The Learning Disabilities Association of New York State
Statement on Response to Intervention as a Model for Identifying
Students with Specific Learning Disabilities Under IDEA 2004

January 26, 2006

Chartered by the Board of Regents in 1958, the Learning Disabilities
Association of New York State (LDANYS) is the only statewide parent
driven organization, specifically representing and advocating for
individuals who have learning disabilities; their families and professionals
who support them. A learning disability is a neurobiological disorder,
which is developmental in nature. A learning disability manifests itself as
a chronic condition in many aspects of learning and behavior across the
lifespan and its impact upon an individual’s ability to function can be
significant. LDANYS’ mission makes us particularly interested in and
concerned with new criteria that will be developed in New York State for
identifying students with specific learning disabilities (SLD) under IDEA
2004.

Background
IDEA 2004 provides an opportunity to improve the process of
identification of students with specific learning disabilities (SLD).
Building on the work of the National Center for the Research on Learning
Disabilities (NRCLD), we support the development of New York State
Education Department policies, procedures and standards to ensure that
the Response to Intervention (RTI) Evaluation Model for identifying
students with learning disabilities is implemented appropriately and
consistently, that data collection is systematic for individual students and
for district and state wide analysis, and that uniform standards are
established for appropriate staff training, interventions, progress
monitoring, and evaluation protocols. We unequivocally oppose the use
of RTI as the sole criterion upon which a diagnosis of an SLD is made
and urge the State Education Department to clarify to the field that it is
the data only, culled from an RTI process that can be considered as part
of a comprehensive evaluation involving a variety of assessment tools.

This is in line with the following statement of the NRCLD: “Although it is
generally agreed that RTI can identify a pool of at-risk students, it does
not appear to be sufficient to identify a specific learning disability. It may,
however, serve as an important component of an evaluation for special
education eligibility.” This also correlates with the proposed federal
regulation on evaluations which states that no single procedure can be
used as the sole criterion for determining whether a child is a child with a
disability and for determining an appropriate educational program for the
child as excerpted below: