placements typically last between one to two weeks.⁹⁷ Again, should a student's IEP require instruction in a residential setting, the student will be sent, at state and district expense, to a nearby public or private residential school.

Most States Operate Schools as Independent Agencies or through Public Agencies Related to Education. There are four primary types of governance structures for state-funded schools for those with sensory disabilities:

- Schools **operated or directly overseen by a state education agency** such as a state department of education, board of education, board of regents or trustees, regional educational service district, or a local school district.

⁹⁴ Most residential schools have a day component, meaning they also enroll students from the school's surrounding area who live at home.

⁹⁵ There are a number of additional day schools around the country not included in this analysis because they are entirely managed and funded by local education agencies (LEAs) or school districts, such as the Detroit Day School for the Deaf in Michigan and the Bruce Street School for the Deaf in New Jersey.

⁹⁶ This information, originally collected for the Institute's 2002 study, was confirmed in this study through interviews with school and state staff.

⁹⁷ For more information, see: <http://www.ndvisionservices.com/instruct-shortterm-programs.html>.

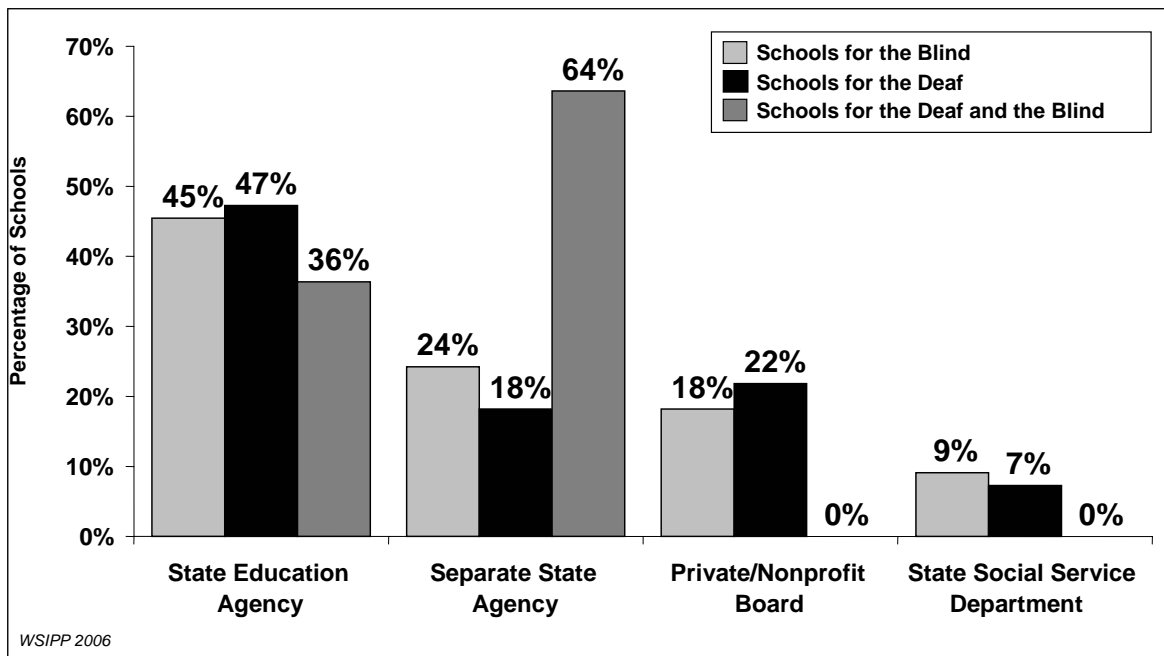
- Schools **operated as a state agency**.⁹⁸
- Private or nonprofit institutions **operated by a private board of directors**.
- Schools **run by a state social service department**.

Forty-one states with schools for students with sensory disabilities maintain one consistent governance structure across every school within the state, regardless of population served. Seven states that have multiple state-funded schools employ more than one governance structure.

Of the states with a single governance structure, the majority either govern the schools as an independent state agency or through a state education agency. Only six of these states use an alternate method. The states that operate schools under various governance systems use some combination of two or more of the following: state education agencies, separate state agencies, and private boards.

Schools for the Blind and Schools for the Deaf Have Similar Governance Patterns; Combined Schools Differ Slightly. The majority of schools for the deaf and for the blind fall under the first two types of governance structures, with similar percentages of each type (see Exhibit B-6). Combined schools for the deaf and the blind are more commonly operated as independent state agencies.

Exhibit B-6
School Governance Structures



⁹⁸ For the most part, state education agencies have some amount of oversight over the schools operated as state agencies and those that are private/nonprofit institutions.

State Boards of Education or Governor-Appointed Boards Manage Schools for Sensory Disabilities in the Majority of States. In addition to collecting information on the governance structures utilized by states, this study reviewed the various types of boards providing day-to-day management of schools for students with sensory disabilities.

The same 41 states with a single type of governance structure also employ one type of managing board throughout schools in the state. Similarly, the same seven states that have various governance structures use multiple processes for creating managing boards. In the 29 states with internally consistent governance, either the state’s board of education acts as the managing board of the schools or the governor appoints members to a school-specific managing board.

Exhibit B-7 provides a list of the different types of managing boards employed at schools for students with sensory disabilities.

Exhibit B-7
Types of Boards in States With Single Governance Structures

Managing Board	Number of States
State Board of Education/Regents/Trustees	15
Appointed by Governor	14
Appointed by Superintendent of Public Instruction	3
No Board	3
Elected Board	2
Appointed by Sitting Private Board	1
Appointed by Combination	1
Appointed by State Board of Education/Regents/Trustees	1
Local Board of Education	1

Managing boards typically have the authority to appoint or hire a school superintendent. This is the case in every state except Washington, where the governor appoints school superintendents. For those state-operated schools without managing boards, the governing institutions (i.e., state education agencies or social services departments) retain the authority to appoint school superintendents.

Differences Between Schools for Students With Sensory Disabilities

This section compares schools for the blind with schools for the deaf in the following areas:

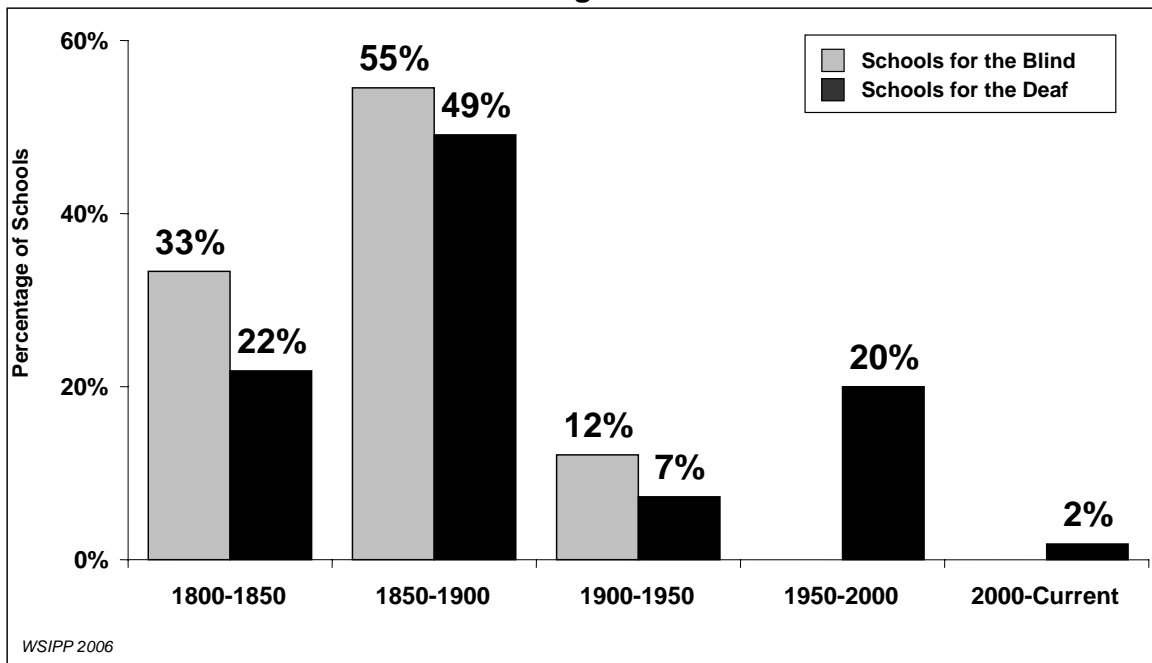
- Founding eras;
- On-campus enrollment; and
- Role in outreach.

Due to the complexity surrounding separating enrollments at combined schools for the deaf and the blind, only separate schools are compared with one another. Short descriptions of the issues under consideration at combined schools are provided at the end of each subsection.

