



# Communication Planning Guide for Students Who Are Deaf or Hard of Hearing

# THE COMMUNICATION PLAN

Student Name: \_\_\_\_\_

Date of Birth: \_\_\_\_\_

## Introduction

Communication and language are the foundations of learning. Students in an educational setting who are deaf/hard of hearing access communication in a variety of ways. It is important for teams, including students and families, to gather and share information about a student's language, communication, and access. This Communication Plan is a tool that can help facilitate a meaningful discussion as team members embark on this decision-making process.

A series of laws pertain to special education and, specifically, students who are deaf/hard of hearing. These include the Individuals With Disabilities Education Act (IDEA), Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans With Disabilities Act (ADA). In addition, in November 2014, the U.S Department of Justice and the U.S. Department of Education issued the document "Frequently Asked Questions on Effective Communication for Students With Hearing, Vision, or Speech Disabilities in Public Elementary and Secondary Schools" (DOJ-DOE FAQ). This document reflects many of the questions parents, families, teachers, service providers, and administrators may have regarding the communication needs of students who are deaf or hard of hearing.

The Communication Plan, organized into five sections, incorporates effective communication guidance for IEP teams: Language and Communication Modality, Auxiliary Aids and Services, Expanded Support Services, Continuous Communication Access, Least Restrictive Environment and Placement Services. Careful consideration of each aspect of this plan will allow teams to feel confident as they plan for successful and meaningful communication access for students in the educational setting.



## SECTION

## 1

## LANGUAGE AND COMMUNICATION MODALITY

"Consider the communication needs of the child, and in the case of a child who is deaf or hard of hearing, 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" (*Operating Standards for the Education of Children with Disabilities*, 3301-51-07 (L)(1)(b)(iv)).

**1A. The child's/student's primary language is one or more of the following:**

Check all that apply.

Expressive	Receptive	
<input type="checkbox"/>	<input type="checkbox"/>	English
<input type="checkbox"/>	<input type="checkbox"/>	American Sign Language
<input type="checkbox"/>	<input type="checkbox"/>	Other native language (Spanish, Somali, etc.); specify the language _____ Is that language spoken or signed? specify _____
<input type="checkbox"/>	<input type="checkbox"/>	Combination of several languages
<input type="checkbox"/>	<input type="checkbox"/>	Minimal language skills, no primary language Comments:

**1B. The child's/student's primary communication mode is one or more of the following.**

Check all that apply and if more than one applies, explain.

**Expressive**

- |  |   |
|--|---|
| <input type="checkbox"/> Spoken language                 | <input type="checkbox"/> Cued Speech/Cued English   |
| <input type="checkbox"/> Fingerspelling                  | <input type="checkbox"/> Gestures   |
| <input type="checkbox"/> Tactile/objects                 | <input type="checkbox"/> Picture symbols/pictures/photographs   |
| <input type="checkbox"/> Home signs                      | <input type="checkbox"/> Manually coded English (Signing Exact English, etc.)                                 |
| <input type="checkbox"/> American Sign Language          | <input type="checkbox"/> Conceptual signs (e.g., Pidgin Signed English, Conceptually Accurate Signed English) |
| <input type="checkbox"/> Other: please explain Comments: |   |

**Receptive**

- |  |   |
|--|---|
| <input type="checkbox"/> Auditory                        | <input type="checkbox"/> Cued Speech/Cued English   |
| <input type="checkbox"/> Speechreading                   | <input type="checkbox"/> Gestures   |
| <input type="checkbox"/> Tactile/objects                 | <input type="checkbox"/> Picture symbols/pictures/photographs   |
| <input type="checkbox"/> Home signs                      | <input type="checkbox"/> Manually Coded English (Signing Exact English, etc.)                                 |
| <input type="checkbox"/> American Sign Language          | <input type="checkbox"/> Conceptual signs (e.g., Pidgin Signed English, Conceptually Accurate Signed English) |
| <input type="checkbox"/> Other: please explain Comments: |   |

SECTION

2

AUXILIARY AIDS AND SERVICES

"The school must honor the individual's choice unless the school can prove that an alternative auxiliary aid or service provides communication that is as effective as that provided to students without disabilities and affords an equal opportunity to participate in and benefit from the service, program, or activity" (DOJ-DOE FAQ, p. 9).

