



AUTISM ALLIANCE OF MICHIGAN

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Autism Alliance of Michigan Public Comment State Board of Education September 9, 2025

RE: Strengthening Special Education Through Complaint Reform & Systemic Solutions: *Upholding Rights and Rebuilding Trust*

Good afternoon board members, Superintendent, and department staff.

The Autism Alliance of Michigan (AAoM) appreciates the opportunity to again provide public comment.

AAoM's Education pillar advances a Whole Child vision for Michigan by catalyzing advocacy and engagement activities to move an equitable education agenda for children and youth with special education needs focused on **funding reform, appropriate identification, access to interventions, system accountability, and decreasing disparities**.

Looking across our remarks this year¹, January - August, a clear throughline emerges:

- Elevating the findings and priorities of students and families through the **Special Education Experience (SEE) Survey: Report to the Community**.²
- Calling for **comprehensive special education funding reform**.
- Drawing attention to the **low graduation rates of students with disabilities**.
- Highlighting **family voice and accountability** in IDEA implementation.
- Challenging the **overreliance on alternate assessments** and calling for the **elimination of the Functional Independent tier of the MI-ACCESS**.
- Confronting Michigan's alarming **drop out crisis** among students with disabilities.
- Demanding student safety through the **elimination of seclusion and restraint**.

Each of these comments has spotlighted **system-level barriers that deny students with disabilities meaningful, inclusive education**.

Today, we turn to the special education complaint system, an essential mechanism meant to uphold rights of students when those barriers emerge.

¹ AAoM Public Comment to the State Board of Education available here: <https://mipaac.org/advocacy/>

² <https://autismallianceofmichigan.org/education-initiatives/special-education-experience-see-survey/>



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Rising Complaints, Declining Trust

Recent Bridge Michigan reporting³ revealed that state complaint investigations have risen **21% since 2018**, while the special education population has grown by only **3.6%**. This increase signals a system under profound strain: families are being forced to fight for services that are legally guaranteed.

Yet too often, families describe the process as **slow, opaque, and ineffective**. Even when violations are confirmed, it is not clear that corrective actions are effectively monitored for meaningful completion. Advocates report parents leaving complaint processes demoralized, with little evidence of systemic change.

This is not simply a paperwork problem—it is a **warning sign of systemic failure and eroding trust**.

Civil Rights in the Context of Current Complexities

As a September 2025 Bridge Michigan opinion piece⁴ underscored, IDEA was enacted in 1975 (50 years ago this November) under a very different educational landscape. Today, students with disabilities face increasingly **complex medical, cognitive, social-emotional, and mental health needs**, compounded by trauma, technology, and pandemic-era stressors. The frameworks of IDEA, which were never fully funded, have not been adequate to sustain today's demands.

While IDEA pledged to cover **40% of the excess cost** of educating students with disabilities, federal support continues to hover around 15%. This means that **funding special education has always fallen largely to states and local districts**. In Michigan, that obligation is magnified by an especially outdated reimbursement system that covers only a fraction of actual costs—among the lowest rates in the nation. As a result, districts absorb hundreds of millions of dollars annually in uncompensated costs.

When schools are asked to deliver modern, individualized supports with inadequate resources, families are too often left to seek recourse through the state complaint system. This helps explain why complaints continue to rise even as student enrollment has remained largely flat.

Expectations without resources are empty promises.

³ <https://bridgemi.com/talent-education/special-education-complaints-jump-in-michigan-as-odds-stacked-against-parents/>

⁴ <https://bridgemi.com/guest-commentary/opinion-michigan-special-education-built-on-old-expectations-not-reality/>



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AAoM State Complaint Project

To better understand and address these challenges, AAoM has undertaken a multi-year **State Complaint Project**.

To date, we have:

- Analyzed nearly **1,000 complaint reports spanning 2018–2024**, identifying trends in violations, noncompliance findings, and corrective action outcomes.
- Documented persistent gaps in enforcement and follow-through, where corrective action orders are issued but not sustained.
- And, currently we are working to develop a **user-friendly complaint toolkit**, which will empower families to navigate a process that otherwise feels inaccessible and adversarial.

This work underscores that **access without recourse is hollow**: unless state complaints produce real change, families' rights exist only on paper.