A Majority of Schools for Students With Sensory Disabilities Were Founded in the Mid-Late 19th Century. The majority of schools for the blind and schools for the deaf were founded in the 19th century, most between 1850 and 1900. The median year of founding for schools for the blind is 1856 and a little over ten years later for schools for the deaf (1869).

No schools for the blind have been founded since North Dakota's in 1908. The last three schools for the deaf, founded between 1993 and 2001, are all public charter schools. Exhibit B-8 displays the distribution of schools by the era in which they were founded.

Exhibit B-8
Founding Periods

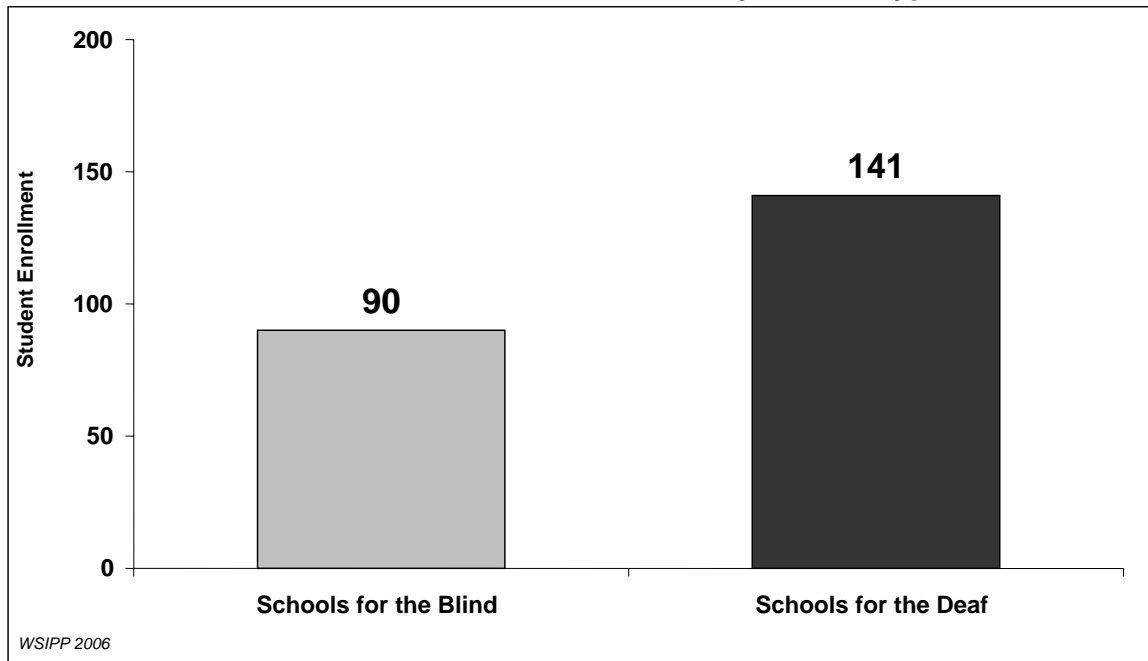


Combined schools for the deaf and the blind follow a similar pattern of founding to schools for the blind. The majority of combined schools were founded between 1850 and 1900, with a median year of 1885. The last combined school for the deaf and blind was established in Hawaii in 1914.

Schools for the Deaf Enroll More On-Campus Students Than Schools for the Blind. Schools for the deaf typically have higher on-campus enrollments than schools for the blind. The median enrollment at schools for the deaf is a little over 50 students higher than at schools for the blind. Nearly 80 percent of schools for the deaf enroll more than 100 on-

campus students, while close to 60 percent of schools for the blind enroll fewer than 100. Exhibit B-9 compares median enrollments at these schools.

Exhibit B-9
Median Student Enrollment, by School Type



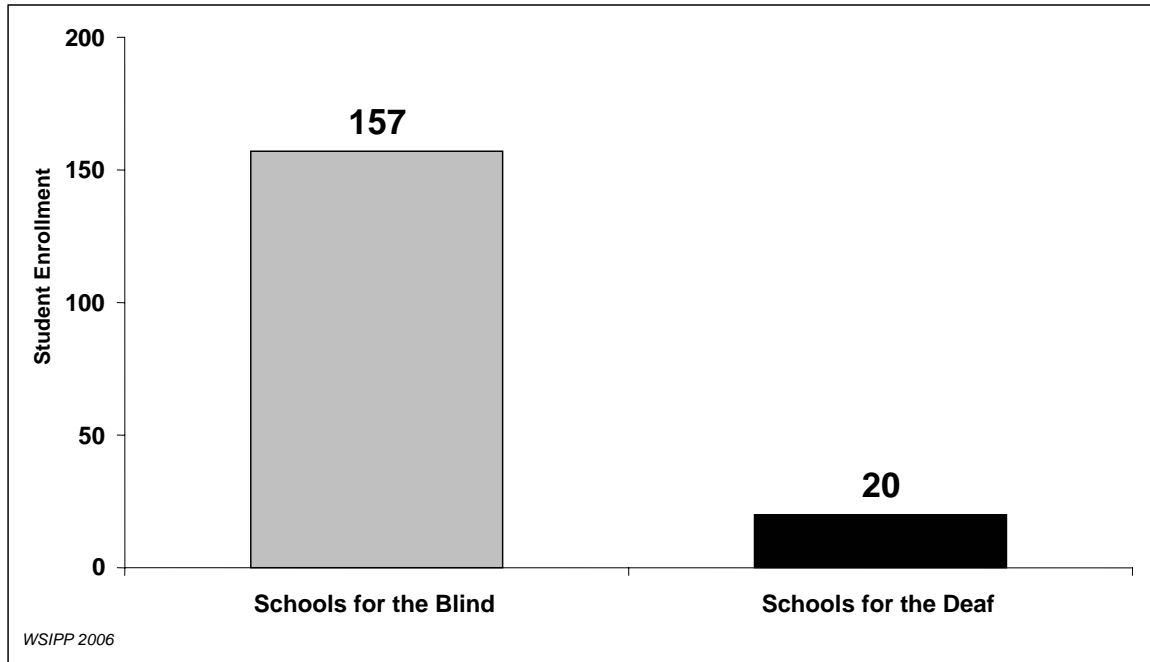
Combined schools for the deaf and the blind follow roughly the same enrollment patterns as described above. Combined schools have a median enrollment of 63 for visually-impaired students and 91 for deaf and hard-of-hearing students, for a total median enrollment of 154 students.

More Schools for the Blind Offer Instruction Through Outreach and Serve More Students in Outreach Programs Than Schools for the Deaf. In contrast to the on-campus enrollment, schools for the blind instruct more students through outreach than schools for the deaf, on average. Eighty-two percent of schools for the blind conduct outreach compared with 60 percent of schools for the deaf.

Most schools for the deaf that operate outreach programs serve fewer than 100 outreach students annually, and only one school serves more than 1,000 students in outreach instruction. Conversely, over 40 percent of schools for the blind serve more than 200 students in outreach programs. Two schools for the blind provide instruction to 3,000 or more students through outreach activities: California and Texas. Exhibit B-10 displays median outreach figures for schools for the blind and for the deaf.

Exhibit B-10

Median Number of Students Served Through Outreach, by School Type



Summary

Key findings comparing schools for the blind and for the deaf include the following:

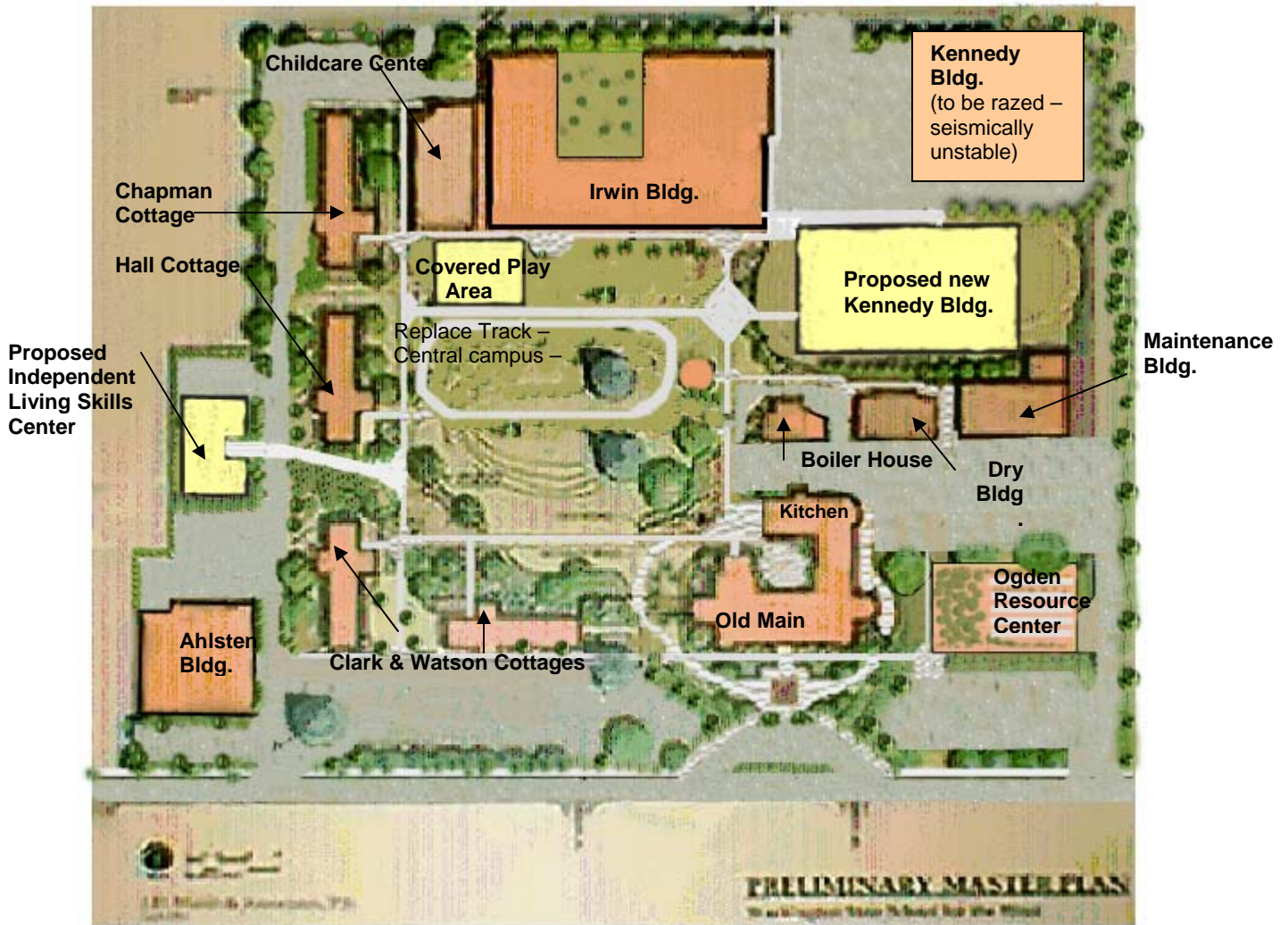
- Forty-eight states operate schools for those with at least one type of sensory disability, and most operate schools for both deaf and blind students (39 states).
- There are more deaf than blind students in the United States, and consequently, more schools for the deaf than for the blind.
- Most schools for students with sensory disabilities operate residential programs, and schools that do not primarily serve deaf students.
- The majority of states govern schools for students with sensory disabilities at the state level as separate state agencies or as sub-departments within state education agencies.
- Most states manage schools for students with sensory disabilities through state boards of education or governor-appointed school-specific boards.
- Schools for the deaf have higher on-campus enrollment, while schools for the blind conduct more outreach services.

APPENDIX C: CAMPUS DETAILS AND CAPITAL PLANS

This appendix presents visual representations of the WSB and WSD campuses and details on the buildings and each school's ten-year capital plans.

Washington School for the Blind

Exhibit C-1
WSB Campus Map



Source: Washington School for the Blind

Exhibit C-2
WSB Campus Building Details

Building (Year Constructed)	Primary use(s)	Square Footage	Current condition/ Miscellaneous
Old Main (1915)	Administration; low vision clinic; dining area; maintenance; storage; independent living skills; housing for student teachers	43,430	On the National Register for Historic Buildings. Restoration of main part of building completed in 2003.
Ogden Resource Center (2003)	Instructional Resource Center; Braille Access Center	11,680	Energy efficient building with earth roof
Irwin Building (1959)	Training for teachers and paraprofessionals; Instruction for students PreK-12	36,464	Remodeled in 2004
4 Cottages (1957-1959)	Student residences	4,690(3); 8,216(1)	Remodeled in 1993
Dry Building (1917)	Arts and crafts instruction; vocational education; maintenance	2,589	On the National Register for Historic Buildings. Some remodeling may be needed in near future.
Warehouse (1997)	Storage; maintenance shop	7,207	N/A
Ahlsten Building (1942)	Leased to Vancouver police department	10,444	Remodeled in 2004
Kennedy Building (1963)	Physical education; sports; community integration; community center	25,764	Seismically unstable, currently unusable

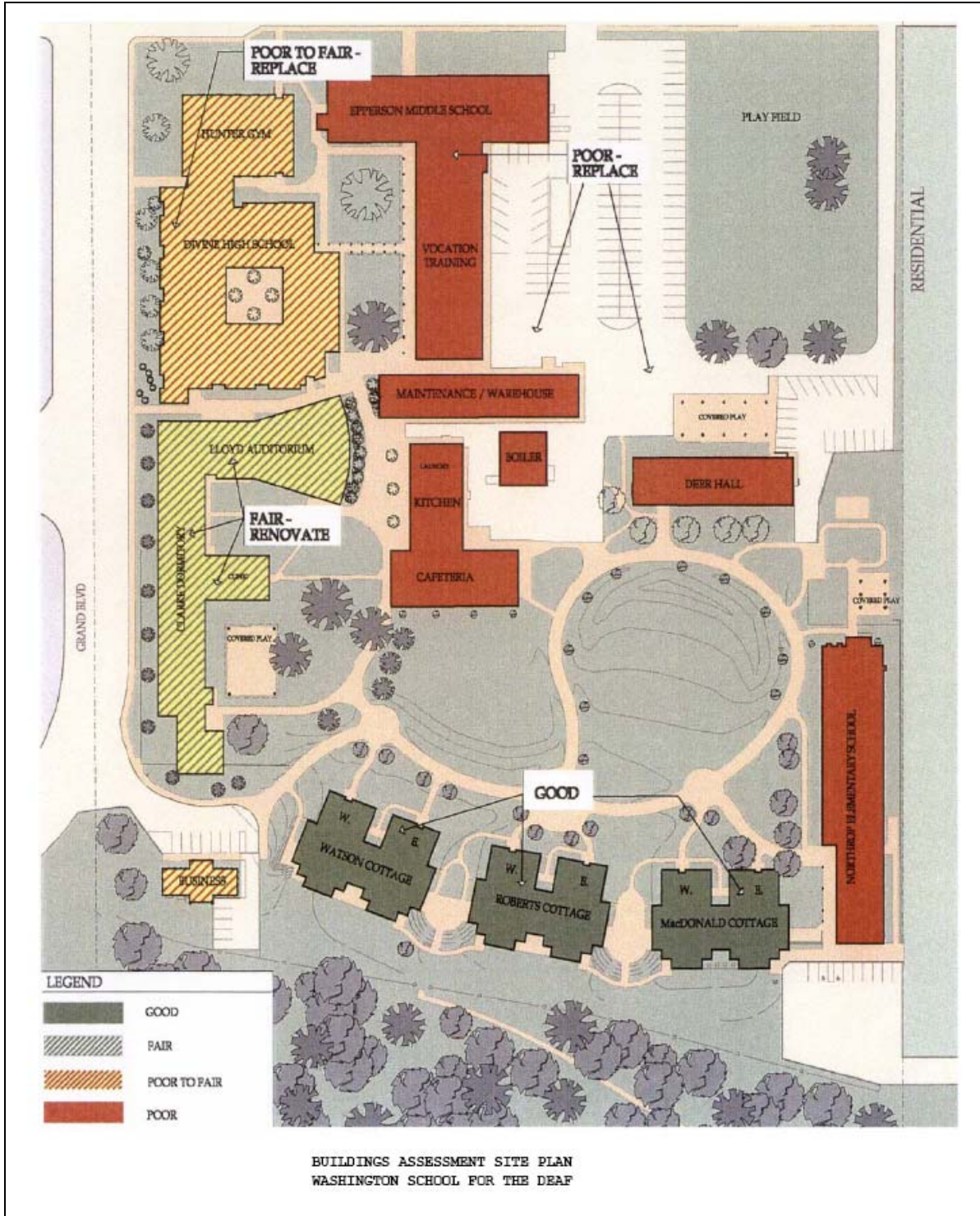
Exhibit C-3
WSB Future Capital Requests (10-year plan)

Biennium	Type of Capital Project	Amount
2005-07	General campus preservation (roofing, heating, energy management, security, lighting, flooring, parking lot sealing)	\$730,000
	New Kennedy Building*	\$8,800,000
	Independent Living Skills Center*	\$600,000
2007-09	General campus preservation (irrigation/wells, roofing, cottage renovation, fencing/sidewalks, heating/cooling upgrades, security, energy management, flooring)	\$700,000
2009-11	General campus preservation (roofing, cottage renovation, fencing/sidewalks, heating/cooling upgrades, security, energy management, flooring, auditorium seating and painting, upgrading fire protection equipment)	\$700,000
2011-13	General campus preservation (roofing, cottage renovation, heating/cooling, security, energy, flooring, painting)	\$700,000
2013-15	General campus preservation (unspecified)	\$700,000
Total 2005-2015		\$12,930,000

*Legislature declined to fund in 2005 session.

