



Carol Dobak, Acting Commissioner  
Rehabilitation Services Administration  
400 Maryland Avenue SW  
PCP Room 5151  
Washington, DC 20202  
202-245-7325  
carol.dobak@ed.gov

Monday January 7, 2019

Dear Ms. Dobak,

On behalf of the National Association of State Agencies of the Deaf and Hard of Hearing (NASADHH), we would like to personally thank you for presenting at our annual meeting in Hartford, Connecticut on July 3, 2018. Your presentation was very well received by our state directors and we benefited from your professional knowledge as the Acting Commissioner of the Rehabilitation Services Administration.

Currently, many State Vocational Rehabilitation (VR) agencies deny Deaf and Hard of Hearing (D/HH) clients' requests to attend "out of state" universities which includes, but is not limited to, Gallaudet University, Rochester Institute of Technology/National Technical Institute for the Deaf (RIT/NTID), and California State University, Northridge (CSUN) in favor of keeping clients within their "in-state" postsecondary institutions. These harmful decisions put D/HH students' pursuit of postsecondary education in jeopardy as these public and private universities are known as the select few nationwide which provide direct communication access and curricula in American Sign Language. Education through direct communication in a student's primary language is critical for academic success and ultimately, for their future employment prospects.

Studies have shown that state VR agencies and D/HH students both benefit when students attend predominately Deaf universities due to the following:

1. Return on Federal Investment/Social Security Study<sup>[\[i\]](#)</sup>
2. Direct Instruction & Accessibility<sup>[\[ii\]](#) [\[iii\]](#) [\[iv\]](#)</sup>
3. Increased Persistence, Retention, and Graduation Rates<sup>[\[v\]](#)</sup>
4. Employment Attainment
5. Culturally Affirming Environments and Social Capital<sup>[\[vi\]](#) [\[vii\]](#)</sup>

VR support is an investment which pays off in the form of higher standards for graduation rates and employment opportunities. Educational success reduces dependency on federal entitlements such as Supplemental Security Income (SSI) and/or Social Security Disability Insurance (SSDI).



Predominately Deaf postsecondary institutions place higher values on employment outcomes as a measure of success which prepares students to be viable taxpayers in our society.

Many D/HH postsecondary students in a predominately spoken-language environment experience reduced opportunities for social networking, expansion of language competency, vocabulary, and knowledge of world events. Incidental learning is a critical aspect of a student's cognitive and social well-being. Predominately Deaf postsecondary environments pave the path for D/HH students to acquire critical information through incidental learning processes and with inclusive and accessible vocational training which may not be readily available in other higher education institutions. Specifically, such environments, where direct, meaningful engagement in a wide variety of activities and organizations such as plays, sports, student government, clubs and so forth, enable students to develop the foundations for professional networks, soft skills, and substantive knowledge of current events and trends so critical to successful career progression and leadership.

An estimated 60% of D/HH students that enroll in postsecondary educational institutions do not graduate, as they are often underprepared to navigate postsecondary environments, in terms of academic and self-advocacy skills. In contrast, Gallaudet University and RIT/NTID's persistence and graduation rates for such students are well above this average as cited in <http://www.nces.ed.gov> and in the Annual Report of Achievements. These two institutions provide culturally affirming environments in that they are not only psychologically supportive but are also free from the systematic barriers D/HH students may face at other institutions due to limited communication access.

In short, NASADHH would appreciate the opportunity to engage in further discussion with your office regarding these issues in order to collaborate on the development of consistent guidelines and/or policies and procedures which exempt predominately Deaf postsecondary institutions from the "in- state" policies and practices for D/HH students who seek postsecondary education and state explicitly that D/HH students should, for better outcomes, be encouraged to attend one of these "out of state" universities.

Thank you in advance for your time in addressing this critical matter. We look forward to receiving your response soon.

Sincerely,

*Sherri Collins*

Sherri Collins  
NASADHH Board President  
Enclosed: Citations



## Citations

- [i] Dirmyer, R. & Walter, G. (2013). *Economic Benefits of Completing a Degree from the National Technical Institute for the Deaf*. Rochester, NY: National Technical Institute for the Deaf, Rochester Institute of Technology.
- [ii] National Deaf Center on Postsecondary Outcomes. <https://www.nationaldeafcenter.org/resource/research-summarized-key-impact-areas>
- [iii] Saur, R. E., Popp-Stone, M. J., & Hurley-Lawrence, E. (1987). *The classroom participation of mainstreamed hearing-impaired college students*. *Volta Review*, 89, 277–286.
- [iv] National Deaf Center on Postsecondary Outcomes. (2017). *Research summarized! Designing accessible environments*. Washington, DC: U.S. Department of Education, Office of Special Education Programs, National Deaf Center on Postsecondary Outcomes. Retrieved from [www.nationaldeafcenter.org](http://www.nationaldeafcenter.org)
- [v] National Deaf Center on Postsecondary Outcomes. (2017). *Research summarized! Designing accessible environments*. Washington, DC: U.S. Department of Education, Office of Special Education Programs, National Deaf Center on Postsecondary Outcomes. Retrieved from [www.nationaldeafcenter.org](http://www.nationaldeafcenter.org)
- [vi] National Deaf Center on Postsecondary Outcomes. (2017). *Research summarized! Leveraging community resources*. Washington, DC: U.S. Department of Education, Office of Special Education Programs, National Deaf Center on Postsecondary Outcomes. Retrieved from [www.nationaldeafcenter.org](http://www.nationaldeafcenter.org)
- [vii] Schenkel, L. S., Rothman-Marshall, G., Schlehofer, D. A., Towne, T. L., Burnash, D. L., & Priddy, B. M. (2014). *Child maltreatment and trauma exposure among deaf and hard of hearing young adults*. *Child Abuse & Neglect*, 38(10), 1581–1589.