**2A. Does the student require auxiliary aids and services, such as qualified interpreters, notetakers, transcription services, etc., to achieve communication that is as effective as communication for individuals without disabilities?** [ADA Title II 28 C.F.R. 35.104(1)] (DOJ-DOE FAQ, p. 7).

Yes

Please explain how the IEP team is ensuring the student is receiving communication that is as effective as what nondisabled peers are receiving and specify what auxiliary aids and services the student is receiving.

No

By answering no, you are indicating that the school can demonstrate the particular auxiliary aid or service (please list below) is not needed or would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens, and the school must provide a written statement of the reasons for reaching that conclusion and provide a satisfactory alternative auxiliary aid or service (ADA Title II 28 C.F.R. 35.164, DOJ-DOE FAQ, pp. 12-13).

**2B. Are the auxiliary aids and services provided by the school primarily based on the preference of the student with disabilities, or his/her parents/guardian?** (DOJ-DOE FAQ, p. 19).

Yes (continue to Question 3) Comments:

No (Stop here and discuss with the student and/or guardians their preference for primary language and primary communication mode.)

Comments:

**2C. Are the auxiliary aids and services provided in a timely manner?** [ADA Title II 28 C.F.R. 35.160 (b)(2)].

Yes

No

If no, please explain why aids and services have not been provided in a timely manner:

Consider opportunities for direct\* communication with peers and professional personnel and opportunities for instruction in the child's/student's language and communication mode. Communication: CFR § 300.324(a)(2)(iv).

*\*Direct language/communication/instruction occurs person-to-person, not through an additional source (e.g., educational interpreter, captioner).*

**3A. The IEP team has considered:**

1.  Opportunities for direct\* communication with peers. Describe opportunities:
2.  Opportunities for direct\* communication with professional staff and other school personnel.  
Describe opportunities:
3.  Opportunities for direct\* instruction: Describe opportunities:

**3B. What supports are needed to increase the proficiency of parents and family members in communicating with the child/student?** Parent Counseling Training: CFR § 300.34(8)(i) and (iii).

Issues considered:

Action plan, if any:

**3C. Mentors/peers who are deaf/hard of hearing can have a positive impact for everyone – child, parent, and professional. Document who on the team will be responsible for arranging adult role model connections and opportunities for the student.**

Issues considered: Action plan, if any:

**3D. The teachers, interpreters, and other specialists providing services and auxiliary aids outlined in the Communication Plan must have demonstrated proficiency in and be able to accommodate for the child's/student's primary communication mode or language and communicate effectively.** Qualified Personnel:

Operating Standards: (B)(50) [ADA Title II 28 C.F. R. 35.160(a) (1)].

Issues considered:

Action plan, if any:

**4A. Academic instruction, school services, and extracurricular activities in which the child/student participates have been identified and will be presented with effective and fully accessible communication. Consideration of the entire school day, daily transition times, and what the student needs for communication that is as effective as what peers receive in all activities will allow more complete and meaningful educational benefits for the student.** Communication: CFR § 300.324(a)(2)(iv), Non-academic settings: CFR § 300.101 FAPE [ADA Title II 28 C.F. R. 35.104 (1)] [ADA Title II 28 C.F. R. 35.160(a) (1)].

Issues considered:

Action plan, if any:

**4B. Is there an alternate plan in place to maintain effective communication during academic instruction, school services, and extracurricular activities with the student if any of the following events happen?**

- Interpreter is absent
- Hearing aids/cochlear implant(s) is/are not working (batteries are dead, components missing, left at home, etc.)
- FM system is not working
- Closed captions are not available, including videos posted online or digital curricula
- Trained notetaker is absent
- Real-time captioning services are not available

Issues considered:

Action plan, if any:

**4C. How will the student be effectively communicated with during emergency situations such as fire alarms, practice drills, tornado alerts, lockdowns, etc.?**

Issues considered: Please describe:

**5A. Did the team discuss which educational placement provides the student with the most appropriate and continuous access to language and communication throughout the student's day? Was an accurate and complete explanation of the continuum of educational placement options provided and considered based on the student's individual communication and LRE needs? IDEA mandates that educational placement for each student with a disability be only as restrictive as the student's individual needs require. The basic regulatory requirement is that students are only removed from general education classrooms if they cannot be educated satisfactorily in general education classes with the use of supplementary aids and services.** Placement Determination: CFR § 300.115 300.116, LRE: CFR § 300.114.

