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## IEP Quality: Changes Observed Following A Period Of Staff Training and Form Revision

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IEP QUALITY: CHANGES OBSERVED  
FOLLOWING A PERIOD OF  
STAFF TRAINING AND FORM REVISION

A Thesis

Presented to the  
Department of Special Education  
and the  
Faculty and Graduate College  
University of Nebraska

In Partial Fulfillment  
of the Requirements for the Degree  
Master of Arts  
University of Nebraska at Omaha

by

Mary M. Spillane

April, 1990

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# THESIS ACCEPTANCE

Acceptance for the faculty of the Graduate College,  
University of Nebraska, in partial fulfillment of the  
requirements for the degree Master of Arts, University of  
Nebraska at Omaha.

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April 18, 1991  
Date

## Abstract

### IEP QUALITY: CHANGES OBSERVED FOLLOWING A PERIOD OF STAFF TRAINING AND FORM REVISION

During the period 1987-1990, a suburban school district implemented an in-service training program as well as several form revisions for the purpose of improving the quality of IEP documents. The purposes of this study were to document what changes, if any, occurred in the levels of legal compliance and internal consistency in a random sample of IEPs over that three year period, to determine whether a significant difference in the levels of compliance and/or internal consistency existed between IEPs of Level 1 and Level 2 students, and to identify areas of strength and weakness in IEPs.

A random sample of IEPs (N=150) of students receiving Level 1 (exclusive of students receiving speech therapy only) and Level 2 special education services was used. IEPs from the academic years 1987-88, 1988-89, and 1989-90 were analyzed. The Nebraska IEP Evaluator, a computerized IEP evaluation tool, was used to assess level of legal compliance and internal consistency for each IEP. One-way ANOVAs as well as Student's t Analyses were performed to document the existence of significant differences among sample groups.

Although Level 1 IEPs scored slightly higher on

internal consistency and Level 2 IEPs scored slightly higher on compliance, no significant difference was noted between the two groups. A significant difference was noted in both areas, however, for IEPs written during the 1987-88 school year. In both cases, significant increases in quality ( $p < .01$ ) were noted during the 1988-89 school year. During the 1989-90 school year, the compliance level of IEPs continued to increase while internal consistency decreased slightly, however neither of these changes was significant at the  $p < .05$  level.

Although the specific causes for these differences could not be conclusively identified, results suggested that form revision was related to the increasing levels of compliance over the three year period. Changes in internal consistency appeared related to both form revision and inservice training. Further research on changes in quality, perhaps related to an area of weakness (e.g. current level of performance statement) should be conducted in a controlled setting to attempt to further identify the relationship between the factors of inservice training, form revision, and IEP quality.

## TABLE OF CONTENTS

I.	Introduction	1
	Statement of the Problem	4
	Research Questions	6
	Definition of Terms	7
	Summary	8
II.	Review of Literature	
	Introduction	11
	The IEP and Instructional Planning	12
	Inservice Training and IEP Development	15
	Factors Affecting IEP Quality	18
	The IEP and Legal Compliance	21
	Internal Consistency and the IEP Document	28
	Summary	33
III.	Methodology	
	Hypotheses	38
	Selection of Sample	38
	Evaluation Instrument	40
	Evaluation Procedures	42
	Data Analysis	45
IV.	Results	
	Changes in Legal Compliance From 1987-1990	48
	Table I	48
	Table II	49
	Table III	50



Table IV	50
Table V	51
Differences in Legal Compliance by Level of Service	51
Table VI	52
Differences in Internal Consistency from 1987-1990	52
Table VII	53
Table VIII	54
Table IX	54
Table X	55
Differences in Internal Consistency by Level of Service	56
Table XI	55
V. Discussion	57
Table XII	58
Participants in the IEP Process	59
Table XIII	60
Compliance Attributes	61
Table XIV	62
Internal Consistency	65
Table XV	66
Hypothesis 1: Changes in Legal Compliance 1987-1990	67
Hypothesis 2: Changes in Internal Consistency 1987-1990	67
Table XVI	69
Hypotheses 3 and 4: Differences in Legal Compliance and Internal Consistency by Level of Service	69

Limitations	70
Summary	71
Implications	72
VI. Appendices	
Appendix A--Item Analysis of <u>Neb. IEP Evaluator</u>	75
Appendix B--Revised Data Collection Form	76
Appendix C--IEP Form 1987-88	77
Appendix D--IEP Form 1988-89/1989-90	81
VII. References	85

## Chapter I

### Introduction

The Education for All Handicapped Children Act of 1975 (EAHCA), P.L. 94-142, ushered in a new era of special education services for handicapped children. Although legislation affecting educational services for the handicapped was passed as early as 1966 (Elementary and Secondary Education Act Title VI), it was not until 1973 with the passage of the Rehabilitation Act that serious inroads were made into the educational system. The Rehabilitation Act prohibited discrimination against the handicapped by any program receiving federal financial assistance. As this did not directly protect a handicapped child's right to be provided with an appropriate education, a more comprehensive bill, P.L. 94-142, which incorporated and expanded upon both the Rehabilitation Act and earlier versions of the Education for the Handicapped Act (P.L. 91-230 and P.L. 93-380) was passed in 1975 (Ysseldyke & Algozzine, 1982).