Washington School for the Deaf

Exhibit C-4 WSD Campus Map



Source: Washington School for the Deaf

Exhibit C-5
WSD Campus Building Details

Building (Year Constructed)	Primary Use(s)	Square Footage	Current Condition/ Miscellaneous
Boiler/Central Plant (1923)	Heating	1,976	Seismically unstable, to be demolished
Business Office/Administration (1962)	None (unusable)	2,505	To be demolished in 2006
Cafeteria/Kitchen/Laundry (1927)	Nutritional services; laundry	6,159	Seismically unstable, to be demolished
Clarke Hall (1953)	Administration; student residence	48,896	Needs remodeling to meet building codes
Lloyd Auditorium (1953)	Auditorium	14,873	Needs remodeling to meet building codes
Commissary/Warehouse/Maintenance (1911)	Storage; garden shop	9,159	Condition poor, to be demolished
McDonald Cottage (1999)	Student residence	9,933	Basement, exterior, and kitchen improvements needed
Watson Cottage (1999)	Student residence	9,933	Kitchen and exterior improvements needed
Roberts Cottage (1999)	Student residence	9,933	Kitchen and exterior improvements needed
Deer Hall (1948)	None	19,113	Abandoned—condition poor, to be demolished
Divine High School (1974)	Instruction	28,069	Condition poor, to be demolished
Epperson Building (1959)	Offices; maintenance	36,637	Condition poor, to be demolished
Hunter Gymnasium (1937)	Gym	7,670	Seismically unstable, to be demolished
Northrop Elementary Building (1952)	Instruction	27,034	Condition poor, needs major remodel or demolition
Stadium Building/Locker Rooms (1971)	Sports	4,786	Good condition

Exhibit C-6
WSD Future Capital Requests (10-year plan)

Biennium	Type of Capital Project	Amount
2005-07	General safety public works (boilers, parking, fencing, cottage basement improvements)	\$800,816
	General campus preservation (demolish old business office, cottage gutters, exterior cottage work)	\$200,000
2007-09	Vocational Education/Cafeteria/Maintenance Support Building*	\$10,000,000
	Update school building design	\$500,000
	General campus preservation (estimate—projects to be determined)	\$1,000,000
2009-11	School building (planned for 100-120 students)	Cost to be determined
	Design Gymnasium (estimate)	\$200,000
	General campus preservation (estimate—projects to be determined)	\$1,000,000
2011-13	Gymnasium	Cost to be determined
	Design work for remodel Clarke Hall and Auditorium (estimate)	\$200,000
	General campus preservation (estimate—projects to be determined)	\$1,000,000
2013-15	Remodel Clarke Hall and Auditorium	Cost to be determined
	General campus preservation (estimate—projects to be determined)	\$700,000
Total 2005-2015, excluding "cost to be determined" projects		\$15,600,816

*Legislature declined to fund in 2005 session

APPENDIX D: SCHOOL RESPONSES TO REPORT

Washington State School for the Blind

Response to WSIPP Study

Dr. Dean O. Stenehjem, Superintendent

January 18, 2006

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Summary Review:

As the WSIPP researchers discovered, trying to analyze data on low incidence populations with a wide range of needs is very difficult and there doesn't appear to be any one approach that works the best for any one blind or visually impaired child at any particular time in his/her educational program. This is confirmed in the literature review that was conducted as part of the study. The development of strong partnerships among residential schools and local education agencies to provide for the comprehensive needs seems to work well in many states.

Information contained within the reviewer's response challenges the belief that residential schools (on-campus programs) are much more expensive than those provided in the local districts. To the contrary, when examining the amount of specialized services provided to comparable high needs students, the residential school could be viewed as a very efficient model in meeting blind and visually impaired children's comprehensive needs. Through intensive comprehensive short-term education placement, blind and visually impaired children are able to build a base of skills that allows these children to experience a higher level of success in a shorter period of time and therefore transition back to the local district with the skills needed to be successful. It is important to mention that the typical student that attends the residential school is usually not the lower cost low vision students that account for the largest percentage of visually impaired children in the state.

Governance (oversight) of the school varies tremendously throughout our country, from multi-layered bureaucracies to private non-profit school, receiving state funding. Washington has one of the more efficient models in being responsive to the needs of blind and visually impaired children, while at the same time meeting all state rules and regulations for the protection and rights of students and their families.

It is our hope this study can be used to expand quality services for blind and visually impaired children, and therefore provide more options for success. As the data analysis in the response will show you, WSSB has had a great track record in the implementation of initiatives that have made a huge difference in our state. The major leadership for these statewide changes has usually come from the Washington State School for the Blind working in partnership with teachers of the visually impaired and the blind consumer organizations from throughout our state. This is confirmed by the success rates of children that have completed the on-campus program in comparison to national data and the success rates of initiatives and the new services that have been implemented.

As Helen Keller stated, "Alone we can do so little, together we can do so much!" This becomes even more evident when trying to develop quality statewide services for low incidence populations such as blind and visually impaired children.

Legislative Directive for Study:

As per the legislative direction three issues were to be examined:

- “**compare** governance, finance, and service delivery” at WSSB and WSD.
- “**recommend** how the schools could configure service delivery to complement and support school district programs.”
- “**examine** which state agency should have responsibility for governance and oversight of the schools.”

ESSB 6094, Section 709, Laws of 2005

Purpose of response to WSIPP study:

- Clarify information, dispel misinterpretation of information, dispute some of the findings that were based upon misleading statistical analysis
- Clarify the role of WSSB and the statewide needs of blind and visually impaired children.
- Focus attention on the development of quality programs and practices through effective partnerships in meeting the needs of all blind and visually impaired children in our state.

Declining enrollment: (Misleading statement) Over-all the numbers of students that WSSB has served per month has increased by approximately 600 percent since 1990.

On-campus enrollment has basically been constant (level) since 1990. WSSB has often had to put in place waiting list for various programs in order to meet the needs of children. [Exhibit 8 shows an on-campus enrollment that has wavered slightly up and down over the years. This has been due partly to waiting lists established various years based upon the needs of children and the inability of WSSB to hire additional personnel to meet children’s on-campus needs. NOTE: WSSB is not funded on a per- student basis, but one time flat biennial funding and does not have the ability to carry a fund balance forward to meet unmet needs]

- **Literature review:** Residential schools had larger on-campus enrollment due to the 1940–1960 RLF situation – as much as a 158% increase in the number of blind/visually impaired needing services. Also, increases in residential enrollment in the 1960–1970’s were due to the rubella epidemic and the need for serving large number of deaf-blind children. (Taylor 2005) from page six of the literature review. This caused a bubble effect for on-campus enrollment at many residential schools during these years.
- **WSSB Outreach Services:** Expansion of outreach services over the years has helped develop effective partnerships with local districts in meeting unmet needs and transitioning students from the district to WSSB for more intensive short-term placement options. Therefore, efficiently meeting students needs in a timely manner and keeping on-campus enrollment between 65-75 students.

Declining residential population (living in the cottage) student enrollment has occurred even when on-campus (counting day students) remains level due to two factors:

- Development of a pre-school program as per requests from local districts to assist with a large population of pre-school age blind and visually impaired children from S.W. Washington – who live at home.
- Numerous parents relocate to Vancouver so their children can attend WSSB and still live at home. During the 2004-05 school year, ten percent (10%) of on-campus enrollment was represented by students whose parents moved to Washington so their child could attend WSSB. The school has an excellent national reputation.

Note: Enrollment in the cottages can change from year to year, based upon student/district/parent needs. An on-campus enrollment increase or decrease of 2-8 students from year to year doesn’t truly represent a declining or increasing on-campus enrollment trend.

- Future anticipated increases in on-campus (cottage) enrollment:

- Currently WSSB has a waiting list for students at the elementary and middle school range. (January, 2006)
- Two years ago, WSSB was requested by LEAs to start a 5th year program for students that are/or have graduated, but lack the CORE Competency, (blindness skills) to be independent and successful. This program also has had waiting lists.

Student Safety: The study implies that both schools have had major student safety issues over the years and have been involved in up to nine similar studies. In reviewing the WSIPP study the last study that was conducted regarding WSSB was in 1981 by DSHS.

