Chapter 97, Subchapter BB, Memoranda of Understanding

Chap.	Ext.	Issue	Desired Change	Rationale	Focus Group Comment	TEC	Agency Response
97	General Comment	yes, rule contains outdated information and timelines	Timelines that have been met should be edited for a more concise rule. Update reporting for a more readable rule.	To make it easier to read.	Change		Agree. The rule will be changed to update the references to dates and processes that have already been accomplished.
97	General Comment	No change	No Change	Fine as is.	No change		Current language reflects the intent of federal regulations
97	General Comment	No comment	No comment	No comment	No change		Current language reflects the intent of federal regulations
97	1011	Yes, because of inconsistencies between Regional Day Schools for the Deaf.	Autonomy to create independent co-ops and not be tied to regional day schools.	The deaf ed students are special education students and by running the deaf ed program through the special ed coop it would be more aligned and consistent with purposes of helping students achieve. It would also be closer to their home campus.	No change		Current language reflects the intent of federal regulations
97	1011	Yes	Allow districts to join their special education co-ops for deaf education services and not be forced to join the regional day schools for the deaf.	Allow for more local control and better and more centralized services. This will also allow for less travel for students and staff.	No change		Current language reflects the intent of federal regulations
97	1011	Sometimes even with MOU difference between what is happening with student at TX School for Blind/Deaf transitioning back to district, can't discern PEIMS codes or credits to ensure graduation.	Ensure same type of system for PEIMS codes/credits.	Better serve students and reduce data errors.	No change		Agree. Agency will address in guidance. Current language reflects the intent of State Law
97	1011(h)(1)	Issue. It is Outdated.	Update the reporting of data 1 A-B	Updated information will be less confusing and more meaningful on how and when to report data.	Change		Agree. The rule will be changed to update the references to dates and processes that already been accomplished.

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97	1012	An assumption about an unwritten policy.	There seems to be an unwritten policy that there is a three-year maximum time for School of the Blind in serving a student.	Just need clarification	No change		Current language reflects the intent of State Law
97	1012(f)(1)	Issue Reporting of Data is outdated	Update Reporting of Data 1 a-d	Updated information is less confusing and more beneficial.	Change		Agree. The rule will be changed to update the references to dates and processes that already been accomplished.