A CASE STUDY OF THE ATTEMPTS TO DEVELOP AND EVALUATE PROGRAM OBJECTIVES IN AN IOWA AREA EDUCATION AGENCY DIVISION OF SPECIAL EDUCATION

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Philip G. Tetzloff
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A CASE STUDY OF THE ATTEMPTS TO DEVELOP AND EVALUATE
PROGRAM OBJECTIVES IN AN IOWA AREA EDUCATION AGENCY

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by

Philip G. Tetzloff

Approved by Committee:

Dr. Richard H. Lampshire, Chair

Dr. Charles D. Rowley

Dr. Kenneth J. Köpecky

Dr. Earle L. Canfield
Dean of the School of Graduate Studies
The problem. The basic problem examined by the study was the development and evaluation of the program objectives of an approved annual plan to provide special education services in Area Education Agency 6. Current federal and state audits of AEA special education programs focused on compliance procedures, not on program objectives.

Procedures. The study was conducted by the coordinator of the evaluation efforts at AEA 6 and was reported as a case study. The case study was organized in a chronological sequence from Year One through Year Six. The study is a narrative description of the effects of the actions of the administrative team on the evaluation process.

The case study details the efforts of the administrative team to develop an annual plan which contained objectives with specific performance levels. As part of this effort, a stratified random sample of students identified as handicapped was used to select the records to be reviewed. The review of records was done to provide evidence of the provision of services.

Findings and Recommendations. The approved annual plan developed in AEA 6 contained too many objectives with no specific performance levels. The expected levels of performance were met in fewer than one-half of the program objectives. Further study of the use of a prediction method to develop criteria levels for special education program objectives at an AEA is recommended. Special educators should also study the single subject multiple baseline design and its application to program evaluation.
# Table of Contents

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Introduction</strong></td>
<td>1</td>
</tr>
<tr>
<td>Rationale</td>
<td>1</td>
</tr>
<tr>
<td>The Purpose of the Study</td>
<td>7</td>
</tr>
<tr>
<td>Significance of the Problem</td>
<td>8</td>
</tr>
<tr>
<td>The Selected Area Education Agency</td>
<td>8</td>
</tr>
<tr>
<td>Limitations</td>
<td>8</td>
</tr>
<tr>
<td>Organization of the Study</td>
<td>9</td>
</tr>
<tr>
<td><strong>2. A Review of the Literature and Research</strong></td>
<td>10</td>
</tr>
<tr>
<td>Introduction</td>
<td>10</td>
</tr>
<tr>
<td>Evaluation Theory</td>
<td>10</td>
</tr>
<tr>
<td>The Design of an Evaluation Study</td>
<td>14</td>
</tr>
<tr>
<td>Management by Objectives</td>
<td>19</td>
</tr>
<tr>
<td>Implications of Goal-Based Evaluation</td>
<td>21</td>
</tr>
<tr>
<td>A Legislative Mandate</td>
<td>22</td>
</tr>
<tr>
<td>Implications of the Education of the Handicapped Act</td>
<td>24</td>
</tr>
<tr>
<td>Summary</td>
<td>25</td>
</tr>
<tr>
<td><strong>3. Methodology</strong></td>
<td>27</td>
</tr>
<tr>
<td>The Case Study</td>
<td>27</td>
</tr>
<tr>
<td>Data Collection Procedures</td>
<td>28</td>
</tr>
<tr>
<td>Report and Treatment of Data</td>
<td>29</td>
</tr>
</tbody>
</table>
Chapter

4. Presentation of the Data .......................... 31
   Introduction .................................... 31
   Year One: 1978-1979 ............................ 31
   Year Two: 1979-1980 ............................ 34
   Year Three: 1980-1981 ........................... 38
   Year Four: 1981-1982 ........................... 40
   Year Five: 1982-1983 ........................... 43
   Year Six: 1983-1984 ............................ 51

5. Summary, Conclusions, and Recommendations ..... 53
   Introduction .................................... 53
   Summary ......................................... 53
   Conclusions .................................... 55
   Recommendations ............................... 59

Bibliography ........................................ 66

Appendices

A. Summary, Study of Selected Rule Adherence and
   Consumer Satisfaction, AEA 1-16 ............... 70
B. Statistical Summary of 1979-80 Rules
   Compliance Review .............................. 82
C. Follow-up Study of Selected Rule Compliance .. 95
D. SDS Program Objectives ........................ 115
E. Job Standards, Special Education Consultants .. 167
F. Record Review/Checklist and Instructions .... 176
G. Staffing Summary/Individual Education Plan
   and Case Management Log ........................ 182
H. SDS Evaluation Report .......................... 187
### Tables

<table>
<thead>
<tr>
<th>Table</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Percent of Yes Responses for Selected Items from SDS Forms G, H and I</td>
<td>49</td>
</tr>
<tr>
<td>2. Performance Levels Obtained from the Record Review Compared to Performance Levels Expected for Each Department Objective</td>
<td>50</td>
</tr>
</tbody>
</table>
CHAPTER ONE

Introduction

In 1975, "The Education for All Handicapped Children Act" was passed by Congress.\textsuperscript{1} This law mandates the provision of public education programs to all handicapped persons between the ages of birth and twenty-one. This law has resulted in the development of new procedures to identify and serve handicapped students, and to insure the rights of these students and their families. Since 1975, efforts to evaluate special education services have focused on the degree of compliance to the procedures established by the law.

Rationale

The Iowa Department of Public Instruction has a responsibility to evaluate special education programs and services (§281.9, Code).\textsuperscript{2} The Department has evaluated Area Education Agencies' (AEA) special education programs and services since 1976.\textsuperscript{1}


\textsuperscript{2}Code of Iowa, II (Des Moines, IA: State of Iowa, 1979), §281.9(6), p. 1337.
services since 1976.  

The first cycle of evaluations, conducted from 1976-79, was based on on-site reviews of each AEA. The visiting team reviewed compliance procedures, staff certification, budget procedures, and perceptions of consumer satisfaction related to special education programs at each AEA. The results were reported as fifteen separate studies.  

The Department of Public Instruction guidelines identified a compliance level of 100 percent and the writers of the reports compared the results of the reviews to that recommended achievement level. Remedial actions to correct deficiencies in compliance, certification and budget were recommended. Suggestions were made to deal with problems perceived by consumers of an AEA's services.  

The compliance reviews conducted by the Department of Public Instruction did not make reference to any previous evaluations that may have been conducted at each of the AEA's. The compliance reviews were first-time reviews of AEA special education programs and established positive data. The expected compliance level was 100 percent.  

The reports did not contain information that helped a

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1 Iowa Department of Public Instruction, Study of Selected Rule Adherence and Consumer Satisfaction, AEA 1-16 (Des Moines, IA: Department of Public Instruction, 1976-79).  

2 Ibid.
reader from one AEA to compare the data with that from re-
views conducted at other AEA's. A reader's interpretation
of the data was impeded by the lack of a mean or range of
levels of performance as determined by the reviews of special
education programs and services in each AEA.

The second cycle of evaluations conducted by the Depart-
ment of Public Instruction was based on a checklist of
compliance items to be completed by the director of special
education of each AEA. The checklist was also sent to each
superintendent of the local school districts of each AEA.
After the receipt of the completed checklists, a review of
student records in selected schools was conducted by repre-
sentatives of the Department of Public Instruction. A re-
port of the results was sent to the director of special
education in each AEA.

The evaluation reports of the second cycle were written
to express clearly the need for corrective action when an
item was found to represent a compliance level of less than
100 percent. The reports gave specific timelines for the
corrections to be implemented and documentation sent to the
Department of Public Instruction.

The reports from the first and second evaluation cycles
did not make any reference to the approved annual plans for
the special education programs of each AEA. The fact that
these plans had been requested by the Department of Public
Instruction before granting approval to each AEA to operate
the programs, indicated another source of data to be collected and analyzed in the evaluation of AEA special education programs. Those approved plans may have contained levels of performance of less than 100 percent and therefore would have been in conflict with a compliance standard.

The Department of Public Instruction had developed a process and procedures to approve the plan of an AEA to provide special education programs. The process included a provision for the Department of Public Instruction to grant approval of the annual plan before the AEA would be permitted to implement special education services. The specific Department of Public Instruction guidelines state that each AEA shall:

submit to the department of public instruction, special education instructional and support program plans and applications including those for new and expanded programs and services subject to criteria listed in Chapter 281 and this chapter, for approval by November first of each year for the school year commencing the following July first.¹

A major portion of the process to develop an annual plan was directed toward identifying goals and objectives for the AEA special education programs and services. A statement to describe the proposed design or system for assessing the attainment of these goals and objectives was

¹Code of Iowa, II, 1979, §281.9(6), p. 1337.
to be included in that process.¹

During the school years of 1976-79 the Department of Public Instruction conducted reviews of AEA special education programs and services. This activity was necessary to meet assurances made to the Bureau for the Education of the Handicapped, Washington, D.C., that federal laws were being upheld in Iowa. The focus of the compliance reviews centered on rule adherence. During those years all of the fifteen AEA special education programs were reviewed.

The review at AEA 6 was conducted on January 17-19, 1978. The review was conducted by specialists from the Department of Public Instruction using interviews, record reviews and observation techniques to collect data. The data were reviewed to compute existing levels of performance related to compliance procedures at AEA 6. Although the reviewers assumed that the information collected was accurate and valid, procedures were established to check the validity of the obtained information. This was done by surveys mailed to parents, teachers, principals and superintendents, and AEA 6 staff.

The purpose of the review was to focus on compliance with the rules of special education. Compliance was defined

¹Iowa Department of Public Instruction, Special Education Program and Service Plan (Des Moines, IA: Department of Public Instruction, 1980).
as the presence of specific procedures in 100 percent of the cases examined. For example, the records of all students identified as handicapped were to include an Individual Educational Plan (IEP).

Recommendations for improvement in compliance procedures at AEA 6 were made for the following areas: evaluation, placement, and procedural safeguards.\(^1\) Other recommendations that were made related to pupil accounting efforts, interaction with community and government agencies, instructional programs, plans, policies and procedures, inservice, and paperwork.

The Department of Public Instruction conducted another compliance review of the special education services of AEA 6 in December of 1979. The review included a completion of a checklist by each department supervisor and a composite for the division of special education at AEA 6. In addition, each superintendent of the twenty-one school districts in AEA 6 completed a checklist. After a review of the completed checklists a team of Department of Public Instruction personnel conducted on-site record reviews in selected school districts of the AEA 6. The results of the review indicated that child identification procedures were in place.\(^2\) Evaluations of students referred for specific evaluation objectives

\(^1\) Appendix A.

\(^2\) Appendix B.
were appropriately conducted. The procedures for determining the appropriate placement of handicapped students were excellent. The quality of IEP's ranged from adequate to excellent. Some children spent excessive amounts of time being bussed and one SDS form (79-I) had an inaccurate statement about parental consent. The level of compliance in AEA 6 was determined to be 92.3 percent.

During the 1980-81 school year, the Department of Public Instruction conducted a compliance review using the same format as in the 1979-1980 school year. The on-site audits were made for the areas found to be in non-compliance in the previous report. Five of the twelve districts were reviewed for instances of non-compliance. No level of compliance was reported.

Purpose of the Study

The purpose of the study was to review the attempts of the administrative team to develop and evaluate approved annual plan objectives for providing special education services at a selected AEA. These annual plan objectives were identified as the Service Delivery System, hereinafter referred to as SDS, at AEA 6. The evaluation goal of the approved annual plan was to measure the accomplishment of the specific objectives of the SDS. This was to be done through

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1 Appendix B.

2 Appendix C.
a review of data collected from the Master Case Management 
Log form of the SDS.

**Significance of the Problem**

The compliance review reports from the Department of 
Public Instruction, submitted to the AEA 6 administrative 
team, did not refer to any of the objectives contained in 
the approved annual plan. The lack of reference to AEA 6 
program objectives made the compliance review results diffi-
cult to translate into procedures to improve daily operation 
of the special education program. It is hoped that the 
results of this study will provide the Department of Public 
Instruction administrators with findings that will be helpful 
to them in the development of an evaluation system directly 
related to the objectives of an AEA approved annual plan.

**The Selected Area Education Agency**

From fifteen area education agencies in Iowa, AEA 6 
was selected as the site to review the annual plan. The 
director of the division of special education agreed to 
evaluate the special education services provided through 
the AEA 6 SDS.

**Limitations**

The study was limited to the geographic area of one 
AEA, twenty-one school districts, and a rural setting. This 
AEA offered the standard special education programs and
services found in Iowa. The method used to allocate resources, assign staff and implement services may have differed from the other AEAs in Iowa. The objectives of the approved annual plan influenced the focus or priority of services and may have been different from the other AEAs in Iowa.

Organization of the Study

Chapter One was an introduction, a presentation of the rationale and purpose of the study, and a discussion of the significance of the problem and limitations of the study.

Chapter Two is a review of the literature and research. The methodology used to conduct the study is presented in Chapter Three. In Chapter Four the case study is presented. Chapter Five is a presentation of the summary, conclusions and recommendations.
CHAPTER TWO

A Review of the Literature and Research

Introduction

Chapter Two is a presentation of the literature and research reviewed in relation to education evaluation theory and design, management by objective theory, federal law, implications of goal-based evaluation and a summary of the review of literature.

Evaluation Theory

Within the context of education the term "evaluation" is used to define an accounting of and judging the worth of resources expended. Cronbach stated that evaluation is the collection and use of information to make decisions about an educational program.1 Provus spoke in terms of using evaluation results to make a decision to improve, maintain or terminate an educational program.2


Provus' ideas is expressed by Yavorsky as comparing a performance to a standard in order to make a decision of the worth of an educational program.\(^1\)

Evaluation has been described as a process used by educators to gather data to make a decision or choose the best alternative to solve a problem. The California Evaluation Improvement Project has defined evaluation as a process to determine the value of an educational activity for purposes of decision-making.\(^2\) Whelan defined evaluation as observable, sequential procedures to determine if a planned program is meeting expectations.\(^3\) Stufflebeam defined evaluation as a process to delineate, obtain and provide information for judging decision alternatives.\(^4\) Worthen and Sanders expanded on these definitions to include identifying the kinds of decisions that need to be made, collecting and analyzing the

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data to support making those decisions, and reporting the information to the appropriate decision-makers.¹

Kolberg and Bagnall reported that evaluation is a time for accounting, comparing actions with consequences, for detecting flaws and making improvements, and for planting the seeds of future challenge.² Alkin defined evaluation as a process of determining decision areas, selecting appropriate information, and collecting, analyzing and reporting information to use in selecting decision alternatives.³ Scriven said that the typical goals of evaluation are judgments of value or worth calling for an interpretation of the outcome with possible causal connections.⁴


Evaluation is classified as formative and summative. Formative evaluation refers to assessments of worth focused on instructional programs that are still capable of being modified\(^1\) with a feedback loop that stays within the developmental agency and serves to compare the product.\(^2\) Stufflebeam believed this process enables persons responsible for plans and programs to receive feedback as the program is being developed.\(^3\) Alkin indicated that the process identifies anticipated and unanticipated outcomes in time for changes to be made in the program so as to achieve its stated goals.\(^4\) Tyler, in discussing the eight-year study, concluded that evaluation had helped teachers and specialists clarify their objectives and describe them in behavioral terms, and to identify situations when student behavior could be measured.\(^5\)

Summative evaluation refers to assessments of worth


\(^3\)Cronbach, p. 138.

\(^4\)Alkin, pp. 207.

about a completed program.¹ Scriven added a dimension to that by using information from outside the agency of origin.² Stufflebeam referred to this as a process to measure and to interpret attainments.³ Alkin felt that program certification serves this purpose and denotes the potential for generalizing to other related situations.⁴

The Design of an Evaluation Study

The anticipated outcome from an evaluation study is information to be used in making a decision about the worth of the program being evaluated. The design of the evaluation instrument or process is intended for the assessment of certain educational programs to see to what degree specified objectives have been met.⁵ Stufflebeam identified the three key points of an evaluation design. One is the purpose or objectives of the design, the second is how a decision to achieve the design objectives will be made, and


²Scriven, p. 62.


⁴Alkin, pp. 2-7.

the third is how one makes a choice among alternatives. Yavorsky suggested that an evaluation plan identifies areas of concern and formulates evaluation questions to be answered.¹

The users of an evaluation study hope to make interpretations and judgments from the data gathered and analyzed. An evaluator must face the task of taking a first approximation to the design need. Then a validation process must occur to increase the likelihood that the inferences and conclusions reached in the study are valid.² Popham indicated that a major concern in this process is to establish well-defined conditions under which such measurements are taken so that meaningful interpretations of the data can be made.³

Malcom Provens described the Pittsburgh Evaluation Model as a process to compare a performance to a standard and then make a decision. Depending on the results of the comparison, one of several alternatives could be used. They have been summarized as: go on to the next stage; change the standard or operation within the program and try the

¹Yavorsky, p. 5.


³Popham, p. 196.
process again; go back to the beginning of a major stage of development; or terminate the project.\(^1\) He also has described "Block W" as a process to use when a discrepancy exists. In the "Block W" process, three questions are asked. One, why is there a discrepancy? Two, what corrective actions are necessary? Three, which corrective action is best? The combinations of questions and answers may number into the hundreds.

Friedman and Anderson presented a model that is a simple and practical problem-solving approach to educational evaluation.\(^2\) The authors acknowledged the discrepancy issue described by Provus, the behavior objective approach used by Tyler, and the decision-making process noted by Alkin and Stufflebeam. They maintained that their model is designed to help solve educational problems.

This problem-solving idea is different from an evaluation design that specifically measures the outcomes of an educational method or project. The authors encouraged an evaluator and decision maker to define how large a discrepancy must exist between obtained and expected outcomes before it will be considered a problem within the organization.

\(^1\)Provus, pp. 178-83.

Friedman and Anderson stated that when a problem is identified, action to find a solution should be taken.\textsuperscript{1} The design of the model encourages action to find solutions that reduce the discrepancy to acceptable limits. The processes followed in the model are used to identify problems, prescribe programs solutions, evaluate the operation of the program, and evaluate the effectiveness of the program.

The design for any evaluation study must take into account the factors that Campbell and Stanley identified as weakening the internal validity of a study. These are: history, maturation, testing, instrumentation, instability, selection, mortality and statistical regression.\textsuperscript{2} History refers to the event of excess time exerting undue influence on performance. Maturation refers to a natural developmental progression due to growth. Testing refers to problems that may arise from repeated testing and learning from the experience. Instrumentation refers to changes in the instruments used during the study and possible effects being more attributable to change than to treatment effects. Selection refers to procedures of sample selection that

\textsuperscript{1}Friedman and Anderson, pp. 16-23.

\textsuperscript{2}Donald T. Campbell and Julian C. Stanley, Experimental and Quasi-Experimental Designs for Research (Chicago, IL: Rand McNally, 1963), p. 5.
differentially select subjects for the study. Mortality refers to the differential loss of subjects from the study. Statistical regression refers to a naturally occurring movement of scores that are extremely far from the mean of the normal standard and test toward the mean on repeated measures.

For the purpose of decision making, Lindell and Nitko stated that a descriptive inference in the evaluation context will usually need to be generalized to future students and future conditions.\textsuperscript{1} The inclusion of input, process and output standards in the design of the evaluation study aids in a general level of analysis. According to Yavorsky, an educational program might be thought of as a "system" using inputs in a process to produce outputs.\textsuperscript{2}

A factor other than statistical regression needs to be considered in working with a special population. Programs aimed at groups identified as handicapped may be the result of laws requiring that all such children be educated. A literal interpretation would mean that an educational program could not be withheld from any such student or groups of students. Control groups could not be used, but a school district could make comparisons between similar

\textsuperscript{1}Lindell and Nitko, p. 57.

\textsuperscript{2}Yavorsky, p. 9.
programs as indicated by Fitz-Gibbon and Morris.¹
Howe made the suggestion that a single-subject design
is flexible and is in consonance with the individualized
education concept.² This design depicts the changes made
by the subject, over time, and with repeated measures.
Treatment and services are provided to each subject and
individual behavior is measured. There is no measure
against a norm.

Management by Objectives

Drucker stated that objectives are needed in every
area where performance will be measured.³ It was his idea
that objectives are the basis for work assignments, the de-
sign of the business and the yardstick of measurement.⁴
He also stated that public service institutions exist to
fulfill a specific social purpose and to satisfy specific
needs of the society, community or individual.⁵ He also

¹Carol Taylor Fitz-Gibbon and Lynn Lyons Morris, How
to Design a Program Evaluation (Beverly Hills, CA: Sage,

²Clifford Howe, Administration of Special Education

³Peter F. Drucker, The Practice of Management (New

⁴Ibid., p. 64.

⁵Peter F. Drucker, Management: Tasks, Responsibilities,
made note of the fact that feedback has to be built into a
decision to provide continuous testing of the expectations
that underline the decision.\textsuperscript{1}

Odiorne defined the system of management by objectives:

A process whereby the superior and subordinate
managers of an organization jointly identify
its common goals, define each individual's
major areas of responsibility in terms of the
results expected, and use these measures as
guides for operating the unit and assessing the
contributions of each of its members.\textsuperscript{2}

In recalling his life at General Motors, Alfred P.
Sloan, Jr., discussed his attempt to build upon decision
making with a specific objective in mind. He felt the relation-
ship of division functions to each other and to the
central organization were critical and needed to be defined.
Only by defining the specific goal could the allocation of
resources be efficiently targeted toward a profit. The
development of divisions had to be coordinated along lines
constructive to the corporation.\textsuperscript{3} Sloan's experiences were
related to the operation of a manufacturing enterprise to


produce a tangible product for profit.

Some modifications or clarifications to the main topic of management by objectives have been developed. Zangwill offered a caution that when more than three or four objectives were used, no one of them received appropriate attention. Managers and employees find it difficult to remember to fill out the forms, collect the paperwork, and record the frequencies for dozens of activities. Hoffman added the dimension of job standards to management by objectives. He indicated that job standards are set for the job not the person, but that the levels set will have no practical value if reliable standards don't exist.

**Implications of Goal-Based Evaluation**

Most of the authors of the articles reviewed indicated the need of an evaluation plan to have a clear focus. Generally, they defined evaluation as a process that could be used to produce information about a specific educational program. The information would be used by educators or other interested people to determine if the program were meeting its intended purpose(s).

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3. Ibid.
A goal-based evaluation plan would focus the evaluation effort toward the review of specific goals or objectives. It would suppose that data could be gathered and analyzed about each objective. It would suppose also that the parties who developed the objectives would be involved in the evaluation process.

A goal-based evaluation plan would proceed with the assumption that the goals or objectives that would be studied were appropriate. The important questions would be "Were the objectives accomplished?" Another question asked would be "Were the objectives the correct ones for the purpose?"

Michael Scriven has suggested that concentrating attention on the stated goals is done at the expense of determining whether or not the goals are appropriate. There is a danger that the developed objectives were indeed met, but they were inappropriate or even detrimental to the program.

### A Legislative Mandate

Federal law states that the purpose of the Education of the Handicapped Act is to assure that all handicapped children have available to them a free appropriate public

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education. The term "free appropriate education" means special education and related services that are provided at public expense, meet state standards, include appropriate preschool, elementary and secondary education in the state and are in accordance with the individualized educational programs of all the children. The term "individualized educational program" means a written statement for each handicapped child developed in a meeting by a representative of a local or intermediate educational agency, the teacher, the parents or guardian of such child and, when appropriate, the child. The statement shall include the present levels of educational performance, annual goals, including short-term instructional objectives, specific educational services to be provided, and the extent to which the child will participate in regular educational programs, the projected date of initiation and duration of services and appropriate objective criteria, evaluation procedures and schedules for determining on at least an annual basis whether the instructional objectives are being met.

1Education for the Handicapped Law Report, 101:11, 1400(c).

2Ibid., 101:13, 1401(a)(17).

3Ibid., 101:13, 1401(a)(18).
Implications of the Education of the Handicapped Act

The programs and services offered by intermediate and local education agencies must be in compliance with federal and state rules. The nature of the provision of a "free appropriate public education" for handicapped children had been specifically focused toward meeting the requirements of the law. The law had specific steps and components to be taken or developed in helping handicapped children.

There was little mention in the new law of what "appropriate" should mean. The procedures of the law promoted the development of an Individualized Education Plan (IEP) to meet the needs of each handicapped child. The procedures to develop an IEP were specifically mentioned but the content of each IEP was left to be determined by a "team." The emphasis of the law was directed toward providing programs and services to the identified population. The result of these services was to be a "free appropriate public education."

Developers of programs and services to students identified as handicapped focused their attention on the procedures of the new law. This resulted in efforts that measured the level of services provided to this population. The law tended to emphasize the process of providing a "free appropriate public education" for handicapped children rather than the outcome or product of having received such
an education.

Summary

A goal-based evaluation plan contains specific objectives to be measured. The specific objectives are intended to eliminate confusion about what the program is to accomplish. The objectives also describe the conditions under which performance is to occur and assign responsibility for their completion to a person or group of workers. Finally, the specific criteria to judge the accomplishment of the objectives are stated.

The rules and regulations of the Department of Public Instruction have been established to meet specific legislative mandates. The guidelines for developing educational programs intended to accomplish those mandates ask for specific goals, specific program objectives and an evaluation design. The Department of Public Instruction granted approval of AEA special education plans after a review of the requested information. The program objectives tested adhered to those guidelines and had Department approval.

Because the term evaluation connotes judgment, the specific analytical results may be interpreted differently by the users of the evaluation report. There may be questions about the conditions, the responsibility and the criteria levels of the objectives and how to modify them. There is always the possibility of questions about the
appropriateness of the objectives selected to be evaluated.

The evaluation process can be used to direct the attention of educators and the public toward an aspect of educational programs. It can be used to gather data, stimulate questions, to describe circumstances and interpret a sequence of actions. It cannot account for the values of its readers and their perceptions about the worth or value of the event(s) reported. How does the measurement of performance affect decisions? It may be that the only effect that occurs is the acquisition of knowledge of the data. That each person refuses to change an opinion due to his established values and no action is taken to modify or change the program evaluated may also occur.
CHAPTER THREE
Methodology

This chapter is a presentation of the method used to collect and analyze data. The purpose of the study was to identify the steps followed to develop and evaluate the program objectives in a Department of Public Instruction approved annual plan. The site chosen was Area Education Agency 6 (AEA 6), Marshalltown, Iowa. The director of the special education division agreed to the study for the purpose of evaluating the special education services provided by AEA 6. The administrative team was given the task of following the annual plan to provide special education services. The administrative team consisted of the director and six department supervisors. The writer was a member of the administrative team and was the coordinator of the evaluation process.

The Case Study

The case study approach was selected as the method for conducting the study. Van Dalen, an authority on the use of the case study method, stated that it will yield more qualitative than quantitative results, that data may come from many sources and can supply descriptive information that a
quantitative study may not.\textsuperscript{1} The study does not yield adequate quantitative data, but does lend itself to qualitative analysis.

