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April 30, 2018

Johnny W. Collett, Assistant Secretary, OSERS  
U.S. Department of Education  
400 Maryland Avenue, SW – Room 5107  
Potomac Center Plaza  
Washington, DC 20202-2500

**Docket ID: ED-2017-OSERS-0128**

Dear Assistant Secretary Collett:

The Learning Disabilities Association of America (LDA) writes to **oppose delay in implementation** of the regulations addressing significant disproportionality. LDA – a national volunteer organization representing individuals with learning disabilities, their families, and the professionals who serve them – has worked for more than 40 years to ensure children with specific learning disabilities are properly identified and receive appropriate services to enable them to fully benefit from these educational opportunities, graduate from high school, and meet their postsecondary goals.

LDA recognizes the longstanding concerns around the issue of significant disproportionality, especially in regard to identification of students of color in the category of Specific Learning Disabilities. However, we view special education eligibility as only one of a number of factors contributing to what is a much larger systemic education issue that cannot be addressed solely through these regulations.

That said, LDA believes we must begin to move forward with a concerted effort to address significant disproportionality. Such an effort involves states and local school districts using the same tools and measurements to determine the extent of the problem and to make necessary changes to reverse the continuing pattern of disproportionality. It also involves districts examining discriminatory discipline policies which often have a negative impact on students with learning and other disabilities. Therefore, we oppose any delay in implementation of these regulations.

LDA looks forward to working with OSERS in partnership with the Office of Elementary and Secondary Education and the Office for Civil Rights to address the broader systemic issue of significant disproportionality. For further information, please feel free to contact LDA Policy Director Myrna Mandlawitz, [mrmassociates@verizon.net](mailto:mrmassociates@verizon.net).

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Beth H. McGaw".

Beth H. McGaw  
President