Were the following options presented?

- General education classroom
- Special education classroom
- Program within a school district for students who are deaf /hard of hearing
- Special school for students who are deaf /hard of hearing (Ohio School for the Deaf, St. Rita School for the Deaf, etc.)
- Other

Issues considered:

Action plan, if any:

# Frequently Asked Questions and Guidance for Completing the Communication Plan for a Student Who Is Deaf/Hard of Hearing

In November 2014, the U.S. Department of Justice and the U.S. Department of Education issued the document *Frequently Asked Questions on Effective Communication for Students With Hearing, Vision, or Speech Disabilities in Public Elementary and Secondary Schools* (DOJ-DOE FAQ <https://www2.ed.gov/about/offices/list/ocr/docs/dcl-faqs-effective-communication-201411.pdf>). In addition, the *Ohio Operating Standards* require IEP teams to consider the unique communication needs of all students with a hearing loss who are receiving related services or support. This document reflects many of the questions parents, families, teachers, service providers, and administrators may have regarding the communication needs of students who are deaf or hard of hearing. This revised Communication Plan incorporates effective communication policies and guidance for IEP teams.

For a glossary of terms used throughout this guide, see:  
<https://deafandblindoutreach.org/guidelines-for-the-assessment-glossary>

## FREQUENTLY ASKED QUESTIONS

### **For whom does the Communication Plan need to be completed?**

The Communication Plan should be completed for any student who is receiving special education services through an IEP and has a documented hearing loss, including Deafblind, Deaf Plus any additional disability. This includes an auditory processing disorder and conductive, sensorineural, unilateral, bilateral, or mixed hearing loss.

### **How is the Communication Plan developed?**

The IEP team completes the Communication Plan at the IEP meeting. All team members, including parents, student, general education teacher, teacher of the deaf, educational audiologist, educational interpreter, etc., should be present and ready to share pertinent information regarding the student's language and communication. If the student's team does not include a teacher of the deaf or other professional with significant experience working with students who are deaf/hard of hearing, it is highly recommended that such a high qualified professional be included. The Communication Plan is not a checklist, but rather a tool to promote meaningful discussions of each component, resulting in any necessary action plans to address relevant needs. The team must also ensure that there is meaningful correlation between the Communication Plan, the student's IEP goals, and how the student functions in his/her educational environment.

### **How often should the Communication Plan be reviewed?**

Along with the student's IEP, the Communication Plan should be reviewed at least annually.

### **What if the student's family does not use the same mode of communication as their child?**

Parents and families make communication choices for their deaf or hard of hearing child; these choices do not always align with the parents' native language. In such cases, parents and families should be given appropriate training and counseling, such as American Sign Language instruction, in order to enable them to assist in implementation of the child's IEP. § 300.34 (c)(8)(i-iii) Students cannot be denied instructional opportunities based on their family's ability to communicate or their language choices.

### **What if the student uses a different mode of communication than the one emphasized in our program?**

A student's experience with other communication modes cannot be the basis for denial of instructional opportunity. The amount of residual hearing a student has cannot be used as the basis for denial of instructional services within the parameters of eligibility guidelines per the *Ohio Operating Standards*. IEP teams should match students' and families' communication/language choices through IEP supports and services. Schools must provide appropriate auxiliary aids and services so that students with disabilities have an equal opportunity to participate in, and enjoy the benefits of, the services, programs, and activities of the public school district. This means a school must match the child's and family's language choice (DOJ-DOE FAQ, p. 19).