Van Dalen, however, identified several important limitations of a case study. He noted that a generalization drawn from a case study will be limited to the population from which the case was selected. There is also a possibility that case study data are too subjective to be of value in drawing accurate conclusions about the results of the study. Finally, facts and information must be recorded accurately and objectively. Conclusions may and should be developed after the evidence has been collected.\textsuperscript{2}

**Data Collection Procedures**

The coordinator established a system to keep records of the activities of the case study. Notes were taken at weekly administrative team meetings and were the source of data which described the activities of the administrative team.

The coordinator conducted interviews with members of the administrative team and three AEA staff members throughout the study. The interviews established that specific


\textsuperscript{2}Ibid.
activities had been conducted. The interviews provided a
description of how staff members at AEA 6 had participated
in the pilot test of the SDS, how they had developed job
standards, and how they had reacted to current requirements
or proposed changes. The results of the interviews were
recorded and provided information on the attempts to develop
and evaluate the objectives of the annual plan.

Another source of information included letters and
documents that were used in the development of the annual
plan. The annual plan is identified as the Service Delivery
System (SDS). The forms used to record staff activities,
Department of Public Instruction correspondence, and compli-
ance checklists were reviewed.

To measure the effectiveness of the SDS, the results
of the evaluation were analyzed. The results of the analysis
were studied to determine whether the SDS had provided the
information necessary to evaluate the program objectives, and
whether the objectives had been met.

Report and Treatment of Data

The case study information is organized in a chrono-
logical sequence from Year One through Year Six. The
report is a narrative description of the activities con-
ducted, and a discussion of the effects of the actions of
administrative team members on the evaluation process.

Chapter Four is the presentation of the case study.
In Chapter Five there is a summary of the case study, conclusions of the study are presented, and recommendations are made.

CHAPTER FOUR
Presentation of the Data

Introduction
This chapter is a presentation of the data collected during the study of the Service Delivery System (SODS). It is a report of the cases developed at the test site. The activities have been listed in a sequential order from first year to the sixth year.

Year One: 1976-1977

The director of the division of special education at the test site appointed a task force consisting of twenty-five members to develop program goals and objectives. This group worked through March, April and May of 1976 to review information and develop the objectives.

The task force members used several sources of information to develop the program objectives. These sources included a new federal law "The Education of All Handicapped Children Act," a manual written by the director titled "Education for the Handicapped Law Report, 1971-72," and other research materials available from other agencies.
CHAPTER FOUR
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Introduction

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Year One: 1978-1979

The director of the division of special education at the test site appointed a task force consisting of twenty-five members to develop program goals and objectives. This group worked through March, April and May of 1979 to review information and develop the objectives.

The task force members used several sources of information to develop the program objectives. These sources included a new federal law "The Education of All Handicapped Children Act;"\(^1\) a manual written by the director titled

\(^1\) "Education for the Handicapped Law Report, 101:11, 1400(c)."
"Multi-Dimensional Service Plan;"¹ a report from the Iowa Department of Public Instruction titled "Study of Selected Rule Adherence and Consumer Satisfaction in Area Education Agency 6"² and a book titled Educational Evaluation: Theory and Practice,³ by Worthen and Sanders. These sources provided the task force members with current student needs, legal requirements, organizational structure and expert opinion.

During the summer, four members of the task force and the director met for four weeks to write a draft of the Service Delivery System (SDS). The director led the project and made the final decisions on the format, forms, and procedures listed in the draft. The three committee members who were interviewed reported that the contents of the draft of the SDS closely followed the content of the "Multi-Dimensional Service Plan" previously used by the director.

Included in the SDS were nine goal statements. These were:

1. To insure that students (0 to 21) and parents are guaranteed their rights to a free and appropriate education.

¹M. Donahue, "Multi-Dimensional Service Plan" (Zumbrota, MN: Wasioja Area Special Education Cooperative, 1977).

²Iowa Department of Public Instruction, Study of Selected Rule Adherence and Consumer Satisfaction, AEA 1-16.

³Worthen and Sanders, Educational Evaluation: Theory and Practice.
2. To seek unidentified special needs students.

3. To assemble data on students who have been identified as having possible special needs.

4. To evaluate students for whom a Level II referral has been submitted.

5. To summarize and interpret assessment data and determine eligibility for placement.

6. The Transdisciplinary Team shall determine placement based on the identified needs of the student.

7. To provide appropriate educational options which will incorporate the identified needs of special needs students in the least restrictive environment.

8. To provide a systematic method of monitoring all intervention strategies.

9. The LEA, in cooperation with the AEA, will follow established procedures in the dismissal of a student from special education programs and services.¹

An examination of the SDS and the nine goal statements by the coordinator indicated that the nine goals had fifty-eight objectives. The minimum number of objectives for each goal was three. Following each objective, there was a listing of activities, persons responsible, time, and evaluation. Time in this case referred to a specific timeline to complete an activity. There were no specific criteria levels of performance for any objective or activity.

The SDS manual was printed and readied for distribution at the end of the summer. Included in the manual were the goals, objectives, forms and procedures of the SDS.

¹ Appendix D.
Year Two: 1979-1980

The pilot test was conducted during the following school year. Local school district administrators and special education teachers were invited to participate in the pilot test. Eighty-five percent of the twenty-one local districts were included in the pilot test. All AEA 6 staff members were informed by the director that they would participate in the pilot test. The director decided that a sufficient number of participants were included in the test to validate the results of the pilot test.

The coordinator developed the schedule for the training sessions. Each department supervisor and the director had the responsibility to train AEA and local district staff members to use the SDS. Each supervisor was assigned to conduct the training at a major attendance center or one of the AEA 6 field offices. Each administrative team member had approximately twenty-five trainees, including special education teachers, principals, guidance counselors, audiologists, speech clinicians, school psychologists, special education consultants, school social workers, school nurses, and occupational or physical therapists.

A video tape illustrating how to follow the SDS procedures was shown at least once at each of the training sites. The video tape simulations depicted the activities necessary to complete each of the program objectives. The SDS contained a sample case that could be presented after the
video tape. Each of the training sessions was concluded by a question and answer period.

Each member of the administrative team audited the SDS forms as they were completed by members of the pilot test group. These forms represented the procedures of the SDS to be completed by teachers and principals. Omissions in forms and incomplete data were identified and corrective actions were taken. The person who had made the error was contacted by telephone or by a written note and requested to make the necessary changes. Improperly completed forms were presented and discussed at weekly administrative team meetings. Changes in pilot test procedures were made by the director. No significant changes were made in the procedures with only minor changes in the format being reported to all participants through memos from the director.

At the end of the test year, the director held a meeting for all participants of the pilot test and solicited suggestions and comments from those attending. The meeting was attended by local district special education teachers, administrators, a parent, AEA teachers, support staff and the administrative team.

The most common suggestion presented was to eliminate or modify the Level I referral form. The need to adjust the forms to fit the typewriters was mentioned several times. Other suggestions were to decrease the amount of paperwork, make parents' guides available for every parent, and divide
the review/dismissal form.

Following this meeting, the director held an administrative team meeting to discuss the changes suggested by the participants in the pilot test. At this time supervisors recommended that there be fewer objectives, that the Level I referral be eliminated, that a timeline of more than twenty working days be allowed to complete an evaluation, and that the due process goal be eliminated.

During the summer, the director prepared the final copy of the SDS manual. The manual included the goals, objectives, forms and procedures necessary to use the SDS. The new manual included the same goal areas as before with fifty-one objectives. The components and format of the previous manual were included; however, no specific criteria to measure performance for each program objective were yet included. The recommendation for redesigning the forms to insert in a typewriter was followed, but the recommendation for eliminating the Level I referral process was rejected.\(^1\)

The Department of Public Instruction conducted a Compliance Review of the Division's services in December of the pilot test year. The review included a completion of a checklist\(^2\) by each department supervisor and a composite for the Division. In addition, each superintendent of

\(^1\)Appendix D.

\(^2\)Appendix B.
a local district in the AEA completed a checklist. After a review of the completed checklists, a team of Department of Public Instruction personnel conducted on-site reviews in school districts of the AEA selected by the Department. The team performed spot checks of student records to determine if specific procedures were followed, recorded, and filed for each student. The checklist did not provide for qualitative statements about the school districts' services to handicapped students.

The results of the review revealed child identification procedures were followed at AEA 6. Evaluations of students referred for specific evaluation objectives were carried out and the procedures used for determining the appropriate placement of handicapped students were reported as excellent. Some children were found to have spent more than the recommended time being bused. One form (79-I) was judged to have had an inaccurate statement about parental consent. Subsequently the statement was changed by the director. The level of compliance in AEA 6 was determined by the Department of Public Instruction to be 92.3 percent on a scale of 100.¹

The administrative team did not complete an evaluation of the SDS objectives during the pilot test. This occurred because the AEA was using an established pupil accounting system while conducting the pilot test. The data to be

¹Appendix C.
recorded on the Master Case Management Log\(^1\) of the SDS during the pilot test was instead transferred to the forms used in the older pupil accounting system. The director accepted the Department of Public Instruction compliance report as evidence that the SDS was providing the necessary services.

**Year Three: 1980-1981**

The administrative team members were assigned to train AEA and local district personnel to use the SDS. The training was conducted during the months of September, October and November. The team members used the same procedures as were developed for the pilot test, and trained AEA and local district personnel in the same geographic areas as they had in the pilot test. The questions raised in the training sessions regarding minor procedural details were discussed in administrative team meetings. Interpretations and clarifications of procedures were transmitted to the users of the SDS by memos from the director's office.

The coordinator was assigned at this time to evaluate the SDS. As previously noted, no specific criteria to measure performance in the SDS objectives had been developed. After studying the issue of "compliance" the administrative team concluded that 100 percent criteria statements would be

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\(^1\)Appendix G.
difficult to attain through actual work in the schools. The team members agreed that specific criteria needed to be developed, but were unable to determine an alternate level for the compliance standard.

The team also grappled with the problem of overlapping services provided to the same student by members of several departments. These problems included unclear lines of authority, similar treatment interventions and multiple treatments being conducted at the same time. Because of these, there was no way to determine which service was effective. In addition, the SDS objectives had targeted the services to be provided but had not identified levels of expected performance.

The coordinator reported to the administrative team that the Master Case Management Log did not yield usable data. The data recorded on this form were the dates that forms were filed. The general areas listed on this form did not correspond to the objectives of the SDS closely enough to identify the specific services provided.

The coordinator recommended to the director that specific criteria levels of performance be developed for the SDS objectives. The administrative team supported that suggestion. Several of the supervisors recommended that fewer objectives be included in the SDS and that the Level I referral be dropped from the system. No action was taken on the recommendations suggested to the director.
During this school year, the Department of Public Instruction conducted a compliance review using the same format as in the previous year.¹ Areas of compliance identified in the previous Department report were not reviewed at this time. Department officials were searching for evidence that procedures had been used and had been recorded in student records for the areas identified as not in compliance in the previous report.

Department officials found nine of forty-five items to be in non-compliance. The nine items related to specific procedures of recording information about a student or notifying parents of their rights. The districts reported as being "non-compliant" were informed that corrective actions should be taken by specified dates. No level of compliance for the AEA was reported.

The director accepted the DPI report as an evaluation of the objectives of the SDS. No evaluation of the SDS was conducted by the administrative team during Year Three. Again, the Master Case Management Log did not yield the necessary data.

Year Four: 1981-1982

Each supervisor was assigned the responsibility of preparing criteria levels of performance for each SDS objective

¹Appendix C.
for his department. The focus of the objectives was on the provision of services and not on student performance. The Level I referral process was included in this assignment. Again, the director made no changes in the content of the SDS. The new statements of expected performance levels were called "job standards." These were to provide a measure of criteria to evaluate the objectives. Each department was allocated extra funds to hire two or three staff members to assist in setting the expected performance levels before the school year began. These were to be completed for use by the beginning of the fall term.

The director proposed that the job standards would list the specific criteria levels of performance necessary to judge if objectives had been completed. The job standards as developed by the supervisors were essentially rewritten SDS objectives which included the minimally acceptable levels of performance. The goals and procedures of the SDS were not changed.

Six of the seven supervisors completed the assignment of preparing job standards. For each department, job standards listed the nine goals of the SDS as seven objectives to be measured. The contents of Goals One, Two and Three, which were closely related, were combined to make the job standard objective "identification." One department, severe and profound, failed to complete the task. There appeared to be no valid reason for not completing the task.
The departments continued to list the Master Case Management Log as the source of data for the evaluation of the accomplishment of the objectives as listed in the job standards.¹

During Year Three of using the SDS, the coordinator reported several problems: first, there were no criteria for evaluation of the SDS objectives; second, the Master Case Management Log did not provide appropriate data for an evaluation; and third, the number of objectives was considered by the supervisors to be too large to be easily managed by the supervisor of each department. The last two problems were ignored when job standards were developed.

The coordinator, with administrative team support, recommended a case review of student records as the source of data to evaluate SDS and job standard objectives. Action on the recommendation to conduct a review of student records was, however, deferred by the director. The director and the supervisors did not fully agree on the use of the job standards and an SDS evaluation. Therefore, no evaluation efforts were conducted during this year.

The director's continued inclusion of the Level I referral and a large number of objectives in the SDS during Year Four raised a problem for the supervisors. Because they were to follow the objectives that had uncorrected problems, the management of the SDS was more difficult. To

¹Appendix E.
the coordinator, there appeared to be little hope for change because of the recommendations made during Year Two, Year Three and Year Four and the lack of action by the director. The coordinator observed that the supervisors may have continued the use of the Master Case Management Log in the job standards to thwart evaluation attempts.

Year Five: 1982-1983

Because the Master Case Management Log did not provide adequate evaluative data, the coordinator proposed a student case record review process to collect data. The student case record review process would consist of a 10 percent sample of case files from students identified as handicapped in AEA 6. AEA 6 staff members would conduct a review of the selected cases using a record review checklist.\(^1\) The record review checklist would provide a method to indicate by yes or no responses whether specific items were a part of each selected student's records. A 10 percent sample was judged by the coordinator to yield approximately three hundred cases, a sufficient number to represent the actual types of records completed and filed at AEA 6. The process was approved by the administrative team for implementation during the second semester.

All of the students identified as handicapped were

\(^{1}\)Appendix F.
sampled except visually impaired, hearing impaired, and severely and profoundly disabled. The number of students in each of these populations was less than sixty, and there were five or fewer staff members to serve them directly. These conditions were considered too restrictive by the administrative team.

Services to the disability groups not included in the sample were evaluated by a third-party team. The third-party team members evaluated the services by reviewing case files, interviewing teachers, principals, and parents, observing classrooms, and visiting with students. The results of this evaluation were reported to the director of the division of special education.

A sample equal to 10 percent of the students was selected by use of microprocessors. This resulted in 288 students being selected for the sample. The students were assigned in sets of five to each staff member for conducting the review.

The coordinator developed a record review checklist that listed all of the items on SDS forms G, H, and I and the Case Management Log.\(^1\) The reviewer was to mark "Y" if it was found that the item had been completed and "N" if not. The items were reviewed and approved by the administrative team as they were presented.

\(^1\)Appendix G.
The coordinator developed the instructions to conduct the record review.\textsuperscript{1} They were reviewed and approved by the administrative team as they were presented.

The coordinator conducted training sessions for the supervisors and department staff members. The coordinator used a sample case review during the training sessions. The coordinator informed all trainees that he was available to answer questions as each case was reviewed.

The completed checklists were returned to the coordinator by the end of the second semester. Of the 288 cases, 206 were completed and returned. Of these, fourteen were discarded because of errors or incompleteness.

The number of responses for each item was tabulated and percentages were computed. Due to large numbers of items not marked either Y or N, these items were coded as "No Response" and new percentages were computed for each item for Y, N, and "No Response." It appeared to the coordinator that the number of incomplete items may have been caused by at least three conditions. First, the instructions may have been unclear; second, the samples did not represent field conditions; and third, the procedures for completing the SDS forms may have been confusing. These conditions were presented to the administrative team, and their reports from the staff members tended to support the idea that the SDS

\textsuperscript{1}Appendix F.
procedures were confusing.

Many errors were made because the SDS review forms had a space for a parent signature, but the procedures did not require a signature except for permission to evaluate, permission for initial placement, and permission to dismiss from special education. Other confusions resulted from directions stipulating which IEP goals and objectives should be rewritten and which should be assumed to be continued but not rewritten.

The administrative team agreed to use the case review data for evaluating the SDS and the percent of Y responses to determine the objectives met. If there were no performance criteria determined in the job standard, the objective was listed as not met. This decision was reached because of the failure of a supervisor to provide criteria statements for each objective.

The administrative team reviewed the total number of items included in the case record review and agreed that many of the items did not have a direct relationship to the job standards. Eight items were selected by the administrative team to be used to measure the performance levels of the department job standards. The eight items were: specific objectives, parent permission, signature, recommended option, label, annual goal, person responsible and review.

The Y responses for the items "specific objectives"
and "parent permission" were matched to the objective "identification." The SDS procedures assure assessments after the specific reasons for the evaluation were explained to parents and permission to conduct the evaluation had been obtained from the parents of the student.

The Y responses for the item "signature" were matched to the objective "evaluation." According to SDS procedures, an evaluation was to be considered complete only if the evaluation report had been signed or initialed by the evaluator.

The Y responses for item "recommended option" were matched to the objective "verification." The recommended option was a descriptive listing of the staffing team's recommendation of specific services to be provided to the student.

The Y responses for the item "label" were matched to two objectives "placement" and "dismissal." The label was used to describe the type of handicap each student had. A label of "regular" and/or "none" indicated no handicap. A change of label from a handicap to "regular" and/or "none" served as an indication of dismissal.

The Y responses for the items "annual goal" and "person responsible" were matched to the objective "intervention." The annual goal was a broad statement of the instructional program to be developed for each student. The person responsible was listed as the specific person who would
provide the service indicated in each objective in the student's individual education plan (IEP).

The Y responses for the item "review date" were matched to the objective "review." The anticipated or actual date of the review was to be recorded for each IEP objective.

The results of the case reviews were reported as the percent of the items judged to be in the record. These data were analyzed for each disability group. The data were reported for the objectives of the job standards.

Where departments used the results from more than one item to measure criteria levels for an objective, the percents reported for those items were averaged. The mean percent was used for comparison with the criteria levels of the job standard to determine if the objective had been met. The departments of school social work, school psychology, and special education consultants were measured by data from the emotional, learning and mental disability groups. The average percent of the two items for all three disability groups was used to determine if the criteria levels had been met.

As seen in Table 1, the performance levels ranged from a high of 100 percent to a low of 60 percent, with preschool having the most reaching 100 percent. It also could be noted that "verification" was at 100 percent level except for speech, which was 98 percent. "Review" was lowest with three departments at 61 percent.
Table 1
Percent of Yes Responses for Selected Items From SDS Forms G, H and I

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Speech</th>
<th>Preschool</th>
<th>School Psychology</th>
<th>School Social Work</th>
<th>Special Education Consultant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identification</td>
<td>93</td>
<td>100</td>
<td>73.5</td>
<td>73.5</td>
<td>73.5</td>
</tr>
<tr>
<td>Evaluation</td>
<td>87</td>
<td>60</td>
<td>73</td>
<td>73</td>
<td>73</td>
</tr>
<tr>
<td>Verification</td>
<td>98</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Placement</td>
<td>72</td>
<td>100</td>
<td>94</td>
<td>94</td>
<td>94</td>
</tr>
<tr>
<td>Intervention</td>
<td>98.5</td>
<td>100</td>
<td>95.5</td>
<td>95.5</td>
<td>95.5</td>
</tr>
<tr>
<td>Review</td>
<td>77</td>
<td>80</td>
<td>61</td>
<td>61</td>
<td>61</td>
</tr>
<tr>
<td>Dismissal</td>
<td>98</td>
<td>80</td>
<td>100</td>
<td>100</td>
<td>100</td>
</tr>
</tbody>
</table>

When the performance levels obtained from the record review were compared to the performance levels expected, it was noted in Table 2 that under "verification" the levels obtained exceeded those expected in all cases. Under "dismissal," they exceeded in all cases except preschool, which failed to establish criteria. It was also noted that "review" was low in three out of the five with 61 percent obtained compared to 95 expected.

When these data were presented to the supervisors, they responded that the expected levels had been set too high.
Table 2

Performance Levels Obtained from the Record Review Compared to Performance Levels Expected for Each Department Objective

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Speech</td>
<td>93</td>
<td>100</td>
<td>87</td>
<td>95</td>
<td>98</td>
<td>95*</td>
<td>72</td>
<td>100</td>
<td>98.5</td>
<td>90*</td>
<td>77</td>
<td>90</td>
<td>98</td>
<td>95*</td>
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<tr>
<td>Preschool</td>
<td>100</td>
<td>0</td>
<td>60</td>
<td>95</td>
<td>100</td>
<td>95*</td>
<td>100</td>
<td>100*</td>
<td>100</td>
<td>95*</td>
<td>80</td>
<td>100</td>
<td>80</td>
<td>0</td>
</tr>
<tr>
<td>School Psychology</td>
<td>73.5</td>
<td>90</td>
<td>73</td>
<td>95</td>
<td>100</td>
<td>95*</td>
<td>94</td>
<td>100</td>
<td>95.5</td>
<td>95*</td>
<td>61</td>
<td>95</td>
<td>100</td>
<td>95*</td>
</tr>
<tr>
<td>School Social Worker</td>
<td>73.5</td>
<td>90</td>
<td>73</td>
<td>95</td>
<td>100</td>
<td>95*</td>
<td>94</td>
<td>100</td>
<td>95.5</td>
<td>100</td>
<td>61</td>
<td>95</td>
<td>100</td>
<td>95*</td>
</tr>
<tr>
<td>Special Education Consultant</td>
<td>73.5</td>
<td>95</td>
<td>73</td>
<td>95</td>
<td>100</td>
<td>95*</td>
<td>94</td>
<td>100</td>
<td>95.5</td>
<td>100</td>
<td>61</td>
<td>85</td>
<td>100</td>
<td>50*</td>
</tr>
</tbody>
</table>

*Obtained percent equaled or exceeded expected percent.
They reported that the compliance standard had contributed to the establishment of criteria levels too high for the expected performance of users of the SDS at AEA 6. The report submitted to the administrative team contained the results of the study, conclusions, and recommendations for modifications to the SDS. The recommendations were similar to those advocated by the supervisor in earlier years. A critique of the evaluation process was included in the report.

Year Six: 1983-1984

At the beginning of the sixth and last year, the coordinator reviewed the SDS manual to see if there had been changes made as a result of recommendations from the previous year. No changes were found in either the number of objectives or their contents. There were no modifications of job standards on file in the director's office. The director informed the administrative team that a new computer system would be developed to record IEP information on new forms, which apparently was the reason for no changes.

It was the coordinator's observation that the director failed to make any substantial changes in the SDS. The recommendations of the pilot test participants in Year Two and subsequent recommendations by the supervisors were not followed by the director.

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1 Appendix H.
The director's failure to make changes in the SDS may explain why the supervisors appeared to withhold support for completing the evaluation of the SDS objectives. To the coordinator, the actions of the supervisors to use the Master Case Management Log as a data source in the job standards, and the failure of some supervisors to complete the job standards indicated a lack of cooperation with the director. They had recommended the elimination of the Level I referral procedure and a reduction in the number of SDS objectives and the director did not support those suggestions. As a result of this decision by the director, the supervisors may have abandoned the agreement to evaluate the SDS objectives.

The procedures and results of the test of the SDS were presented from the field setting. The summary, conclusions and recommendations of the study are included in Chapter Five.
CHAPTER FIVE
Summary, Conclusions, and Recommendations

Introduction

This chapter is a presentation of the summary, conclusions and recommendations of the case study of efforts to develop and evaluate special education programs at AEA 6. The summary will list the strengths and weaknesses of the efforts as determined by the coordinator's analysis of case review data. The conclusion will present the coordinator's analysis of the actions of the administrative team to develop and evaluate the SDS objectives. The recommendations are suggestions to be considered by persons at other AEA's as they attempt to develop and evaluate special education program objectives.

Summary

The approved annual plan of AEA 6, known as the SDS, did contain goals and objectives to provide AEA special education services to handicapped children, ages birth to twenty-one. However, as the SDS listed nine goals and more than fifty objectives, there were too many goals and objectives developed to be managed effectively by the administrative team.
The administrative team conducted a pilot test of the instruments and procedures they had developed to meet the goals and objectives of the SDS. The pilot test did provide an opportunity for them to identify faulty instruments and procedures. However, the director did not take action on the recommendations of administrative team members and did not make changes in the SDS manual.

The original data collection source, the Master Case Management Log, did not provide accurate data to measure the SDS objectives. The alternate data source used by the administrative team was similar to the case review design used by the representatives of the Department of Public Instruction to conduct compliance reviews of special education programs in each AEA. Data related to specific objectives of the SDS were collected by a review of randomly selected case records of students identified as handicapped.

The administrative team did approve an evaluation plan and a procedure to select and train evaluators to measure the SDS objectives. The use of a coordinator was important in terms of providing continuity, structure, and monitoring information as the evaluation was conducted. The administrative team reported to the coordinator that the use of a sample of the case record review and checklist was important during the training session with those responsible to review case records.

The evaluation of the SDS objectives resulted in a
report that listed the objectives and noted those met by each department. The report contained recommendations for further modifications to the SDS. A review of the SDS objectives for the school year following the evaluation indicated that no changes had been made to the SDS manual, which listed the program objectives, procedures and forms used by AEA 6 to provide programs to handicapped children.

Conclusions

The number and type of objectives of the SDS determined the focus of the activities the management team used to supervise department staff members. The coordinator identified two problems that made the evaluation of those objectives difficult for the administrative team as they performed their supervisory duties.

The first problem was that the task force committee had developed over fifty objectives that were included in the SDS. That committee had attempted to include the procedures listed in the "Education for All Handicapped Children Act" in the SDS objectives. These were the same procedures that the Department of Public Instruction compliance review audit teams had reviewed during visits to AEA 6.

The number of objectives in the SDS was far greater than experts had suggested. One writer had suggested three or four objectives as an appropriate number for a manager to expect to accomplish. Each supervisor had the responsibility to direct staff activities to accomplish the many SDS
objectives. This was in addition to the duties of personnel evaluation, department budget development, and field office supervision. The amount of time and energy needed to audit the special education services of a department was overwhelming for the supervisors.

The second problem was that the original objectives of the SDS did not contain specific criteria levels of performance. This may have been an oversight by the task force committee or it may have reflected an assumption that the "compliance" level of 100 percent was implied. The later development of job standards by the supervisors included specific levels of performance for the SDS objectives. The criteria listed in the job standards ranged from 50 percent to 100 percent.

Management by objective theory called for the development of performance levels by using a method to predict high, average, and low levels of performance. No evidence was found by the coordinator to indicate that the task force members had used such a system. Neither was there evidence to indicate that the administrative team had used this method to develop the performance levels in the department job standards. The failure to use such a prediction method was determined by the coordinator to have resulted in the development of SDS objectives that listed specific performance levels set too high.