Under the EAHCA, the central component in the provision and monitoring of effective educational programs for handicapped students is the Individualized Educational Program (IEP) (Larsen & Poplin, 1980). The IEP document is the end result of a complex process involving a multi-

disciplinary team approach to the identification, assessment, and planning of services for each individual student. Although the composition of teams responsible for IEP development and the format of actual documents varies among school districts, certain minimum requirements are specified in the EAHCA. At a minimum, the IEP team must consist of the following members:

- A representative of the public agency, other than the student's teacher, who is qualified to provide, or supervise the provision of, special education;
- The child's teacher;
- One or both of the child's parents;
- The child, where appropriate;
- For handicapped children evaluated for the first time, either a member of the evaluation team or another individual who is knowledgeable about the evaluation procedures used with the child and the results.

(Federal Register, 1982, p.33855)

The document itself must contain:

- A statement of the child's present levels of educational performance;
- A statement of annual goals, including short term instructional objectives;
- A statement of the specific special education and related services to be provided to the child, and the extent to which the child will be able to participate in regular education programs;
- The projected dates for initiating services and the anticipated duration of the services;
- Appropriate objective criteria and evaluation procedures and schedules for determining, on at least an annual basis, whether the short term objectives are being achieved.

(Federal Register, 1977, p.42491)

Although the majority of IEP documents comply with the letter of the law, that is, contain all information required

by law, questions often arise regarding the actual quality of information provided. Walker (1979) suggested seven factors which must be considered in order for an IEP to meet both the letter (compliance) and spirit (quality) of the law and thus have a significant positive impact on the handicapped learner. Four of these factors relate specifically to the IEP document:

1. The adequacy, quality, and completeness of information used to develop the plan;
2. the internal consistency of the document;
3. the comprehensiveness with which IEP elements are addressed;
4. the quality and specificity of long and short term objectives.

(Walker, 1979, p. 149)

### Problem

A substantial amount of research has been devoted to the issue of compliance, whether the IEP document contains those elements required by federal law. In addition to documenting legal compliance, many researchers have attempted to identify, and in some way measure, those elements indicative of a quality IEP document. Researchers have identified key characteristics indicative of quality in

various components of the IEP (Morgan, 1981; Walker & Kukic, 1979). The IEP process itself has been analyzed to determine elements which have an effect on the overall quality of the written document (Tymitz-Wolf, 1982).

Children in need of special education require carefully sequenced instructional programs based upon their current level of performance for optimal learning (Morgan, 1981). For this reason, the concept of internal consistency becomes important in the evaluation of a quality IEP. Internal consistency refers to the logical interrelationship of the assessment results, present levels of performance, annual goals, and short-term objectives set forth in the IEP document (Dickson, 1981).

It has been widely assumed by most school districts that providing inservice training on a topic will increase employee knowledge of that topic. Likewise, when state and federal monitoring agencies have found deficiencies in IEP documents, it has been assumed that revising forms will result in the provision of the missing information. No studies could be located regarding changes in internal consistency of IEP documents following in-service training on that topic or on the changes in compliance/internal consistency over time following that training.

As previous research has documented the effectiveness of both form revision and inservice training on increasing the compliance level of IEP documents, it would seem appropriate to determine whether this would also hold true for internal consistency. Specifically, this research attempted to document changes in internal consistency and overall compliance which might have occurred following inservice training conducted as a part of federal/state monitoring visits and the subsequent revision of IEP forms. In addition to documenting changes, an attempt was made to identify areas in which further inservice training and/or form revision might be appropriate.

#### Research Questions

During the first semester of the 1988-1989 school year, a suburban school district provided intensive inservice training to staff regarding the issues of IEP compliance and internal consistency. In the fall of 1988, following a monitoring visit, modifications were made to the district IEP form with the goal of further increasing quality and compliance. This study attempted to answer the following questions.

1. What changes, if any, occurred in the levels of legal compliance and internal consistency



in a random sample of IEPs over a three year period?

2. Is there a significant difference in the levels of compliance and internal consistency between the IEPs of Level 1 and Level 2 students?
3. Do consistent areas of weakness in compliance or internal consistency exist in this sample of IEPs?

#### Definition of Terms

Individualized Education Program (IEP). A written document, labelled as such, detailing the specific special education needs and services to be provided to an individual student.

Present Level of Performance (PLP). A written statement, contained in the IEP document, which delineates the student's strengths, weaknesses, and needs as related to the educational setting.

Annual Goal. A written statement of a desired outcome which can reasonably be attained within one school year.

Short Term Objective (STO). A written statement of steps which, when successfully completed by the student, will result in the attainment of the annual goal.

Related Service. Non-educational services or therapies which are necessary for a specific child to attain the annual goals set forth in the IEP.

Compliance. The extent to which an IEP document contains the eleven required items, and their components, as specified in the EAHCA.

Internal Consistency. The extent to which a logical relationship exists between various components of the IEP document. Specifically this refers to a direct and observable relationship between needs identified in the PLP section of the IEP and annual goals as well as a direct and sequential relationship of short term objectives to the annual goals.

Level 1 Student. A student who receives special education services in excess of speech therapy and spends the majority of his/her time in a regular education classroom.

Level 2 Student. A student who spends the majority of his/her time in a self-contained special education classroom.