# GUIDANCE FOR COMPLETING THE COMMUNICATION PLAN

## SECTION

# 1

## LANGUAGE AND COMMUNICATION MODALITY

“Consider the communication needs of the child, and in the case of a child who is deaf or hard of hearing, 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” *Operating Standards for the Education of Children with Disabilities*, 3301-51-07 (L)(1)(b)(iv).

### 1A. The student’s primary language (expressive and receptive):

The IEP team discusses and checks the appropriate boxes in each column for the student’s **expressive** and **receptive language**.

Students need to develop English literacy skills based on their individual abilities and potential to ensure academic success. If a student uses American Sign Language, the team should find continuous educational opportunities for the student to develop his or her academic American Sign Language, just as typical peers develop academic English skills.

### Discussion Questions

Is the student’s language level sufficient to acquire grade-level skills and concepts of the general education curriculum? If not, how will the team address the development of language skills?

### 1B. The child’s primary communication mode (expressive and receptive):

The IEP team discusses and checks the appropriate box in each column for the student’s expressive and receptive communication. Consideration must be given to each student’s unique communication needs. The student may or may not use multiple modes. If the student uses multiple modes, describe this in this section under “explanation.” The student’s expressive and receptive modes may differ (e.g., a student may use spoken language expressively and sign language receptively).

Deaf and hard of hearing students often “code switch” based on the needs of their communication partner. This means students have an awareness of their partner’s communication needs and their own preference. This is an important postsecondary transition and self-advocacy skill for deaf and hard of hearing students to develop, and they should be meaningfully guided and supported as they develop this skill.

When possible, include the student in the discussion of his/her preferred communication mode.

### Discussion Questions

- What communication mode does the student use to communicate with peers, hearing and deaf?
- What communication mode does the student use to communicate with adults, hearing and deaf?
- What communication mode does the student use in familiar situations?
- What communication mode does the student use in new and unfamiliar situations?
- Does the student change communication mode based on the environment in which he or she is (e.g., general education classroom, resources room, playground, gym class, lunchroom, hallway)?

"The school must honor the individual's choice unless the school can prove that an alternative auxiliary aid or service provides communication that is as effective as that provided to students without disabilities and affords an equal opportunity to participate in and benefit from the service, program, or activity" (DOJ-DOE FAQ, p. 9).

**2A. Does the student require auxiliary aids and services, such as qualified interpreters, notetakers, transcription services, etc., to achieve communication that is as effective as communication for individuals without disabilities?** [ADA Title II 28 C.F.R. 35.104(1)](DOJ-DOE FAQ, p. 7).

Yes

Please explain how the IEP team is ensuring the student is receiving communication that is as effective as what nondisabled peers are receiving and what auxiliary aids and services the student is receiving.

No

By answering no, you are indicating that the school can demonstrate the particular auxiliary aid or service (please list below) is not needed or would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens, and the school must provide a written statement of the reasons for reaching that conclusion and provide a satisfactory alternative auxiliary aid or service (ADA Title II 28 C.F.R. 35.164, DOJ-DOE FAQ, pp.12-13).

It is important to note that ADA requires effective communication for students who are deaf or hard of hearing. Sign language interpreters are considered an auxiliary aid/service and are "qualified" based on meeting state requirements and their ability to effectively communicate information to their student. It is recommended that sign language interpreters' skills be assessed through the Educational Interpreter Performance Assessment (EIPA) or Sign Language Proficiency Interview (SLPI) and that school districts adopt a standard of required skill levels for sign language interpreters, such as a 4.0 minimum EIPA score and continuing education requirements.

## Discussion Questions

- What auxiliary aids and services does the student require to be meaningfully included in his or her educational setting?
- What skills and training do related service providers possess to ensure they provide effective communication to students who are deaf or hard of hearing?
- Where can additional training for providers be obtained as needed?
- Is the student's notetaker trained and providing the same information that nondisabled peers are receiving?
- Is it appropriate, based on effective communication, for the student to receive copies of teachers' notes?
- What training has a notetaker received in order to ensure the notes provided are as effective as those nondisabled peers are receiving?

**2B. Are the auxiliary aids and services provided by the school primarily based on the preference of the student with disabilities or his/her parents/guardian?** (DOJ-DOE FAQ, p. 19).