The coordinator had drawn conclusions about the pilot
test of the SDS, the effects of the Department of Public Instruction compliance review reports on the development of criteria levels in the SDS objectives, and the actions of the administration at AEA 6.

The administrative team reported to the coordinator that the pilot test of the SDS was important to the discovery of unexpected conditions in the field. Also, the use of training procedures with users of the SDS proved to be beneficial and provided a means for further training when correcting individual problems.

The coordinator found no evidence that the data collection source, the Master Case Management Log, had been included in the pilot test. Instead, the pupil accounting procedures established before the SDS were used to record the demographic information from the completed SDS forms. That information did not reflect the activities.

The coordinator found no evidence of substantive changes to the SDS based on the recommendations of participants and the administrative team following the pilot test. The director did not take action on most of the recommendations to modify the SDS for use in AEA 6.

It is an observation of the coordinator that the compliance reviews, conducted in AEA 6 by representatives of the Department of Public Instruction, influenced the administrative team to set the expected performance levels of SDS objectives too high. The compliance level used by the
Department of Public Instruction officials ignored the use of a high, average and low system of predicting performance levels. The results of the compliance reviews could have been more effectively used if the results of the first review had been accepted as baseline data. Future compliance levels could have been predicted for the AEA using this data. Also, information from the compliance reviews conducted of other AEA special education programs may have contributed to these predictions.

The use of a more accurate prediction method by the AEA 6 administrative team would have been helpful in establishing reasonable expected performance levels. The supervisors informed the coordinator that only thirteen of the thirty-five objectives had been met because the criteria levels had been set too high. The AEA 6 administrative team did not use the SDS evaluation data as baseline data and revised the specific levels of expected performance in the SDS objectives. Therefore, no further efforts were made to evaluate the SDS objectives at AEA 6.

The coordinator observed that the administrative team needed to use flexible procedures to develop and evaluate the SDS objectives. The director failed to make changes in the SDS following the recommendations of the administrative team. The supervisors did not make a change from the Master Case Management Log, as a data collection source, until the case record review approach was recommended by the coordinator.
during Year Four. A further observation by the coordinator is that because the members of the administrative team did not reach agreement about the goals, objectives, instruments and procedures of the SDS, the evaluation of the SDS objectives took too many years to complete.

Recommendations

The following recommendations are offered:

1. Further research by special education administrators seems necessary in two areas:

   a. First, there should be continued examination of the application of the single subject multiple baseline design to measure the performance of special education students. The concept offers the opportunity to measure a student's performance as it relates to his expected performance as stated in the Individual Education Plan (IEP) objectives. It accounts for many of the instructional variables, such as time, materials, and reinforcement techniques that may be used in the teaching process and contributes to the provision of an appropriate education.

   Such research may contribute information useful to further defining the term "appropriate" as used in the phrase "free appropriate public education" in the "Education for All Handicapped Children Act." The act contains well-defined
procedures to be used in providing services to handicapped children and their families, but very little information about the meaning of appropriate programs and services.

b. Second, further study of the feasibility of evaluating special education programs based on student performance as well as adherence to mandated procedures should be conducted. The effects of state and federal education agency audits of the special education programs and services offered to handicapped students by local and intermediate school districts may be detracting from efforts to provide an appropriate education to these children. The development of program objectives which focus on a standard of 100 percent may not be an educationally sound practice.

2. Representatives of the Department of Public Instruction should consider the objectives of the approved annual plan when conducting compliance reviews of AEA special education programs and services.

3. Future compliance reviews should make use of the low, average, and high prediction method, using the results of previous compliance reviews to determine the expected levels of compliance in each AEA.

4. The AEA administrative teams responsible for special
education programs should develop annual plans containing only three or four objectives, with specific levels of performance, to be submitted to the Department of Public Instruction for approval. The development of these objectives could be enhanced by using the following checklist.

**Develop Objectives**

1. The administrative team should state the specific purpose of the organization.

2. A committee of representatives from the user groups of AEA special education services should be selected by the administrative team to develop the program objectives.

3. The director should appoint a project coordinator to schedule and keep records of the activities of the committee.

4. The committee should follow a format that will state each objective in specific measurable terms and include who will conduct an activity, what will be accomplished, when the activity will be performed, where it will occur, and how the performance will be measured and reported.

5. The committee should establish "reasonable" performance levels through a prediction method of stating low, average and high levels of performance and reach consensus on the expected levels to be
included in each program objective.

**Develop Instruments and Procedures**

1. The administrative team should allocate and organize the resources necessary to accomplish the objectives.

2. The administrative team should develop a manual to explain and define the procedures and forms for users of the program.

3. The guide should include specific instructions which describe the conditions and behaviors to be used as staff members work to complete each objective. The guide should explain the sequence of activities, which form to use, how to complete each form, timelines for completing the forms, and how the forms will be processed.

**Pilot Test the Program Objectives**

1. A test of the activities and procedures listed in the manual should be conducted in an actual field situation.

2. The administrative team should prepare for the pilot test by using the following sequence of activities: identify a person responsible for coordinating the pilot test, determine the pilot test participants, prepare the manual to be used in the test, train those who will test the procedures and forms in the manual, monitor the activities of users as the test is conducted, make changes if
problems develop that halt the activities, collect suggested changes and reactions from all those who participated in the pilot test, review the suggestions and other pilot test data and determine modifications to the manual and prepare the new manuals for use or terminate the program.

Select and Train Evaluators

1. The director should select a coordinator for the evaluation of the program objectives.

2. The coordinator should develop an evaluation plan that will include how and when the data will be collected, analyzed and reported.

3. The coordinator's evaluation plan should be reviewed and approved by the administrative team.

4. The coordinator should secure agreement from all administrative team members to support the evaluation plan, due to the impact the results will have on their program objectives.

5. The administrative team should select and train those who will conduct the data collection activities of the evaluation plan.

6. The coordinator should use training procedures that include samples of the procedures that will be used in the field.

7. The coordinator should conduct at least one trial run to provide the coordinator with information
about the field conditions and the data collection forms and procedures.

Conduct the Evaluation

1. Selected staff members should collect the data to be used in measuring the accomplishment of the program objectives following the procedures of the evaluation plan.

2. The coordinator should analyze the data collected to determine the performance levels for each of the program objectives.

3. A preliminary report should be prepared and then checked for accuracy by the coordinator and members of the administrative team.

Prepare the Evaluation Report

1. The coordinator should complete the final evaluation report to be delivered to the administrative team.

2. The report should include at least a summary of the results of the evaluation, conclusions from the study, and recommendations about future use of the program.
   a. The summary should be a brief presentation of the results of the study directly related to the performance levels obtained in the study.
   b. The conclusions should be meaningful interpretations of the results and should describe and explain the circumstances and procedures used
in the evaluation process that may have influenced the results obtained in the study.

c. The recommendations should be statements of value related to the objectives and the program and should contain suggestions to improve or modify the program, if necessary.

**Critique the Evaluation Process**

1. The coordinator should develop a critique of the process used to evaluate the program objectives.

2. The coordinator should include a comparison of the procedures approved by the administrative team to the procedures used in the actual study and a listing of problem areas, with possible remedies included.

3. Statements should be made to indicate whether all of the steps of process were completed and whether the timelines were met.

4. Finally, recommendations regarding any future use of the evaluation procedures should be made.
BIBLIOGRAPHY

Books


BIBLIOGRAPHY

Books


Periodicals


Other Sources


Iowa Department of Public Instruction. Special Education Program and Service Plan. Des Moines, IA: Department of Public Instruction, 1980.


SUMMARY

The foregoing report contains much data and analysis. Here a summary of the major points of the foregoing report will be presented. The reader is asked to remember that the items here are highlights only and that the document in its entirety should be perused in order to obtain an accurate reflection of the evaluation team's findings in a number of areas. The material in this summary will be organized in a fashion consistent with its first appearance in the original document. Brief statements will be made about each of the major headings from the Table of Contents.

Under the area of evaluation it was found that:

- Referral and screening records are well maintained;
- Assessment in the areas of vision, hearing, and speech and language need to be completed more routinely than they appeared to be in the past;
- In the area of staffing, the following findings can be highlighted:
- The majority of special education teachers feel the evaluation procedures utilized are average or "good," and
- Both special education teachers and BPA personnel feel the evaluation procedures are improving this year as compared to last.

Similarly, the diagnosis appeared to be supportable from the information maintained in the records in the majority of records reviewed.

All groups surveyed by interviewers mentioned excessive time requirements as characteristic of the evaluation procedures employed.

CONSUMER SATISFACTION, AEA 1-16

APPENDIX A
SUMMARY

The foregoing report contains much data and analysis. Here a summary of the major points of the foregoing report will be presented. The reader is asked to remember that the items here are highlights only and that the document in its entirety should be perused in order to obtain an accurate reflection of the evaluation team's findings in a number of areas. The material in this summary will be organized in a fashion consistent with its first appearance in the original document. Brief statements will be made about each of the major headings from the Table of Contents.

Under the area of evaluation it was found that:

Referral and screening records are well maintained;

Assessment in the areas of vision, hearing, and speech and language need to be completed more routinely than appeared to be the case during the review process;

In the majority of records reviewed it was felt that the choice of procedures and instruments utilized was appropriate for the age and suspected disability of the child;

Similarly, the diagnosis appeared to be supportable from the information maintained in the records in the majority of records reviewed;

All groups surveyed by interviewers mentioned excessive time requirements as characteristic of the evaluation procedures employed;

Majority of special education teachers feel the evaluation procedures utilized are average or "good," and

Both special education teachers and AEA personnel feel the evaluation procedures are improving this year as compared to last.

In the area of staffings the following findings can be highlighted:

In the great majority of cases it appears that children are staffed by an evaluation team prior to placement, a very appropriate circumstance;
A written record of staffing results appear to be routinely maintained, an appropriate circumstance;

Parent invitation for attendance at placement staffings appears to be nearly uniformly implemented and this is of course also appropriate;

Greater attention needs to be paid to including sufficient data in records to support the recommendations of the staffing team in the placement decision;

In the majority of records reviewed, it could be determined that staffing team recommendations had been implemented; and

A majority of all individuals surveyed felt that the placement staffing procedures are adequate and improving, those who were initially opposed to the system slowly recognizing its benefits.

The general heading of placement includes a number of findings of interest:

Although the majority of individual educational plans (IEP) showed evidence of staffing-team involvement in their generation, there appears to be less staffing involvement here than is true for placement decisions;

IEP's usually contained adequate statements of students' levels of functioning, goals, objectives, and listing of those educational services to be provided;

IEP's usually did not make reference to the extent to which a student will participate in a regular education program, the projected dates for beginning services and the duration of those services, and least often included were references to evaluation procedures to see whether short term objectives are being achieved;

The goals noted in IEP's need improving to make them more helpful in programming and much attention needs to be directed toward consideration of the evaluation techniques by which progress on short term objectives will be measured;

There appears to be little involvement of regular education instructional staff in development of IEP's;

While the majority of IEP's appear to be developed with parent input, there is need for improved parental involvement here;
While the majority of all respondent groups surveyed indicated that they were not having problems implementing IEP requirements, a substantial minority expressed concern about confusion and change of procedures in this regard during the last year;

Communication to parents about their child's program appears to be consistent and understandable if not always on a regular schedule;

The majority of children served appear to be in the least restrictive models which are appropriate;

General education resources appear to be routinely explored before special education programs are seriously considered, an appropriate circumstance;

Parents are generally pleased about programs in special education provided for their children; and

In 100 percent of those cases where annual reviews should have occurred from those records surveyed, such an annual review could be documented, again a commendable circumstance.

Another concern of the visitation team falls in the area of procedural safeguards. The following summative points can be extracted from the report:

In a majority of cases it appears parents have given permission to have their child evaluated for potential placement in special education programs and services;

However, in only half of the cases could it be determined that such permission was given prior to the evaluation, a condition to which the AEA should direct attention;

Although it appears that evaluations were conducted prior to placement in a majority of cases reviewed, it was difficult in many cases to make this determination with assurance because of inconsistent inclusion of dated reference;

The permission to place form was contained in a great majority of case records reviewed, an appropriate circumstance;

Attention will need to be directed toward greater implementation of record release forms in order to be consistent with confidentiality safeguards mandated by federal regulation;
A relatively high proportion of parents appeared not to be aware of the fact that they had a right to review their child's records, a circumstance which should receive attention; and,

Less than half of the records reviewed revealed that there had been parental involvement in generation of the IEP, a circumstance which should receive attention.

Pupil accounting efforts attempt to determine that the sequence of activities carried out between the entry of students into a special education instructional program, the transfer of students to other programs, and the removal of students from special education programs is in compliance with state and federal regulations and procedures. Salient points for summary here are as follows:

The system employed to maintain records on children in special programs was generally adequate;

There tended to be a more accurate record for students who had entered the program recently as opposed to those who had entered five or more years ago;

Records of intellectual assessments appear to be those which are most frequently maintained and only one record of the sixty-one examined in this regard showed that the assessment had been conducted more than three years prior, a commendable circumstance;

Records of referral and parental permission to evaluate appeared consistently in place only for those students placed since July 1, 1975;

Information regarding speech and hearing assessments could be found in only approximately one-third of the records examined, a finding which should be of concern to the Area;

Only rarely could records of visual and social adjustment assessments be found in the records reviewed, a finding which should be of concern to the Area;

Three-fourths of the records reviewed contain no record of health histories, a circumstance which should be remedied;

An appropriate number and variety of professionals appeared to routinely be involved in staffing procedures, according to a records review;
There is need to improve the consistency with which dates of service, testing, parental notification, etc., are placed in the file: only the date of staffing was routinely indicated; and

There is serious need to reconsider the mechanism being used to remove students from the weighted enrollment count as they leave programs for whatever reason, as numerous errors in this regard were discovered: approximately 40 percent of student records randomly reviewed indicated that children were in programs who in fact were not because they had been removed from the program or had graduated from school.

AEA interaction with community and governmental agencies revealed a number of points which would be useful to summarize:

There appears to have been very little contact between the Area and state sponsored institutions within the geographic boundaries of AEA 6, a circumstance which should receive attention.

There appears to be a clearer line of communication between the AEA and state-sponsored service agencies within the geographic boundaries of AEA 6;

While parents were generally pleased with the efforts made to provide programs for special children within the Area there was concern that the AEA needed to provide greater leadership in the area of inservice to regular education teachers to facilitate integration and mainstreaming; and

Individuals from other community agencies interviewed were generally supportive of AEA efforts but did suggest that the Area needs to embark on a public relations program with constituent publics.

Special education instructional programs were reviewed on a number of criteria and there are substantive points which can be summarized. They are as follows:

Class size and age span within a class appeared consistent with regulations in a majority of cases reviewed, an appropriate circumstance;

Class activities in nearly all classes appeared appropriate based on the disabilities of the children enrolled;
In a significant number of cases there appears to be an inconsistency between the class lists provided by the Area Education Agency and the actual children being served in that class in that there were frequent instances of more children being served than were included on a class roster, a circumstance which should receive the urgent attention of the Area;

While in a majority of cases the facilities available to handicapped children in their classes was equivalent to that available to non-handicapped children in the same building, a significant minority of instances existed where the facilities were less than equivalent, a circumstance which should be of concern to the Area;

In the majority of classrooms, acquisition of equipment and materials to support the programs was not a problem;

Although transportation arrangements appear generally adequate for those children needing special transportation, there were two circumstances of significant deviation from regulations which will need to be attended to urgently; and

Parents and principals were generally pleased with the transportation arrangements which had been made.

A review was made of AEA 6 publications to determine the compliance with regard to plans, policies, and procedures. Findings of note are as follows:

The system slated to be implemented for the 1978-79 year to monitor the process of services should be implemented as early as possible rather than waiting until next year;

The significant involvement of principals in the staffing and IEP procedures should be reviewed;

The job description manual is current and well-written generally; specific concerns being expressed about the "referral network coordinator" and several positions within the preschool program;

It was difficult to identify the intended sequence of events from referral to placement because of the proliferation of different forms to serve various purposes over the last two years, a concern which should continue to be addressed by the Area;
Consideration should be given to reviewing the wording of a parent-permission-for-evaluation form as it is quite detailed and legalistic;

The disability of the child should be noted on the form which requires parental permission to place a child in special education or to remove a child from special education to place him/her back in the regular program;

The majority of a randomly selected sample of local education agencies indicated that they had not adopted formal special education policies and procedures, a circumstance which should be of concern to the Area;

The Area must accurately reflect state and federal regulations in any policy manuals or guideline booklets it publishes;

The content as well as the tone of a section of the publication titled "Responsibilities and Duties of the Diagnostic-Educational Team" are appropriate and helpful;

There is need to reconsider a mechanism by which input is requested from constituents as regards AEA plans, policies and procedures in special education so as to expand the breadth of input beyond the administrative structure of the local districts; and,

The Area will need to deal with relatively intense feelings on the part of constituents that the input which is given is not in truth seriously considered by the administration of the Area.

Financial review of the Area Education Agency was accomplished on site by examining a number of sources of information including document review and interview. Pertinent points are two:

... The record-keeping system is adequate for present circumstances; and,

... The Area must review the mechanism by which it arrives at a tuition charge for youngsters served in the Pleasant Hill Developmental Center.

A financial review of seven local education agencies was conducted based on information contained in the Secretary's Annual Report. A general trend of findings is as follows:
The SAR's for six of the districts reviewed were in need of correction prior to the on-site visit;

Three of the local education agencies reviewed did not accurately report instructional salaries and benefits;

Amounts reported on the SAR for supply and material expenditures were found to be accurate in all cases, a commendable circumstance;

Contracts between LEA's and AEA 6 were generally appropriate; however, three districts reported purchasing services from AEA 7 without a formal contract; and,

There appears to be an area-wide concern for proper fiscal control of special education monies.

There were two issues of concern in the area of personnel. The first concern centered on the appropriateness of authorization for each employed individual serving handicapped children. The second concern centered on the appropriateness of utilization, supervision, and training of individuals serving as paraprofessionals. Some summary comments are as follows:

The majority of personnel employed directly by Area Education Agency 6, special education division, are properly authorized to provide the services for which they were employed;

Generally, individuals employed by local education agencies to serve handicapped children are appropriately authorized to provide the services for which they have been employed;

Exceptions to this general trend of LEA employee certification status tended to fall into difficulties with level of authorization (elementary trained individuals serving adolescent age handicapped students);

The supervision afforded preschool aides and audiometricists appeared sufficient while that afforded communication aides will need strengthening;

There is particular concern about the lack of supervision provided aides in the Pleasant Hill Center;

Degree of freedom authorized for aides in the pursuit of their responsibilities appeared adequately circumscribed for all populations with the exception of aides employed in the Pleasant Hill Developmental Center where there appears to be significant violation of the limits of authority which can be afforded these individuals;
Pre-service training for all paraprofessional populations interviewed appeared adequate with the exception of the aide employed at the Pleasant Hill Developmental Center where pre-service training was not made available; and,

Inservice training programs appeared to be routinely provided to aides employed in the Pleasant Hill Developmental Center but do not appear as readily available to other aide populations, a circumstance to which the AEA should direct attention.

Several areas of investigation were pursued in the area of staff functioning and the highlights of the results of that investigation will be listed here:

The competency and professionalism of support service personnel were generally felt to be high by the recipients of those services as well as by the support staff themselves;

While most groups surveyed indicated that they were "getting the services they wanted" the special education teacher population was divided on this question;

Parents apparently depend primarily, when they have questions about special education, upon the teacher of their child's class;

The services of speech clinicians and school psychologists are apparently those most routinely provided to handicapped children after the placement staffing has been held; and,

There appears to be substantial concern on the part of the majority of individuals questioned as to the adequacy of special education administrative services and the reader is referred to the body of the report for a detailed discussion of these.

There are a number of areas of investigation which are reported in the document under the heading of miscellaneous. These comments will be reviewed here. The most substantial question from the "miscellaneous" category concerns itself with the strengths and weaknesses, as perceived by the respondents, of the AEA special education operation. The strengths and weaknesses, summarized from the report, appear below, strengths noted first:
... As noted earlier, the quality of support personnel was cited as a strength with specific reference being made by a number of respondents to consultative assistance in the area of materials and the child advocacy posture taken by support service persons;

... Supplies and materials were seen as adequate;

... Speech and hearing personnel, as well as school psychology personnel, were cited as particular strengths;

... There did not appear to be a significant population of unserved handicapped individuals in Area 6 according to statements made by some respondents;

... Media services of the AEA were cited as a strength;

... Staffing procedures were seen as a positive element; and,

... Services are available to smaller districts on a more intense basis than could be the case if the local districts were asked to provide them independently.

The weaknesses cited in response to the questions seeking input in this area can be summarized in the main points as follows:

... Both AEA general and special education administrative services were cited as significant weaknesses (the reader is referred to the report for the specifics in this regard);

... There is a felt need on the part of respondents for more support service personnel to serve the schools (especially consultants and psychologists);

... Staff turnover was listed as a weakness; and,

... Failure of the AEA to encourage models of programming other than resource was cited as a weakness by a number of respondents.

When asked what changes the respondents would make if they could "make just one change in the function or operation of special education programs in Area 6" there was some consistency of response pattern as noted below:
The paper work requirements were selected by many as an area needing significant change;

More support services was also as a listed change;

A change in the special education administration was specifically listed by respondents in response to this question as were other administrative concerns as they appeared in other sections of the report;

A resolution of communication problems between AEA and the various publics served by the Area was listed as a change; and,

Inservice efforts were seen as potential targets for change by a number of respondents.

Because inservice was an area of concern as a result of the opinionnaire analysis, a follow-up question was asked in the on-site interview which essentially validated the original finding with the exception of speech clinicians for whom inservice does not appear to be a problem. The structured interview asked for suggestions to improve the inservice offered and these are included in the body of the report.

The area of paper work was one of substantial concern to most groups as can be seen from analysis of the opinionnaire results and therefore a question in this area was included in the on-site interview. The results of the on-site interview validated the accuracy of the opinionnaire data. The primary concern in the area of paper work appears to be that the forms change too quickly. Other concerns voiced can be found in the body of the report. Suggestions for improving this situation relative to paper work concerns were solicited in the structured interview and the results of those solicitations are contained in the report as are an additional body of suggestions offered by the authors of this report.

AEA receptivity to new ideas was also investigated as a result of pre-visit opinionnaire analysis. The general results of the opinionnaire were validated by the on-site interviews and the specific concerns of various population groups are reviewed in the body of the report.
TO:  Mike Donahue, Special Education Director, AEA 6
FROM:  John W. Hillmapps, Ph.D.
DATE:  January 9, 1981

SUBJECT:  Statistical Summary of 1979-80 Rules Compliance Review

Enclosed is a statistical summary of the findings from the 1979-80 Rules Compliance Review conducted by the State Division of Special Education.

The findings are presented [by compliance issue] for the AEA and for the State as a whole. The reader of this report must keep in mind that the review covered only a sample of districts, buildings, programs, and records. Therefore, the numbers and percentages reported here are based on a limited sample and are "estimated" values and statistical inferences to the population and not "actual" values.

APPENDIX B

STATISTICAL SUMMARY OF 1979-80 RULES COMPLIANCE REVIEW

This report will not be sent to the legislature, nor will it be shared with anyone beyond this office and yours, without your knowledge and consent. It is for your information and ours; and we will use it as a baseline for progress in compliance issues. I hope it will be of interest and value to you and your staff.

Please let me know if you have any questions about the report.

Sincerely,

PUPIL PERSONNEL SERVICES BRANCH
SPECIAL EDUCATION DIVISION

John W. Hillmapps, Ph.D., Consultant
Special Education Evaluation Service
Iowa Department of Public Instruction

JWM/nkb

Enclosure
TO:     Mike Donahue, Special Education Director, AEA 6
FROM:   John W. Millsapps, Ph.D.
DATE:   January 9, 1981
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Please let me know if you have any questions about the report.

Sincerely,

PUPIL PERSONNEL SERVICES BRANCH
SPECIAL EDUCATION DIVISION

John W. Millsapps, Ph.D., Consultant
Special Education Evaluation Services
Iowa Department of Public Instruction

JWM/nkb

Enclosure
A. Child Identification

PUBLIC AGENCY REQUIREMENTS

1. AEA and all LEAs are participating in child-find activities.
   - 121a.128
   - Actual: 0
   - Estimated: 0
   - % of Districts Noncompliant: 100
   - % of Districts in Compliance:
     - Entire State: 94.6
     - from Sample:
       - Actual: 14
       - Estimated: 24

2. All children identified are further evaluated, if appropriate.
   - Actual: 0
   - Estimated: 0
   - % of Districts Noncompliant: 100
   - % of Districts in Compliance:
     - Entire State:
     - from Sample:
       - Actual: 0
       - Estimated: 0

B. Protection in Evaluation

- Fed. Regs. or State Rules

1. Tests are administered by trained personnel using standardized procedures.
   - 121a.530-534
   - 12.18
   - Actual: 1
   - Estimated: 1
   - % of Districts Noncompliant: 94.7
   - % of Districts in Compliance:
     - Entire State: 99.1
     - from Sample:
       - Actual: 3
       - Estimated: 4

2. A multidisciplinary team makes the evaluation.
   - Actual: 2
   - Estimated: 2
   - % of Districts Noncompliant: 89.5
   - % of Districts in Compliance:
     - Entire State: 92.6
     - from Sample:
       - Actual: 24
       - Estimated: 33

3. Reevaluation takes place every three (3) years.
   - 12.18
   - Actual: 0
   - Estimated: 0
   - % of Districts Noncompliant: 100
   - % of Districts in Compliance:
     - Entire State: 90.0
     - from Sample:
       - Actual: 29
       - Estimated: 45
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<td>4. The agency has procedures for: Providing to parents, on request, information about where to obtain an independent educational evaluation.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>J. PARTICIPATION IN PUBLIC SCHOOL PROGRAMS BY CHILDREN ENROLLED IN NON-PUBLIC SCHOOLS</td>
<td>121a.450-460</td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>99.6</td>
<td>1</td>
</tr>
<tr>
<td>Procedures include opportunities to participate in special education and related services.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Item</td>
<td>Description</td>
<td>Actual</td>
<td>Estimated</td>
<td>State of Iowa</td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>5.</td>
<td>To maintain records for at least three years after the pupil has completed the school program or would have reached the maximum age of compulsory school attendance, unless other time requirements have been prescribed.</td>
<td>12.24(6)</td>
<td>2</td>
<td>96.7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td>Procedures have been implemented: To permit parents to inspect and review their child's educational records.</td>
<td>0</td>
<td>0</td>
<td>98.3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td>To insure that these records are made available to parents without unnecessary delay and before any IEP meeting or hearing, and in no case more than 45 days after the request.</td>
<td>0</td>
<td>0</td>
<td>98.6</td>
<td></td>
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</tr>
<tr>
<td>8.</td>
<td>To keep a record of parties obtaining access to educational records, including the name of the party, date of access, and the purpose.</td>
<td>6</td>
<td>7</td>
<td>79.3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9.</td>
<td>To amend records at parents request if they are found to be inaccurate, misleading, or violating the privacy or other rights of the child.</td>
<td>2</td>
<td>2</td>
<td>80.6</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>AEA #</th>
<th>6</th>
<th>9</th>
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<tr>
<td>FEDERAL REGULATIONS OR STATE RULES</td>
<td>ACTUAL # of Districts Cited for Noncompliance</td>
<td>ESTIMATED # of Districts Noncompliant (from Sample)</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>---------------------------------------------</td>
<td>------------------------------------------------</td>
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<tr>
<td>121a.560-575 Conf. Regs. 99.5, 99.6</td>
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<td>7</td>
</tr>
<tr>
<td>12.24(6)</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>4</td>
<td>7</td>
<td>8</td>
</tr>
</tbody>
</table>

6. CONFIDENTIALITY

1. The AEA and LEAs have formulated and adopted a policy: Of informing parents and eligible students of their rights regarding records.

