

March 17th, 2025

Dear Chair and Committee members,

SUBJECT: HF1803 - ELIMINATION OF SHORT-TERM OBJECTIVES

The Autism Society of Minnesota (AuSM) was founded in 1971. We work to make the lives of individuals and families affected by autism better. AuSM serves Minnesotans throughout their lives. Our most important commitments are to: Advocacy, Education, Support, Collaboration, Community building. We believe this approach is not in the best interest of students or families, as short-term objectives serve several key purposes:

1. They outline the steps needed to achieve the goals, detailing how the student will progress from point A to point B.
2. They provide checkpoints for progress reports, allowing parents to track their child's development and intervene if necessary.
3. Short-term objectives are typically written in a clearer, more accessible manner, making them easier to understand.

Without short-term objectives, the goal alone does not offer the necessary information to determine when the goal has been met or how the student will achieve meeting that goal and subsequently removes accountability for educational process and would allow a check box approach to special education.

We fully acknowledge that IEP paperwork is cumbersome, complex, and often ineffective for parents, educators, and students. However, the solution is not to roll back essential protections for families. Instead, stakeholders should critically evaluate the unnecessary additions to IEPs—such as excessive charts, graphs, state standards, and repetitive content—that go beyond state and federal requirements and often make these documents less accessible.

Additionally, we strongly oppose delaying the age of transition. Transition planning should begin in grade 9 to ensure students can take the necessary coursework and make essential preparations for life after high school. Delaying this process does not provide students with disabilities enough time to explore career options and develop a well-structured transition plan. Delaying transition planning would only put more burden on the Medicaid system post education and allow for students to fall through cracks due to limited access to staffing supports in these areas of adult services.

Minnesota's First Autism Resource[®]

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Equal family participation in the IEP process is a fundamental principle of the Individuals with Disabilities Education Act. However, many families do not experience this in practice. Removing short-term objectives and delaying transition planning further shifts the balance of information away from families, which is not in the best interest of students.

We respectfully urge you to vote no on this bill. Thank you for your time and consideration.

Sincerely,

Jillian Nelson

Policy Director

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Written Testimony
HF1803
March 18, 2025

Dear Chair Bennet, and the House Education Policy Committee Members,

I'm Erin Sandsmark, Executive Director of Solutions Not Suspensions Coalition (SNS), and I am writing to submit my concerns regarding HF1803.

The community that SNS serves would be directly impacted by HF1803 in ways that would be extremely damaging to how parents understand their child's IEP.

I understand the goal of this bill is to reduce the burden put on our Special Education Teachers. IEPs as they are now in Minnesota are long, complicated, and could use change. It is important to make the lives of teachers a little easier so they can continue to focus their energy on our children.

However, Section 2 of HF1803 eliminates the requirement for benchmarks and short-term objectives. Our families and children need these short-term objectives and goals to add transparency to how a child is doing in school, and allow for any shifts in how a child's needs may change throughout the school year. Taking away benchmarks and short term objectives goes against federal law, the Individuals with Disabilities in Education Act (IDEA).

Parents with students with IEPs need more insight into what's going on with their children, not less. There are so many ways IEPs in the state of MN could be changed to follow federal law and reduce the burden on teachers. However, taking out this piece gives less insight for parents and families. Parents and caregivers, with this bill, would have to wait 12 months for a report on their child's progress. So much can happen in that time, and we worry that early interventions could be completely missed.

We need to reduce the burden on our Special Education teachers, but we feel HF1803 is not the best way to go about it. We must find ways to reduce the burden on our teachers, without taking away transparency from our parents and caregivers.

Thank you for your time and consideration,

Erin Sandsmark
Executive Director
Solutions Not Suspensions Coalition



March 17, 2025

Minnesota House Education Policy Committee
2nd Floor Centennial Office Building
St. Paul, MN 55155

Dear Chair Bennett and Members of the House Education Policy Committee:

The Legal Services Advocacy Project (LSAP) appreciates the opportunity to provide written testimony on HF1803 and to share our serious concerns with the proposal.

LSAP and the Minnesota Disability Law Center (MDLC) are statewide projects of Mid-Minnesota Legal Aid. MDLC provides free legal services to children and adults with disabilities. LSAP is the advocacy arm of Legal Aid and has provided legislative and administrative advocacy on behalf of Minnesotans with low incomes since 1977.

Legal Aid is committed to ensuring all Minnesota children with disabilities have access to a free appropriate public education and high-quality opportunities for growth. As such, Legal Aid works to ensure that those policies and processes that protect the rights of children with disabilities are meaningful and effective.

Section 2 of HF1803 eliminates the requirement for benchmarks and short-term objectives as part of the statement of an annual goal in an IEP. Eliminating short-term objectives and goals ignores the ways children learn and grow and the fluid ways in which new barriers may appear during a school year, which necessitate different strategies and supports. This change also removes a powerful component of progress transparency for parents and caregivers. If a parent or caregiver is waiting 12 months for a progress report, earlier opportunities for support and intervention may have been missed.

In addition, removing the requirement for benchmarks and short-term objectives for all children with IEPs violates the federal Individuals with Disabilities in Education Act (IDEA), which requires IEP goals to include benchmarks or short-term objectives for children with disabilities who take alternate assessments aligned to alternate achievement standards. 34 CFR 300.320 (a)(2).

As Legal Aid has testified in other forums, the IEP process is often complicated and arcane for families. We also acknowledge it's a demanding process for staff because it serves the critical purpose of ensuring children with disabilities have access to the free appropriate public education to which they are entitled under the law. However, many requirements have been added at a district level that are not required by state or federal law. Teachers are asked to include charts, graphs, and references to state standards, often requiring duplicative information.