### Summary

The Education for All Handicapped Children Act of 1975 guaranteed every handicapped child the right to a free and

appropriate education. The primary component in both the monitoring and provision of this individually appropriate education is the Individualized Educational Program (IEP). The IEP process involves a multi-disciplinary team in the assessment, planning, and evaluation of services for each student.

The EAHCA specifies certain criteria that an IEP must meet to be "in compliance" with federal law. Although the majority of IEP documents comply with these requirements, questions exist regarding the overall quality of the information included. One method of measuring this quality is to determine the level of internal consistency within the IEP.

School districts frequently use inservice training as a method of improving the skills of staff in various areas. To date, however, no research regarding the effectiveness of inservice training on increasing internal consistency within IEP documents has been noted. IEP forms are often modified following state and/or federal monitoring visits to deal with identified compliance difficulties. During the period 1987-1990, both of these events occurred in a suburban school district in the mid-west.

The purpose of this study was to document changes in both legal compliance and internal consistency of IEP

documents over a three year period. In addition, an attempt was made to determine whether differences existed in the levels of compliance and internal consistency among students receiving different levels of special education services. Finally, an attempt was made to identify areas of weakness which might be the focus of further training and/or form revision.

## Chapter II

### Review of Literature

#### Introduction

Since the inception of the EAHCA in 1975, considerable research has been focussed on one component of the Act, the Individualized Education Program (IEP). The term IEP has been used both to refer to the process of determining appropriate educational services for handicapped children and to the specific document which delineates those services. As previously stated, the IEP document must comply with certain mandates. These mandates include specifications regarding required content as well as a listing of persons required to be involved in the development of the IEP.

Research regarding the IEP has been prolific and has covered a wide variety of topics related to both the IEP process and the IEP document. Specific research to be reviewed in this section will include that focussed on the utility of the IEP document in instructional planning, determination of the quality of IEP documents, effects of in-service education on the quality of IEP documents, compliance with the mandates of the EAHCA, and the internal consistency of IEP documents. An attempt will be made to provide an historical perspective on the current status of

IEPs as well as to prove that in reality little improvement in either IEP quality or internal consistency has been found since the inception of the EAHCA.

### The IEP and Instructional Planning

Although research has consistently documented the fact that preparation of the IEP requires a significant amount of the special education teacher's time, the actual usefulness of this document in instructional planning remains unclear. A two-year study regarding special education teachers' attitudes toward IEPs found that teachers often viewed the development of the IEP as an "administrative/clerical" task as opposed to a basis for the planning of instructional activities. The study, conducted during the period 1978-80, used a Likert type questionnaire to assess the attitudes of approximately 300 Utah special educators. Results in both the original and follow-up studies suggested moderately negative attitudes toward IEPs as well as the lack of perception of any relationship between the IEP document and what occurs in the classroom (Morgan & Rhode, 1983).

In 1978, Marver interviewed a group of special education teachers to determine the extent to which IEPs impacted the instruction provided in their classrooms.

Fifty percent of these teachers stated that they neither read nor referred to their students' IEPs during the school year. The primary reason cited for this was lack of accessibility of the IEP documents.

In 1980, the Bureau of Education for the Handicapped (BEH) issued the first in a series of reports concerning a longitudinal study of the implementation of the EAHCA. Special education teachers from twenty-two local education agencies (LEAs) in nine states were interviewed. Results of the interviews indicated that although teachers felt that implementing the IEP requirements involved the most time of any of the required procedures, it remained "an exception rather than a rule for service givers to make significant use of the IEP documents" (Stearns, Greene, & David, 1980 p.90).

Dudley-Marling (1985) studied a sample of 150 teachers of emotionally disturbed and learning disabled students to determine their perceptions of the utility of the IEP document. Although the majority of the teachers felt that the IEP was useful in general, only 41% found it useful in determining day to day instructional planning. In addition, a majority of the teachers stated that their students' IEPs were not readily accessible to them. These findings lead to serious questions as to the extent to

which the goals and objectives stated in the child's IEP were being implemented.

In addition to determining the level of utility of IEPs, attempts have been made to determine specific factors which influence teacher use of IEPs. As mentioned in previous studies (Dudley-Marling, 1985; Marver, 1978), lack of accessibility to the IEP document significantly impacted the extent to which it was used in instructional planning. A study was conducted in 1987 in New York City to determine both the extent to which IEPs were used to plan instruction as well as factors which influenced that level. As in previous studies, the 33 special education teachers surveyed neither made extensive use of the document nor viewed it as a significantly important guide to instruction. The factors most frequently cited as reasons for not utilizing the IEP document were objectives which were not matched to student needs (66%), unrealistic objectives (66%), difficulties accessing the IEP document (27%), and inaccurate or incomplete diagnostic and assessment information (21%) (Margolis & Truesdell, 1987).

As indicated in the previously cited studies, little appears to have changed in regard to the utility of the IEP document. Although the IEP document purportedly contains the most comprehensive and reliable information regarding a



special education students' needs regarding educational programming, special education teachers continue to refrain from actively utilizing the IEP document on a daily basis. This information supports the theory that significant difficulties in at least some aspects of the IEP process continue to exist.