2. Each agency has given annual notice to parents containing: Their rights related to records, the agency's policy, the records regulations.

3. To obtain parent consent before disclosing personally identifiable information to anyone other than school officials.

4. To maintain, for public inspection, a current listing of the names and positions of employees who may have access to personally identifiable information.
<table>
<thead>
<tr>
<th>FEDERAL REGULATIONS OR STATE RULES</th>
<th>ACTUAL # OF Districts Cited for Noncompliance</th>
<th>ESTIMATED # OF Districts Noncompliant (from Sample)</th>
<th>% OF Districts Noncompliant</th>
<th>% OF Compliance ENTIRE STATE</th>
<th>ACTUAL # OF Districts Cited for Noncompliance (from Sample)</th>
<th>ESTIMATED # OF Districts Noncompliant (from Sample)</th>
</tr>
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<tr>
<td>121a.340-348</td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>100</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>12.21(2)</td>
<td>121a.13</td>
<td>12.3(8)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15. For handicapped children in parochial or other private schools: IEPs are developed/implemented for children receiving special education and related services from AEA/LEA.</td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>99.2</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>2. Transportation</td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>94.7</td>
<td>17</td>
<td>23</td>
</tr>
<tr>
<td>3. School health services</td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>94.2</td>
<td>18</td>
<td>24</td>
</tr>
<tr>
<td>4. School social work services</td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>93.3</td>
<td>21</td>
<td>30</td>
</tr>
<tr>
<td>5. Work experience</td>
<td>0</td>
<td>0</td>
<td>100</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Item</td>
<td>Description</td>
<td>Federal Regulations or State Rules</td>
<td>Actual # of Districts Cited for Noncompliance</td>
<td>% of Districts Noncompliant (from Sample)</td>
<td>% of Districts in Compliance</td>
<td>Estimated % of Compliance of Districts Compliant</td>
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</tr>
<tr>
<td>9</td>
<td>Contents of the IEP describe: Present levels of educational performance.</td>
<td>12.21(2)</td>
<td>1</td>
<td>94.7</td>
<td>87.7</td>
<td>35</td>
</tr>
<tr>
<td>10</td>
<td>Annual goals and short-term instructional objectives.</td>
<td></td>
<td>1</td>
<td>94.7</td>
<td>92.8</td>
<td>21</td>
</tr>
<tr>
<td>11</td>
<td>Description of the special education and related services to be provided.</td>
<td></td>
<td>1</td>
<td>94.7</td>
<td>92.1</td>
<td>23</td>
</tr>
<tr>
<td>12</td>
<td>Statement as to the extent of participation in regular education.</td>
<td></td>
<td>2</td>
<td>89.5</td>
<td>91.2</td>
<td>27</td>
</tr>
<tr>
<td>13</td>
<td>Dates of initiation and duration of the special education services.</td>
<td></td>
<td>2</td>
<td>89.5</td>
<td>84.3</td>
<td>44</td>
</tr>
<tr>
<td>14</td>
<td>Objective evaluation criteria and procedures to measure progress (at least annually) toward meeting objectives.</td>
<td></td>
<td>2</td>
<td>89.5</td>
<td>86.8</td>
<td>37</td>
</tr>
<tr>
<td>Item</td>
<td>Federal Regulations or State Rules</td>
<td>Actual # of Districts Cited for Noncompliance</td>
<td>Estimated # of Districts Noncompliant (from Sample)</td>
<td>% of Districts in Compliance</td>
<td>% of Compliance Entire State</td>
<td>Actual # of Districts Cited for Noncompliance (from Sample)</td>
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</tr>
<tr>
<td>2.</td>
<td>Participants in IEP meetings include: A representative of the public agency who is qualified to provide or supervise the provision of special education.</td>
<td>12.21(2)</td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>96.0</td>
</tr>
<tr>
<td>3.</td>
<td>The child's teacher</td>
<td></td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>95.5</td>
</tr>
<tr>
<td>4.</td>
<td>Parent(s)</td>
<td></td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>93.3</td>
</tr>
<tr>
<td>5.</td>
<td>Evaluation personnel (for a new referral)</td>
<td></td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>98.6</td>
</tr>
<tr>
<td>6.</td>
<td>The child, when appropriate</td>
<td></td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>7.</td>
<td>Parent participation includes: Parents being notified early enough to allow an opportunity to participate.</td>
<td></td>
<td>1</td>
<td>1</td>
<td>94.7</td>
<td>77.5</td>
</tr>
<tr>
<td>8.</td>
<td>Documentation of attempts to involve parent(s).</td>
<td></td>
<td>1</td>
<td>1</td>
<td>94.7</td>
<td>77.7</td>
</tr>
<tr>
<td>FEDERAL REGULATIONS OR STATE RULES</td>
<td>ACTUAL # of Districts Cited for Noncompliance</td>
<td>ESTIMATED # of Districts Noncompliant (from Sample)</td>
<td>% of Districts IN Compliance</td>
<td>% of Compliance ENTIRE STATE</td>
<td>ACTUAL # of Districts Cited for Noncompliance (from Sample)</td>
<td>ESTIMATED # of Districts Noncompliant (from Sample)</td>
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</tr>
<tr>
<td>2. Participants in IEP meetings include: A representative of the public agency who is qualified to provide or supervise the provision of special education.</td>
<td>12.21(2)</td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>96.0</td>
<td>12</td>
</tr>
<tr>
<td>3. The child's teacher</td>
<td></td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>95.5</td>
<td>11</td>
</tr>
<tr>
<td>4. Parent(s)</td>
<td></td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>93.3</td>
<td>22</td>
</tr>
<tr>
<td>5. Evaluation personnel (for a new referral)</td>
<td></td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>98.6</td>
<td>4</td>
</tr>
<tr>
<td>6. The child, when appropriate</td>
<td></td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>100</td>
<td>0</td>
</tr>
<tr>
<td>7. Parent participation includes: Parents being notified early enough to allow an opportunity to participate.</td>
<td>1</td>
<td>1</td>
<td>94.7</td>
<td>77.5</td>
<td>62</td>
<td>100</td>
</tr>
<tr>
<td>8. Documentation of attempts to involve parent(s).</td>
<td>1</td>
<td>1</td>
<td>94.7</td>
<td>77.7</td>
<td>61</td>
<td>99</td>
</tr>
<tr>
<td>AEA #</td>
<td>6</td>
<td>Estimated Overall % of Compliance</td>
<td></td>
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<tr>
<td># of Districts</td>
<td></td>
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<td></td>
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<tr>
<td># of Districts Sampled</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Overall Rank</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>FEDERAL REGULATIONS OR STATE RULES</th>
<th>ACTUAL # of Districts Cited for Noncompliance</th>
<th>ESTIMATED # of Districts Noncompliant (from Sample)</th>
<th>% of Districts in Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. Each handicapped child is educated in the school which he/she would attend if not handicapped unless the IEP requires another arrangement.</td>
<td>12.19</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>4. Placement is in accord with the IEP.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Parents are given written notice prior to any subsequent change in placement.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| D. CHILDREN RECEIVE SPECIAL EDUCATION AND RELATED SERVICES OUT-OF-STATE: | 12.12(6) Sect. 273.3 Iowa Code | | | | | |
| - Only when specified in child's IEP. | | | | | | |
| E. INDIVIDUALIZED EDUCATIONAL PROGRAMS | 121a.340-348 | | | | | |
| - IEP is in effect prior to provision of special education and related services. | 12.21(2) | | | | | |

<table>
<thead>
<tr>
<th>State of Iowa</th>
<th># of Districts: 445</th>
<th># of Districts Sampled: 301</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estimated Overall % of Compliance:</td>
<td></td>
<td></td>
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</tbody>
</table>
### 1979 - 80 COMPLIANCE REVIEW ITEMS SAMPLED

<table>
<thead>
<tr>
<th>13. Other elements deemed appropriate by the diagnostic-educational team.</th>
<th>121a.530-534</th>
<th>12.18</th>
<th>0</th>
<th>0</th>
<th>100</th>
<th>100</th>
<th>0</th>
<th>0</th>
</tr>
</thead>
<tbody>
<tr>
<td>14. Procedures are implemented for securing parent consent prior to initial evaluation.</td>
<td>12.18</td>
<td>3</td>
<td>4</td>
<td>86.3</td>
<td>92.3</td>
<td>22</td>
<td>34</td>
<td></td>
</tr>
<tr>
<td>15. Procedures are implemented for notification of parents for all subsequent evaluations.</td>
<td>121a.533</td>
<td>121a.550-553</td>
<td>0</td>
<td>0</td>
<td>100</td>
<td>96.4</td>
<td>11</td>
<td>16</td>
</tr>
</tbody>
</table>

### C. PLACEMENT PROCEDURES

<table>
<thead>
<tr>
<th>1. Placement recommendations are made by a group of persons knowledgeable about the child, the meaning of evaluation data, and the placement options.</th>
<th>12.19</th>
<th>0</th>
<th>0</th>
<th>100</th>
<th>96.6</th>
<th>10</th>
<th>15</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Placement decisions take into account the least restrictive environment considerations: Each child's placement is determined at least annually.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

State of Iowa

<table>
<thead>
<tr>
<th># of Districts: 445</th>
<th># of Districts: 301</th>
</tr>
</thead>
</table>

Estimated Overall % of Compliance: ___
Prior to placement in a special education program, comprehensive testing has occurred where appropriate to include recent evaluations of:

1. Vision: **12.18**
   - Actual # of Districts Cited for Noncompliance: 5
   - Estimated # of Districts Noncompliant (from Sample): 6
   - % of Districts in Compliance: 73.7
   - % of Compliance Entire State: 64.5
   - Actual # of Districts Cited for Noncompliance (from Sample): 104
   - Estimated # of Districts Noncompliant (from Sample): 158

2. Hearing: **1**
   - Actual # of Districts Cited for Noncompliance: 1
   - Estimated # of Districts Noncompliant (from Sample): 1
   - % of Districts in Compliance: 94.7
   - % of Compliance Entire State: 79.2
   - Actual # of Districts Cited for Noncompliance (from Sample): 60
   - Estimated # of Districts Noncompliant (from Sample): 93

3. Language and Speech: **4**
   - Actual # of Districts Cited for Noncompliance: 5
   - Estimated # of Districts Noncompliant (from Sample): 5
   - % of Districts in Compliance: 79.0
   - % of Compliance Entire State: 78.7
   - Actual # of Districts Cited for Noncompliance (from Sample): 62
   - Estimated # of Districts Noncompliant (from Sample): 95

4. Intellect: **0**
   - Actual # of Districts Cited for Noncompliance: 0
   - Estimated # of Districts Noncompliant (from Sample): 0
   - % of Districts in Compliance: 100
   - % of Compliance Entire State: 94.8
   - Actual # of Districts Cited for Noncompliance (from Sample): 15
   - Estimated # of Districts Noncompliant (from Sample): 23

5. Motor Functioning: **5**
   - Actual # of Districts Cited for Noncompliance: 6
   - Estimated # of Districts Noncompliant (from Sample): 6
   - % of Districts in Compliance: 73.7
   - % of Compliance Entire State: 59.4
   - Actual # of Districts Cited for Noncompliance (from Sample): 121
   - Estimated # of Districts Noncompliant (from Sample): 181

6. Adaptive Behavior: **5**
   - Actual # of Districts Cited for Noncompliance: 6
   - Estimated # of Districts Noncompliant (from Sample): 6
   - % of Districts in Compliance: 73.7
   - % of Compliance Entire State: 49.6
   - Actual # of Districts Cited for Noncompliance (from Sample): 151
   - Estimated # of Districts Noncompliant (from Sample): 224

7. Social Functioning: **5**
   - Actual # of Districts Cited for Noncompliance: 6
   - Estimated # of Districts Noncompliant (from Sample): 6
   - % of Districts in Compliance: 73.7
   - % of Compliance Entire State: 61.2
   - Actual # of Districts Cited for Noncompliance (from Sample): 115
   - Estimated # of Districts Noncompliant (from Sample): 173

8. Academic Status: **0**
   - Actual # of Districts Cited for Noncompliance: 0
   - Estimated # of Districts Noncompliant (from Sample): 0
   - % of Districts in Compliance: 100
   - % of Compliance Entire State: 97.5
   - Actual # of Districts Cited for Noncompliance (from Sample): 6
   - Estimated # of Districts Noncompliant (from Sample): 11

9. Health History: **2**
   - Actual # of Districts Cited for Noncompliance: 2
   - Estimated # of Districts Noncompliant (from Sample): 2
   - % of Districts in Compliance: 89.5
   - % of Compliance Entire State: 69.4
   - Actual # of Districts Cited for Noncompliance (from Sample): 86
   - Estimated # of Districts Noncompliant (from Sample): 136
APPENDIX C

FOLLOW-UP STUDY OF SELECTED RULE COMPLIANCE

November 12, 1980

Staff members participating:
Carol Bradley (Chairperson)
Doral Lange
John Lee
John Kilpatrick (Coordinator)
State of Iowa
DEPARTMENT OF PUBLIC INSTRUCTION
Special Education Division
Grimes State Office Building
Des Moines, Iowa 50319

SPECIAL EDUCATION
Follow-up Study of Selected Rule Compliance
in
Area Education Agency 6
November 12, 1980

Staff members participating:
Carol Bradley (Chairperson)
Drexel Lange
John Lee
John Millsapps (Coordinator)
INTRODUCTION

On November 26 and 27, 1979, AEA 6 was visited by a team of consultants from the Division of Special Education, Iowa Department of Public Instruction. This visit was for the purpose of monitoring compliance to state and federal rules and regulations related to the education of handicapped children. The findings from that team visit were reported in writing to the AEA and to the Iowa President of the Senate and the Iowa Speaker of the House as required by law.

When instances of noncompliance were cited in that report, corrective actions and timelines for completing those actions were also specified. A follow-up visit was scheduled then to "spot-check" or monitor progress toward completing corrective actions. This follow-up visit was conducted on November 12, 1980, by staff members of the State Division of Special Education. The team members were: Carol Bradley, team chairperson; Drexel Lange; John Lee; and John Millsapps, team visit coordinator.

All issues of noncompliance (from the November, 1979 visit) were monitored on the follow-up visit in November, 1980. Districts, however, were selected on a random sampling basis. The review team made visits to the following sites:

Montezuma High School (Montezuma District)
Semco Junior High School (Semco District)
Melbourne Elementary School (West Marshall District)
Marshalltown High School (Marshalltown District)
Wellsburg Junior-Senior High School (Wellsburg District)
Ackley-Geneva High School (Ackley-Geneva District)
Alden Elementary School (Alden District)
Eldora Elementary School (Eldora-New Providence District)
Whitten Elementary School (Union-Whitten District)
Beaman-Conrad-Liscomb Junior-Senior High School at Conrad (Beaman-Conrad-Liscomb District)
Green Mountain Elementary School (Green Mountain Independent District)
Garwin Junior-Senior High School (Garwin District)

The team chairperson reviewed policies and the service delivery system at the AEA office in Marshalltown, and interviewed the AEA Director of Special Education. Other team members worked closely with AEA supervisors, visiting districts in teams of two, each team visiting four districts. An exit conference was conducted to present the findings to the AEA Director of Special Education and other AEA staff members.

It was found by the team that a majority of the districts in AEA 6 had either adopted written policies based on the AEA 6 Service Delivery System or had such adoption on the agenda for November and December 1980 board meetings.

Of the districts visited, Ackley-Geneva reported that written policies had been adopted in October, 1980; Alden reported policies were to be adopted in November, 1980; Beaman-Conrad-Liscomb reported that policies had been adopted; Eldora-New Providence reported that policies had been adopted; and the Montezuma district had no policy at the time of the site visit, but presented evidence on November 19, 1980, that the district board had adopted a policy.
At the time of the 1979-80 Compliance Review site visit, the review team reported a concern over lack of placement options across the AEA, specifically programs for emotionally disturbed, chronically disruptive, and for moderately, severely and profoundly handicapped. Since then, programs for the emotionally disturbed have been started at Marshall-town High School, Grinnell Elementary, and at Iowa Falls. Although no alternative to the Pleasant Hill facility is available to the severely/profoundly handicapped, a survey of parents indicated that they want to continue to have their children placed at that facility.

Child Find policies and procedures described in the Service Delivery System were considered by the team to be excellent. Also, the AEA, through the Comprehensive Employment Training Act (CETA), is hiring a school social worker to work with school drop-outs and potential drop-outs who are handicapped and may be in need of further special education services.

This year's three-year re-evaluations by AEA personnel should insure that all children in mental disabilities programs have an assessment of adaptive behavior (see p. 27 in Eligibility Criteria section of Service Delivery System).

The administrator in Garwin District was not present for the scheduled site visit. He was contacted by letter and asked to respond to compliance items cited in the Garwin District during the November, 1979, Compliance Review.
The professional staff of AEA has done a commendable job of follow-up to the November, 1979, compliance review, and it was apparent to the Department of Public Instruction review team that the AEA has a well-organized system for periodic monitoring of compliance issues in the future.

LIMITATIONS

It is important for the reader of this report to know that this 1980 review was only a spot check and did not include every school district visited during the 1979 visit to AEA 6. Although all districts were not visited, each compliance issue earlier cited as deficient was checked during this visit.

FINDINGS

The findings of the team are reported on the following pages. Any compliance issue listed as "compliant" in 1979 was not rechecked in 1980.
<table>
<thead>
<tr>
<th>COMPLIANCE ISSUE</th>
<th>DISTRICT</th>
<th>STATUS Nov. 1979</th>
<th>STATUS Nov. 1980</th>
<th>CORRECTIVE ACTION REQUIRED</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. CHILD IDENTIFICATION</td>
<td></td>
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<tr>
<td>Is the agency involved in child-find activities?</td>
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<tr>
<td>B. PROTECTION IN EVALUATION</td>
<td></td>
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</tr>
<tr>
<td>Are tests administered by trained personnel using standardized procedures?</td>
<td>Semco</td>
<td>NC</td>
<td>C</td>
<td></td>
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<tr>
<td>Does a multidisciplinary team make the evaluation?</td>
<td></td>
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<tr>
<td>Prior to placement, has comprehensive testing occurred where appropriate?</td>
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<tr>
<td>COMPLIANCE ISSUE</td>
<td>DISTRICT</td>
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<td>STATUS Nov. 1980</td>
<td>CORRECTIVE ACTION REQUIRED</td>
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</tr>
<tr>
<td>Vision:</td>
<td>Ackley-Geneva</td>
<td>NC</td>
<td>C</td>
<td>(ED placement)</td>
</tr>
<tr>
<td></td>
<td>Eldora</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Union-Whitten</td>
<td>C</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>Marshalltown</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>Hearing:</td>
<td>Ackley-Geneva</td>
<td>NC</td>
<td>C</td>
<td></td>
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<tr>
<td></td>
<td>Union-Whitten</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>Language and Speech:</td>
<td>Ackley-Geneva</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Eldora</td>
<td>NC</td>
<td>C</td>
<td></td>
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<tr>
<td></td>
<td>Union-Whitten</td>
<td>NC</td>
<td>C</td>
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<tr>
<td>Intellect:</td>
<td></td>
<td>C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Motor Functioning:</td>
<td></td>
<td>C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adaptive Behavior:</td>
<td>Eldora</td>
<td>NC</td>
<td>C (MD placement)</td>
<td></td>
</tr>
<tr>
<td>COMPLIANCE ISSUE</td>
<td>DISTRICT</td>
<td>STATUS Nov. 1979</td>
<td>STATUS Nov. 1980</td>
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<td>-----------------------------</td>
</tr>
<tr>
<td>Social Functioning:</td>
<td>Eldora</td>
<td>NC</td>
<td>C (ED placement)</td>
<td></td>
</tr>
<tr>
<td>Academic Status:</td>
<td></td>
<td>C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Health History:</td>
<td>Montezuma</td>
<td>NC</td>
<td>NC</td>
<td>Procedures must be updated by February 1, 1981.</td>
</tr>
<tr>
<td></td>
<td>Union-Whitten</td>
<td>NC</td>
<td>NC</td>
<td>Health histories must be completed by February 1, 1981.</td>
</tr>
<tr>
<td>Is parent consent being secured (in writing) prior to initial evaluation?</td>
<td>C</td>
<td></td>
<td>(P.L. 94-142, Section 121.530-534, STATE RULES 12.18)</td>
<td></td>
</tr>
<tr>
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<td>---------------------------</td>
</tr>
<tr>
<td>E. Are parents notified of subsequent evaluation? How?</td>
<td>Montesuma</td>
<td>C</td>
<td>NC</td>
<td>No data on IEP, participant section blank</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>This procedure must be corrected to provide complete IEPs by February 1, 1981.</td>
</tr>
<tr>
<td>C. PLACEMENT PROCEDURES (LRE considerations)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Is each child's placement determined at least annually?</td>
<td>Union-Whitten</td>
<td>NC</td>
<td>NC</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td>Wellsburg</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Green Mountain</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>Is placement in accord with IEP?</td>
<td>Union-Whitten</td>
<td>NC</td>
<td>NC</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td>Green Mountain</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>Are parents notified (in writing) prior to any subsequent change in placement?</td>
<td></td>
<td></td>
<td></td>
<td>C</td>
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<tr>
<td>COMPLIANCE ISSUE</td>
<td>DISTRICT</td>
<td>STATUS Nov. 1979</td>
<td>STATUS Nov. 1980</td>
<td>CORRECTIVE ACTION REQUIRED</td>
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<td>----------------</td>
<td>-----------------</td>
<td>------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>E. INDIVIDUALIZED EDUCATIONAL PROGRAM</td>
<td>Montezuma</td>
<td>NC</td>
<td>NC</td>
<td>This procedure must be corrected to provide complete IEPs by February 1, 1981.</td>
</tr>
<tr>
<td>Is the IEP in effect prior to provision of special education and related services?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Who participated in IEP meetings:</td>
<td>Union-Whitten</td>
<td>NC</td>
<td>C</td>
<td>(P.L. 94-142, Section 12la.340-348, STATE RULES 12.21(2))</td>
</tr>
<tr>
<td>A representative of the public agency who is qualified to provide or supervise the provision of special education?</td>
<td>Montezuma</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>The child's teacher?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The child's parent(s)?</td>
<td></td>
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<td></td>
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<tr>
<td>Evaluation personnel (new referral)?</td>
<td></td>
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<td>COMPLIANCE ISSUE</td>
<td>DISTRICT</td>
<td>STATUS Nov. 1979</td>
<td>STATUS Nov. 1980</td>
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<td>-----------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td>The child, when appropriate?</td>
<td></td>
<td>C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PARENT PARTICIPATION:</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Are parents notified early enough to allow an opportunity to participate?</td>
<td></td>
<td>C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Are the attempts to involve parents documented?</td>
<td>Montezuma</td>
<td>NC</td>
<td>NC</td>
<td>A procedure must be implemented by February 1, 1981.</td>
</tr>
<tr>
<td>CONTENTS OF IEP:</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Does the IEP contain a description of present levels of educational performance?</td>
<td></td>
<td>C</td>
<td></td>
<td>(P.L. 94-142, Section 121a.340-348, STATE RULES 12.21(2))</td>
</tr>
<tr>
<td>Annual goals and short-term instructional objectives?</td>
<td></td>
<td>C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>COMPLIANCE ISSUE</td>
<td>DISTRICT</td>
<td>STATUS Nov. 1979</td>
<td>STATUS Nov. 1980</td>
<td>CORRECTIVE ACTION REQUIRED</td>
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<td>---------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Description of the special education and related services to be provided?</td>
<td></td>
<td>C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Statement as to extent of participation in regular education?</td>
<td></td>
<td>C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dates of initiation and duration of the special education services? (both are required)</td>
<td></td>
<td>C</td>
<td></td>
<td></td>
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<tr>
<td>Objective evaluation criteria and procedures to measure progress (at least annually) toward meeting objectives?</td>
<td></td>
<td>C</td>
<td></td>
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</tr>
<tr>
<td><strong>F. SUPPORT AND RELATED SERVICES</strong></td>
<td></td>
<td></td>
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<tr>
<td>Is appropriate transportation available when necessary for a handicapped child?</td>
<td></td>
<td>C</td>
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<tr>
<td>COMPLIANCE ISSUE</td>
<td>DISTRICT</td>
<td>STATUS Nov. 1979</td>
<td>STATUS Nov. 1980</td>
<td>CORRECTIVE ACTION REQUIRED</td>
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</tr>
<tr>
<td>If physical therapy services are available, how is it determined that they are related to the educational program of a child?</td>
<td>C</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

G. CONFIDENTIALITY (Policies)

<p>| Have all agencies (AEA &amp; LEAs) formulated and adopted a policy of informing parents and eligible students of their rights regarding records? | Beaman-Conrad-Liscomb | NC | C |
| Ackley-Geneva | NC | C |
| Alden | NC | C |
| Montezuma | NC | C |
| Semco | NC | C |
| Garwin | NC | C |</p>
<table>
<thead>
<tr>
<th>COMPLIANCE ISSUE</th>
<th>DISTRICT</th>
<th>STATUS Nov. 1979</th>
<th>STATUS Nov. 1980</th>
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</thead>
<tbody>
<tr>
<td>ANNUAL NOTICE:</td>
<td></td>
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<tr>
<td>Does the agency give annual notice to parents containing their rights related to records, the agency's policy, the records regulations?</td>
<td>Green Mountain</td>
<td>NC</td>
<td>C</td>
<td></td>
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<tr>
<td></td>
<td>Garwin</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Alden</td>
<td>NC</td>
<td>NC</td>
<td></td>
</tr>
<tr>
<td></td>
<td>West Marshall</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Montezuma</td>
<td>NC</td>
<td>NC</td>
<td></td>
</tr>
<tr>
<td>Does the agency annually notify parents that the agency will obtain parent consent (in writing) before disclosing personally identifiable information to anyone other than school officials?</td>
<td>Green Mountain</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Alden</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Garwin</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
</tbody>
</table>

Annual notification procedure must be available by February 1, 1981. Current listing must also be maintained by February 1, 1981, in the Garvin, Montezuma, and Marshalltown districts. Annual written notice must be developed by February 1, 1981.