Yes (continue to Question 3)

No (Stop here and discuss with the student and/or guardians their preference for primary language and communication mode.)

When determining what types of auxiliary aids and services are necessary, the school must analyze the student's needs and how to meet those needs while giving primary consideration to the specific request of the student or family (DOJ-DOE FAQ, p. 19). The type of auxiliary aids or services necessary to ensure effective communication will vary in accordance with the method of communication used by the

individual; the nature, length, and complexity of the communication involved; and the context in which the communication is taking place.

It is important for IEP teams and families to recognize that a student's preferences can change over time. The student and family's preference should be discussed annually to incorporate any changes in hearing, amplification, or language development over the past year. Students and families often make fluid decisions about communication; for example, what is effective in kindergarten is not always as effective in middle school or beyond.

## Discussion Questions

- If a student uses an interpreter, what type of sign language is preferred – American Sign Language, PSE, SEE, CASE?
- What language is used in the student's home?
- How can IEP teams ensure language and communication consistency between home and school?
- How does the student communicate with teachers, interpreters, and other service providers at school?
- How does the student communicate with others outside of the school environment?

**2C. Are the auxiliary aids and services provided in a timely manner?** [ADA Title II 28 C.F.R. 35.160 (b)(2)].

Yes

No

If no, please explain why aids and services have not been provided in a timely manner:

Auxiliary aids and services may need to be provided to the student before completion of the IDEA evaluation process and eligibility determination in order to be considered timely (e.g., FM system, AAC devices).

## Discussion Questions

- How long will it take the team to complete the student's evaluation?
- What is a reasonable timeframe within which to provide the needed aid or service?
- Does the team have access to the auxiliary aid or service now?
- How long will it take to find or order the aid or service?

Consider opportunities for direct\* communications with peers and professional personnel and opportunities for instruction in the child's language and communication mode.

*\*Direct language/communication/instruction occurs person-to-person, not through an additional source (e.g., educational interpreter, captioner).*

What opportunities does the student have to engage in direct communication with peers and professional personnel in the child's language and communication mode, at his or her academic level, and considering his or her full range of needs, including opportunities for direct instruction in the child's language and communication mode?

Opportunities for direct communication with peers, teachers, and community members are important because they encourage the student to develop skills needed for successful postsecondary planning, career preparation, and independent living. Also, direct communication allows the student to naturally develop his/her own communication skills, cognitive skills, self-advocacy skills, and emotional intelligence.

### 3A. The IEP team has considered:

- Opportunities for direct\* communication with peers.

The IEP team will discuss opportunities for the student to communicate directly with peers who are hearing and/or deaf or hard of hearing using the student's language and communication mode. Opportunities in and out of school should be discussed. Direct communication with peers is important as it allows the student to develop social skills with peers, gain and increase self-confidence, learn through peer modeling, learn through incidental communications, develop self-awareness, and develop meaningful and lasting relationships.

- Opportunities for direct\* communication with professional staff and other school personnel.

The IEP team will discuss opportunities for the student to communicate directly with staff and school personnel using the student's language and communication mode. This may include related services professionals, school principal, secretary, cafeteria staff, bus driver, etc. When students have direct communication with all school personnel, it promotes independence and allows them to feel a sense of belonging within their community and, thereby, an increased sense of safety and readiness to learn.

- Opportunities for direct\* instruction:

The IEP team will discuss opportunities for the student to receive direct instruction from professional staff and school personnel in the student's language and communication mode. Direct instruction means the teaching of general education curriculum and IEP goals. Direct communication with teachers is important in order to allow for proper assessment and evaluation of a student's knowledge. Use of an interpreter to overcome a language barrier poses the potential risk that information is not communicated as fluently and effectively as when two people communicate directly in the same language.

## Discussion Questions

- What opportunities exist for the student to communicate directly with peers using his or her preferred language and communication mode?
- Do nondisabled peers have opportunities to learn sign language if the student uses sign language?
- Do typical peers understand the communication needs of the deaf or hard of hearing student in order to allow for direct communication among peers?
- Can the student communicate in his or her native language with teachers?