#### Inservice Training and IEP Development

Maher (1980) summarized research concerning several difficulties which were identified in the IEP development process and provided implications for inservice training of special educators. These included a lack of understanding of essential components of the IEP (Anderson, Barnes, & Larson, 1978); a lack of skills in formulating goals, objectives, and evaluation criteria (Gallistel, 1978); and difficulty writing the IEP in a format that could be easily understood by IEP implementors (Hayes, 1978; Higgins, 1978; Safer, Morrissey, Kaufman, & Lewis, 1977). Using this research as a basis, Maher compared three methods of training special services teams in IEP development. The methods compared involved inservice training only, inservice training combined with performance feedback, and performance feedback only. The variable assessed was the number of legally complete IEPs prepared by each team.

Results showed that performance feedback alone did not significantly increase the number of complete IEPs. Inservice training, both alone and combined with performance feedback, appeared to enable the teams to complete significantly more complete IEPs. However only when inservice training was combined with performance feedback did the team maintain an increased level of complete IEPs throughout the school year.

Cox and Pyecha (1980) also found inservice training to be effective in increasing the informativeness and internal consistency of IEP documents. A follow-up study to the national survey of IEPs conducted by the Research Triangle Institute attempted to identify factors which contributed to the informativeness and internal consistency of IEP documents. Three factors were found to have a significant impact on these qualities--IEP format, staff training, and supervision of staff. Findings showed that districts with the lowest ratings of IEP informativeness and internal consistency maintained only minimal levels of inservice training as compared to those districts with more informative and internally consistent IEPs.

In a study designed to analyze teachers' perceptions of their instructional needs in relation to IEP development, Tymitz (1980) asked 215 teachers participating

in a federally funded training program to complete a questionnaire rating the perceived difficulty of various portions of the IEP process. Following the completion of that questionnaire, the teachers were asked to develop an IEP for a hypothetical student. Teachers perceived the formulation of short term objectives to be the most difficult portion of this task. The statement of annual goals was also perceived to be difficult. The teachers' actual performance tended to validate their perceptions. Problems identified in the sample IEPs included overly broad goals and objectives, lack of congruence between goal statements and identified needs, lack of a clear standard of performance in short term objectives, and a tendency to confuse instructional activities and short term objectives.

A 1989 study attempted to evaluate the effectiveness of inservice training on the quality of short term objectives developed by special education teachers. Inservice training consisting of lectures, concrete examples, and group activities was provided to a group of special education teachers. Results showed that inservice training increased the teachers' ability to write objectives that were functional, technically adequate, and appropriate for generalization (Davis, 1989).

Although the previous studies do indicate that

inservice training has historically been an effective means of improving teacher performance in some areas of IEP development over at least a short period of time, little information was available regarding the lasting effects of training. Only one study (Cox & Pyecha, 1980) was found which specifically related inservice training to IEP compliance and internal consistency.

#### Factors Affecting IEP Quality

Many initial studies involving IEP quality were conducted at a time when most special education staff had little familiarity with the IEP document or process. A significant number of studies were carried out between 1977 and 1980 in an attempt to qualitatively define a "good" IEP as well as to begin to evaluate the quality of existing IEP documents. In addition, some studies attempted to determine the perceived needs of teachers in developing these "quality" IEPs.

Studies conducted to assess the quality of IEP documents have tended to support the areas of needed training identified by special education teachers. Primary difficulties identified have centered around the quality and inter-relationship of annual goals and objectives. In addition, some concerns have been raised regarding the

relationship of goals and objectives to identified student needs.

In a 1978 study, Anderson, Barnes, and Larson attempted to qualitatively and quantitatively describe 400 randomly selected IEPs. In this sample of IEPs, the authors found a near 1:1 ratio between goals and objectives, leading them to question whether too few objectives were being written. In addition, approximately 75% of the objectives addressed basic academic areas seemingly without relation to the stated educational needs of the student.

A sample of 61 IEPs collected during BEH monitoring visits also indicated difficulties in the relationship between identified needs and goals/objectives. In this case, a significant number of IEP documents contained short term objectives for all curricular areas regardless of the student's identified strengths/weaknesses. Results also indicated that while a special educator was involved in the preparation of all IEPs, a regular education teacher was involved only 44% of the time (Safer & Hobbs, 1980).

In a study of IEPs in the state of California, Alper (1978) also found difficulties with both IEP goals and objectives. Two hundred and sixty-five IEPs were studied to determine the level of comprehensiveness, specificity,

and clarity of the goals and objectives. Difficulties in all three areas were found for both goals and objectives.

In 1979, Blaschke studied the IEP development process and resultant documents in nine school districts spanning a three state area. Results from this study indicated that IEPs appeared to be developed primarily around what services and activities were readily available in the school district. In addition, the majority of districts did not delineate short term objectives at the time of the IEP conference. Instead, these objectives were determined by the teacher following special education placement and later added to the IEP document.

Finally, a 1986 study of the IEPs of 61 children with Down Syndrome found that only 6% of the annual goals were judged to be written in such a way that they could be accomplished within a one year period. Rather than being stated in such a way that a specific desired outcome could be determined, the majority were stated as simply "To improve...". In addition, the majority of short term objectives included a projected duration of all four quarters of the school year thus rendering them, in effect, annual goals. Based upon these results the researcher stated that "[the] question can be raised, are teachers simply writing goals and objectives without any hope of

their implementation, or are they simply overestimating their ability to carry out educational programming?" (Weisenfeld, 1986, p. 216).