(P.L. 94-142, Section 560-575, Confidentiality Regulations 99.5, 99.6)
<table>
<thead>
<tr>
<th>COMPLIANCE ISSUE</th>
<th>DISTRICT</th>
<th>STATUS Nov. 1979</th>
<th>STATUS Nov. 1980</th>
<th>CORRECTIVE ACTION REQUIRED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the agency annually notify parents that the agency maintains a current listing of the names and positions of employees who may have access to personally identifiable information?</td>
<td>Union-Whitten</td>
<td>NC</td>
<td>C</td>
<td>Annual notification procedure must be available by February 1, 1981. Current listing must also be maintained by February 1, 1981, in the Garwin, Montezuma and Marshalltown districts. (P.L. 94-142, Section 560-575, Confidentiality Regulations 99.5, 99.6)</td>
</tr>
<tr>
<td></td>
<td>Green Mountain</td>
<td>NC</td>
<td>C</td>
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<tr>
<td></td>
<td>Garwin</td>
<td>NC</td>
<td>NC</td>
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<tr>
<td></td>
<td>Wellsburg</td>
<td>NC</td>
<td>C</td>
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<td></td>
<td>Alden</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Montezuma</td>
<td>NC</td>
<td>(doesn't do annually)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>West Marshall</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Marshalltown</td>
<td>NC</td>
<td>NC (but working on this now)</td>
<td></td>
</tr>
<tr>
<td>Does the agency annually notify parents that records will be maintained for at least three years after the pupil has completed the school program?</td>
<td>Alden</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Green Mountain</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Garwin</td>
<td>NC</td>
<td>C</td>
<td>Annual written notice must be developed by February 1, 1981. (P.L. 94-142, Section 560-575, Confidentiality Regulations 99.5, 99.6)</td>
</tr>
<tr>
<td>COMPLIANCE ISSUE</td>
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</tr>
<tr>
<td>Does the agency have a procedure to permit parents to inspect and review their child's educational records?</td>
<td>Union-Whitten</td>
<td>NC</td>
<td>C</td>
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<tr>
<td></td>
<td>Beaman-Conrad-Liscomb</td>
<td>NC</td>
<td>C</td>
<td></td>
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<td></td>
<td>Garwin</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>Does the agency keep a record of parties obtaining access to educational records, including the name of the party, date, and purpose of access?</td>
<td>Semco</td>
<td>NC</td>
<td>C</td>
<td></td>
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<tr>
<td></td>
<td>Marshalltown</td>
<td>NC</td>
<td>C</td>
<td></td>
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<tr>
<td></td>
<td>Wellsburg</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Garwin</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td>Does the agency have an established procedure for amending records at parents' request if they are found to be inaccurate, misleading or violating the rights of the child?</td>
<td>Alden</td>
<td>NC</td>
<td>C</td>
<td>Procedure must be established by February 1, 1981.</td>
</tr>
<tr>
<td></td>
<td>Garwin</td>
<td>NC</td>
<td>NC</td>
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</tr>
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(P.L. 94-142, Section 121a.500-514)

(P.L. 94-142, Section 560-575, Confidentiality Regulations 99.5, 99.6)
<table>
<thead>
<tr>
<th>COMPLIANCE ISSUE</th>
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<th>STATUS Nov. 1979</th>
<th>STATUS Nov. 1980</th>
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</thead>
<tbody>
<tr>
<td>H. DUE PROCESS (Notices to parents)</td>
<td>Semco</td>
<td>NC</td>
<td>C</td>
<td></td>
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<td></td>
<td>Green Mountain</td>
<td>NC</td>
<td>C</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Garwin</td>
<td>NC</td>
<td>NC</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ackley-Geneva</td>
<td>NC</td>
<td>C</td>
<td>Must be in writing by February 1, 1981.</td>
</tr>
<tr>
<td></td>
<td>Alden</td>
<td>NC</td>
<td>C</td>
<td>(P.L. 94-142, Section 121a.500-514)</td>
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<tr>
<td></td>
<td>Green Mountain</td>
<td>NC</td>
<td>C</td>
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</tr>
<tr>
<td></td>
<td>Garwin</td>
<td>NC</td>
<td>C</td>
<td>Must be in writing by February 1, 1981.</td>
</tr>
<tr>
<td></td>
<td>Ackley-Geneva</td>
<td>NC</td>
<td>C</td>
<td>(P.L. 94-142, Section 121a.500-514)</td>
</tr>
<tr>
<td></td>
<td>Alden</td>
<td>NC</td>
<td>C</td>
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<tr>
<td></td>
<td>Green Mountain</td>
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</tr>
<tr>
<td></td>
<td>Garwin</td>
<td>NC</td>
<td>C</td>
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<td>STATUS Nov. 1979</td>
<td>STATUS Nov. 1980</td>
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</tr>
<tr>
<td>What procedure does the agency use for providing to parents, on request, information about where to obtain an independent educational evaluation?</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
SUMMARY

Findings of non-compliance were few on this follow-up visit and were primarily confined to two or three districts. Those districts cited as non-compliant must follow the corrective action as indicated in this report, complete that action before February 1, 1981, and provide evidence of such completion, in writing, to the Division of Special Education, Department of Public Instruction on or before February 4, 1981.

For the information of those districts in violation of state or federal law, each case of non-compliance has been provided a reference to the state or federal regulation being violated. Reference is also hereby made to Section 121a.602(b)(3), authorizing the State Department of Public Instruction to impose sanctions on districts in cases of non-compliance.
APPENDIX D

SDS PROGRAM OBJECTIVES
2.1 PARENT RIGHTS AND PROCEDURAL SAFEGUARDS

2.1 Goal: To insure that students (0 to 21) and parents are guaranteed their rights to a free and appropriate education.

2.1.1 Procedural Safeguards - Screening/Identification of Preschool, Nonattending School-Age and School-Age Attending

Objective: All screening efforts shall comply with procedural safeguards.

Activity:

a. All screening tests and procedures shall be preceded by parental notification of intent to screen.

b. All screening tests and procedures shall have been validated for the specific purpose for which they are used.

c. All screening tests and procedures shall be administered by a trained examiner.

d. All screening tests and procedures shall be administered in accordance with instructions provided by the test author.

e. All screening tests and procedures shall be administered in the student's native language.

f. All screening tests and procedures shall insure that the measured achievement or aptitude, accurately reflects the student's skills or abilities and not his/her performance due to sensory impairment, speaking ability, or physical impairment.

g. All screening tests and procedures shall be followed by parental notification of screening results and recommendations.

Responsible: Direct - Individual team members involved in screening efforts

Indirect - LEA Administrator

Time: Prior to screening

Evaluation: The LEA Administrator shall monitor evaluation procedures to insure compliance with these safeguards.

2.1.2 Procedural Safeguards - Evaluation

Objective: To insure the student's right to a valid non-biased assessment of school achievement, capabilities and current levels of educational functioning.

- 41 -
Activity:  
a. All tests and procedures shall be preceded by written parental permission to evaluate.  
b. All tests and procedures shall have been validated for the specific purpose for which they are used.  
c. All tests and procedures shall be administered by a trained examiner.  
d. All tests and procedures shall be administered in accordance with instructions provided by the test author.  
e. All tests and procedures shall be administered in the student's native language.  
f. All tests and procedures shall ensure that all aspects to be measured accurately reflect the student's skills and not his/her performance due to sensory impairment, speaking ability, or physical impairment, etc.  
g. All tests and procedures shall be followed by parental notification of results and recommendations.

Responsible: Direct - Evaluation Team Members  
Indirect - LEA Administrator

Time: Ongoing

Evaluation: The AEA Special Education Administrative Team shall maintain written documentation of compliance with these safeguards.

2.1.3 Procedural Safeguard - Placement/Intervention

Objective: The LEA shall ensure that appropriate procedural safeguards are adhered to throughout all placement and intervention procedures.

A Transdisciplinary approach shall be encouraged during the evaluation and subsequent procedures. Each team member provides services based on professional interests and expertise rather than rigid disciplinary specifications. This approach provides for the most efficient utilization of human resources in the provision of special education services.

Activity:  
a. The Transdisciplinary Team shall ensure that the parents (parents, legal guardian or eligible students) are informed of their rights.  
b. If the parents do not have a copy of the Parent Guide, they will be given one.
c. The parents shall be involved in establishing staffings.
   1. They must be contacted early enough to insure that they will have an opportunity to attend.
   2. The staffings must be established at a mutually agreeable time between the LEA and parents.
   3. The notice of the staffing shall include: the purpose, time, location, and persons to be in attendance.

d. If the parents are unable to attend any staffing, the LEA shall use other methods to insure participation, including individual and conference telephone calls, etc.

e. A staffing may be conducted if the parents are unable to attend. In this case the LEA must have a record of its attempts to arrange a mutually agreed upon time and place such as:
   1. Detailed records of telephone calls and the results of same.
   2. Copies of correspondence sent to the parents and any responses received.
   3. Detailed records of visits made to the parent's home or place of employment and the results of those visits.

f. The LEA shall take appropriate action to insure that the parents understand the proceedings of the staffing.

g. The LEA shall arrange for an interpreter for those parents who are deaf or whose native language is other than English.

h. The parents may present any information which they deem appropriate to their child's program.

i. The parents may be represented by an appropriate specialist.

j. The parents have the right to request a review of their child's program at any time.

k. The parents may request an independent evaluation if they question the findings or recommendations of the assigned team.

l. The parents should participate in the development of all IEPs.

m. The parents shall receive copies of all current IEPs and may request copies of any other educational records on their child.

n. The parents must be notified of changes in their child's special education placement or dismissal.
o. The parents may request additional meetings to review data and resolve any possible differences.
p. The parents may request that an impartial hearing officer review their child's case.
q. The parents may revoke consent for critical actions any time prior to placement.
r. A surrogate parent may be appointed to protect the rights of the student.

Responsible: Direct - Intervention Team Members
Indirect - LEA Administrator
Director of Special Education

Time: Prior to placement and reviews

Evaluation: The LEA Administrator shall indicate compliance with this objective by the completed IEP.

2.1.4 Procedural Safeguard - Review/Program Monitoring

Objective: The LEA shall ensure that appropriate procedural safeguards are adhered to throughout all review proceedings.

Activity:

a. The Transdisciplinary Team shall ensure that the parents are informed of their rights.
b. Steps will be taken to ensure that the parents have a copy of the Parent Guide.
c. The parents shall be involved in scheduling the review staffings.
   1. The parents must be contacted early enough to ensure that they will have an opportunity to attend.
   2. The staffings must be scheduled at a time mutually agreeable to the LEA and parents.
   3. The notice of the staffing shall include the purpose, time, location, and persons to be in attendance.
d. If the parents are unable to attend any Review Staffings, the LEA shall use other methods to ensure participation, including individual and/or conference telephone calls.
e. A Review Staffing may be conducted if the parents are unable to attend. In this case the LEA must have a record of its attempts to arrange a mutually agreed on time and place such as:
   1. Detailed records of telephone calls and the results of same.
   2. Copies of correspondence sent to the parents and any responses received.
3. Detailed records of visits made to the parent's home or place of employment and the results of those visits.

f. The LEA shall take appropriate action to ensure that the parents understand the proceedings of the review staffing.

g. The LEA shall arrange for an interpreter for those parents who are deaf or whose native language is other than English.

h. The parents may present any information which they deem appropriate to their child's program.

i. The parents may be represented by an appropriate specialist.

j. The parents have the right to request a review of their child's program at any time.

k. The parents may request an independent evaluation if they question the findings of the assigned team.

l. The parents shall participate in the development of all IEPs.

m. The parents must receive copies of all current IEPs and may request copies of any other educational records on their child.

n. The parents must be notified prior to a change in their child's special education placement. It is highly recommended that parent permission be obtained prior to a change in placement.

o. The parents may request a reasonable length of time to consider the proposed IEP.

p. The parents may request additional meetings to review data and resolve any possible differences.

q. The parents may request that an impartial hearing officer review their child's case.

r. A surrogate parent may be appointed to protect the rights of the student.

Responsible: Direct - Intervention Team Members
Indirect - LEA Administrator
Director of Special Education

Time: Prior to placement and review

Evaluation: The LEA Administrator shall indicate compliance with this objective by the completed IEP.
2.1.5 Procedural Safeguards - Dismissal/Follow-Up

Objective: The LEA shall insure that appropriate procedural safeguards are followed throughout all dismissal and follow-up procedures.

Activity:

a. The Transdisciplinary Team shall insure that the parents are informed of their rights.

b. A Parent Guide will be provided to parents who have not received one.

c. The parents shall be involved in scheduling the staffing:
   1. The parents must be contacted early enough to insure that they will have an opportunity to attend.
   2. The staffings must be established at a time mutually agreeable to the LEA and parents.
   3. A notice of the staffing shall include: the purpose, time, location, and persons to be in attendance.

d. If the parents are unable to attend any staffing, the LEA shall use other methods to insure parental participation, including individual and/or conference telephone calls.

e. A staffing may be conducted if the parents are unable to attend. In this case the LEA must have a record of its attempts to arrange a time mutually agreeable to the parents and LEA such as:
   1. Detailed records of telephone calls and the results of same.
   2. Copies of correspondence sent to the parents and any responses received.
   3. Detailed records of visits made to the parent's home or place of employment and the results of those visits.

f. The LEA shall take appropriate action to insure that the parents understand the proceedings of the staffing.

g. The LEA shall arrange for an interpreter for those parents who are deaf or whose native language is other than English.

h. The parents may present any information which they deem appropriate to their child's program.

i. The parents may be represented by an appropriate specialist.

j. The parents may request an independent evaluation if they question the findings of the assigned team.

k. The parents should participate in the development of the follow-up procedures.
2.1.5 **Procedural Safeguards - Dismissal/Follow-Up**

**Objective:** The LEA shall ensure that appropriate procedural safeguards are followed throughout all dismissal and follow-up procedures.

**Activity:**

a. The Transdisciplinary Team shall ensure that the parents are informed of their rights.

b. A Parent Guide will be provided to parents who have not received one.

c. The parents shall be involved in scheduling the staffing.
   1. The parents must be contacted early enough to insure that they will have an opportunity to attend.
   2. The staffings must be established at a time mutually agreeable to the LEA and parents.
   3. A notice of the staffing shall include: the purpose, time, location, and persons to be in attendance.

d. If the parents are unable to attend any staffing, the LEA shall use other methods to insure parental participation, including individual and/or conference telephone calls.

e. A staffing may be conducted if the parents are unable to attend. In this case the LEA must have a record of its attempts to arrange a time mutually agreeable to the parents and LEA such as:
   1. Detailed records of telephone calls and the results of same.
   2. Copies of correspondence sent to the parents and any responses received.
   3. Detailed records of visits made to the parent's home or place of employment and the results of those visits.

f. The LEA shall take appropriate action to insure that the parents understand the proceedings of the staffing.

g. The LEA shall arrange for an interpreter for those parents who are deaf or whose native language is other than English.

h. The parents may present any information which they deem appropriate to their child's program.

i. The parents may be represented by an appropriate specialist.

j. The parents may request an independent evaluation if they question the findings of the assigned team.

k. The parents should participate in the development of the follow-up procedures.
1. The parents may request and receive copies of the dismissal and follow-up reports.

m. Parents must be notified prior to dismissal. It is recommended that parent permission be obtained prior to dismissal.

n. The parents may request that an impartial hearing officer review their child's case.

o. A surrogate parent may be appointed to protect the rights of the student.

Responsible: Direct - Intervention Team Members
Indirect - LEA Administrator
Director of Special Education

Time: Ongoing

Evaluation: The LEA Administrator shall indicate compliance with this objective by the completed IEP.

2.1.6 Parent Needs and Services

Objective: The AEA shall develop and initiate a system for identifying, evaluating and providing services to parents of children in special education.

Activity: a. The Coordinator of Parent Programming shall develop and implement an intensive staff development program.

b. The Coordinator of Parent Programming shall develop a system for identifying the needs of parents.

c. The Coordinator of Parent Programming shall develop a system for matching parent needs with intervention options.

d. The Coordinator of Parent Programming shall develop a cascade of services for parents. Possible options may be:

1. Individual counseling
2. Small group counseling
3. Family counseling
4. Large group counseling
5. Parenting education program
6. Coordination of the community resources
7. Parent to parent programs
8. Parent to student program
9. Other services to be developed

e. The Coordinator of Parent Programming shall pilot these systems with a small group of select parents.
f. The Coordinator of Parent Programming shall develop and implement a Parent Advisory Committee from members of the pilot group.

g. The Coordinator of Parent Programming shall analyze, modify and refine all components of the system, utilizing the Parent Advisory Committee's critical input.

h. The Coordinator of Parent Programming shall develop and implement further staff development based on identified needs.

i. The Coordinator of Parent Programming shall initiate refined systems with expanded groups of parents.

j. The Coordinator of Parent Programming shall monitor program strengths, etc., of all systems.

k. The Coordinator of Parent Programming shall refine the system as needed.

Responsible: Direct - Coordinator of Parent Services
Indirect - Supervisor of Psychological Services

Time: Ongoing

Evaluation: The Coordinator of Parent Services shall maintain records of all critical factors dealing with this objective. The Supervisor of Psychological Services shall monitor all facets of this program.

2.1.7 Timeline Extension

Objective: The LEA Administrator should notify parents prior to the extension of any timelines.

Activity:

a. Team members shall notify the LEA Administrator of the need for an extension of the timeline.

b. The LEA Administrator should contact the parents and review the rationale for the extension.

c. The parents should agree with the prescribed extension of the timeline.

d. The new timelines shall be recorded in the student's master file.

e. The new timelines shall be disseminated to all team members by the Case Manager and Case Coordinator.

f. The Case Manager and Case Coordinator shall update the case management log, reflecting new timelines.
2.1.8 Collection and Maintenance of Records

Objective: To insure the confidentiality of information and guarantee the student's rights to privacy, both the LEA and AEA shall establish procedures regarding the collection and maintenance of information pertinent to the student's education.

Activity:

a. All information used in the provision of special education services must be documented.

b. All information collected on a student receiving special education services is confidential.

c. Special education records should be kept within the student's cumulative files. If kept separately, the cumulative file must reflect the presence of those records.

d. Records must be reviewed periodically and deleted or destroyed whenever a determination is made that the information is not necessary or relevant to the education of the special education student.

e. The parents may request that portions of the records be removed from the file.

f. The LEA and AEA shall review the student's file and take appropriate actions pertaining to the parent's request.

g. Any information contained in the file which is pertinent to the student's current educational placement may not be removed.

Responsible: Direct - LEA Administrator
Indirect - Superintendent (LEA)
Director of Special Education

Time: Ongoing

Evaluation: Student file access logs will be updated to show person, date, and reason for review.
2.1.9 Access to Student Records

Objective: Each LEA shall establish policies and procedures pertaining to the access of student records to parents, the student, other school officials who have legitimate educational interests, and outside community resources.

Activity: a. Each LEA shall establish written policies and procedures pertaining to the access of student records which guarantee parents at least the following:
   1. The right of the parents to reasonable requests for explanation and interpretation of their child's records.
   2. The right of the parents to obtain copies of their child's records.
   3. The right of the parents to obtain a list of the types and locations of their child's records.

b. Access to all student special education files shall be documented. The date and signature of the person gaining access must appear on the student's record.

c. Only appropriate educational personnel who have legitimate educational interests shall be granted access to any student's file. These shall include:
   1. Principal and other school administrators
   2. Assigned teachers
   3. Appropriate special education personnel (LEA and AEA)
   4. Assigned pupil personnel employees
   5. Others deemed appropriate by the LEA Administrator

d. Parents and eligible students (over the age of majority) have the right of access to their child's (or their own) records upon their request.

e. The parents may request that records they deem to be inappropriate be removed from the student's file.

f. The LEA Administrator shall upon the receipt of a request for removal of records notify appropriate team members of the request. The request is then reviewed by the team for appropriate actions to be taken.

g. If the parents disagree with the conclusions of the team members, the parents may request that a record hearing be conducted by the LEA.
h. The parents must designate in writing before a third party may have access to and receive copies of any and all records. The specific information to be shared must be documented on the request.

i. Student records or individual testimony may be subpoenaed by court action.

j. The Principal and the Assistant Director of Special Education shall monitor access procedures.

Responsible: Direct - Principal
            Assistant Director of Special Education
            Indirect - Superintendent
            Director of Special Education

Time: Ongoing

Evaluation: A copy of the LEA's policies regarding access to student records will be on file with the Board secretary.

2.2 IDENTIFICATION

2.2 Goal: To seek unidentified special needs students.

2.2.1 Preschool Identification

2.2.1.1 Preschool Identification Criteria

Objective: Identification shall be based on the degree to which the student's rate of demonstrated development deviates from the normal developmental progression.

Activity: a. Early signs of difficulty shall be identified through observations by:
          1. Trained observers
          2. Concerned public
          3. Parents
          4. Others

b. Identification of the at risk population shall be made on the basis of the following criteria:
<table>
<thead>
<tr>
<th>Age Range</th>
<th>Developmental Lag</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-6 months</td>
<td>1 month</td>
</tr>
<tr>
<td>6-12 months</td>
<td>2 months</td>
</tr>
<tr>
<td>12-24 months</td>
<td>4 months</td>
</tr>
<tr>
<td>24-36 months</td>
<td>5 months</td>
</tr>
<tr>
<td>36-48 months</td>
<td>6 months</td>
</tr>
<tr>
<td>48-60 months</td>
<td>6 months</td>
</tr>
<tr>
<td>60-72 months</td>
<td>6 months</td>
</tr>
</tbody>
</table>

c. Criteria for identification shall be disseminated through:
   1. Brochures
   2. Training programs
   3. Public service announcements
   
d. The Supervisor of the Preschool Division, in conjunction with a Transdisciplinary Team, shall review the effectiveness of this process and modify when appropriate.

Responsible: Direct - Child Find Coordinator
             Indirect - LEA Administrator
             Supervisor of Preschool Division

Time: Initiated prior to implementation of the identification network

Evaluation: A summary report of actions taken shall be filed by the Supervisor of the Preschool Division.

2.2.1.2 Preschool Identification Network

Objective: Each local school district shall establish and maintain an identification network to identify all preschool students with special needs.

Activity:
   a. Appropriate school census data shall be used to identify special needs students.
   b. Coordination with public and private community agencies and other sources shall be established.
   c. Participation in identification and screening programs shall be maintained.
   d. Information shall be disseminated through:
      1. Public news media
      2. School bulletins
      3. Speaking engagements
      4. Child Find Coordinator
      5. Other

Responsible: Direct - LEA Administrator
             Indirect - Supervisor of Preschool Division
Time: Ongoing

Evaluation: Reports of the sources of referrals, appropriateness of referrals, percent of cases with identified special needs, degree of special needs, etc., shall be entered on the LEA Administrator's case management log. The master case management log (AEA) shall be updated.

2.2.1.2.1 School Census

Objective: From the census report reviewed by the LEA Administrator, a list shall be compiled of preschool students who are possibly in need of special services.

Activity: a. The LEA Administrator shall develop census forms to facilitate identification of possible special needs students.
   b. The LEA Administrator shall conduct in-service training with school census takers for the purpose of actively seeking possible special needs students.
   c. The census results shall be analyzed by the LEA Administrator.
   d. A list of possible special needs students will be compiled.
   e. The LEA Administrator shall initiate Level I referrals for those preschool students who may have special needs (Form A).
   f. Follow through on Level I referrals shall be conducted by the LEA Administrator to ensure that action has been taken on the Level I referrals.

Responsible: Direct - LEA Administrator
Indirect - Supervisor of the Preschool Division

Time: Ongoing analysis of school census

Evaluation: The case management log will list the name of students for whom a Level I referral has been initiated.

2.2.1.2.2 Coordination - Referring Agencies

Objective: Prior to October 1 of each year, the AEA personnel shall provide information such as: referral criteria, procedures, forms, etc. to all community agencies, groups and individuals who have contact with students below the age of six.
Community agencies/groups and individuals shall include: physicians, public health agencies, hospitals, clinics, mental health center, public and private social service agencies, daycare centers, day activity centers, nurseries, local chapters of parent and lay associations, Head- start, Title I, preschool, churches, etc.

Activity:  
a. An advisory committee shall be formed for the purpose of establishing an at risk screening program to be recommended to medical personnel.  
b. A list of all community agencies and other sources shall be updated and maintained.  
c. A referral packet for each agency shall be prepared.  
d. Training meetings shall be scheduled and conducted.  
e. The case management log for the monitoring of referrals and related information shall be utilized.  
f. A review committee shall consider the disposition of various referrals and maintain communication with the referring agency or group.

Responsible: Direct - LEA Administrator  
Child Find Coordinator  
Indirect - Supervisor of the Preschool Division

Time:  
Initial contact prior to October 1 and ongoing

Evaluation: The case management log will list the names of students recommended for a Level I referral and the disposition of the referral.

2.2.1.2.3 Participation In Other Agency Screening Clinics

Objective: Throughout the school year, LEA and AEA personnel shall help develop and conduct preschool clinics in conjunction with other community resources and projects for the identification of possible special needs students.

Activity:  
a. Coordination with other resources shall be developed.  
b. Staff responsibilities shall be established and a Screening Coordinator appointed.  
c. Screening procedures and referral criteria shall be developed and updated by the Preschool Division.  
d. Information on screening clinics including dates, places, etc. shall be publicized through local media.
e. Screening clinics shall be conducted.

f. Possible special needs students shall be referred to the Preschool Division for evaluation.

Responsible: Direct - Child Find Coordinator

LEA Administrator

Indirect - Supervisor of Preschool Division

Time: Ongoing

Evaluation: The case management log will contain the names of those students meeting the initial screening criteria and being recommended for a Level I referral.

2.2.1.2.4 Dissemination of Information

Objective: The LEA Administrator, AEA Child find Coordinator, and/or other appropriate personnel shall prepare and disseminate information regarding referral procedures for preschool students with possible special needs.

Dissemination shall be via public news releases, school bulletins, brochures, hand-outs, and speaking engagements to parent and civic groups, etc.

Activity:

a. A list of newspapers, radio stations, etc. serving the AEA shall be updated.

b. Brochures, hand-outs, and articles for school newsletters shall be developed and distributed.

c. Speaking engagements shall be arranged and conducted.

d. Records of all disseminated information shall be maintained.

e. Referrals for screening shall be made.

f. A case management log shall be maintained for all referrals received.

g. A follow-up on screening shall be conducted to insure follow through of services.

Responsible: Direct - Child Find Coordinator

LEA Administrator

Indirect - Supervisor of Preschool Division

Time: Ongoing
Evaluation: The information disseminated, the sources receiving information and the number and appropriateness of all referrals received will be recorded, by the LEA Administrator.

2.2.1.2.5. Preschool Screening Clinics

Objective: The LEA Administrator and Child Find Coordinator shall be responsible for conducting annual preschool Screening Clinics for students four (4) years of age or younger.