In the special education paperwork working group hosted by Education Minnesota, stakeholders reached consensus that there is information included in IEPS that is not required by state or federal law. That conversation should be the starting point for this legislation; however, eliminating protections for students and families was not the consensus of that group.

Legal Aid respectfully requests the Legislature further consider those efforts to make the IEP process more accessible (not less accessible) for parents and caregivers and to also consider bolstering efforts and supports that give staff the time they need to meaningfully engage in the process.

Sincerely,
Jessica L. Webster
Staff Attorney
Legal Services Advocacy Project

Education Policy Committee

Minnesota House of Representative

March 2025

Chair Rep. Peggy Bennett, Vice Chair Rep. Patricia Mueller, DFL Lead Rep. Sydney Jordan, and Members of the House Education Policy Committee,

As a coalition of parents, educators, and disability advocates, we share a deep commitment to creating efficient and effective systems that prioritize student learning. We recognize the value of reducing redundancies and maximizing instructional time. However, we respectfully oppose the proposed changes in HF1803 (page 2, line 7), which would eliminate short-term objectives from most Individualized Education Programs (IEPs), as well as the provision to delay transition planning until age 16.

Short-term objectives are more than just procedural steps—they are essential markers that help students make steady, measurable progress toward their annual goals. In Minnesota, where nearly 15% of public school students receive special education services (Minnesota Department of Education, 2023), these objectives provide families with a clear understanding of how their children are moving toward success. They also help ensure consistency when staffing changes occur, giving new educators the tools to offer seamless and effective support.

Additionally, delaying the start of transition planning until age 16 would rob students of valuable time to prepare for life after high school. The Minnesota Statewide Longitudinal Education Data System (SLEDS) shows that students with disabilities already face persistent disparities in postsecondary enrollment, degree attainment, and workforce participation compared to their non-disabled peers. Early and thoughtful transition planning is a proven way to close these gaps; reducing this window would only widen them.

We are grateful for your ongoing efforts to improve the special education process and reduce unnecessary burdens on schools. Still, we believe these proposed changes would come at too great a cost to the children and families we represent. We urge you to preserve the current IEP requirements and maintain early transition planning practices to ensure all students with disabilities in Minnesota have equitable opportunities to thrive.

We stand ready to serve as a partner and technical resource to help shape solutions that balance efficiency with the needs of the students we all care deeply about.

Thank you for your time and thoughtful consideration.

Sincerely,

The Coalition for Children with Disabilities

COALITION FOR CHILDREN WITH DISABILITIES

Autism Society of Minnesota • The Arc Minnesota • Decoding Dyslexia Minnesota • Epilepsy Foundation of Minnesota • Mid-Minnesota Legal Aid/Minnesota Disability Law Center • Minnesota Brain Injury Alliance • Minnesota Council on Disability Multicultural Autism Action Network • PACER Center

Prader-Willi Syndrome Association of Minnesota • Proof Alliance



March 13, 2025

SUBJECT: HF1803 - ELIMINATION OF SHORT-TERM OBJECTIVES

Dear Chair Bennett and Education Policy Committee Members,

The Multicultural Autism Action Network is a non-profit organization serving families of children with disabilities in multicultural communities. We are writing to you today to express concern about HF1803 which proposes to eliminate short-term objectives (also known as benchmarks) from Individualized Education Programs (IEPS) for students with disabilities.

We believe this is not in the best interest of students or families as short-term objectives serve several important functions:

- 1) They often describe **HOW** the goals are going to be met - what steps will be taken to get the student from A to B.
- 2) They provide an opportunity to check in and offer additional information on the progress report, so a parent can see whether their child is on track and has an opportunity to correct course if they are not.
- 3) Short term-objectives are often written in a much more transparent and user-friendly way. To provide you with a specific example, here is a goal from an IEP we recently reviewed:

Measurable Annual Goal #2: Given a general rubric for analyzing and solving multiplication and division problems (without reminders), student will correctly identify and then solve, with a calculator if needed, applied problems with no extra information, when these are intermingled without other types of math activities in distributed trials, from a present level of 30% independence across all four operations, with 80% indepedent [sic] success across distributed trial opportunities in the course of a month, as measured by direct observation and recording of prompted assistance by special education staff by (date).

The short-term objectives for this goal are:

- Student will correctly identify and then solve multiplication and division problems with 50% success with or without the use of a calculator by X date.

- Student will correctly identify and then solve multiplication and division problems with 80% success with or without the use of a calculator by Y date.

As you can see, without the short-term objectives, the goal alone is difficult to comprehend and certainly not accessible to the 12% of special education families who speak a language other than English at home.

We are in complete agreement that IEP paperwork is cumbersome, unwieldy, inaccessible, and does not serve the purposes of parents, educators, or students well. But the answer is not to roll back protections for families. A better approach would be to have stakeholders take a hard look at all the extra things that are being included in IEPs that go far above and beyond state and federal requirements. Adding charts, graphs, state standards, and repeating the same things over and over again are not requirements, and their inclusion often makes IEPs less accessible to families.

We also oppose measures to delay the age of transition. We feel strongly that transition planning needs to start at grade 9 so students can plan to take appropriate coursework and make other necessary preparations for life after high school. Delaying transition planning does not allow adequate time for students with disabilities to design and implement a successful transition plan and explore and prepare for possible career options.

Equal participation by families in the IEP process is one of the cornerstones of the Individuals with Disabilities Education Act, but this is not the reality experienced by many families. Eliminating short-term objectives and delaying transition further shifts the information balance away from families and is not, in our opinion, in the best interest of students.

We respectfully ask you to vote no on this bill.

Thank you for your consideration.

Multicultural Autism Action Network
Fatima Molas
Delia Samuel
Rufo Jiru
Maren Christenson Hofer