Although the specific difficulties with annual goals and short term objectives have varied with time, problems in these two areas have remained consistent. As will be described in the sections related to internal consistency and compliance, significant qualitative deficits in goals and objectives continue to impact the overall quality of IEP documents.

#### The IEP and Legal Compliance

Although the EAHCA requires at least "paper" compliance with the requirements set forth regarding IEPs, actual studies of existing documents have shown that although the majority of IEPs comply with most requirements, few are totally in compliance. Numerous states have developed manuals for monitoring compliance (Illinois State Board of Education, 1981; Nebraska IEP Evaluation, 1987; Walker & Kukic, 1979;). Several independent researchers have also developed compliance/evaluation checklists, the most comprehensive of which was used in the national survey of IEPs conducted by the Research Triangle Institute (Pyecha & Cox, 1980).

Based upon his review of the literature from 1975-1989, Smith (1990) stated that the IEP remains a "questionable" document and that research "reveals a history of IEP inadequacies and passive compliance" (p.6).

In an attempt to study the comprehensiveness, clarity, and specificity of IEP documents, Alper (1978) reviewed 265 IEP documents. None of the eleven required areas was found to have 100% compliance in the IEPs analyzed. Areas with less than 70% of IEPs in compliance included present levels of performance/strengths (65.5%) and amount of time spent in regular education (59.2%). Only 76.8% of the IEPs were in compliance with requirements regarding short term objectives. In addition, Alper found that both long term goals and short term objectives were non-specific and poorly written and that regular education teachers were usually not involved in the IEP process.

Schenck and Levy (1979) analyzed the IEPs and psycho-educational evaluations of 300 students with a range of handicapping conditions. Again, no single required area attained 100% compliance and a high rate of non-compliance was noted in three areas. Of these IEPs, 68% did not specify the amount of time to be spent in regular education, 64% did not state current levels of performance, and 57% lacked evidence of parental approval. Thirty-three



percent of the IEPs did not specify evaluation procedures to be used, while either annual goals or short term objectives were missing in 20% of the IEPs.

In a related study, focussing only on learning disabled students, Schenck (1981) looked at the IEPs of 186 students from the previous study who were identified as learning disabled. Again, the areas of time spent in regular education (72%), current levels of performance (62%), and parental approval (73%) were not in compliance for the majority of IEPs. In this sample, 26% did not identify evaluation procedures while 12% failed to specify either goals or objectives.

A survey of 456 IEPs conducted by the Comptroller General's Office in 1981 also found significant deficits in compliance with the mandates of the EAHCA. Of the IEPs surveyed, 65% had compliance deficits in at least one area. An additional 13% contained exceptionally vague or general statements. Thus this study found that 78% of the IEPs surveyed did not meet the specific content requirements set forth by law. Most common areas of deficit included lack of evaluation procedures (36%), missing or vague annual goals (31%), missing or vague statement of present levels of performance (29%), and missing or vague short term objectives. An additional item of concern was that many

school districts appeared to limit the content of IEPs to those services that were readily available within the school district.

A national survey of IEPs was conducted in 1980 by the Research Triangle Institute. In this study a random sample of 2,657 IEPs was drawn from school districts in all states of the continental U.S., with the exception of New Mexico. An additional sample of 550 IEPs of students attending state/special facilities was also analyzed. The "basic survey" consisted of an attempt to determine the levels of compliance and internal consistency of IEPs written by school district staff. The "state and special facilities substudy" attempted to determine the same information for IEPs written by non-public school district staff. Finally, the "retrospective longitudinal study" analyzed changes that occurred in the IEPs over a two-year period (Pyecha & Cox, 1980a).

Results from the basic survey indicated that 36% of the IEPs contained all of the required information, 71% contained at least 10 of the 11 required items, and approximately 90% of the IEPs contained at least 7 of the required items. Approximately one-third of the short term objectives analyzed complied with the requirement that they be written in measurable terms or contain clearly stated

evaluation criteria. The two items of required information which were most frequently missing were proposed evaluation criteria (35%) and extent of participation in regular education (38%). The findings strongly suggested a relationship between the existence of headings for required information and the presence of that information in the IEP document. Ninety-nine percent of the IEPs that included a heading for annual goals included that information while only 16% of forms without such a heading included the information. In terms of short term objectives, 97% of forms with such a heading included this information while it was present in only 25% of IEPs without such a heading (Pyecha & Cox, 1980b).

Results of the state/special facilities substudy were similar to those of the basic survey. Approximately one-third of the IEPs contained all of the required information. Ten of eleven required items were found in 80% of the IEPs and at least seven of the eleven required items were found in over 90% of the IEPs. The only significant differences noted were that information regarding the extent of participation in regular education was more likely to be included in IEPs from the basic survey sample and that information regarding proposed evaluation criteria was more likely to be included in the

IEPs of state/special facility students (Pyecha & Cox, 1980c).

Results of the retrospective longitudinal study showed a significant increase in the level of compliance from the first to second year of the study. Specifically, improvement was seen in the increased evidence of short term objectives, proposed evaluation criteria, evaluation procedures, evaluation schedules, and assurance of at least an annual evaluation. In spite of these improvements, however, only approximately 1/3 of the IEPs sampled met all of the requirements for including mandated information (Pyecha & Cox, 1980d).