Activity:

a. The LEA Administrator and Child Find Coordinator shall determine age groups to be screened (e.g. all four year olds, all three year olds, three and four year olds, etc.).

b. Emphasis shall be placed on the importance of identifying students who are under three (3) years of age.

c. The LEA Administrator and Child Find Coordinator shall schedule preschool clinics.

d. Responsibilities shall be assigned to team members for establishing screening procedures and criteria for further evaluation.

e. Coordination with other screening programs shall be encouraged.

f. The screening shall be conducted and the results analyzed.

g. Referrals for Refined Identification and/or individual developmental evaluation shall be made.

Responsible: Direct - Child Find Coordinator

LEA Administrator

Indirect - Supervisor of Preschool Division

Time: At least annually

Evaluation: The case management log will list the names of those students meeting the initial screening criteria and being referred for Refined Identification and/or individual developmental evaluation.

2.2.2 Identification of Nonattending School-Age Special Needs Students

2.2.2.1 Identification Network

Objective: Each LEA shall establish and maintain an identification network to identify all nonattending school-age students with special needs.
Activity:  
  a. Appropriate school census data shall be used to identify possible special needs students.
  b. Coordination with public and private community agencies and other resources shall be maintained.
  c. Information shall be disseminated through:
     1. Public news media
     2. School bulletins
     3. Speaking engagements
     4. Other

Responsible: Direct - LEA Administrator
            Indirect - Director of Special Education

Time: Ongoing

Evaluation: Reports of the sources of referrals, appropriateness of referrals, percent of cases with identified special needs, degree of special needs, etc., will be maintained by the LEA Administrator.

2.2.2.1.1 School Census

Objective: Census reports shall be reviewed by the LEA Administrator and a list of school-age students who are not presently attending school and may be in need of special services shall be compiled.

Activity:  
  a. The LEA Administrator shall develop census forms to facilitate identification of possible special needs students.
  b. The LEA Administrator shall conduct inservice training with school census takers for the purpose of actively seeking possible special needs students.
  c. The census results shall be analyzed by the LEA Administrator.
  d. A list of possible special needs students shall be compiled.
  e. The LEA Administrator shall initiate Level I referrals for those nonattending school-age students who may have special needs (Form A).
  f. Follow-through on Level I referrals shall be conducted by the LEA Administrator to insure that action has been taken.

Responsible: Direct - LEA Administrator
            Indirect - Director of Special Education

Time: Ongoing
Evaluation: The case management log will list the names of those students for whom a Level I referral has been initiated.

2.2.2.1.2 Referral Agencies

Objective: Prior to October 1 of each year, the LEA/AEA staffs shall provide information such as: referral criteria, procedures, forms, etc., to all community agencies, groups, and to individuals involved with school-age nonattending special needs students.

Community agencies, groups, and individuals shall include: physicians, public health agencies, hospitals, clinics, mental health center, public and private social service agencies, day care centers, nurseries, parent associations, etc.

Activity:

a. A list of all community agencies and other sources shall be updated and maintained.

b. A referral packet for each agency shall be prepared.

c. Training meetings shall be scheduled and conducted.

d. The case management log for monitoring of referrals and related information shall be utilized.

e. A review committee shall consider the disposition of various referrals and maintain communication with the referring agency or group.

Responsible: Direct - LEA Administrator
             Indirect - Director of Special Education

Time: Prior to October 1 of each year

Evaluation: The case management log will list the names of those students for whom a Level I referral has been initiated.

2.2.2.1.3 Dissemination of Information

Objective: The LEA Administrator shall prepare and disseminate information regarding referral procedures for school-age nonattending special needs students. Dissemination shall be via public news releases, school bulletins, brochures, hand-outs, and speaking engagements to parent and civic groups, etc.
2.2.3 Identification of School-Age Possible Special Needs Students

2.2.3.1 Screening Methods

Objective: The LEA Administrator shall be responsible for the identification of students with possible special needs.

Activity: a. The LEA Administrator and classroom teacher shall review group test scores.
   b. LEA/AEA Administrators shall insure that annual screenings are conducted in their district.
   c. Observational data shall be utilized in the initiation of referrals.
   d. A Level I referral shall be completed for each appropriate student.
   e. All Level I referrals shall be entered on the case management log.

Responsible: Direct - LEA Administrator
           Indirect - Director of Special Education

Time: Ongoing

Evaluation: The above activities and maintaining the case management log of all possible special needs students will be insured.
2.2.3.1.1 **Review of Group Test Scores**

**Objective:** The LEA Administrator and classroom teacher should review the records of all students scoring below the twentieth percentile (20%) in one or more of the basic academic areas (e.g., reading, math, spelling) on group test scores to consider the appropriateness of a Level I referral.

**Activity:**
- a. The LEA Administrator and classroom teacher shall compile a list of students meeting the above mentioned criteria.
- b. A conference involving the teacher, principal and other appropriate personnel shall be conducted to consider a Level I referral.

**Responsible:** Direct - LEA Administrator and Teacher

Indirect - Director of Special Education

**Time:** Ongoing

**Evaluation:** The case management log will list all students meeting the above criteria.

2.2.3.1.2 **School-Age - Annual Screening**

**Objective:** Periodic screening of all children shall take place in the areas of hearing, vision, and speech/language.

- Vision - selected grades and new students
- Hearing - K, 1, 2, 3, 4, 5, 6, 8, 10, preschool, Headstart
- Speech/Language - Pre-kindergarten and specific preschool populations, 1st grade, and new students.

**Activity:**
- a. The LEA Administrator shall assign appropriate LEA/AEA personnel the responsibility of establishing screening procedures, the criteria for referrals, and the screening instruments to be utilized.
- b. Each screening program shall be coordinated with existing screening programs.
- c. Appropriate personnel shall be informed of new students within 24 hours of registration.
- d. The results of all screening shall be reviewed and analyzed.
- e. When appropriate, Level I or Level II referrals shall be made.
- f. All appropriate procedural safeguards shall be followed.
2.2.3.1.3 School-Age - Previously Identified

Objective: All students who have been identified as having special needs based on the criteria set forth in the "Rules of Special Education" and who are not presently being served shall have their records reviewed to determine if a Level II referral and/or staffing is needed. These are students on a follow-up status.

Activity: a. The classroom teacher shall review all students' records to determine previously identified students who are in need of further services.
b. The classroom teacher shall initiate Level I referrals when appropriate.
c. The LEA Administrator shall enter on the case management log the names of all students referred at Level I.
d. The LEA Administrator shall monitor the progress of case dispositions.

2.2.3.1.4 Observational Data

Objective: Observation of possible special needs students shall be utilized in the initiation of Level I referrals.

Activity: a. Observations of possible special needs students shall be documented and placed in the student's file.
b. The teacher shall document attempted intervention strategies and their effectiveness.

c. A Level I referral shall be initiated by the teacher when appropriate.

d. The LEA Administrator shall record the initiation of the Level I referral on the case management log.

Responsible: Direct - Classroom teacher and other appropriate personnel
Indirect - Director of Special Education

Time: At the beginning of the school year and ongoing thereafter

Evaluation: Students identified through observational data shall be entered on the case management log.

2.3 REFINEMENT OF IDENTIFICATION

2.3 Level I Referral And Refinement of Identification

Goal: To assemble data on students who have been identified as having possible special needs.

2.3.1 The Refined Identification Process

Objective: A Level I referral form shall be completed and processed for all students (0-21) who have been identified as having possible special needs.

Activity: 

a. A Level I referral may be completed by anyone.

b. The parents should be apprised of the need for a Refined Identification process.

c. The appropriate special education personnel are assigned for Refined Identification by the LEA Administrator or Child Find Coordinator according to the Staff Utilization Grid. (Refer to the Section on Special Forms).

d. The appropriate sections of the Refined Identification Guide will be completed by the assigned personnel in conference with the referral source.

e. The information presented on the Level I referral, the Refined Identification Guide, and other pertinent information shall be discussed with the referring person and the assigned special education staff.
f. The Refined Identification Conference shall result in one of the following recommendations:
   1. Indirect services
   2. Level II referral
   3. Ineligibility for services
   4. Referral to outside agency

   g. A Case Manager (LEA) and a Case Coordinator (AEA) shall be selected by the Refined Identification Conference Team.

   h. The case management log shall be updated by the Case Manager.

   Responsible: Direct - LEA Administrator or Preschool Child Find Coordinator
               Indirect - Director of Special Education

   Time: Ongoing

   Evaluation: The case management logs will identify all Level I referrals and their disposition.

2.3.2 Refined Identification Conference

Objective: A Refined Identification Conference should be held within 10 days on any student for whom a Level I referral has been initiated.

   Once a Level I referral has been initiated, only the person who initiated the referral may terminate the process.

Activity:
   a. The LEA Administrator shall arrange a convenient time for the Refined Identification Conference and notify the team members.
   b. Team members may include:
      1. LEA Administrator
      2. Referral source
      3. Teachers
      4. Parents and/or student
      5. Appropriate special education personnel
      6. Other appropriate persons
   c. Information shall be reviewed and synthesized by the Refined Identification Conference Team.
   d. Disposition is determined by the team members.
   e. If indirect services is the option chosen, an intervention plan shall be developed. A modified IEP (Form H) must be completed, if the service is to be provided by AEA personnel.
   f. The Case Manager shall update the case management logs.
   g. The intervention plan shall be initiated.
2.3.3 *Indirect Services Option*

**Objective:** The Refined Identification Conference Team shall analyze a student's needs and may select indirect services as a disposition option.

**Activity:**

a. During the conference, the Refined Identification Conference Team shall determine which objectives can be met through indirect program options.

b. Indirect program options shall include:
   1. A regular education program with building or district level consultative services to the classroom teacher.
   2. A regular education program with AEA special education consultative services.

c. A Modified IEP shall be utilized at the Refined Identification level when AEA personnel are involved (Form H).

d. Those team members who are responsible for the program options shall be designated on the modified IEP.

e. The team members responsible for implementing the IEP shall establish a means of maintaining records which demonstrate appropriateness of the objectives as determined at the staffing.

f. The team members responsible shall implement the remediation strategies.

g. The student’s progress shall be continually reviewed by the team members designated as responsible on the Modified IEP.

h. In the event that the student’s progress is not satisfactory, the assigned team members may have to re-assess the student’s needs or it may be necessary to revise the sequence of objectives, methods, materials, etc.

i. In the event the assigned team members believe that the student is in need of a further team evaluation, they shall take appropriate steps to request parental permission for a Level II referral.
j. A Periodic Review shall be conducted by the team members based on need. It must be conducted at least annually.

k. The Case Manager and Case Coordinator shall update the master case management log. Each team member shall update his/her case management log.

**Responsible:** Direct - Refined Identification Conference Team
Indirect - LEA Administrator
Director of Special Education

**Time:** Ongoing

**Evaluation:** The master case management log shall be updated.

### 2.3.4 Level II Referral

see 2.4.1 Pre-Evaluation Staffing and 2.4.2 Pre-Evaluation of Level II Referral

### 2.3.5 Ineligible For Services

**Objective:** The Refined Identification Conference Team shall analyze a student's needs and determine that the student is ineligible for services.

**Activity:** During the conference, the Refined Identification Conference Team shall determine the student has generally acceptable performance, progress and behavior and does not need indirect services.

**Responsible:** Direct - Refined Identification Team
Indirect - LEA Administrator
Director of Special Education

**Time:** Ongoing

**Evaluation:** The Case Management Log shall be completed for the Level I referral.
2.3.6 Referral to Outside Agency

Objective: The Refined Identification Conference Team shall analyze a student's needs and determine if a referral to another agency is appropriate.

Activity:
   a. During the conference the Refined Identification Conference Team shall determine if a student needs further services not available through the district or AEA.
   b. The Case Manager will report the information to the parents for their consideration and action.

Responsible:
   Direct - Refined Identification
   Case Manager
   Indirect - LEA Administrator
   Director of Special Education

Time: Ongoing

Evaluation: The Case Management Log will be completed at the Level I referral stage.

2.3.7 Pre-Referral Option

Objective: To screen data related to student performance and behavior to determine if further assessment for special education services is necessary. To develop the objective(s) for further evaluation.

Activity:
   a. The screening process to determine the objectives for a Level II referral should include:
      1. The parents, LEA administrative representative, and the referring person.
   b. A committee, team, or group may develop screening procedures for use by appropriate personnel in:
      1. A building
      2. An instructional level (K-6) (7-9) (10-12)
      3. A district
c. Describe list, and identify the screening procedures to be used to identify students for further assessment.
d. File a copy of the Pre-Referral option with the AEA 6 Director of Special Education for review and approval.
e. Provide copies of the Pre-Referral option to the appropriate personnel working in the building, instructional level or district.

Responsible: Direct - LEA Administrator
Indirect - Director of Special Education

Time: Ongoing

Evaluation: The case management log will identify all students referred for Level II evaluations.

2.4 EVALUATION

2.4 Goal: To evaluate students for whom a Level II referral has been submitted.

2.4.1 Pre-Evaluation Staffing

Objective: When a Level II referral and evaluation is needed, a Pre-Evaluation Staffing shall be conducted.

The purpose of the Pre-Evaluation Staffing is to determine the objectives to be addressed during the evaluation procedure and to obtain parental permission to conduct the evaluation.

Activity:

a. The Pre-Evaluation Staffing may be conducted concurrently with the Refined Identification Conference.
b. The staffing participants shall include:
   1. Parents
   2. LEA administrative representative
   3. Referral source
   and may also include:
   4. Appropriate special education personnel
   5. Other appropriate personnel
c. The Pre-Evaluation Staffing Team shall review the student's needs.
d. The Pre-Evaluation Staffing Team shall determine the objectives to be addressed by the Evaluation Team Members.

- 67 -
e. Special objectives shall be assigned to Evaluation Team Members and the Level II Referral Form shall be completed.

f. The rights of parents and student shall be reviewed, clarified and a Parent Guide given to the parents.

g. Parental permission shall be obtained.

h. If permission is denied, a mutually agreeable alternative shall be formulated.

i. The Level II Referral Form with the attached Level I referral and corresponding sections of the Refined Identification Guide attached shall be distributed to appropriate Evaluation Team Members.

j. The Case Manager shall update the case management log.

k. The Evaluation Team members shall initiate the evaluation process.

Responsible: Direct - LEA Administrator
Indirect - Director of Special Education

Time: Within 10 days of the receipt of a Level I referral.

Evaluation: The case management log will be updated for those students being referred for an evaluation.

2.4.2 Pre-Evaluation Review of Level II Referral

Objective: The Case Coordinator and other Evaluation Team Members shall review the information contained on the Level II referral.

Activity: a. The information contained on the Level II referral shall include, but is not limited to, the following:
   1. Identifying information
   2. Statements of concern
   3. Refined screening results
   4. Prior intervention results
   5. Objectives
   6. Signatures (parental permission and acknowledgment of due process)

   This information may be contained on the Level I referral and Refined Identification Forms. These Forms (A, B, C) should be attached to the Level II referral.

b. The objectives of the evaluation shall be consistent with the identified needs of the student.

c. If necessary, referrals may be returned in order to achieve further clarity.
d. The Evaluation Team members shall coordinate their efforts and tentatively schedule their evaluations.

e. The evaluation process shall be initiated by appropriate team members.

f. The Case Coordinator shall insure that the AEA master case management log is updated.

g. All Evaluation Team members shall update their individual case management logs.

Responsible: Direct - Case Coordinator and other Evaluation Team Members
Indirect - Director of Special Education

Time: Within 48 hours of receipt of Level II referral

Evaluation: The master case management log (AEA) shall be updated.

2.4.3 Level II - Evaluation

Objective: The Evaluation Team Members shall conduct a comprehensive evaluation of the student and his/her environment.

The major components of the evaluation shall include:

I. Environmental Assessment:
   School
   Home
   Community

II. Individual Assessment:
   Historical records
   Current educational functioning
   Cognitive functioning
   Social-emotional functioning
   Sensori-motor functioning
   Language/speech functioning
   Learning style

Activity:

a. The Evaluation Team members shall review and summarize historical records to synthesize pertinent background information.

b. Individual Evaluation Team Members shall confer with the referring person and other appropriate personnel.

c. The Evaluation Team members shall compile a summary of steps previously taken to alleviate the areas of difficulty (tutoring, placement, etc.) and the effectiveness of those efforts.

d. The Evaluation Team members shall schedule their assessments.
e. Evaluation procedures shall include but not be limited to:
   1. Standardized tests and procedures
   2. Informal tests
   3. Criterion referenced tests
   4. Observations
   5. Interviews
   6. Work samples
   7. Other appropriate procedures
f. Each evaluation team member shall conduct appropriate assessment procedures.
g. Each Evaluation Team member shall review and summarize his/her assessment data.
h. Each Evaluation Team Member shall provide a written summary of the student's present level of functioning and recommendations for intervention.
i. Written reports shall be submitted prior to the Eligibility/Placement Staffing to the LEA Administrator.
j. A Pre-eligibility Conference may be scheduled by Evaluation Team Members to insure the completeness of the evaluation.
k. In the event that the membership of the Evaluation Team needs to be expanded; the LEA Administrator will contact the parents, obtain permission, record the changes, and notify the new team members.
l. The LEA Administrator shall schedule a mutually agreeable staffing time with the parents.
m. The Eligibility/Placement Staffing shall be conducted.
n. The Case Manager and Case Coordinator shall update the case management logs and individual team members shall update their case management logs.

Responsible: Direct - Individual Evaluation Team Members
            Indirect - LEA Administrator
            Director of Special Education

Time: Within 20 school days of receipt of Level II referral.

Evaluation: The AEA master case management log shall be updated.

Re-evaluation: Procedures addressing Re-evaluation will be found in the Review Section (See 2.8.4).
2.5 SUMMARY OF EVALUATION/VERIFICATION NEED

2.5 Goal: To summarize and interpret assessment data and determine eligibility for placement.

2.5.1 Placement Staffing

2.5.1.1 Pre-Staffing Preparation

Objective: The Evaluation Team Members shall individually prepare their findings for the Eligibility Staffing.

Activity:

a. The Evaluation Team members shall review and summarize historical records to synthesize pertinent background information.

b. Individual Evaluation Team Members shall confer with the referring person and other appropriate personnel.

c. The Evaluation Team Members shall compile a summary of steps taken to alleviate the areas of difficulty (tutoring, placement, etc.) and the effectiveness of those efforts.

d. The Evaluation Team Members shall schedule their assessments.

e. Evaluation procedures shall include but not be limited to:
   1. Standardized tests and procedures
   2. Informal tests
   3. Criterion referenced tests
   4. Observations
   5. Interviews
   6. Work samples
   7. Other appropriate procedures

f. Each Evaluation Team Member shall conduct appropriate assessment procedures.

g. Each Evaluation Team Member shall review and summarize his/her assessment data.

h. Each Evaluation Team Member shall provide a written summary of the student's present level of functioning and recommendations for intervention.

i. Written reports shall be submitted prior to the Eligibility/Placement Staffing to the LEA Administrator.

j. A Pre-Eligibility Conference may be scheduled by Evaluation Team Members to insure the completeness of the evaluation.

k. The LEA Administrator shall schedule a mutually agreeable staffing time with the parents.

l. The Eligibility/Placement Staffing shall be conducted.

m. The Case Manager and Case Coordinator shall update the case management logs and individual team members shall update their case management logs.

- 71 -
2.5.1.2 Individual Summarization of Evaluation

Objective: Each Evaluation Team Member shall develop an individual summary report which addresses his/her objectives.

The components to be included in the summary report are:

1. Specific objectives
2. Evaluation techniques
3. Factors affecting evaluation performance
4. Environmental conditions
5. Results of assessment by objective
6. Recommendations for additional assessment
7. Summary of present performance
8. Recommendations of intervention
9. Confirmation of Procedural Safeguards

Activity:

a. Each team member shall assess only his/her individually specified objectives on the Level II referral.
b. Each team member shall confer with the teacher prior to conducting an evaluation.
c. Each team member shall conduct his/her evaluation.
d. Each team member shall develop his/her individual reports independent of other team members. The written report must be finalized prior to attending the Eligibility/Placement Staffing.
e. The staffing should be conducted within twenty school days of receiving parental permission for the evaluation.
f. Each team member shall present copies of his/her written reports to the LEA Administrator prior to the staffing. If the reports are not submitted prior to the staffing, the staffing shall not be conducted.
g. Each individual report shall be placed in the student's file.
h. If team members are unable to complete their evaluation within the twenty days, the student's parents should be informed of extension.
i. Parents may request copies of any or all individual evaluation reports.
j. Each team member shall update his/her case management log.

Responsible: Direct - Individual Evaluation Team Members
Indirect - LEA Administrator
Director of Special Education

Time: Should take place within 20 school days of parental permission for evaluation.

Evaluation: Individual evaluation reports by all team members shall be contained within the student's LEA and AEA master files.

2.5.1.3 Inclusion of Appropriate Eligibility/Placement Staffing Team Members

Objective: The LEA shall ensure that the appropriate Eligibility/Placement Team members are present at the staffing.

Activity: a. The number of persons attending a staffing shall be minimized.
b. The participants of the Eligibility/Placement Staffing Team must include:
   1. Parents/student (shall be encouraged to attend)
   2. LEA Administrative representative
   3. Representative of classroom teachers
   4. Special Education Evaluation Team Members
   5. AEA Special Education Representative (the Special Education Evaluation Team member may serve as the AEA representative).

Responsible: Direct - LEA Administrator
Indirect - Director of Special Education

Time: Prior to Eligibility/Placement Staffing

Evaluation: Participants of the staffing will be listed on the IEP.

2.5.1.4 Eligibility

Objective: The Evaluation/Staffing Team shall determine the student's eligibility for intervention based on information presented.

Activity: a. The utilization of labels (ED, MD, LD, etc.) will be minimized in lieu of behavioral descriptors.
b. The following classifications will be utilized for administrative purposes only:

- 73 -
1. Emotionally Disabled (ED)
2. Mentally Disabled (MD)
3. Learning Disabled (LD)
4. Physically Disabled (PO)
5. Communication Handicapped (CH)
6. Chronically Disruptive (CD)
7. Hearing Impaired (HI)
8. Visually Impaired (VI)
9. Speech and Language Impaired (SLI)

c. All decisions shall reflect the consensus of the team.
d. Eligibility shall be determined solely upon information presented at the staffing.
e. A student may be denied eligibility for either direct or indirect services.
f. The IEP shall reflect the results and recommendations of the team.
g. A minority report must be submitted to the LEA Administrator, the Director of Special Education and all team members within 48 hours of the staffing by any team member who disagrees with the team decision. Anyone wishing to file a minority report must so inform other team members at the staffing.
h. The Case Manager and Case Coordinator shall update the master case management logs. Each team member shall be responsible for his/her own personal case management log.

Responsible: Direct - Evaluation/Staffing Team Members
Indirect - LEA Administrator
Director of Special Education

Time: Should take place within 20 days of Level II referral and prior to placement.

Evaluation: The case management log shall be updated.

2.6 PLACEMENT

2.6 Goal: The Transdisciplinary Team shall determine placement based on the identified needs of the student.

2.6.1 Placement Procedures

Objective: Placement shall be based on the verified needs of the student and the least restrictive alternative.
All disciplines responsible for carrying out any part of the IEP (Direct Services), must be present at the staffing. In the event that the discipline responsible for providing the direct service is not present, a new staffing must be scheduled.

Activity:

a. Identify the critical performance data (evaluation reports).
b. Determine eligibility.
c. Summarize the student's needs on the IEP.
d. Develop goals consistent with the student's verified needs.
   1. Determine and record sequential objectives for each annual goal.
   2. Establish the criteria which will demonstrate the successful completion of each objective.
   3. Determine who will be responsible for carrying out the objectives and the means of coordination between regular and special education.
   4. Describe and record the intervention strategy appropriate to each objective.
   5. Establish re-entry criteria to demonstrate successful completion of the IEP.

e. Establish appropriate time lines for the following:
   1. Implementation of plan.
   2. Time sequence per objective.
   3. Anticipated duration of services.
   4. Length of each session.
   5. Tentative review dates.

f. Take into consideration the following factors in determining program options:
   1. The identified needs of the student.
   2. The restrictiveness of the program option.
   3. The length of time in regular education programs.
   4. A demonstration of the student's unsuccessful performance at the next lower option.
   5. The accommodations being made in regular education program.
   6. The availability of the recommended option.
   7. The appropriateness of available program options.
   8. The anticipated student success within selected option.
   9. The feasibility of placement in a non-local program.
   10. Select a program option on which consensus can be achieved.
   11. Other appropriate factors.
g. Conduct further assessment if a consensus cannot be achieved.

h. Include a component of indirect services in all program options less restrictive than a self-contained placement.

i. Establish procedures which insure that all special considerations are incorporated into the plan. (e.g. transportation, tuition, etc.)

j. Insure that appropriate procedural safeguards are followed on behalf of parents and students.

k. Obtain parental permission prior to implementing the IEP.

l. Update the case management logs.

m. Submit the finalized IEP to the AEA office within five (5) school days of the Eligibility/Placement Staffing.

n. Begin intervention only after the IEP has been submitted to the AEA office.

**Responsible:** Direct - Transdisciplinary Team Members

Indirect - LEA Administration

Director of Special Education

**Time:** Prior to placement

**Evaluation:** The case management log shall be updated.

### 2.5.2 Minority Report

**Objective:** The Transdisciplinary Team shall make every effort to arrive at a consensus concerning placement.

**Activity:**

a. Each Evaluation Team Member shall prepare a written report of his/her findings prior to the Eligibility/Placement Staffing.

b. The findings and recommendations of each team member shall be presented at the Eligibility/Placement Staffing.

c. Any team member who believes the evaluation is incomplete shall request that further specific evaluation be conducted.

d. The finalization of the staffing shall be postponed until the additional evaluation can be conducted.

e. Any team member, inclusive of parents, may submit a Minority Report if he/she disagrees with the recommendations of the other team members.

f. If a team member elects to file a Minority Report, he/she must notify the other team members at the staffing.
g. The entire staffing team must make every effort possible to resolve differences if a Minority Report is being filed.

h. The Minority Report must be submitted to the LEA Administrator and the AEA Director of Special Education and other team members within 48 hours of the Eligibility/Placement Staffing.

i. The IEP may not be implemented if a Minority Report has been filed.

j. The Minority Report and all information appearing on the IEP will be reviewed by the AEA Director of Special Education prior to approving or disapproving the student's proposed program.

k. The AEA Director of Special Education may request additional information prior to making a decision regarding the student's proposed placement.

l. The Director of Special Education shall analyze information presented at the Eligibility/Placement Staffing and the Minority Report before making one of the following decisions:
   1. Approval of the IEP as presented.
   2. Disapproval of IEP.
   3. Request for further evaluation prior to a decision being made.

m. The Director of Special Education shall submit his decision to the LEA Administrator and other team members within 48 hours of receiving the completed IEP.

n. If the Director does not approve the IEP, the rationale for disapproval shall be attached to the IEP prior to its being returned to the LEA.

o. The IEP shall be implemented following the receipt of approval.

p. The LEA and/or any team member may appeal the decision of the AEA to the State Department of Public Instruction.

q. The LEA and AEA shall maintain copies of all Minority Reports in the student's file.