- Can the student communicate directly with school staff?
- Does the communication access for the student foster independence and social skills growth?
- Can the student communicate with his or her bus driver going to and from school?

**3B. What supports are needed to increase the proficiency of parents and family members in communicating with the student?** Considerations: Parent Counseling Training 300.34(8)(i) and (iii).

The IEP team should help the parents feel comfortable expressing their needs to help support their child's development at home. Parents often have difficulty expressing exactly what they may need in order to be able to support their child, but they are often able to express this through discussions with IEP team members.

Parent training and counseling means:

- Assisting parents in understanding their child's special needs
- Providing parents with information about child development
- Helping parents acquire the skills that necessary to support implementation of their child's IEP
- Helping parents to understand their rights and responsibilities under IDEA Part B

The needs of parents can vary greatly depending on their child's disability, age, IEP goals, etc. Generally, parents need support at times of transitions, change in disabilities, or the diagnosis of an additional disability. Parents of children who use sign language should be offered support to increase their signed language and communication skills. The need for such support does not go away, but changes over time. Do not make any assumptions about parents' ability – one way or the other – to communicate fluently with their child via sign language. Parents of younger children will need support with basic vocabulary and language development; later, as students get older and their sign language skills increase, parents will also need to deepen their language skills. This may present itself in learning vocabulary surrounding specific topics, such as high school "slang" signs, sexuality signs, sports signs, pop culture signs, academic signs, etc.

Parents of children with in-depth communication needs, such as those who are using AAC devices or FM systems, may need training on how to properly use the equipment at home. Parents of children who use spoken language may need additional support and understanding of spoken language development from a qualified speech-language pathologist.

Parent training and counseling can be provided as a related service on the IEP and should be included on the IEP.

## Discussion Questions

- What are the family's strengths with regard to supporting their child's progress and development?
- What are the family's struggles or barriers to supporting their child's progress and development?
- Do the parents and the family believe they can communicate effectively with the child? If not, what kind of additional training is necessary to increase communication?
- Does the school district offer sign language classes for parents and families?
- Would parents benefit from networking with other parents?
- Can the team connect the parents with or make referrals to outside agencies that provide parent support?
- Have the parents and families been offered information and resources specific to their child's disability?
- What training do parents need?
- Where can that training be obtained?

**3C. Deaf/hard of hearing mentors/peers can have a positive impact for everyone – child, parent, and professional. Document who on the team will be responsible for arranging adult role model connections and opportunities for the student.** Considerations: Placement Determination 300.116.

As a team, discuss how the involvement of adults and peers who are deaf or hard of hearing might facilitate the student meeting language goals and objectives on his/her IEP. Document the action plan made by the team. Describe opportunities for the student to interact with adults and peers who share his/her language and communication mode. Opportunities should be discussed for in and out of school activities.

## Discussion Questions

- Does the team have access to adults who are deaf/hard of hearing in the student's communication mode(s)?
- Does the team have access to academic ASL curriculum to promote pragmatics of ASL for the students who use ASL?
- If no adults who are deaf/hard of hearing are available, what are the options (e.g., video phone to deaf/hard of hearing adults, community centers for Deaf events)?

**3D. The teachers, interpreters, and other specialists providing services and auxiliary aids outlined in the Communication Plan must have demonstrated proficiency in, and be able to accommodate for, the child's/student's primary communication mode or language and communicate effectively.** Qualified personnel: Operating Standards, 3301-51-09(H)(1-3) [ADA Title II 28 C.F. R. 35.160(a) (1)].

Service providers who are working with students must be able to communicate effectively in the child's primary preferred language, as discussed in Question 2B.

## Discussion Questions

- Does the professional staff working with the student have relevant training in providing services and auxiliary aids?
- How have the service providers demonstrated their proficiency?
- Where can staff obtain training to increase their skills and proficiency?
- How much training is needed for professional staff to become proficient?
- Can this training occur in a reasonable timeframe to meet the student's needs?