Strategic Recommended Actions

To rebuild trust and ensure equity, AAoM urges the State Board and the Michigan Department of Education (MDE) to pursue the following:

1. **Treat complaint reform as a civil-rights imperative**
Enhance complaint processes as essential to IDEA compliance and equity—not as administrative technicalities.
2. **Mandate transparent, tiered reporting**
Publish annual complaint data disaggregated by type, outcome, corrective action status, and demographic subgroup. This transparency is necessary to reveal systemic issues and measure progress.
3. **Require monitoring and follow-through**
Move beyond issuing corrective action orders; publish monitoring summaries that confirm whether changes have been implemented effectively and sustained over time.
4. **Connect complaints to adequacy and capacity**
Fully implement Michigan's **MI Blueprint weighted funding model** to give districts the resources needed to provide individualized supports—not just minimal compliance.
5. **Enhance proactive systems**
Reduce reliance on complaints by strengthening **Multi-Tiered Systems of Support (MTSS)**, trauma-informed practices, inclusive instruction, and effective family engagement—addressing needs before violations occur.



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Key Takeaways

- **Access Without Recourse Is Hollow**
Families may have legal mechanisms under IDEA and MARSE, but rising complaints and weak enforcement reveal a system failing at its moment of truth.
- **Compliance Alone Is Not Equity**
Technical adherence to minimal standards does not equal meaningful education. Students deserve outcomes, not paperwork compliance.
- **System Transparency Builds Trust, Not Complaints**
Publishing complaint data and corrective action outcomes fosters confidence and encourages collaboration.
- **Investment in Educators Is Prevention**
Staff shortages, under-prepared educators, and inadequate professional development drive systemic failures. Strengthening capacity is essential both to prevention and equity.

The surge in complaints is not an aberration—it is a **signal of systemic breakdown**.

Families are asking not for special treatment, but for schools to meet the obligations already written into law. Unless the **complaint system is strengthened with transparency, monitoring, and resources**, trust will continue to erode, and students will continue to pay the price.

AAoM stands ready to partner with the State Board of Education and MDE to ensure complaint reform becomes part of Michigan's broader strategic work for education system improvement. Through transparency, accountability, and capacity-building, we can move from compliance to meaningful inclusion.

Thank you for your attention and your ongoing commitment to Michigan's students with disabilities.

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About the Autism Alliance of Michigan

The Autism Alliance of Michigan (AAoM) is a 501(c)(3) organization serving as a trusted ally and partner for thousands of families across the state. AAoM's mission is to lead efforts to raise expectations and expand opportunities for people connected to autism across their lifespan. The organization's Education pillar drives initiatives that address systemic barriers to education, focuses on student-centered advocacy, and educates families on related topics – working towards its goal to make Michigan a top 10 state for special education outcomes.

For help finding resources, providers, and information contact our MiNavigators at 877-463-2266 (AAOM) or email at navigator@aaomi.org.

More information about AAoM's Education pillar can be found at:
<https://autismallianceofmichigan.org/education-initiatives/>.

Learn more about how AAoM is elevating the lived experience, identifying system barriers, and amplifying the voices of parents and students with disabilities connected to the special education system in Michigan to inform our collective advocacy efforts:

- **Special Education Experience (SEE) Survey: Report to the Community**
bit.ly/AAOM-SEE

Learn more about how AAoM is looking toward a broader vision of system transformation with the aim of increasing high-quality, inclusive opportunities for students with disabilities while improving educational outcomes through special education finance reform that will serve to re-imagine how our system serves kids with disabilities Pre-K through post-secondary:

- **Funding Our Future: The Call for a New Framework in Special Education Finance**
<https://tinyurl.com/AAOM-Funding-Our-Future>

The MI Special Education Finance Reform Blueprint (MI Blueprint) is a statewide initiative to create a better system— one that aligns funding with actual student needs and ensures schools have the resources to deliver. This work, led by Autism Alliance of Michigan with support from Public Sector Consultants, is backed by legislation and bipartisan support, and it's grounded in data, experience, and input from families, educators, and advocates.

- **Michigan Special Education Finance Reform Blueprint (“MI Blueprint”)**
<https://autismallianceofmichigan.org/education-initiatives/mi-blueprint/>