**Responsible:**
- Direct - Transdisciplinary Team members
- Indirect - LEA Administrator
  Director of Special Education

**Time:** Prior to final approval and implementation of the IEP.
Evaluation: Records of filed Minority Reports, timelines and actions taken shall be maintained by the AEA/LEA.

2.6.3 Rule Exception

Objective: The Transdisciplinary Team shall make placement recommendations based upon the identified needs of the student. Occasionally, it will be necessary to place a student in an option which will necessitate a rule exception.

There are two types of Rule Exception:

I. Report of Rules Exception:
   a. Program Model
   b. Disability
   c. Class Size Maximum
   d. Age Span of Self-Contained Special Class

II. Request for Rules Exception:
   a. Out-of-state placements
   b. Part-time special education personnel
   c. Multi-disability Special Class with Integration
   d. Resource Teaching Program for Hearing Impaired or Visually Impaired.
   e. Itinerant Teacher for Mental Disabilities.

Activity:
   a. The team may find it necessary to request a Rule Exception in order to most effectively address the identified needs of the student.
   b. A consensus of the Eligibility/Placement Staffing Team shall be obtained prior to requesting a Rule Exception.
   c. The Eligibility/Placement Staffing Team shall explain to parents the rationale of the Rule Exception.
   d. The Eligibility/Placement Staffing Team shall jointly complete the form.
   e. The LEA Superintendent must complete the appropriate section of the form and sign it.
   f. After the Rule Exception has been completed, it shall be attached to the IEP and submitted to the AEA.
   g. The Assistant Director of Special Education shall render a disposition within 48 hours of receipt of the request for Rule Exception.
   h. The Assistant Director may request additional information when appropriate.
i. The LEA shall be notified of the decision within 48 hours of the receipt of said documents.

j. The Assistant Director shall submit copies of the approved Rule Exception to the LEA and OPI.

k. Copies of all Rule Exceptions shall be maintained by the Assistant Director of Special Education.

Responsible:
- Direct - Transdisciplinary Team members
- Indirect - LEA Superintendent
- Assistant Director of Special Education

Time: Prior to final approval of IEP

Evaluation: Records of Rule Exceptions, timelines and actions taken shall be maintained by the AEA/LEA.

2.7 INTERVENTION

2.7 Goal: To provide appropriate educational options which will incorporate the identified needs of special needs students in the least restrictive environment.

2.7.1 Indirect Intervention: Weighted Students

Objective: The Transdisciplinary Team may choose to provide indirect intervention services to weighted students.

Entry into indirect services for weighted students may be achieved by:
1. Holding an eligibility/placement staffing.
2. Moving towards a less restrictive option at a periodic review staffing.

Activity:
- During the staffing, the team shall:
  1. Establish goals.
  2. Determine which objectives can be met through indirect intervention which could include:
     a. regular education program with building or district level consultative services to classroom teachers.
     b. regular education programs with AEA consultative services to classroom teachers.
3. Assign appropriate personnel and designate them on the IEP.

b. During remediation in indirect intervention, the team shall:
1. Implement the remediation strategies.
3. Redefine the student's need in the event of unsatisfactory progress.
4. Revise sequence of objectives, methods, and materials in the event of unsatisfactory progress.

c. Intra- and inter-district transfer:
1. Must be preceded by a staffing between sending and receiving intervention teams.
2. Should the transfer involve a change in placement options/program model, a staffing shall be held prior to placement.
3. A transition from Infant program to Preschool, Preschool to Elementary School, Elementary School to Junior High, Junior High to Senior High or from Senior High to a Post Secondary Program must be preceded by a staffing with both sending and receiving Transdisciplinary teams in attendance.

d. During the reviews of progress (Initial Review held 6 to 9 weeks after implementation; Periodic Review held at least annually), the team shall:
1. Complete a review of progress.
2. Take appropriate steps to request additional evaluation if warranted.
3. Modify plan as is appropriate.
4. Update case management log.

Responsible: Direct - Transdisciplinary Team
Indirect - LEA Administrator
Director of Special Education

Time: Ongoing

Evaluation: The AEA and LEA case management logs shall be updated and an IEP shall be completed by the appropriate personnel with follow-up services initiated.

2.7.2 Indirect Intervention: Non-Weighted Students

Objective: The Transdisciplinary team may choose to provide indirect services to a student in an effort to avoid placement in weighted program.
Entry into indirect services for nonweighted students may be achieved by:

1. A Refined Identification Conference, or at the request of the LEA Administrator and the teacher.
2. An eligibility/placement staffing.
3. Going from a weighted program to a non-weighted option.

Activity:

a. During the Refined Identification Conference or staffing, the team shall:
   1. Determine which objectives can be met through indirect intervention.
   2. Assign appropriate personnel.
   3. Establish a means of maintaining records.
   4. If the service is to be provided by AEA personnel it is necessary that a modified IEP be completed (Form H).

b. During remediation in indirect intervention, the team shall:
   1. Implement the remediation strategies.
   3. Re-define the student's need in the event of unsatisfactory progress.
   4. Revise sequence of objectives, methods, and materials in the event of unsatisfactory progress.

c. During the Initial Review (which is held 6 to 9 weeks after implementation and which could coincide with conferences) the team shall:
   1. Complete a review of progress.
   2. Take appropriate steps to request additional evaluation if warranted.
   3. Update case management log.

Responsible: Direct - Transdisciplinary Team
            Indirect - LEA Administrator, Director of Special Education

Time: Ongoing

Evaluation: The AEA and LEA master case management logs shall be updated and a modified IEP shall be completed by the appropriate personnel with services initiated.

2.7.3 Direct Intervention

Objective: The Transdisciplinary Team shall analyze students' needs and design an intervention plan which includes direct services.
Entry into direct services may be achieved by two means:
1. An Eligibility/Placement Staffing.
2. Movement towards a less restrictive placement.

Activity

a. During the staffing, the Intervention Team shall:
   1. Determine which program options can be implemented only through direct services.
   2. Include the appropriate following direct program options:
      a. Regular educational program in addition to itinerant special education support personnel working in the regular classroom or other facility.
      b. Regular education program in addition to special education resource teaching programs.
      c. Special Education Class with Integration.
      d. Self-Contained Special Education Class.
      e. Regular or Special Education Services combined with private or public supplementary services.
      f. Special Day School.
      g. Special Boarding School or Residential facility.
      h. Hospital/Home-Bound.
      i. Combination of other options.

b. During remediation of direct services the appropriate team members shall:
   1. Utilize a complete IEP for direct services.
   2. Establish a means of maintaining records on periodic basis, which demonstrates the appropriateness of the objectives.
   3. Indirect services shall be part of all IEP's with program options less restrictive than a self-contained option.
   4. Implement the remediation strategies.
   5. Review the student's progress by the team members as designated on the IEP.
   6. Redefine the student's needs in the event that the progress is not satisfactory.
   7. Revise the sequence of objectives, methods and materials in the event that the progress is not satisfactory.
c. Intra and Inter-district transfers:
   1. Must be preceded by a staffing between sending and receiving intervention teams.
   2. Should the transfer involve a change in placement options/program model, a staffing shall be held prior to placement.
   3. A transition from infant program to Preschool, Preschool to Elementary School, Elementary School to Junior High, Junior High to Senior High or from Senior High to a Post Secondary Program must be preceded by a staffing with both sending and receiving Transdisciplinary teams in attendance.

d. During the review of direct intervention, the team:
   1. Should conduct an Initial Review of the placement 6 to 9 weeks following the placement.
   2. Should conduct the Periodic Review based on need. It must be conducted at least annually.
   3. Should take appropriate steps to request parent permission for evaluation. In the event the assigned team members feel that the student is in need of a further team evaluation, appropriate steps shall be initiated.
   4. Should update of the master case management logs by the Case Manager and Case Coordinator. Each team member shall update his/her case management log.

Responsible: Direct - Transdisciplinary Team
Indirect - LEA Administrator
           Director of Special Education

Time: Ongoing

Evaluation: The master case management log shall be updated and a modified IEP involving AEA personnel shall be completed to reflect expected student change resulting from indirect services.
2.8 Review Process

Goal: To provide a systematic method of monitoring all intervention strategies.

2.8.1 Program Monitoring

Objective: To establish and maintain a communication system which will reflect the student's current educational status and growth.

The Program Monitoring and other review activities shall be conducted to insure the appropriateness of the intervention. These activities shall be ongoing and are integral to the intervention process.

Activity:

a. The LEA shall establish guidelines for reporting procedures, forms, and data management necessary to accomplish this objective.

b. The Intervention Team members shall establish evaluation criteria for each objective in small increments, consistent with the intervention strategies.

c. The Intervention Team members shall implement and maintain a recording system which reflects the ongoing growth of the student.

d. In the event that the specified growth criteria is not met, the Intervention Team will meet to analyze possible problems.

e. If the student's growth is insignificant, the following are suggested for review:
   1. IEP goals and objectives
   2. Evaluation criteria
   3. Placement options
   4. Other data, such as teacher information, parent information, medical information, and student reactions.

f. As a result of analyzing possible problems, it may be necessary to realign objectives and/or activities.

g. Occasionally, it will be necessary to request a re-evaluation of the student.

h. It may be appropriate to request that other persons assist with the Program Monitoring activities (parents, outside agencies, etc.).

i. It may be necessary to request a staffing for purposes of a review. The Intervention Team should not hesitate to call for a staffing if the student's progress is inappropriate.

j. The case management log shall be updated to reflect any appropriate changes in programming.
2.8.2 Initial Review

Objective: Within six to nine weeks of placement, it is recommended that the Intervention Team schedule and conduct the Initial Review.

The Initial Review is merely a conference to review the student's process. (In the event significant changes are necessary, a periodic review should be conducted.) The Initial Review process may clarify or make minor modifications in the IEP objectives and/or strategies. Changes in goals would require a Periodic Review.

Activity:

a. An Initial Review should be conducted with the parents within six to nine weeks of placement. This review may take the form of a conference or a staffing.

b. The Intervention Team should review progress toward the goals, objectives and re-entry criteria as determined at the Eligibility/Placement Staffing.

c. Additional information should be presented when appropriate.

d. If student's progress is not satisfactory, the Intervention Team should request a Periodic Review.

e. The information presented should be recorded on the Review Staffing Form.

f. The Intervention Team should modify the goals and objectives of the IEP when appropriate.

g. The Case Manager and Case Coordinator should update the master case management log.

Responsible: Direct - Case Manager and Case Coordinator
Indirect - LEA Administrator
Director of Special Education

Time: Six to nine weeks following the initiation of intervention

Evaluation: The master case management log and team member logs shall be updated.
2.8.3 Periodic Review

Objective: To periodically review and update (no less than annually) the goals and objectives of each Individual Education Plan.

It is recommended that conferences be held in addition to the Periodic Review Staffings. These conferences should be conducted at the time of other parent-teacher conferences and as needed. These conferences will insure parent knowledge of student progress.

Activity:

a. A Periodic Review may be scheduled at any time that new information regarding a student's identified needs is made available that could alter the goals and objectives of the IEP.

b. A Periodic Review must be held at least one year from the date of the last staffing.

c. Any member of the Intervention Team may contact the LEA Administrator and request that a Periodic Review be scheduled.

d. The LEA Administrator shall contact the parents to schedule a staffing time which is mutually agreeable to the parents and LEA.

e. The LEA Administrator shall notify the Case Manager, Case Coordinator, LEA and AEA personnel, and other appropriate persons of the scheduled staffing.

f. The goals and objectives of the IEP shall be reviewed.

g. New information shall be reviewed, such as:
   1. Teacher information
   2. Educational testing
   3. Speech/Language
   4. Psychological, when appropriate
   5. Familial report
   6. Medical
   7. Other

h. Revisions and deletions shall be made on the IEP based on goals and objectives that have been met; new goals and objectives that need to be formulated; and, goals and objectives that are still applicable (based on the identified needs of the student,) and re-entry criteria.

i. Recommendations and conclusions shall include three possibilities:
   1. Continuing services unchanged
   2. Continuing services with placement or other changes
   3. Dismissal of services
j. The information presented at the staffing shall be recorded on the Review Staffing (Form J).
k. Parents shall be notified if change of placement is recommended.
l. The revised IEP shall be submitted to the AEA office for review and weighting.
m. The Case Manager and Case Coordinator shall update the case management logs and complete a Review Staffing summary for the student’s file.

Responsible: Direct - Case Manager and Case Coordinator
Indirect - LEA Administrator
Director of Special Education

Time: Periodically as needed with a minimum of once a year

Evaluation: Updated case management log and appropriate reports for the student’s file shall be maintained.

2.8.4 Educational Re-Evaluation

Objective: A re-evaluation must be completed at least once every three (3) years or as needed on all students receiving special education services.

Activity:

a. The Transdisciplinary Team shall review the student's progress.
b. The parents may request a re-evaluation at any time.
c. The Transdisciplinary Team shall determine the objectives of the re-evaluation.
d. Each area need not be reassessed if the team determines the previously collected data accurately reflects the student's present levels of functioning. A statement to that effect should be incorporated into the respective reports.
e. The team will assign individuals responsible for each objective.
f. Parents shall be notified prior to their re-evaluation. Permission should be obtained.
g. The team members shall schedule their assessments.
h. Each team member shall conduct his/her assessment.
i. Each team member shall review and summarize his/her assessment data.
j. Each team member shall provide written documentation of present levels of functioning and make recommendations for intervention.
k. Written reports shall be submitted prior to the staffing.
1. The LEA Administrator shall schedule a staffing time that is mutually agreeable to the parents and LEA.

m. The staffing shall be conducted.

n. The appropriate forms will be completed and submitted for action.

o. The Case Manager and Case Coordinator shall update the case management logs.

Responsible: Direct - Case Manager
Indirect - LEA Administrator
Director of Special Education

Time: Minimum of once every three years

Evaluation: The master case management log shall be updated.

2.9 DISMISSAL/FOLLOW-UP

2.9 Dismissal From Direct Services

Goal: The LEA, in cooperation with the AEA will follow established procedures in the dismissal of a student from special education programs and services.

2.9.1 Dismissal Process

Objective: The Review/Dismissal Staffing Team shall determine whether the student has met the criteria for dismissal.

Criteria for dismissal shall be contained in the goals and objectives of the IEP which shall reflect re-entry to regular education.

Activity:

a. The Placement/Intervention Team shall insure that each student's IEP is developed with re-entry (dismissal) criteria specified.

b. The Intervention Team may initiate trial re-entry to determine if the student can be successfully grouped for instructional purposes in the regular education setting.

c. Should the trial re-entry prove unsatisfactory the Intervention Team will analyze the areas of difficulty and suggest appropriate modification.
d. If the re-entry is successful the Intervention Team shall request a Dismissal Staffing.
e. The LEA Administrator shall contact the parents to schedule a mutually agreeable time for the staffing.
f. Prior to the Dismissal Staffing, additional evaluations shall be conducted if appropriate.
g. Each Intervention Team member involved with additional evaluation shall submit a summary of relevant data.
h. An AEA representative must be present at the Dismissal Staffing or provide appropriate written documentation stating that there are no objections to the dismissal.
i. The Dismissal staffing shall be conducted.
j. During the Dismissal Staffing, the student’s present level of functioning shall be reviewed in relationship to goals, objectives and re-entry criteria of the IEP.
k. The Review Staffing Form shall be completed with emphasis being placed on the use of indirect services during follow-up.
l. Parent notification is necessary prior to Dismissal. It is recommended that parent permission be obtained.
m. If the parents disagree with the dismissal, they may file a written Minority Report with the Director of Special Education.
n. Follow-up procedures shall be initiated.
o. Case Manager and Case Coordinator shall update the master case management logs.

Responsible: Direct - Review/Dismissal Team
Indirect - LEA Administrator
Director of Special Education

Time: Prior to dismissal

Evaluation: The staffing shall be entered on the master case management log.

2.9.2 Follow-Up Procedures

Objective: Follow-up procedures will be initiated to insure the student's satisfactory adjustment within the regular education placement.

Activity: a. A Modified IEP (Form H) is recommended during Follow-Up. AEA personnel responsible for Follow-up must utilize a Modified IEP.
b. The Case Manager shall have periodic conferences, as specified on the Modified IEP, with the classroom teacher to determine if the student is progressing satisfactorily.
c. If progress is unsatisfactory, the assigned specialist and the classroom teacher shall analyze the problem and make necessary modifications.
d. If the problem persists, a Level II referral shall be initiated.
e. If progress is deemed satisfactory at the six (6) month Follow-Up Conference, the Case Manager and regular education teacher shall file a Follow-up report using the Completion of Follow-Up Form.
f. It may be necessary to extend the Follow-Up period.

Responsible: Direct - Classroom Teacher and Case Manager
Indirect - LEA Administrator
             Director of Special Education

Time: Periodically up to six (6) months following the Dismissal Staffing

Evaluation: The master case management log shall be updated.
Objective:

The Special Education Consultant will participate in screening and Level I activities as assigned by LEA's or preschool representative.

Activities:

1. Conduct assessments as assigned.
   a. Review of records
   b. Observation
   c. Communication with appropriate LEA personnel.

2. Report results of above.
   b. Attempt modifications with classroom teachers.
   c. Proceed to appropriate option.

APPENDIX E

JOB STANDARDS, SPECIAL EDUCATION CONSULTANTS

As reflected in personal case management log when notified and completed at least 95% of the time.
IDENTIFICATION

Objective:

The Special Education Consultant will participate in screening and Level I activities as assigned by LEA's or preschool representative.

Activities:

1. Conduct assessments as assigned.
   
   a. Review of records
   b. Observation
   c. Communication with appropriate LEA personnel.

2. Report results of above.
   
   b. Attempt modification(s) for classroom teachers.
   c. Proceed to appropriate option.

Standard:
As reflected in personal case management log when notified and completed at least 95% of the time.
EVALUATION

Objective:

The Special Education Consultant will complete objectives as assigned on a Level II referral within 20 school days.

Activities:

1. Select appropriate evaluation instruments.

2. Conduct evaluations as assigned by Level II objectives.

3. Share evaluation information with TD team members prior to staffing.

Standard:

Attainment 95% of the time as documented by evaluation reports and master case management log.
VERIFICATION

Objective:

The Special Education Consultant will provide a written summary of evaluation results when assigned to Level II activities.

Activities:

1. Present a written report including recommendations for eligibility and possible intervention strategies.

2. Assist in determining the appropriate placement and individual educational program.

Standard:
Attainment 95% of the time as documented by evaluation reports, attendance at staffings and master case management log.

2. Assist in the development of the IEP:
   a. Assist with developing goals and objectives consistent with student’s verified needs.
   b. Assist in developing intervention strategies for implementing the objectives.
   c. Assist with establishing timelines and criteria for goal attainment.

Standard:
Participation in 100% of placement staffings when assigned a Level II objective, as reflected in the master case management log.
PLACEMENT

Objective:

The Special Education Consultant will participate in placement staffings. The consultant will assist in the development of the IEP and the selection of a program option based upon the verified needs(s) of the student.

Activities:

1. Assist in the selection of appropriate program option.
   a. Review information presented at the staffing.
   b. Complete additional assessment if necessary.
   c. Participate in team decision for placement.
   d. Assist in writing a rule exception at the staffing when necessary.

Standard:
Participation in 100% of placement staffings when assigned a Level II objective, as reflected in the master case management log.

2. Assist in the development of the IEP.
   a. Assist with developing goals and objectives consistent with student's verified needs.
   b. Assist in developing intervention strategies for implementing the objectives.
   c. Assist with establishing timelines and criteria for goal attainment.

Standard:
Participation in 100% of placement staffings when assigned a Level II objective, as reflected in the master case management log.

Standard:
Implementation of IEP, form N, 100% of time.

3. Monitor progress of direct intervention;

Standard:
Data reported to teacher 100% of time.
INTERVENTION

Objective:

The Special Education Consultant may provide indirect or direct services as specified on the modified IEP or IEP.

Activities:

1. Provide indirect services:
   a. Consultation with parents.
   b. Consultation with other agencies providing services to the student.
   c. Providing teacher inservices.
   d. Consultation with regular/special education staff regarding:
      1. Curriculum
      2. Modified materials
      3. Instructional approaches
      4. Behavior management techniques
      5. Diagnostic teaching
      6. Demonstration teaching
      7. Classroom observation
      8. Alternative grading systems

Standard:
Evaluation surveys, interviews, SDS reviews will reflect that each consultant provide technical assistance 80% of the time when requested by teachers, administrators and AEA staff.

2. Provide direct services:
   a. Group or individual counseling.
   b. Group or individual diagnostic instruction.
   c. Reinforcement of behavior/academic progress.

Standard:
Implementation of IEP, form H, 100% of time.

3. Monitor progress of direct intervention:

Standard:
Data reported to teacher 100% of time.
b. Assist teacher to maintain records to demonstrate progress on objectives.

Standard:
Grade books, reports, etc. (teacher's records).

Activities:

1. Assist in activities comparable to those at placement staffings (i.e., goals, objectives, reports).

2. Share information regarding:
   a. Appropriateness of placement.
   b. Disability.
   c. Time allotment in program commensurate with need.
   d. Integration.
   e. Curriculum modification/selection.

3. Assist in making referrals to outside agencies, other disciplines not present at the staffings and for further evaluation.

Standard:
Evaluation reports, case management logs and/or review staffing summaries will document participation in 85% of the cases in which consultant was responsible for indirect/direct services.
Objective:

The Special Education Consultant will be involved in the review of students when providing direct or indirect intervention or upon specific request.

Activities:

1. Assist in activities comparable to those at placement staffings (i.e., goals, objectives, reports).

2. Share information regarding:
   a. Appropriateness of placement.
   b. Disability.
   c. Time allotment in program commensurate with need.
   d. Integration.
   e. Curriculum modification/selection.

3. Assist in making referrals to outside agencies, other disciplines not present at the staffings and for further evaluation.

Standard:
Evaluation reports, case management logs and/or review staffing summaries will document participation in 85% of the cases in which consultant was responsible for indirect/direct services.
DISMISSAL/FOLLOW-UP

Objective:

The Special Education Consultant will assist the Transdisciplinary Team in determining if the student has met criteria for dismissal/follow-up.

Activities:

1. Review attainment of re-entry criteria.

2. Recommend appropriate curriculum modifications and intervention strategies to help insure success in regular education.

3. Assist in development of follow-up activities.

Standard:
Evaluation reports, case management logs and/or review staffing summaries will document participation in at least 50% of the case review. (N=300)
INSTRUCTIONS TO COMPLETE RECORD/REVIEW CHECKLIST

Complete a form for the current year of the child's special education program the child has been receiving Special Education

80G-N

Student Name --------- Enter DPI computer numbers and letters

Date --------------- Of Review/Placement

 Disability --------- Sp & L = Speech and Language
                    Aud = Audiology
                    HI = Hearing Impaired
                    VI = Visually Impaired
                    PBH = 2.0 MD or 4.0 MD or 4.0 SPH
                    MS = 1.7 KTP or SCI Mental Disabilities
                    ED = Emotionally Disabled
                    LD = 1.7 KTP or SCI Learning
                    Ph = Physically Disabled or Health Impaired
                    Pre = MD, LD, MD, DD, Home/Center based Preschool

Type ---------------- Circle I = Initial Placement
                     Circle R = Review

60A-B

L I Form ----------- Level I Referral = Circle Y = Yes or N = No

Screening---------- Other than Level I information Y or N

60D

Level II Form ------ Is a Level II form in file Y or N

Spec Obj --------- Are specific objectives for evaluation(s) listed Y or N

Pa Perm --------- Is a parent signature on form Y or N

APPENDIX F

RECORD REVIEW/CHECKLIST AND INSTRUCTIONS
INSTRUCTIONS TO COMPLETE RECORD/REVIEW CHECKLIST

Complete a form for the current year of the child's special education program the child has been receiving Special Education

80G-H
Student Name ------ Enter DPI computer numbers and letters
Date ------------ Of Review/Placement
Disability ------- Sp & L - Speech and Language
                Aud ---- Audiology
                HI ---- Hearing Impaired
                VI ---- Visually Impaired
                PHDC --- 2 0 MD or 4 0 MD or 4.0 SPH
                MD ------ 1 7 RTP or SCI Mental Disabilities
                ED ------ 1 7 RTP, SCI or 2.0 SCSC
                           Emotionally Disabled
                LD ------ 1.7 RTP or SCI Learning Disabled
                PH ------ Physically Disabled or Health Impaired
                Pre ---- MD, LD, ED, DD, Home/Center Based Preschool

Type ------------ Circle I = Initial Placement
                Circle R = Review

80A-B
L I Form --------- Level I Referral - Circle Y = Yes or N = No
Screening -------- Other than Level I information Y or N

80D
Level II Form ---- Is a Level II form in file Y or N
Spec Obj -------- Are specific objectives for evaluation(s) listed Y or N
Pa Perm -------- Is a parent signature on form Y or N
80E and F

ER I II III IV V VI VII VIII Circle Y or N or each item completed.

Put remaining evaluation report data on back of form

# Rec --------------- Record the number of specific recommendations on the evaluation report

Sign. ------------- Did the evaluator sign the report

Rating ----------- 1 = Unacceptable, Comment on back (incomplete/error in administration, faulty conclusions, etc.)

2 = Acceptable

3 = Very Good

4 = Excellent, comment on back (recommendations, interpretations, etc.)

80G

Summ Data -------- Is the summary data on the initial placement form there? Y or N

Concerns -------- Are any concerns noted? Y or N

Lev of Ed. Funct. - Is the level of education functioning tested? Y or N

Sign. Strengths --- Are significant strengths listed? Y or N

Limitations ------ Limitations listed? Y or N

Lrng Style ------- Is a learning style listed? Y or N

80H

Stu Name --------- Student name listed? Y or N

Re-entry Crit. ---- Re-entry criteria is listed? Y or N

Date Init. -------- Date of the initiation of services is listed. Y or N

Date Comp. ------- Date objective completed is listed. Y or N
Per Resp. ------- A person has been designated as responsible for the IEP objective. Y or N

Interv. Strag. ---- An intervention strategy is listed for the IEP objective. Y or N

Rev. Date ------- The review date is listed. Y or N

General Goals & Objectives ------- List the first annual goal by code, then the accompanying objectives by code. Do so for all the goals and related objectives.