- WSSB has gone through two national accreditation self-studies over the past 10 years, like other schools that are interested in achieving national accreditation.
- WSSB has had a solid school safety record and provides yearly training to all employees and students.

Cost Comparison WSSB: local school districts: The study implies that it cost significantly more to educate a student at WSSB than in the local district. This is based upon (mean costs data) from OSPI on 321 visually impaired children. WSSB has analyzed the 321 children from data by accessing the Instructional Resource Center (IRC) federal quota count database that lists each student's reading mediums, etc. Of 321 students 11% are braille readers and higher cost students. (**Note:** A data discrepancy occurs in the report – visually impaired listed as 362 in on location and 321 in another. The 321 is the correct number in accordance with OSPI, we assume that the 42 deaf/blind students were added to the 321 to arrive at 362 students). These are the students that need to be compared against students in attendance at WSSB to gain true comparative data. The cost in local districts based upon a sampling from these 35 students range from \$49,120 to \$79,000 for a 5-6 hour program. WSSB yearly costs for children on a 24 hour Individualized Program (IEP), which emphasizes all CORE Competency skills training elements, is \$46,000 to \$50,677 for 10-12 hours of instruction, including all residential and transportation costs associated with operating a residential program that also provides a diversity of statewide services.

Missing visually impaired/blind children in WSIPP study:

The study is missing 752 children that have more than one disability and are counted in OSPI database system as multi-disabled. Of the total 1,073 students in grades K-12, 85 students are braille readers, and an additional 64 students are dual readers moving from print to braille. These are one of the groups typically served by WSSB and are usually the higher cost students for districts. (IRC, quota count for 2005.)

Condition of Facilities: WSSB has been extremely proactive in bringing a one time dated facility up to current standards (state-of-the-art) facilities.

- With the exception of the P.E. (Kennedy) Building replacement project, the remainder of the campus is in excellent conditions. (see the attached map of past projects)
- Future projects also include an independent living skills program to house the 5th year program.
- Other than these two projects, the campus will average approximately \$350,000 per year in maintenance projects focused on life safety, energy conservation, preservation, etc.
- 50,000 people a year use WSSB facilities, which assist the school in covering some of its cost for utilities, etc. Some of the on campus partners are:
 - Department of Services for the Blind – regional office
 - Detectives Division – Vancouver Police Department
 - Southwest Washington Childcare Consortium
 - YMCA & large variety of various community organizations

Governance: Seven potential oversight options were mentioned in the study, none would result in real cost savings and could result in a less efficient operation.

- Of the seven options of governance, the current system is probably the most efficient when it comes to limiting the layers of bureaucracy and the ability for a school/agency to be proactive in promoting quality programs for children on a state-wide basis. Placing the school under another large bureaucracy would more than likely pull additional financial resources away from direct services to children to cover additional administrative oversight.
- The ability to advocate for quality services throughout the state could be curtailed through additional bureaucratic layering.
- Establishing the school as a private nonprofit that is state supported would reduce bureaucracy, provide more flexibility in service delivery, but also would reduce state-oversight and control.

Closing the schools: Since this was a comparative study, information on WSD and WSSB should not have been collapsed for data analysis. Decision on one school should not necessarily impact the other. This did not provide solid numbers as to each school's programs and services and how these would be replaced if the schools were to be closed.

- The five options all assume that there would be savings by closing the schools. We assume that this was based upon the incorrect data that was ascertained in the earlier part of the study on the cost to educate a blind/visually impaired child in the local district. The cost to educate children currently served by WSSB could actually cost more in putting in place comprehensive services in the local district, and paying for out of state placement options, which would run from \$50,000 - \$150,000 per year. This would also eliminate an important option for children within our state, and the ability for children to fluidly move back and forth in meeting their educational, social and emotional needs.
- The study also has not taken into account that WSSB is a Hub of service delivery for LEAs, parents, etc. throughout the state. Each of the itinerant teachers of the blind and visually impaired depend on the on-campus teachers as consultants in a wide variety of disciplines. (i.e. math, science, music, adaptive physical education, expanded CORE competencies, psychological services, evaluation, assistive technology, speech and language services to blind and deaf/blind, etc.) Each of the individuals that work with children on a daily basis in these areas is not only a trained teacher of the blind, but also trained in that specific discipline. Most of the individuals are the only ones in the state that have these credentials and skills. Their consultative skills remain current because they are working with children on a daily basis as opposed to only being a consultant.
- Capital project savings: WSSB's facilities are used 12 months out of the year. When children go home for the summer another group of children needing intensive short-term programs enter for summer school. At the completion of summer school, WSSB becomes a training program for teachers from throughout the state that will be having a blind child in their classroom the following fall and a training site (in conjunction with various universities) for individuals working on their credentials to become a teacher of the blind/visually impaired. In addition numerous classes are held throughout the year in the areas of: braille, assistive technology training, etc.
- Over 50,000 people a year use WSSB facilities.

Literature Review - Educational Placement Options: As stated throughout the literature review, it is very difficult to come to any one solid conclusion about what placement options are best for blind/visually impaired children due to the low incidence number and variability of those being served. No concrete statement of which program is the best for children has been inconclusive because each child being served has unique and special differences that need to be addressed specifically at various times in their educational experience if they are to be successful.

- Crandel and Streeter found that students who attended a combination of residential and public schools were more socially adjusted followed by students attending a residential school. BVI students in local schools demonstrated the poorest social adjustment (Crandel & Streeter, 1977–page 23 of literature review)
- NLTS researcher concluded that BVI students who spent more time in regular classrooms were more likely to struggle academically while in high school compared with those receiving special education services. (NLTS, 1996)
- NLTS found that 30% of BVI youth were employed in the first three years after graduation. WSSB success rate for graduates (employed or in post secondary educational/training programs) is 77.6%. (1998–2000)
- No studies have defined which setting provides a higher level of success, but implies that children’s ability to move into intensive training and back to LEAs as needed might be the best model. (McMahon 94 – page 19 of literature review) Without development of all expanded CORE competencies the likelihood of success could be limited.
- It is highly unlikely that a single educational setting could meet all the needs of all BVI children all the time. (Hebbeler, 1993 – page 20 of literature review)

Quality Services and Initiatives Implemented by WSSB: WSSB has had a very rich history of providing quality services to blind and visually impaired children within the state of Washington. Below is just a small sample of some of the successes that have occurred over the past 15 years:

- **Successful Graduates:** Tracking of all graduates since 1998 show an 87% success rate compared to national figures of 50-70% unemployment in the blind community. (employed, involved in post-secondary education, & all service provision in place for terminally ill students)
- **Parent and District Satisfaction:** Since 1993, WSSB has been collecting quality information on programs and the services that are provided. WSSB consistently receives ratings of 4.5 or higher in almost all service areas, based on a 5.0 scale.
- **Implementation of a 24-hour IEP System:** This provided the staff/school the opportunity to focus on its strength in being able to provide intensive 24-hour services for children and accomplishing a tremendous amount in a relatively short period of time.
- **Self Medication Program:** If blind and visually impaired children are going to be independent, all aspects of independence needs to be addressed. WSSB is one of the few schools in the country that has implemented such a program.
- **Outreach Expansion:** Providing services throughout the state and having the school be viewed as a Center of Best Practices has assisted local districts in meeting the needs of blind and visually impaired children. WSSB currently contracts with approximately 1/5th of the school districts in the state for itinerant vision services. This service continues to grow based upon the availability of highly qualified teachers of the blind and visually impaired.
- **Summer School Program:** WSSB provides summer school programs to children from throughout the state that are not in attendance during the school year.
- **Summer Sports Camp:** WSSB, in partnership with WCBSA (West Coast Blind Sports Association), provides a sports camp for blind and visually impaired children.
- **Youth Employment Solutions I (YES I):** Summer school opportunities for students ages 14-16 in the area of career education and job skill development. This program is in partnership with the Department of Services for the Blind and has led to YES II, which is a six week program run by DSB in the Seattle area during the summer with a focus on 16+ age students in on the job training.
- **Technology Statewide Center:** WSSB was successful in developing a statewide technology center for blind and visually impaired children that provides software, equipment, and training to students and educators. Successfully negotiated statewide contracts on JAWS for many blind students in LEA, which have resulted in huge savings for districts and reduced down time for students.

