Dyslexia, dyscalculia, and dysgraphia, based on the *USDOE Dyslexia Dear Colleague Letter* are conditions that **could** qualify a child with a specific learning disability under the Individuals with Disabilities Education Act (IDEA).

Please note I worked to review significant guidance, but this posted link sent me to an error message. *www2.ed.gov/policy/gen/guid/significant-guidance.html*.

I encourage the USDOE to learn more about Dyslexia, dyscalculia, and dysgraphia and to provide stronger language than exists to better support state policy. For children in our public schools with these learning differences, this language is not sufficient to support their needs. For example, the diagnosis of dyslexia, in and of itself, is insufficient in the state of South Carolina to obtain 504 accommodations in spite of the wealth of educational and medical research literature regarding what dyslexia is and WHY it interferes with reading and writing. If a child is dyslexic/dysgraphic the minimum a child needs is a 504, and as a young child, an IEP may be warranted.

Below, is a link to text from the peer-review Journal *Developmental Disorders* that nicely summarizes that in education we think of dyslexia as reading disability but it is far more. Dyslexia is a combination of factors that include visual processing, auditory processing, and automaticity deficits that may be observable to teachers as reading deficits, writing deficits, and students having trouble following multi-step directions. To students this is chronically observable to self as not having enough time to complete work, not having the right tools to do work, and not getting “it” at the rate of their peers.  If the USDOE understood what dyslexia is from the context of medical literature in addition to the educational research/special education literature, a 504 and the resulting accommodations would not be such a challenge for a child to receive (e.g., larger print/more white space/use of computer/extended time). Children are being denied access to appropriate coursework as a result.

Dyslexia has a range of severity; however, even high functioning dyslexics need a 504 and accommodations. Higher functioning dyslexics are often not provided accommodations because their grades are deemed “good enough.” Good enough, as in around average, must be considered in light of what a child would have achieved if barriers to showing what he or she knows were removed. “Good enough” must be considered in light of the ESSA legislation that requires **all** students to meet “the challenging State academic standards” and be “on track to graduate college- and career-ready. “ Average, empirically as may be seen by the USDOE’s own standards and assessment peer review evidence from standard settings, is not on track for college and career ready.

In our state, not only did I need to pay to understand why my child was suffering in school and unable to complete work in a time teachers thought was appropriate, I also had to pay for ancillary evidence with formal comorbid documentation of information that is KNOWN and STANDARD in the medical literature. When I was told dyslexia would not qualify my children for the 504 they needed, I had to go to medical sources to provide comorbid visual deficit and auditory deficit evidence, because there is not an understanding that these are indicators of a single condition. The slow visual and auditory processing necessitates additional time and a different mode of responding on assignments and tests. My own children are unable to show achievement that matches their aptitude without these accommodations. The educational policy side of ESSA and the teacher evaluation processes that expect to see growth across all children and on-track achievement for college and career readiness is at odds with an outdated policy that for the purposes of qualifying for a 504 stipulates that around the average is ok. And our outdated understanding of dyslexia does not set up our education system to elicit and use the right types of evidence to ensure we are making accurate decisions about students.

<https://link.springer.com/article/10.1007%2Fs40474-014-0030-6>