Goals ---------
Cognitive CG
Motor MO
Self-Help SH
Social Emotional SE
Communication CO
Vocational VO

Objectives ------
Behavior bh
Reading rd
Math ma
Spelling sp
Oral Expression ox
Written Expression wx
Articulation ar
Readiness rn
Listening li
Study Skills ss

# Objs. --------  List the number of objectives. 01 to 99

# Objs. Met ------ List the number of objectives met or completed. May need to check previous IEP. 01 to 99

# Objs. Not Met --- List the number of objectives not met or not completed. 01 to 99

# Objs. Cont. ----- List the number of objectives continued on new IEP. 01 to 99

# New Objs. ------- List the number of new objectives on next IEP. 01 to 99

Rating of IEP -----
1 = Unacceptable IEP, Comment on back
2 = Acceptable
3 = Very Good
4 = Excellent, Comment on back
Stu Name--------- Student name is listed.  Y or N
Date----------- Date of staffing is recorded.  Y or N
Rec. Option----- Recommended option is listed.  Y or N
Placement Option is listed.  Y or N
Location of option is listed.  Y or N
Label is listed.  Y or N
Stu in Reg------- Time in regular education is listed.
                Y or N
Suppt. Svcs.----- Direct services are listed.  Y or N
S/L IT I pre VI  Family Cons. PT OT = These services
                checked as being delivered.  Y or N
Spec Tran-------- Special transportation is listed.  Y or N
Rule Except------ A rule exception needs to be filed.
                Y or N
Min Rpt--------- A minority report was filed.  Y or N
Report Comp.----- A person is listed as having completed
                the report.  Y or N
Pa Rght--------- Parent rights are checked as having been
                presented.  Y or N
Pa Per---------- Parent permission was obtained.  Y or N
Approved-------- Signed, dated, weighted.  Y or N
Min. Rpt on File -- Check with Doris.  Y or N

When completed turn in to your supervisor.
# Record Review/Checklist

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<th>Date</th>
<th>Dept</th>
<th>Type</th>
<th>L I Form</th>
<th>Screen</th>
<th>L II Form</th>
<th>Spec Obj.</th>
<th>Pa. Perm.</th>
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<th>ER II</th>
<th>ER III</th>
<th>ER IV</th>
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<th>ER VI</th>
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# Weighted File

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<th>Label</th>
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<th>Family Cons.</th>
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APPENDIX G

STAFFING SUMMARY/INDIVIDUAL EDUCATION PLAN
AND CASE MANAGEMENT LOG
### STAFFING SUMMARY/INDIVIDUAL EDUCATION PLAN

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<th>Name of Student:</th>
<th>Birthdate:</th>
<th>Age:</th>
<th>Staffing Date:</th>
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<tbody>
<tr>
<td>Parent/Guardian:</td>
<td>Home Address:</td>
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<td>Current Class Placement:</td>
<td>Teacher:</td>
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<td>District:</td>
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<td>Date Parent Invited to Staffing:</td>
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-----------SUMMARIZATION DATA---------------------

The following areas have been reviewed by appropriate personnel and demonstrated no significant needs or fluence on this plan (check appropriate areas---back-up data should be attached)

- Medical History
- Hearing
- Speech/Language
- Vision
- Motoric
- Other (Specify)

CONCLUSIONS/JUSTIFICATION FOR PLACEMENT:

PARENT/STUDENT CONCERNS:

CURRENT LEVELS OF EDUCATIONAL FUNCTIONING:

- Significant Strengths:

- Significant Limitations:

LEARNING STYLE:

White - Block, Yellow - LEA, Pink - Parents, Goldenrod - Team Member
<table>
<thead>
<tr>
<th>Name:</th>
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<th>Projected Dates Reviews to be Conducted:</th>
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<tr>
<td>Annual Goals:</td>
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<td>Re-Entry Criteria to Regular Education:</td>
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**Objectives:**

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<th>Date Init.</th>
<th>Person/Responsibility</th>
<th>Intervention Strategies (Curriculum, Materials, etc.)</th>
<th>Team Review</th>
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<tbody>
<tr>
<td>Date Comp.</td>
<td></td>
<td></td>
<td>Degree of Objective Attainment</td>
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Date Reviewed:  
Objective Attained: Yes  No  
Comments: 

**Objectives:**

<table>
<thead>
<tr>
<th>Date Init.</th>
<th>Person/Responsibility</th>
<th>Intervention Strategies (Curriculum, Materials, etc.)</th>
<th>Team Review</th>
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<tbody>
<tr>
<td>Date Comp.</td>
<td></td>
<td></td>
<td>Degree of Objective Attainment</td>
</tr>
</tbody>
</table>

Date Reviewed:  
Objective Attained: Yes  No  
Comments: 

**Objectives:**

<table>
<thead>
<tr>
<th>Date Init.</th>
<th>Person/Responsibility</th>
<th>Intervention Strategies (Curriculum, Materials, etc.)</th>
<th>Team Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date Comp.</td>
<td></td>
<td></td>
<td>Degree of Objective Attainment</td>
</tr>
</tbody>
</table>

Date Reviewed:  
Objective Attained: Yes  No  
Comments: 

White - AEA, Yellow - LEA, Pink - Parents, Goldenrod - Team Member
INDIVIDUAL EDUCATION PLAN

NAME:

Educational Option (recommended program option):

Placement/Intervention Option If Other Than Above:

Location of Option To Be Used:

Diagnostic Classification (label):

Anticipated Duration of Services:

Extent student will be in regular education and means of coordination:

Support Services Being Provided:

<table>
<thead>
<tr>
<th>Ext.</th>
<th>Speech/Language</th>
<th>Consultation-Family</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ext.</td>
<td>Itinerant-Hearing</td>
<td>Counseling</td>
</tr>
<tr>
<td></td>
<td>Itinerant-Pre-school</td>
<td>Physical Needs</td>
</tr>
<tr>
<td></td>
<td>Vocational Rehab.</td>
<td>P.T. or O.T.</td>
</tr>
<tr>
<td></td>
<td>Other</td>
<td>Other</td>
</tr>
</tbody>
</table>

Family Needs:

Services Provided by Outside Agency (Include means of coordination, if appropriate):

Special Transportation (if necessary, specify):

Rule Exception: Yes  No  Person Filing: Date:

Minority Report: Yes  No  Person Filing: Date:

Describe briefly steps taken to abate the need for minority report:

Date Plan to be Implemented:  Report Completed By:  Date:  
Parental Rights reviewed By:  

PARENT PERMISSION

I have been notified that the placement suggested for my child (student's name) is (program placement)

I have reviewed my rights and hereby GIVE MY CONSENT for the Individual Education Plan as specified.
Signature:  Date:

I have reviewed my rights and hereby REFUSE TO CONSENT to the Individual Education Plan as specified.
Signature:  Date:

Approved by:  AEA Director of Special Education  Date  Weighted Factor Assigned

White = AEA, Yellow = LEA, Pink = Parents, Goldenrod = Team Member
APPENDIX H

SDS EVALUATION REPORT
SDS Evaluation Report
AEA 6 Special Education
Fall 1982

Analysis of Student Record Review

The number of records reviewed was 288. One hundred ninety-two record reviews were determined to have been completed correctly and were used for the data analysis of performance levels. Records represented 8.1 percent of the population and served in the AEA as reported by the December 1, 1981, DPI head count.

The completed record reviews were sorted by disability group. At this time incomplete record reviews were set aside. The completed records for each group were then sorted into two sets labeled Initial and Review.

A frequency table for each disability group was built to record the number of items marked as being evident in the student's records by the reviewer. Responses were marked yes or no by the reviewer. Items that were not marked yes or no were tallied as not applicable. A frequency table for all groups was built from the additional frequencies for each group.

The mean percent of items was then computed for the departments labeled school psychology, school social work and...
The SDS evaluation has been completed according to the procedures agreed upon by the administrative team. The study was conducted during the 1981-82 school year. The results are reported as objectives completed by each department according to job standards. This review did not include Pleasant Hill, hearing, or vision department services.

Analysis of Student Record Review

The number of records reviewed was 206. One hundred ninety-two record reviews were determined to have been completed correctly and were used for the data analysis of performance levels. The 192 completed records represented 8.1 percent of the populations identified and served in the AEA as reported by the December 1, 1981, DPI head count.

The completed record reviews were sorted by disability group. At this time incomplete record reviews were set aside. The completed records for each group were then sorted into two sets labeled initial and review.

A frequency table for each disability group was built to record the number of items marked as being evident in the student's records by the reviewer. Responses were marked yes or no by the reviewer. Items that were not marked yes or no were tallied as null. A frequency table for all groups was built from the addition of the frequencies for each group.

The mean percent of items was then computed for the departments labeled school psychology, school social work and
special education consultant. These three departments developed objectives and performance levels that were measured by the results of the record reviews for three disability groups. These groups were identified as emotionally, learning, and mentally disabled and were the data source for the computation of the mean percents.

The mean percent of items matched to each objective was computed. The objectives identification and intervention had two items matched to performance levels for each department.

The obtained performance levels from the record review were then compared to the expected performance levels as included in the department's objectives. Items having a percent equal to or greater than the expected percent were judged to have been met.

Departments

The obtained percent for all items reported for the speech department ranged from a high of 99 percent to a low of 72 percent. The low percentages reported for the items location option and review date were from records identified as initial and review cases. The reviewers judged that the services from the speech staff were not recorded according to SDS procedures in the student records reviewed for these two items.
Table 3
Frequency and Percent of Responses from Student Record Reviews for Speech Disabled Students on Selected Items from SDS Forms G, H, and I

<table>
<thead>
<tr>
<th>Items</th>
<th>Frequency Initial N = 32</th>
<th></th>
<th>Frequency Review N=47</th>
<th></th>
<th>Percent N=79</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>yes</td>
<td>no</td>
<td>null</td>
<td>yes</td>
<td>no</td>
<td>null</td>
</tr>
<tr>
<td>Specific Objective</td>
<td>31</td>
<td>1</td>
<td>0</td>
<td>40</td>
<td>2</td>
<td>5</td>
</tr>
<tr>
<td>Parent Permission</td>
<td>32</td>
<td>0</td>
<td>0</td>
<td>44</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Signature</td>
<td>31</td>
<td>0</td>
<td>1</td>
<td>39</td>
<td>3</td>
<td>5</td>
</tr>
<tr>
<td>Recommended Option</td>
<td>30</td>
<td>1</td>
<td>1</td>
<td>47</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Location Option</td>
<td>19</td>
<td>13</td>
<td>0</td>
<td>38</td>
<td>9</td>
<td>0</td>
</tr>
<tr>
<td>Label</td>
<td>32</td>
<td>0</td>
<td>0</td>
<td>45</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Annual Goal</td>
<td>32</td>
<td>0</td>
<td>0</td>
<td>46</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Person Responsible</td>
<td>31</td>
<td>1</td>
<td>0</td>
<td>46</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Review Date</td>
<td>24</td>
<td>8</td>
<td>0</td>
<td>37</td>
<td>9</td>
<td>1</td>
</tr>
</tbody>
</table>

The obtained percent for all items reported for the preschool department ranged from a high of 100 percent to a low of 60 percent.
Table 4

Frequency and Percent of Responses from Student Record Reviews for Preschool Age Students on Selected Items from SDS Forms G, H, and I

<table>
<thead>
<tr>
<th>Items</th>
<th>Frequency Initial N=1</th>
<th>Frequency Review N=4</th>
<th>Percent N=5</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>yes  no  null</td>
<td>yes  no  null</td>
<td>yes  no  null</td>
</tr>
<tr>
<td>Specific Objective</td>
<td>1      0    0</td>
<td>4      0    0</td>
<td>100    0   0</td>
</tr>
<tr>
<td>Parent Permission</td>
<td>1      0    0</td>
<td>4      0    0</td>
<td>60     0   40</td>
</tr>
<tr>
<td>Signature</td>
<td>1      0    0</td>
<td>2      0    2</td>
<td>60     0   40</td>
</tr>
<tr>
<td>Recommended Option</td>
<td>1      0    0</td>
<td>4      0    0</td>
<td>100    0   0</td>
</tr>
<tr>
<td>Location Option</td>
<td>1      0    0</td>
<td>4      0    0</td>
<td>100    0   0</td>
</tr>
<tr>
<td>Label</td>
<td>1      0    0</td>
<td>3      1    0</td>
<td>80     20  0</td>
</tr>
<tr>
<td>Annual Goal</td>
<td>1      0    0</td>
<td>4      0    0</td>
<td>100    0   0</td>
</tr>
<tr>
<td>Person Responsible</td>
<td>1      0    0</td>
<td>4      0    0</td>
<td>100    0   0</td>
</tr>
<tr>
<td>Review Date</td>
<td>1      0    0</td>
<td>4      0    0</td>
<td>100    0   0</td>
</tr>
</tbody>
</table>

The low percentage reported for the item signature was from records identified as review cases. The 40 percent for responses scored as null by the reviewers indicated a problem of determining that reports had been signed by members of the preschool staff.
The obtained mean percent for all items reported for the school psychology, the school social worker and the special education consultant departments ranged from a high of 100 percent to a low of 61 percent. The low percentages for the items **specific objectives**, **parent permission**, **signature**, and **review date** were from records identified as initial and review cases. The reviewers judged that the services from the staff of these departments were not recorded according to SDS procedures in the student records reviewed for these four items.

**Table 5**

Mean Percent of Responses from Student Record Reviews for Emotionally, Learning, and Mentally Disabled Students on Selected Items from SDS Forms G, H, and I

<table>
<thead>
<tr>
<th>Percent</th>
<th>Specific Objective</th>
<th>Parent Permission</th>
<th>Signature</th>
<th>Recommended Option</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>72</td>
<td>75</td>
<td>73</td>
<td>100</td>
</tr>
<tr>
<td>No</td>
<td>21</td>
<td>17</td>
<td>9</td>
<td>0</td>
</tr>
<tr>
<td>Null</td>
<td>7</td>
<td>8</td>
<td>100</td>
<td>0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Percent</th>
<th>Location Option</th>
<th>Label</th>
<th>Annual Goal</th>
<th>Person Responsible</th>
<th>Review Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>94</td>
<td>100</td>
<td>100</td>
<td>91</td>
<td>61</td>
</tr>
<tr>
<td>No</td>
<td>6</td>
<td>0</td>
<td>0</td>
<td>5</td>
<td>35</td>
</tr>
<tr>
<td>Null</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>4</td>
<td>5</td>
</tr>
</tbody>
</table>
Table 6
Frequency and Percent of Responses from Student Record Reviews for Emotionally Disabled Students on Selected Items from SDS Forms G, H, and I

<table>
<thead>
<tr>
<th>Items</th>
<th>Frequency Initial N=1</th>
<th>Frequency Review N=</th>
<th>Percent N=</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>yes</td>
<td>no</td>
<td>null</td>
</tr>
<tr>
<td>Specific Objective</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Parent Permission</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Signature</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Recommended Option</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Location Option</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Label</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Annual Goal</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Person Responsible</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Review Date</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
Table 7
Frequency and Percent of Responses from Student Record Reviews for Learning Disabled Students on Selected Items from SDS Forms G, H, and I

<table>
<thead>
<tr>
<th>Items</th>
<th>Frequency Initial N=14</th>
<th>Frequency Review N=39</th>
<th>Percent N=53</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>yes</td>
<td>no</td>
<td>null</td>
</tr>
<tr>
<td>Specific Objective</td>
<td>14</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Parent Permission</td>
<td>14</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Signature</td>
<td>14</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Recommended Option</td>
<td>14</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Location Option</td>
<td>14</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Label</td>
<td>14</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Annual Goal</td>
<td>14</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Person Responsible</td>
<td>14</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Review Date</td>
<td>13</td>
<td>1</td>
<td>0</td>
</tr>
</tbody>
</table>

The obtained percentages for the three departments were determined by computing the mean percent for each item in the records reviewed for the group emotionally, learning and mentally disabled. The staff of school psychology, social work and special education consultants worked...
Table 8

Frequency and Percent of Responses from Student Record Reviews for Mentally Disabled Students on Selected Items from SDS Forms G, H, and I

<table>
<thead>
<tr>
<th>Items</th>
<th>Frequency Initial N=3</th>
<th>Frequency Review N=38</th>
<th>Percent N=41</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>yes  no  null</td>
<td>yes  no  null</td>
<td>yes  no  null</td>
</tr>
<tr>
<td>Specific Objective</td>
<td>3      0           0</td>
<td>18     15        5</td>
<td>51    37 12</td>
</tr>
<tr>
<td>Parent Permission</td>
<td>3      0           0</td>
<td>21     12        5</td>
<td>59    29 12</td>
</tr>
<tr>
<td>Signature</td>
<td>3      0           0</td>
<td>16     8         14</td>
<td>46    20 34</td>
</tr>
<tr>
<td>Recommended Option</td>
<td>3      0           0</td>
<td>38     0         0</td>
<td>100   0   0</td>
</tr>
<tr>
<td>Location Option</td>
<td>3      0           0</td>
<td>35     3         0</td>
<td>93    7   0</td>
</tr>
<tr>
<td>Label</td>
<td>3      0           0</td>
<td>38     0         0</td>
<td>100   0   0</td>
</tr>
<tr>
<td>Annual Goal</td>
<td>3      0           0</td>
<td>38     0         0</td>
<td>100   0   0</td>
</tr>
<tr>
<td>Person Responsible</td>
<td>2      0           1</td>
<td>36     2         0</td>
<td>93    5   2</td>
</tr>
<tr>
<td>Review Date</td>
<td>2      0           1</td>
<td>23     15        0</td>
<td>61    37  2</td>
</tr>
</tbody>
</table>

The obtained percentages for the three departments were determined by computing the mean percent for each item in the records reviewed for the groups emotionally, learning and mentally disabled. The staff of school psychology, school social work and special education consultants worked
primarily with children from these populations. The special classes in AEA 6 were predominantly for emotionally, learning and mentally disabled students.

Objectives

Two objectives had more than one item matched to determine the obtained performance level. The items specific objective and parent permission were matched to the objective identification. The obtained mean percent for this objective ranged from a high of 100 percent to a low of 73.5 percent. The low percentage for the groups emotionally, learning and mentally disabled were from records identified as initial and review cases.

Table 9

Mean Percent of Responses to Items Specific Objective and Parent Permission for the Groups Speech, Preschool, and the Combined Groups of Emotionally, Learning, and Mentally Disabled for the Objective Identification

<table>
<thead>
<tr>
<th>Items</th>
<th>Speech</th>
<th></th>
<th>Preschool</th>
<th></th>
<th>ED/LD/MD*</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>yes</td>
<td>no</td>
<td>null</td>
<td>yes</td>
<td>no</td>
<td>null</td>
</tr>
<tr>
<td>Specific</td>
<td>90</td>
<td>4</td>
<td>6</td>
<td>100</td>
<td>0</td>
<td>0</td>
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<tr>
<td>Objective</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parent</td>
<td>96</td>
<td>1</td>
<td>3</td>
<td>100</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Permission</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mean</td>
<td>93</td>
<td>2.5</td>
<td>3.5</td>
<td>100</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>73.5</td>
<td>19</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>7.5</td>
</tr>
</tbody>
</table>

*Emotional Disabled=ED, Learning Disabled=LD, Mentally Disabled=MD.
The items annual goal and person responsible were matched to the objective intervention. The obtained mean percent for this objective ranged from a high of 100 percent to a low of 95.5 percent.

Table 10

Mean Percent of Responses to Items Annual Goal and Person Responsible for the Groups Speech, Preschool, and the Combined Groups of Emotionally, Learning, and Mentally Disabled for the Objective Intervention

<table>
<thead>
<tr>
<th>Items</th>
<th>Speech</th>
<th>Preschool</th>
<th>ED/LD/MD*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>yes</td>
<td>no</td>
<td>null</td>
</tr>
<tr>
<td>Specific</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Objective</td>
<td>99</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Parent</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permission</td>
<td>98</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Mean</td>
<td>98.5</td>
<td>0.5</td>
<td>1</td>
</tr>
</tbody>
</table>

*Emotional Disabled=ED, Learning Disabled=LD, Mentally Disabled=MD.

The obtained percent for the objective evaluation ranged from a high of 87 percent to a low of 60 percent. The low percentages for the preschool, school psychology, school social work and special education departments indicated that the items matched to this objective were not recorded in student records according to SDS procedures.

The obtained percent for the objective verification ranged from a high of 100 percent to a low of 98 percent.
Table 11
Percent of Yes Responses from Selected Items from SDS Forms G, H, and I Matched to Department Objectives

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Speech Percent yes</th>
<th>Preschool Percent yes</th>
<th>School Psychology Percent yes</th>
<th>School Social Work Percent yes</th>
<th>Special Education Consultant Percent yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identification</td>
<td>93</td>
<td>100</td>
<td>73.5</td>
<td>73.5</td>
<td>73.5</td>
</tr>
<tr>
<td>Evaluation</td>
<td>87</td>
<td>60</td>
<td>73</td>
<td>73</td>
<td>73</td>
</tr>
<tr>
<td>Verification</td>
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<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Placement</td>
<td>72</td>
<td>100</td>
<td>94</td>
<td>94</td>
<td>94</td>
</tr>
<tr>
<td>Intervention</td>
<td>98.5</td>
<td>100</td>
<td>95.5</td>
<td>95.5</td>
<td>95.5</td>
</tr>
<tr>
<td>Review</td>
<td>77</td>
<td>80</td>
<td>61</td>
<td>61</td>
<td>61</td>
</tr>
<tr>
<td>Dismissal</td>
<td>98</td>
<td>80</td>
<td>100</td>
<td>100</td>
<td>100</td>
</tr>
</tbody>
</table>

The obtained percent for the objective placement ranged from a high of 100 percent to a low of 72 percent. (See Table 11.) The low percentage for the speech department indicated that the item matched to this objective was not recorded in the student records according to SDS procedures.

The obtained percent for the objective intervention ranged from a high of 100 to a low of 95.5 percent. (See Table 11.)

The obtained percent for the objective review ranged from a high of 80 percent to a low of 61 percent. (See Table 11.) The low percentages reported for the speech,
school psychology, school social worker and special education consultant indicated that the item matched to this objective was not recorded in student records according to SDS procedures.

The obtained percent for the objective dismissal ranged from a high of 100 percent to a low of 80 percent. (See Table 11.)

The obtained percentages were compared to the expected percentages for each objective for each department. The objective identification was judged to have been met by none of the departments. The preschool department failed to set an expected performance level and the other three departments failed to meet the expected 90 or 95 percent performance level.

The objective evaluation was judged to have been met by none of the departments. (See Table 12.)

The objective verification was judged to have been met by all the departments. (See Table 12.)

The objective placement was judged to have been met by the preschool department. All of the other departments failed to meet the expected 100 percent performance level. (See Table 12.)

The objective intervention was judged to have been met by the speech, preschool and school psychology departments. The school social work and special education consultant departments failed to meet the expected 100 percent performance
Table 12
Performance Levels Obtained from the Record Review Matched to Performance Level Stated in Each Department Objective and Listed as Met When the Obtained Score is Equal to or Greater than the Anticipated Performance Level Objectives

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Speech</td>
<td>93</td>
<td>100</td>
<td>87</td>
<td>95</td>
<td>98</td>
<td>95</td>
<td>72</td>
<td>100</td>
</tr>
<tr>
<td>Preschool</td>
<td>100</td>
<td>0</td>
<td>60</td>
<td>95</td>
<td>100</td>
<td>95</td>
<td>100</td>
<td>100*</td>
</tr>
<tr>
<td>School Psychology</td>
<td>73.5</td>
<td>90</td>
<td>73</td>
<td>95</td>
<td>100</td>
<td>95</td>
<td>94</td>
<td>100</td>
</tr>
<tr>
<td>School Social Worker</td>
<td>73.5</td>
<td>90</td>
<td>73</td>
<td>95</td>
<td>100</td>
<td>95</td>
<td>94</td>
<td>100</td>
</tr>
<tr>
<td>Special Education Consultant</td>
<td>73.5</td>
<td>95</td>
<td>73</td>
<td>95</td>
<td>100</td>
<td>95</td>
<td>94</td>
<td>100</td>
</tr>
</tbody>
</table>

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<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Speech</td>
<td>98.5</td>
<td>90*</td>
<td>77</td>
<td>90*</td>
<td>98</td>
<td>95</td>
</tr>
<tr>
<td>Preschool</td>
<td>100</td>
<td>95*</td>
<td>80</td>
<td>100</td>
<td>80</td>
<td>0</td>
</tr>
<tr>
<td>School Psychology</td>
<td>95.5</td>
<td>95*</td>
<td>61</td>
<td>95</td>
<td>100</td>
<td>95</td>
</tr>
<tr>
<td>School Social Worker</td>
<td>95.5</td>
<td>100</td>
<td>61</td>
<td>95</td>
<td>100</td>
<td>95</td>
</tr>
<tr>
<td>Special Education Consultant</td>
<td>95.5</td>
<td>100</td>
<td>61</td>
<td>85</td>
<td>100</td>
<td>50*</td>
</tr>
</tbody>
</table>

*Obtained percent equaled or exceeded expected percent.
level. (See Table 12.)

The objective review was judged to have been met by none of the departments. The range of expected performance was set at 85, 90, 95 and 100 percent by the other departments. (See Table 12.)

The objective dismissal was judged to have been met by four of the five departments. Again, the preschool department failed to set an expected level of performance. (See Table 12.)

Recommendations

The criteria to measure the objectives of the job standards were set too high to be met. Only one of the 100 percent criterion levels was met. The influence of federal and state compliance reviews seems to have made 100 percent criterion levels necessary. Two more years of data collection would give us a three-year record and an average that could be used as baseline data. This average would be a starting point for determining more appropriate criteria levels in the SDS objectives.

There are too many objectives for the supervisors to manage effectively. Willard Zangwell reminded us in his January workshop that three or four objectives are adequate to manage. My estimate is that we still try to manage forty or more objectives in the SDS. As an example the Special Education Consultants work on at least eighteen activities in
the job standards. The other duties for administrative and line staff compete for time and resources during the work year.

Items on the record review but not reported in the tables were related to Level I referral services. The results indicate that the level of use for the Level I referral is below 50 percent. It is seldom used at the junior and senior high levels. This is one objective that could be eliminated due to a low level of use by AEA and local district staff.

The objectives of the SDS seem directed toward counting the activities of the special education staff. There are no stated levels of performance related to student change or growth. The real target of the SDS should be to measure what happens because students have received our services. One possibility is to move toward recording the IEP objectives completed on the Periodic Review (80-J) form. We could then establish baseline data for students in the various program models, by disability and by grade level.

We need to continue the study for two more years. Then we will have sufficient data to modify the SDS. The timelines set for the development, implementation and evaluation of the SDS were too tight. You seemed to have picked certain dates for things to be completed even though the supervisors did not think they could meet those timelines. More time needs to be spent assessing our resources to meet
your goals.

The job standards were developed to correct the lack of criteria in the SDS objectives. It would seem that the SDS needs to be reviewed to determine if all of the goals are appropriate. An outside team could be hired to assist you on this review. Their objectivity may be sufficient to provide you with accurate data about how staff feel about the SDS, what seems to work and suggestions to improve the system.

You could assume more of the evaluation responsibility during the next two years. I found that the role of supervisor and evaluator to be difficult. They both demand lots of time and resources. The other supervisors and staff seem to be concerned about the outcome of the evaluation. This may be a problem that always accompanies an evaluation.

I wish to thank the staff for their help in this effort. John Rendzio and Becky Stevenson were especially helpful in collecting and recording data.