The purpose of this section is to guide the IEP in discussing issues related to accessibility throughout the school day, including plans for maintaining effective communication in the event that amplification systems stop working or the interpreter is absent. Also, it is critical that students who are deaf and hard of hearing have access to communication during all emergency drills and procedures, as well as during actual emergencies. It is strongly recommended that IEP team discuss detailed methods for maintaining communication during all potential emergencies.

**4A. Academic instruction, school services, and extracurricular activities in which the child/student participates have been identified and will be presented with effective and fully accessible communication. Consideration of the entire school day, daily transition times, and what the student needs for communication that is as effective as what peers receive in all activities will allow more complete and meaningful educational benefit for the student.** Communication: CFR § 300.324(a)(2)(iv), Non-academic settings: CFR § 300.101 FAPE [ADA Title II 28 C.F. R. 35.104 (1)] [ADA Title II 28 C.F. R. 35.160(a) (1)]

A student who is deaf or hard of hearing has complex communication needs, and these needs can vary and change multiple times during the school day based on the environmental surroundings and peers. Even when using amplification, many students who have a hearing loss struggle to hear in lunch rooms, crowded hallways, assemblies, gym class, on the school bus, and even in the classroom. The IEP team should discuss how the student's communication access and needs change with each transition and environmental change during the school day. This is especially important for students who use listening and spoken language, because acoustics and sound access are not always consistent.

Deaf and hard of hearing students should be afforded the same after-school opportunities as their peers. The IEP team should discuss the process to request accommodations and how communication access will be provided at organized events, including sporting events, drama events, after-school clubs, etc.

## Discussion Questions

- How will communication access be provided during classroom instruction? During small-group or therapy sessions? During extracurricular activities?
- Do parents need to request communication access for after-school events? If so, whom should they contact?
- If the student is old enough to request communication access and support services him/herself, does the student know the process?
- How does the student communicate with peers and staff during recess? Lunch? Before and after school?
- Does the change in room acoustics impact the student's ability to listen?
- Does the student have visual access to an interpreter at all times without "visual noise" that is distracting to the student?
- Does the student have siblings who participate in after-school events and activities in which the student will need communication access, such as an interpreter or FM system?
- Can the student self-advocate for his or her communication needs in various school settings?
- Does the student have communication access with the bus driver?
- If school field trips are taken, what are the plans for ensuring effective communication during the bus ride and throughout the trip?

**4B. Is there an alternate plan in place to maintain communication during academic instruction, school services, and extracurricular activities with the student who is deaf or hard of hearing if any of the following possible events happen?**

- Interpreter is absent
- Hearing aids/cochlear implant(s) is/are not working (e.g., batteries are dead, components missing, left at home)
- FM system is not working
- Closed captions are not available, including videos posted online or digital curricula
- Trained notetaker is absent
- Real-time captioning services are not available

It is important for the IEP team to be proactive in planning for unexpected circumstances. The IEP team will discuss alternative means of communication in the event one of the above scenarios occurs in order to ensure full access to and effective communication is still continuous throughout the day and the student has access to academic content. A student should not be sent home or to the resource room because the interpreter is absent, the student's FM system is broken, or an AAC device is not working.

## Discussion Questions

- What are the IEP team's plan for finding and contacting a substitute interpreter?
- Is the substitute interpreter a licensed educational interpreter with the Ohio Department of Education?
- How will the IEP team ensure that extra batteries are available for the FM system, hearing aids, or cochlear implants?
- How will the FM system be charged daily?
- What is the IEP team's plan in case the student's FM system is not working?
- Does the IEP team know how or where to get closed captions added to digital media?
- Does the IEP team know how or where to get digital media transcribed?
- What happens if Internet services are not available for real-time captioning services to be provided?

**4C. How will the student be effectively communicated with during emergency situations such as fire alarms, practice drills, tornado alerts, lockdowns, etc.?**

Students who are deaf or hard of hearing will at times be alone throughout the school day, just as typical peers; however, deaf or hard of hearing students will have communication limitations. The IEP team should discuss these possible limitations and how to address them in emergency situations. Imagine a deaf student who is in the restroom and unaware that the school has just been placed on lockdown or unable to hear the tornado siren being activated. Imagine a hard of hearing student who can hear, but cannot understand the verbal announcement being made during an emergency. Student activities should not be limited by safety and security needs; instead, students should be given the necessary tools and opportunities to practice and develop independence in emergency situations for lifelong independence.