- Braille Access Center: Washington was the first state to have Braille on demand for public documents (1993). This partnership with the Office of the State Printer, Corrections, Department of Information Services, and Tacoma Community College has led to a tremendous service resulting in hundreds of thousands of dollars in savings to local districts and the state, while tremendously improving access. (2004-2005-\$400,000 worth of textbooks produced in braille for blind students in Washington at a cost to taxpayers of \$30,000). Over 12 million pages of braille produced.
- Instructional Resource Center: Relocated on the WSSB campus, which has resulted in a blending of OSPI federal funding, WSSB, state, and private funding resulting in improved services for children. (Recently located in a new state-of-the-art facility including an on-line database/web system that other states are examining that resulted in time-savings of one employee that is now able to perform additional needed duties).
- High Tech Campus and Services: Leadership has helped secure funding to keep WSSB on the cutting edge in this important area. This not only addresses access and communication devices and training for kids and staff, but also for the operation of campus facility and the safety of children and staff.
- Quality On Campus Education Programs Provided by Quality Staff: Intensive services with a focus on short-term placement, which has resulted in tremendous gains for children.
 - Strong academic programs
 - Strong CORE Competency Programs for the blind and visually impaired
 - Strong technology access programs
 - Quality programs: pre-school through 5th year transition programs
 - Successful integration program with Hudson Bay High School – Vancouver School District and Clark Community College
 - Extra-curricular programs geared toward confidence and self-esteem building: Downhill Skiing, Power Lifting, Goalball, swimming, student council, a variety of clubs and organizations
 - Quality staff: many nationally recognized teachers and administrators in: assistive technology, math, science, physical education, music, CORE Competencies (blindness specific skill training) & leadership.
 - WSSB teaching staff meet - No Child Left Behind (NCLB) highly qualified teacher status.
- Distance/Digital Learning Initiative: Starting the fall of 2003, WSSB entered the distance/digital learning with a goal of being able to provide services to blind and visually children in a variety of classes where location would not be a factor. WSSB also became part of the Digital Learning Commons Pilot Program for the state, along with 17 other schools.
 - 36 students (both on and off campus) enrolled in on-line classes
 - 18 video conference provided training to 110 participants
 - 30 video conferences hosted on WSSB campus – providing service to 96 participants
 - 10 workshops on assistive technology – providing services to 90 participants
 - Over-all rating on workshops and conferences: 4.6 out of a possible 5.0.
- Capital Project Campaign: WSSB has virtually rebuilt the entire campus since 1990 with the demolition of non-used facilities, the remodeling of current facilities, addition of new buildings, and development of new partners resulting in a more efficient use of the campus. (Currently over 50,000 people use the campus each year.)
- Partnerships: Very little of what has been accomplished over the years would have been possible without strong partnerships on a local, state, regional and national basis.
- Governor's Quality Award:
 - Energy Management - 2004
 - Braille Transcription Program – 2002
 - Low Vision Stateside Task Force – 2001
 - Statewide Technology Center – 1999
- Community Pride Awards
 - Historic Preservation/seismic stabilization - Old Main Building Restoration - 1999

- Ogden Resource Center – Photo-voltaic/eco-roof Bldg. – 2003
- Discovery Courtyard – Community Design Award – 2004
 - Excellence in Concrete – state of Washington – 2004
 - Excellence in Concrete – state of Oregon – 2004
- Foundation: WSSB worked with community member to develop a public non profit foundation to help meet the unmet needs of blind and visually impaired children within the state.

WSSB is always examining new and better ways to serve children both through outreach services and intensive on-campus programs.

Helen Keller said: “Alone we can do so little, Together we can do so much!” This probably best describes how WSSB has worked over the past 16 years in helping to strengthen programs throughout our state.

Washington State School for the Blind Campus

The first buildings were located on the site of this campus in 1886. The oldest building being used today is the Boiler House Building, which was constructed in 1892. The Boiler House, along with the Dry Building (1921) and Old Main (1915) are on the National Historic Register.

The school has had an active long range capital plan that has resulted in just about the total remodeling of all facilities. The current facilities are in excellent condition with the exception of those that are slated for replacement. (See the school’s Ten Year Capital Plan for more detailed information.)

The school’s facilities are used by approximately 50,000 individuals per year. These partnerships have been a key in the success of the school’s capital plan along with solid future strategic planning, which has been driven by program needs within our state.

For more detailed information contact:

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Washington School for the Deaf – Board of Trustees Summative Response to the IPP Comparative Review

Below is a summation of a more detailed Board of Trustees response to the IPP Comparative Review of Washington State Schools for Students with Sensory Disabilities (attached). The Legislature directed IPP to provide information and recommendations in three broad areas. The Board of Trustees response contains clarifications and recommendations in those areas, along with a response to the policy options included in the IPP report.

Compare governance, financing, and service delivery at WSB and WSD.

1. Increased residential costs at WSD are a result of increased labor costs associated by state regulation to ensure a staff to student ratio of 1:7 anytime outside the regular school day, including during the graveyard shift.
2. Current data indicates that enrollment has stabilized. The enrollment trend over the past several years must be viewed in light of more stringent admissions criteria instituted less than three years ago. In each successive year since 2002, the number of admissions applications has increased, as have the number of denials and withdrawals of applications due to the heightened safety standards. Had admissions practices of years past been employed, the current enrollment at WSD would reflect a significant increase in the enrollment trend line.
3. Data indicates enrollment will stabilize between 100 and 125 students, using current admissions criteria.
4. Expanded Outreach programming has increased the trend line of students served who do not regularly attend WSD, counteracting the enrollment trend line of the last several decades. This service is offered to local districts at little or no cost.

Recommend how WSD could complement and support school district programs.

1. **Board of Trustees Recommendation:** Convene an educational summit that identifies variability in services to Deaf and hard of hearing students across the state, to review a statewide service model that would be most responsive, and the role of WSD in the delivery of services.
2. **Board of Trustees Recommendation:** Identify direct student services that require statewide oversight and delivery. Current data suggests that no matter what service delivery model is ultimately adopted, a state resource such as WSD will be necessary to complement regional and local service delivery. WSD is aggressively pursuing collaborative partnerships with agencies to provide services to students statewide.
3. **Board of Trustees Recommendation:** Structure and prioritize capital projects by their utility in serving Deaf and hard of hearing students in an Outreach capacity. Our current capital request is emblematic of WSD's desire to assist school districts in meeting the pre-vocational and vocational needs of Deaf and hard of hearing students.
4. **Board of Trustees Recommendation:** Endorse the validity and necessity of WSD as a placement option for Deaf and hard of hearing students. Requiring school districts to carry the legal burden of locating and placing students in an out-of-state residential placement is financially speculative, logistically complex, and contrary to national practices.

Examine which state agency should have responsibility for governance and oversight of the schools.

Option 1: Maintain schools' instructional, residential, and outreach programs; consider capital requests and governance changes.

1. **Board of Trustees Recommendation:** Maintain WSD's current governance structure. Recent legislative action creating the current governance structure has resulted in positive change, and no other agency or educational entity is equipped to address the needs of students at WSD.

Option 2: Reconfigure or close one or both schools.

Board of Trustees General Opposition to Option 2: It is premature to consider any option regarding program elimination or closure without thorough examination of quality educational programming statewide for Deaf and hard of hearing students.

2A. Closing the Residential Program: Residential program provides an important mechanism for delivery of federally-mandated related services. Wrap-around services surrounding each residential student include recreational services, academic support and tutoring, enhanced vocational opportunities and school-to-work transitioning, recreational services, and preventative and direct mental health services.

2B. Close schools except for outreach programs: Statewide shortage of highly qualified staff specializing in working with students who are Deaf or hard of hearing result is an overwhelming hardship for school districts to provide sufficient social workers, school psychologists, speech pathologists, and other service providers proficient in sign language, capable of providing daily services.

2C. Close schools and create regional centers: Among other complications, it is likely that regional centers would require significantly greater capital expenditures, given the need to construct educational facilities for each region. Even then, residential placement remains a needed placement option.

2D. Close schools without continuing outreach services or creating regional programs: This option would simply place all administrative weight on local school districts. Moreover, families who have moved to the Vancouver area so their children could attend WSD and live at home would be uprooted once more, in search of a state with a school for the deaf.

2E. Close schools but alter funding formula: A simple financial comparison between school districts and WSD does not capture all the services that other local agencies would have to provide. Altering the funding formula is in conflict with current OSPI WAC 392-172 which does not allow for categorical funding.

**Washington School for the Deaf – Board of Trustees
Response to the Institute of Public Policy’s
Comparative Review of Washington State Schools
For Students with Sensory Disabilities**

This response is structured in accordance with the legislative direction provided to IPP, and articulated on page 8 of the report, specifically: 1) compare the governance, financing, and service delivery at WSB and WSD; 2) recommend how the schools could configure service delivery to complement and support school district programs; 3) examine which state agency should have responsibility for governance and oversight of the schools. Although it is difficult to gauge where discussion of partial or complete closure of WSD fits within the legislative direction, it will be addressed within the context of the complementary programs for school districts and as a concluding summary.