Three studies have attempted to compare the compliance levels for students with differing handicapping conditions and/or levels of special education service. In a study conducted in a large urban school district in Texas, researchers analyzed 1317 IEP documents of students with eight different handicapping conditions to determine their level of legal compliance. Results indicated that a significant amount of mandated information was not present in the IEPs. In addition, IEPs prepared for speech handicapped students had a higher rate of compliance than those of either mentally retarded or learning disabled students (Say, McCollum, & Brightman, 1980).

A study conducted to assess the quality of IEPs of behaviorally impaired students also looked at differences that might occur over grade and service level. Smith and Simpson (1989) found that in a sample of 214 IEPs results showed compliance difficulties in over 50% of the IEPs. Specific areas of difficulty included extent of regular education participation, identification of related services, parental participation, and lack of required signatures. No significant difference in compliance level was found across grade or service levels though fewer deficits were noted in the IEPs of students served in self-contained classrooms.

A similar study was conducted by Smith in 1990. In this study a sample of 120 IEPs of students with either a behavioral disorder (BD) or learning disability (LD) were compared with regard to compliance, number of goals and objectives, and internal consistency. The sample consisted of four groups of 30 IEPs each. Groups included Resource LD, Resource BD, Self-Contained LD, and Self-Contained BD. Procedural deficits were found in a large number of the IEPs however no statistically significant difference was found between either levels of service or handicapping condition. IEPs of learning disabled resource room students did differ from those of behaviorally disordered

resource room students due to a lack of identification of dates for initiation/duration of services and failure to specify participation in physical education programs.

Although a ten year period has elapsed between many of the early studies related to compliance and the most recent studies conducted by Smith (1990), compliance levels have shown little improvement. Over 50% of IEPs continued to demonstrate at least some difficulties related to legal compliance and these difficulties appeared consistent across both handicapping condition and level of special education service.

#### Internal Consistency and the IEP Document

In studying internal consistency, researchers have tended to focus upon two constellations of relationships in the IEP document. These are the logical relationship between instructional needs as identified in the Present Level of Performance (PLP) statement and annual goals and the relationship between annual goals and short term objectives (STOs). Based upon Cawley's (1977) premise that special education instruction should be designed to meet the unique needs of the learner and thus directly linked to the results of assessment, Schenck (1980) conducted a study of 243 IEPs of students identified as emotionally

disturbed, educable mentally retarded, and learning disabled. The purpose of the study was to determine whether long term goals and short term objectives were actually based upon the results of the child's psycho-educational assessment. In no case was a significant relationship documented between assessment results and either annual goals or STOs. As a result, Schenck commented that "the extent to which current IEPs are addressing the unique needs of the learner must be seriously questioned" (Schenck, 1980 p.341).

A similar study conducted by Dickson and Costa (1981) investigated the relationship among reasons for referral, psycho-educational assessment results, and certain portions of the IEP document in 405 IEPs of students ranging from preschool through twelfth grade. Although annual goals were related to PLP statements 71% of the time, neither the PLP statement nor the annual goals were related to the actual assessment results with any consistency. In addition, only 37% of the STOs were representative of sequential increments of improvement between the PLP and annual goals. STOs were related to assessment results in only four of fifteen instructional areas.

As part of a study focussed on the effects of participatory planning on the internal consistency of IEP

documents, Dickson (1982) investigated the relationships among PLP, annual goals, and STOs. When information from 114 IEPs of special education students was coded on three checklists designed for the study, researchers found a coherent relationship between PLP statements, annual goals, and STOs did not consistently exist. In fact, the overall rate of internal consistency was too low for significant results regarding the relationship between internal consistency and participatory planning to be determined.

Pyecha and Cox (1980b) attempted to measure the extent to which an interrelationship existed between identified needs, annual goals, and short term objectives in a national sample of IEPs. In approximately 71% of the IEPs studied at least one case of such an interrelationship could be observed within the IEP document. In attempting to document consistent interrelationships, 40% of the IEPs studied were described as informative and internally consistent however only 5% were described as exceptionally so.

In assessing change over a two-year period, results of the retrospective longitudinal study showed an improvement in the level of internal consistency of the IEPs studied. Specifically, more IEPs included at least one instance in which a relationship between identified needs, annual



goals, and short term objectives could be documented (Pyecha & Cox, 1980d).

Although results comparing the internal consistency of IEPs from the basic survey sample and those of students attending state/special facilities were statistically similar, there was some indication that the IEPs of the state/special facility students might be more internally consistent, especially in the areas of social, self-help, motor, and visual acuity skills (Pyecha & Cox, 1980c).

In a study limited to the IEPs of behaviorally disordered students, Fiedler and Knight (1986) attempted to determine whether a relationship existed between recommendations related to diagnostic/assessment data and instructional goals stated in the IEP. Results showed a weak relationship between assessment results and goals. Only 36% of the IEP goals appeared in any way related to the assessment data. As found in early studies, an overemphasis on academic goals, in the absence of identified academic needs, was found. In addition an under-emphasis on behavioral goals was noted.