## Discussion Questions

- How will all school staff and personnel be educated about the student's communication needs in the event of an emergency?
- What are the options for communication access for the student during a lockdown?
- Can visual supports and alerts be implemented during emergency situations?
- Are the existing alert systems visually accessible (e.g., flashing fire alarms, emClock messages) for the student?
- Does the student understand the safety protocols for emergency situations?
- When and how will the student practice communication access during emergencies?
- If the student uses school-provided transportation, will the driver be able to communicate with the student in the case of an accident or emergency?

**5A. Was an accurate and complete explanation of the continuum of educational placement options provided and considered? The IDEA mandates that the placement for each student with a disability be only as restrictive as the student's individual needs require. The basic regulatory requirement is that students are removed from general education classrooms only if they cannot be educated satisfactorily in general education classes with the use of supplementary aids and services.** Considerations: Placement Determination 300.115 300.116, LRE 300.114.

Were the following options presented?

- General education classroom
- Special education classroom
- Program within a school district for students who are deaf or hard of hearing
- Special school for students who are deaf or hard of hearing (i.e., Ohio School for the Deaf, St. Rita School for the Deaf, etc.)

"Any setting, including a regular classroom, that prevents a child who is deaf from receiving an appropriate education that meets his or her needs, including communication needs, is not the LRE for that child. Placement decisions must be based on the child's IEP. Thus, the consideration of LRE as a part of the placement decision must always be in the context of LRE in which appropriate services can be provided. Any setting which does not meet the communication and related needs of a child who is deaf, and therefore, does not allow for the provision of FAPE, cannot be considered the LRE for that child. The provision of FAPE is paramount, and the individual placement determination about LRE is to be considered within the context of FAPE" (<https://www2.ed.gov/about/offices/list/ocr/docs/hq9806.html>).

Use the checkboxes to indicate whether or not the continuum of placement options was discussed by the team. Remember to include the parents' and student's preference when deciding on appropriate placement. Document the issues discussed as a team and describe an action plan, if any.

For more information regarding LRE for students who are deaf or hard of hearing, please visit the following Hands & Voices resources: Deaf Is Different and School Placement Considerations for Students Who Are Deaf or Hard of Hearing. For more information regarding LRE, watch this Least Restrictive Environment Video on OCALI's website [www.ocali.org](http://www.ocali.org).

## Discussion Questions

- Have the parents and student toured or visited alternate placement options?
- Has district personnel toured or visited alternate placement options?
- Does the home school district have teachers, interpreters, and related service providers who are experienced and trained to work with children who are deaf or hard of hearing?
- What placement option provides communication access that is equal to the communication access that typical peers receive?
- Does the student have effective communication options in the LRE as defined in IDEA?
- Which placement will provide the student with full, meaningful, and effective communication throughout the academic day, including with peers and school personnel?
- Does the student have access to peers who are deaf and hard of hearing?



- Does the student have access to deaf adult role models?
- Is the placement determined based on the child's IEP goals and required accommodations?
- What kind of services will need to be implemented in order to support the child's language/communication mode needs?
- What additional information about placement options is needed before a placement decision can be?
- What is the student's and family's preferences regarding placement options?

*This Communication Plan and guidance document are revisions of the following documents: The Communication Plan and Guidance Document (2013) created by the Center for Outreach Services at the Ohio School for the Deaf, Frequently Asked Questions; Communication Plan for Deaf and Hard of Hearing Students, Colorado; Directions for Iowa's Communication Plan for a Student Who Is Deaf or Hard of Hearing; Addendum for Students Who Are Deaf or Hard of Hearing, Communication Considerations, New Mexico.*

*The Outreach Center for Deafness and Blindness at OCALI appreciates the participation of the authors of the 2013 version of The Communication Plan and Guidance Document, Tabitha Belhorn, Executive Director of Ohio Hands & Voices and Carrie Davenport, researcher with The Ohio State University in the revision process.*