Overview: The Washington School for the Deaf (WSD) is a complex, comprehensive educational and social service agency designed to meet the educational, social, emotional, and vocational needs of deaf and hard of hearing children in a completely accessible environment. As distinguished from the historical perspective of institutional settings such as those for developmentally disabled children, the two reasons most commonly cited by parents wishing to enroll their Deaf or hard of hearing child at WSD are availability of comprehensive services⁹⁹ and a desire to counteract social isolation in their local school or community. At WSD, in addition to academic rigor, students experience easy access to all elements of a well-rounded life that all parents desire for their children.

I. Compare governance, financing, and service delivery at WSB and WSD.

It is difficult to compare and contrast financing and service delivery for two agencies for the most part serve populations with distinctly different needs. The report devotes significant attention to cost comparisons of the two agencies. Nonetheless, there are areas of service delivery and financing needing further clarification.

First, as stated in the IPP report, the increased residential costs at WSD are a result of increased labor costs associated with protecting the health, safety, and welfare of students in the after-school program.¹⁰⁰ It should be noted that WSD is obligated by state regulation to ensure a staff to student ratio of 1:7 anytime outside the regular school day, including during the graveyard shift. The allegiance to this staffing ratio is the primary reason for disparity in the residential cost per student comparisons.

Second, though the enrollment trend at WSD has declined over the past several years, current data indicates that enrollment has leveled off, consistent with enrollment trends at WSB. As reflected in the IPP report, the enrollment decline over the last three years at WSD is in large measure a result of strict application of new admission procedures designed to safeguard students and staff from aggressive students. A reduction in admissions can be attributed to increased denials and withdrawals of admissions applications, despite increased applications for admission each of the last three years. The applications received in succession over the last three school years were: fourteen (14) for the 2002-03 school year, twenty-nine (29) for the 2003-04 school year, and thirty-five (35) for the 2004-05 school year. A total of twenty-six (26) applications were either withdrawn or denied admission over this time period.¹⁰¹ Had

⁹⁹ The lack of a critical mass of deaf students in all but a few school districts throughout the state lead to socio-emotional challenges due to isolation and compromised educational environments due to lack of trained staff.

¹⁰⁰ Applicable only to WSD, WAC 388-180-0220 requires a staffing ratio of 1:7 while students are in dorms or cottages and when they are participating in elective activities. Effective in March of 2003, this staffing requirement has resulted in a 66% increase in residential costs on a per student basis.

¹⁰¹ Application materials of students who may pose a danger to self or others are typically referred to an outside expert with experience in addressing psychosocial needs of deaf students. If the student is deemed a risk to self or others that cannot be ameliorated through a safety plan, the student is denied enrollment. The lack of

admissions practices of years past been employed, the current enrollment at WSD would reflect a significant increase in the enrollment trend line. Thus, we believe enrollment will stabilize between 100 and 125 students, using current admissions criteria.

Enrollment trends have redoubled our commitment to increase services to non-enrolled students through Outreach programming. Because WSD recognizes that decreased enrollment is consistent with a very conservative admissions process, we believe serving as many students in their home school district without reimbursement is consistent with our mission to reach students statewide. Moreover, it provides school districts with services by highly trained professionals they wouldn't otherwise be able to access. By providing this level of service at a little or no cost to school districts, we spread our operating dollars across a greater number of Deaf and hard of hearing students than our enrollment numbers portray. WSD recognizes that future service delivery to public school districts and expansion of our Outreach program will likely require contracting for a cost-neutral arrangement if staff members are permanently located in regionalized areas. In such a circumstance, WSD will likely incorporate a similar contracting arrangement currently in use at WSB.

A recommendation regarding governance is made under Section III.

II. Recommend how the schools could configure service delivery to complement and support school district programs.

A. Board of Trustees Recommendation: Convene an educational summit that identifies variability in services to deaf and hard of hearing students across the state, to review a statewide service model that would be most responsive, and the role of WSD in the delivery of services.

WSD is committed to structuring its service delivery to complement and support school district programs. However, it is difficult to compare and contrast WSD's service delivery to public schools without analyzing the quality and variability that exists within school districts regarding the breadth of services available to their Deaf and hard of hearing students. Absent from the IPP report is an analysis of quality of program indicators reflecting access to specialized services as part of the cost per student calculations in the public schools. Understandably, the IPP report sheds limited light on exactly how WSD might better structure its service delivery to improve educational programming for Deaf and hard of hearing children in the public schools.

Within our state there is great variability how local school districts provide deaf education services. Some have a critical mass to support their own programs. But most school districts either form loose associations (Cooperatives) with tenuous durability or are required to contract with a neighboring school district large enough to support a deaf education program.

Also, the need exists statewide for effective transition services for Deaf and hard of hearing students who have exited the K-12 system but lack the literacy skills to realize positive post-school outcomes. A 5th year or transitional program that provides effective work force training and independent living skills is sorely needed within our state to better prepare students throughout our state for the world of work.

Thus, we propose that an Educational Summit be conducted to reveal not only what level of service is needed in the local public schools, but also delineate if a better structure for statewide delivery of deaf education is needed in our state, and how WSD can structure its services to maximize quality education. As stated in the IPP report, 46 states operate at least one school for the deaf or school for the deaf and blind; but these states differ markedly in how deaf education services are delivered to children locally and how the school for the deaf participates in that service delivery. For example, in Iowa, deaf education for locally-enrolled students is overseen by the Area Education Agency (similar to Educational

comprehensive services for these students buttresses the need for a comprehensive statewide service delivery system.

Service Districts in our state), with the School for the Deaf overseeing the service delivery of the AEA wherein the School for the Deaf is located. Other states oversee deaf education using other service delivery models.

B. Board of Trustees Recommendation: Identify direct student services that require statewide oversight and delivery.

Current data suggests that no matter what service delivery model is ultimately adopted, a state resource such as WSD will be necessary to complement regional and local service delivery. For example, the partnership between WSD and Listen and Talk, Inc is a prime example of a public/private partnership to provide services statewide that would not otherwise be accessible without a state agency providing oversight. Regardless of the interplay between local school districts and regional ESDs in the organization of education for the hearing impaired, the extremely limited number of personnel trained in auditory verbal therapy or auditory oral techniques necessitates a service structure where limited staffing expertise can reach a wide audience for deaf and hearing impaired students using oral communication and enrolled in local schools. Personnel at Listen and Talk have this expertise but student access to their services would be curtailed without financial support from WSD. The advent of new technology and cochlear implants has resulted in a population of students with new diverse and intense oral communication needs. WSD is committed to assisting school districts in meeting this need.

C. Board of Trustees Recommendation: Structure and prioritize capital projects by their utility in serving Deaf and hard of hearing students in an Outreach capacity.

Our current capital request is emblematic of WSD's pursuit to assist school districts in meeting the important educational needs of Deaf and hard of hearing students. Although we currently offer the services of a Transition Specialist to support local school districts in planning the post-school outcomes for individual Deaf students statewide, a lack of direct vocational opportunities exist throughout the state. The capital project will serve to counteract that trend by serving as an instructional space to deliver short-term vocational placements and vocationally-oriented after school electives for students. The benefits for the various student populations include:

Enrolled WSD Students: Although WSD has maximized its space to provide vocational opportunities to students, the need for vocational facilities designed for instruction is readily apparent. All enrolled WSD students (ranging from 100 to 125, depending on the year) would be provided direct vocational opportunities as part of federally-mandated post-school transition planning. On-site vocational instruction will serve as a precursor for student enrollment in other vocational programs.

Deaf and Hard of Hearing Students in Southwest Washington: Students enrolled in their local public schools can access these vocational electives, along with WSD students, after school hours. Therefore, students within commuting distance to WSD can receive vocational opportunities at WSD without disrupting their academic day in their local school district.

Deaf and Hard of Hearing Students Outside Southwest Washington: Students enrolled in their local public schools outside southwest Washington can participate in vocational training at WSD through the implementation of short-term placements such as intensive summer vocational camps and trainings.

D. Board of Trustees Recommendation: Endorse the validity and necessity of WSD as a placement option for Deaf and hard of hearing students.

At the outset, it is speculative to judge how WSD's partial or complete closure could in any way improve the lives of Deaf and hard of hearing children enrolled in the public schools. Rather, it is more likely these options will further complicate a complex special education funding structure already the subject of current litigation. Requiring school districts to carry the legal burden of locating and placing

students in an out-of-state residential placement is financially speculative, logistically complex, and counter to the national trend.

Simply put, access to a School for the Deaf where Deaf and hard of hearing students have full and direct communication access to school personnel is a legal mandate. The report accurately states that federal law requires school districts to make a spectrum of placement options available to special education students, but fails to capture the unique legal parameters of this requirement for Deaf and hard of hearing students. In the special case of Deaf and hard of hearing children, IEP teams must:

...consider the child's language and communication needs, *opportunities for direct communications with peers and professional personnel in the child's language and communication mode*, academic level, and full range of needs, *including opportunities for direct instruction in the child's language and communication mode (emphasis added)*. P.L. 108-446 §614(d)(3)(B)(iv).