In an attempt to determine teacher inservice training needs regarding IEP planning, resource teachers (Level 1), self-contained special education teachers (Level 2), and regular education teachers were asked to write an IEP for a

fictional student. Of the six areas studied, resource teachers received the highest number of adequacy ratings, however those ratings were below 50% in three of the six areas. In the area of internal consistency, special education teachers performed slightly better than their resource counterparts. Of the goals written, 68% of those written by self-contained teachers, 64% of those written by resource teachers, and 39% of those written by regular education teachers were congruent with stated needs within the hypothetical student profile (Tymitz, 1980).

A 1989 study focussed on a comparison of IEPs of behaviorally disordered students served in a variety of special education settings. An evaluation tool developed for this study was used to rate the IEPs on legal compliance and congruence. Over 50% of the IEPs showed lack of compliance in at least one area. In addition, substantial deficits were found in internal consistency, specifically in the areas of performance deficits (an annual goal is stated in an area in which no needs have been identified) and annual goal deficits (no annual goal has been stated for an identified need). No significant difference was found between age groups or service delivery models in relation to internal consistency. Although it was not a significant difference, a higher level of legal

compliance was noted in the IEPs of students served in a self-contained classroom program (Smith & Simpson, 1989).

A statistical comparison was recently made of the IEPs of 120 students classified as learning disabled or behaviorally disordered and served in either a resource or self-contained setting. IEPs were compared with regard to level of compliance, number of goals and objectives, and level of internal consistency. Compliance problems were found in a large number of the IEPs across both handicapping conditions and service models. In a general sense, the PLP statement was found to serve a basis for goals and objectives in only 62% of the IEPs. Both performance and annual goal deficits were prevalent. The only significant difference between groups was that the IEPs of behaviorally disordered students served in a self-contained setting were more likely to be internally consistent than those of either behaviorally disordered resource students or learning disabled students served in a self-contained classroom (Smith, 1990).

### Summary

A significant amount of research relating to the IEP document has been published since the implementation of the EAHCA in 1975. Although most teachers agree that the IEP

provision requires the largest time commitment of any provision of the Act, early research indicated that the IEP document did not frequently impact on the handicapped child's daily educational program. More recent research has indicated that this has continued to be the case. Proposed reasons for this have included difficulty accessing the document, objectives which are unrelated to student needs, unrealistic objectives, and incomplete assessment data. Attempts to increase the utility of IEP documents through the remediation of these difficulties appear to be warranted.

Attempts have been made to identify teachers' perceptions of their training needs regarding IEP development. Perceived needs have tended to be validated by observed problem areas in completed IEPs. Specific areas of difficulty have included the appropriateness of goals and objectives, lack of internal consistency, and objectives which lack a clear standard of required performance. Of these areas, teachers perceived the writing of appropriate, legally compliant, and internally consistent goals and objectives to be the most difficult.

Several studies have examined the impact of inservice training on IEP development. Although inservice training did appear to increase the quality and compliance level of

IEPs, improvements were maintained throughout the school year only when the inservice training was combined with performance feedback. Only one study was found which dealt with the impact of inservice training on internal consistency. Little information regarding the effectiveness of inservice training over time was found.

A variety of studies, comprised of both local and national samples, have examined the compliance levels of IEPs. Rarely did any one of the eleven required areas demonstrate 100% compliance in any sample. Specific compliance difficulties observed included current level of performance statements, short term objectives, evaluation procedures, statements of time spent in regular education, and evidence of parental participation. Additionally, it was noted that participation by regular educators in the IEP process was quite low. In regard to short term objectives, it was noted that a significant number of objectives were written for a projected duration of one year, thus rendering them in effect annual goals. A strong relationship was also found between the existence of informational headings on IEP forms and the presence of that information in the IEP document. No significant difference was noted in the levels of legal compliance when IEPs for students receiving different levels of special

education service were compared. IEPs for speech handicapped students, prepared by speech pathologists, however, were found to have a significantly higher degree of compliance than those of other special education students.

Results related to the level of internal consistency in IEPs varied widely. Several studies found negligible levels of internal consistency with others reporting levels as high as 71% of IEPs surveyed showing some degree of internal consistency. The national survey of IEPs conducted by Pyecha & Cox in 1980 found 40% of the IEPs surveyed to have an acceptable level of internal consistency with 5% rated as exceptionally internally consistent. Results from studies comparing internal consistency by level of service found IEPs of Level 2 special education students to be slightly more internally consistent.

Although many studies reviewed were conducted as the EAHCA was being initially implemented, it is significant that the majority of problems identified related to compliance and internal consistency levels have continued to be observed in more recent studies. This underscores the continuing need for investigation related to the IEP process and resultant document. Attempts must be made to

determine the causes behind the continued low rates of compliance and internal consistency as well as to investigate remediation activities.

Previous research has shown that both form revision and in-service training of staff can have a positive effect on the quality of IEP documents. Little research exists on the relationship of either of these activities to the overall level of internal consistency of the IEP document, nor does significant information exist regarding the long-range effects of inservice training alone on either compliance or internal consistency.

In documenting changes in the levels of internal consistency and legal compliance, this study will not attempt to attribute a specific cause to any such identified changes. Rather, the results of this study will serve as a guide to future research by identifying trends as well as areas of strength and weakness in the IEP documents thus allowing the formulation of testable hypotheses regarding the origin of those differences.

## Chapter III

### Methodology

#### Hypotheses

In attempting to answer the previously stated research questions, the following hypotheses were generated.

