



August 27, 2018

Allison Holte
U.S. Department of Education
400 Maryland Avenue SW, Room 5W106
Washington, DC 20202– 5970

RE: ED–2018–OII–0062

Dear Ms. Holte:

We are writing on behalf of the Consortium for Citizens with Disabilities (CCD) Technology and Telecommunications Task Force to provide comments regarding the U.S. Department of Education (ED) Office of Innovation and Improvement’s Proposed Priorities, Requirements, Definitions, and Selection Criteria—Expanding Opportunity Through Quality Charter Schools Program; Grants to Charter Management Organizations for the Replication and Expansion of High-Quality Charter Schools.

CCD is a coalition of more than 100 national disability organizations working together to advocate for national public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. The Technology and Telecommunications Task Force focuses on ensuring that national policy on matters of telecommunications and technology, including assistive technology, moves society toward our ultimate goal of full inclusion of all people with a disability.

With this grant initiative, ED has a tremendous opportunity to help students with disabilities gain full access and appropriate services in charter schools. In order to ensure full access, the Task Force requests ED make it clear that every charter school has an obligation under federal law to serve students with disabilities and abide by not only the Individuals with Disabilities Education Act, but also Section 504 of the Rehabilitation Act and the Americans with Disabilities Act (ADA). Therefore, the Task Force offers the following recommendation:

Virtual/Online Charter Schools:

- Grant applications should be notified of their obligation to ensure all virtual and online instructional platforms and content conform to nationally accepted accessibility standards, such as WCAG 2.0 level AA.

Rationale: It is imperative that full accessibility be ensured in the online instructional platform and content provided by virtual schools. For many students with disabilities, especially those who use assistive technology, this is THE greatest barrier to being able to access and benefit from a virtual public school. It is essential that

virtual public schools are fully accessible for students with disabilities by ensuring that their instructional platform and content conform to nationally accepted accessibility standards, such as WCAG 2.0 level AA. Virtual public schools must be made aware of their obligation under Section 504 of the Rehabilitation Act and the Americans with Disabilities Act (ADA) to create, purchase and provide accessible content, and the Federal government should ensure this requirement is clear in any guidance or application for federal funding issued to Section 504 and ADA covered entities (such as virtual public schools). If digital instructional content is not accessible, students with disabilities who use assistive technology will be denied equal access to a virtual public school.

The CCD Technology and Telecommunications Task Force appreciates the opportunity to provide these comments.

Sincerely,

The CCD Technology and Telecommunications Task Force Co-Chairs

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