WSD is the only public agency in the state of Washington wherein students relying on sign communication can directly access all general education, special education, related services personnel, and peers.

Moreover, it is impossible to close the WSD without legally violating federal special education law. A state legislature is not empowered to change a special education child's placement. The IEP team is the sole entity sanctioned to change a student's educational placement. True, the current residential students could be served out of state, if the local school district could locate the residential school. However, current day-students whose parents chose to relocate to the Vancouver area for the purpose of having their child reside at home while receiving full communication access during the academic day would not receive a comparable placement in a public agency unless they moved out-of-state.

The presumption that local school districts could easily locate an out-of-state residential school is fraught with unknowns and potential pitfalls. First, different states have varying state regulations enforcing federal special education law; school districts would be required to locate schools for the deaf in states with state regulations consistent with Washington. Secondly, it's likely that local school districts would be required to sign each out-of-state IEP as the district representative, such that if the school for the deaf chose not to continue the contract, the parents' legal due process rights attach only to the local school district. Moreover, there's no guarantee that tuition costs alone would be stable. Out-of-state schools can set whatever tuition structure the local school district is willing to pay, and if airline routes only make one out-of-state school possible, the local school district is left with little choice.

III. Examine which state agency should have responsibility for governance and oversight of the schools.

Option 1: Maintain schools' instructional, residential, and outreach programs; consider capital requests and governance changes

A. Board of Trustees Recommendation: Maintain WSD's current governance structure.

WSD's governing Board of Trustees very closely approximates the governance structure of a local school district. Thus, WSD believes the current governance structure is in the best interests of students.

No other state agency or educational entity is adequately equipped to oversee all aspects of academic and residential operations. WSD is currently monitored by the Department of Social and Health Services' Division of Licensed Resources, specific only to issues of student safety. Although the school and its students have benefited from this oversight, DSHS is not equipped to address substantial linguistic and academic challenges confronting Deaf and hard of hearing students. The Office of Superintendent of Public Instruction does not engage in the operational function of school districts. Likewise, the State

Board of Education does not undertake day-to-day operations and direction of schools and school districts. The Vancouver School District has not evidenced a desire to oversee WSD, and it is unclear what true benefits would accrue to Deaf students desiring to attend WSD by modeling supervision after the Juvenile Rehabilitation Administration, where students aren't enrolled by their choice.

Moreover, the intent and purpose of the state legislature's recent governance change to WSD is being fulfilled. Improvements have been made in student safety, accountability of the WSD administration has increased, and academic program improvements have been made. Changing the governance structure now risks the reversal of these accomplishments.

Board of Trustees Opposition to Option 2: Reconfigure or close one or both schools.

It is premature to consider any option regarding program elimination or closure without thorough examination of quality educational programming statewide for Deaf and hard of hearing students.

2A. Closing the Residential Program: The residential program provides an important conduit for the delivery of federally mandated services. More than simply 'supplemental' or ancillary to the attainment of a 'balanced life', these services are provided to satisfy the legal entitlements that individual students may have under federal and state special education laws and regulations. For example, WAC 392-172-055 sets forth a number of related services to which students with special education needs may be entitled, such as:

...classified staff services, counseling services, ... parent counseling and training, ... recreation, ... school health services, social work services in schools, and transportation.

The list of related services is not exhaustive and may include other developmental, corrective, preventative or supportive services, if they are required to assist a special education student to benefit from special education.

The after-school residential program offers a needed conduit for delivery of these mandated related services. For example, recreational services are not provided simply to "fill out the day" of when students are not otherwise engaged during the academic school day; rather, the residential program is designed around delivery of legally mandated services without disruption to the academic school day and, by extension, our concerted efforts to accomplish the objectives of national and statewide education reform.

In stark contrast to the historical perception of a residential facility warehousing children along the lines of age-old facilities for developmentally disabled, residential programming at WSD embodies a complex, dynamic social service delivery system. The wrap-around services surrounding each residential student include recreational services, academic support and tutoring, enhanced vocational opportunities and school-to-work transitioning, recreational services, and preventative and direct mental health services. Cities and towns throughout our state simply cannot procure the staff required to successfully implement these programming options for individual Deaf and hard of hearing students. A fiscal analysis of passing along these costs to some rural areas is hampered by the inability to locate, recruit, and retain staff to support the needs of Deaf and hard of hearing children in these varied social service areas. For example, the challenge of providing qualified educational interpreters in both rural and populous areas has not receded over time, despite significant attention to the need.

2B. Close schools except for outreach programs: In addition to the reasons for opposition as noted above, closure of the schools rests all burden on the local school districts to make a residential placement option available to Deaf students. Moreover, it appears presumed that the quality of special education and related services to our students would remain the same, despite overwhelming evidence that the majority of our students reside in locales without a critical mass of Deaf students, such that procuring highly qualified staff would be nearly impossible, despite whatever increased Outreach focus ensued. It would be an overwhelming hardship for school districts to provide sufficient social workers, school psychologists,

speech pathologists, and other service providers proficient in sign language, capable of providing daily services to Deaf and hard of hearing students. It remains a substantial hardship for WSD to recruit and retain these personnel.

Moreover, Outreach services cannot replicate the depth and level of services available to students at a residential school. It is a dangerous assumption to presume services to students in rural areas of Washington could even remotely approach services they receive at WSD, even with the most aggressive Outreach model, a model that likely would not result in any cost savings whatsoever.

Additionally, the program model significantly undermines the vitality and importance WSD plays in the cultural integrity of the Deaf community. The cultural cornerstone of the Deaf community is anchored at residential schools for the Deaf. By serving isolated students in an Outreach capacity only while “mothballing” the campus, the vitality of Deaf community suffers. It is not possible to “mothball” WSD without, in part, “mothballing” the Deaf community.

2C. Close schools and create regional centers: Regionalization is certainly worth investigating as a model of service delivery within our state, but virtually every other state that has employed a regional service delivery model also operates a School for the Deaf. Of course, a school for the deaf can offer the residential programming that would still remain a viable option for students, while supporting regionalization through Outreach efforts tailored to meet the needs of each region. For example, the student at WSD that benefits from the trained mental health counselor through Columbia River Mental Health would likely not receive these services even if educational services were regionalized. Thus, there is still a necessity of a residential school which provides true, wraparound services for Deaf and hard of hearing students that can't be provided regionally. Nonetheless, it is likely that regional centers would require significantly greater capital expenditures, given the need to construct educational facilities for each region.

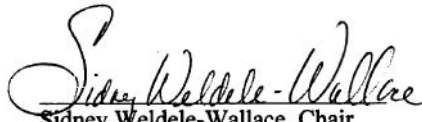
2D. Close schools without continuing outreach services or creating regional programs: It is difficult to believe this option would be seriously considered, given the legal mandate for local school districts to provide a spectrum of placement options to Deaf and hard of hearing students. This option would simply place all administrative weight on local school districts. Worse yet, the families who have moved to the Vancouver area so their children could attend a school for the deaf and live at home would be uprooted once more, in search of a state with school for the deaf.

2E. Close schools but alter funding formula: In addition to previous arguments made in relation to closure of the School for the Deaf, the estimated net operating cost savings to the state does not include any quality indicators to ensure services provided to Deaf and hard of hearing students would actually replicate the service delivery at WSD. Again, access to mental health services is prohibitive regardless of the additional monies allotted for deaf education in the local school districts. Also, as a comprehensive service delivery agency, the additional cost burdens on local parks and recreation departments for providing accessible recreation programs is not considered in the monetary calculus. A simple financial comparison between school districts and WSD does not capture all the services that other local agencies would have to provide.

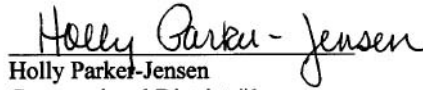
Finally, the same reasons that parents and students currently seek out WSD would still exist.

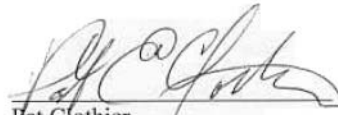
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For Students with Sensory Disabilities**

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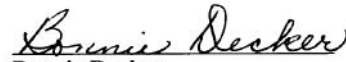

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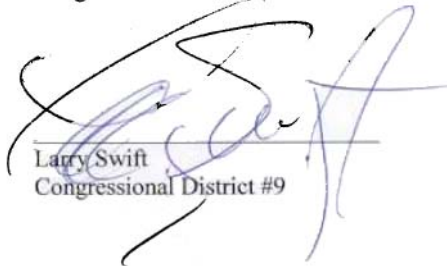

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