Hypothesis 1: There will be no difference in the level of legal compliance in a random sample of IEPs over the three year period 1987-1990.

Hypothesis 2: There will be no difference in the level of internal consistency in a random sample of IEPs over the three year period 1987-1990.

Hypothesis 3: There will be no difference in the level of legal compliance between IEPs for Level 1 and Level 2 special education students in a random sample of IEPs collected over the three year period 1987-1990.

Hypothesis 4: There will be no difference in the level of internal consistency between IEPs for Level 1 and Level 2 special education students in a random sample of IEPs collected over the three year period 1987-1990.

#### Selection of sample

A random sample of 150 IEPs of special education students in a midwestern school district was obtained in the following manner. A record of all students served in special education was obtained for the academic years 1987-



88, 1988-89, and 1989-90. Students verified solely as speech-handicapped, early childhood students, students receiving Level 3 special education services, and students receiving more than one level of special education service during the same year were eliminated from the list. Annual lists of students were then divided into two groups based upon level of service and numbered consecutively. A table of random numbers was used to select 30 names from each list (25 sample + 5 alternate). A sample name was replaced by an alternate name if any of the following situations occurred:

1. The same IEP was selected in two consecutive years;
2. The student appeared on the enrollment list due to a referral for service during a given academic year but no IEP was written until the following academic year;
3. The student was enrolled only in speech therapy or early childhood services though this was not noted on the original enrollment list;
4. The IEP for the given academic year was written in another school district; or
5. The student's folder was unable to be located in the district files.

Although an Office of Civil Rights (OCR) audit

occurred during one of the targeted years, the selection of an IEP for participation in that audit was not considered in sample selection for two reasons. First, it was impossible to determine which IEPs were involved in the audit due to the confidentiality of the sampling procedure used. Second, it was assumed that as the original sample in the OCR audit was obtained in a random manner, those IEPs would be randomly distributed in the sample drawn for this study. Participation in the OCR audit was considered relevant as any observed deficits were required to be remedied within a specified period of time and such folders were re-audited to insure compliance.

#### Evaluation Instrument

Selected IEPs were evaluated by this researcher using a modified version of the Nebraska IEP Evaluator (Westside Community Schools, 1987), a computerized IEP evaluation system developed by a local school district. This evaluation system focussed both on issues related to legal compliance and overall IEP quality. As this system was developed primarily as an administrative tool, no specific information was supplied regarding either reliability or validity. Based upon information provided in the accompanying manual, however, the instrument did demonstrate face validity. The manual provided a detailed

analysis of each item contained in the instrument and its relationship to specific legislative mandates regarding the IEP. At least one item assessed compliance in each of the eleven mandated areas. In addition to stating which mandates were represented by each item, the manual indicated whether the rating for a specific item was an indicator of compliance, quality, or both. The items related to internal consistency were also considered to demonstrate face validity as those items measured the existence of objective statements previously related to internal consistency (Dickson, 1981; Walker, 1979). As the indicators of internal consistency were treated as measures of quality by this instrument, a more extensive method for scoring these items was developed. A list of mandated information referenced to specific items of the instrument may be found in Appendix A.

The Nebraska IEP Evaluator consists of nineteen questions requiring the rater to either mark applicable responses, choose the correct descriptor from several choices, or count and record the number of specific items in the IEP. A computer software package accompanies the program enabling automatic scoring of IEPs and reporting of data. This program was not used due to the lack of specificity of the data provided regarding internal consistency.

For the purposes of this study, only those items of the instrument dealing specifically with legal compliance and internal consistency were completed for each IEP. This was done both to minimize the collection of extraneous data and to limit data collection to items whose presence could be objectively observed. All questions involving the subjective rating of IEP quality were omitted as no information regarding reliability of those items existed. Although information regarding the reliability of other items also did not exist, this was not felt to be a significant problem for items where the response required indicating only the presence or absence of specific information within the document. Further assessment of the level of quality of the actual information contained within the IEP document would require the use of an instrument with proven validity and reliability.

#### Evaluation procedures

As the data form accompanying the Nebraska IEP Evaluator is 19 pages in length (one page per item), a shorter data form was created (Appendix B). For the previously mentioned reasons, questions 10, 15, 18, and 19 were omitted. In addition, scores on items 16 and 17 were not used in this study as they were not directly relevant to the two areas being investigated.

Each IEP was assigned an identifying code consisting of the year, level of service, and an alphabet letter from A-Y (e.g. 88-2-R). Once the IEP had been located and evaluated, all references to the actual student's name were destroyed to ensure the confidentiality of the students involved. IEPs were evaluated in no specific order as they were stored in several locations. As a result, all IEPs in a given location, regardless of sample group, were evaluated during the same session. All items were scored in accordance with criteria presented in the accompanying manual.

Data were obtained regarding three aspects of the IEP document. First, information regarding the title and number of participants in each IEP conference was recorded. From this information, the percentage of participation for each type of professional was determined for each sample. In addition, the mean number of participants in the IEP conference was determined for each sample.

Second, information was obtained regarding the extent of legal compliance of the IEPs in each sample. The Nebraska IEP Evaluator assesses compliance in each of eleven mandated areas. Data obtained were used to calculate the percentage of IEPs in compliance by number of mandated areas. That is, the percentage of IEPs that demonstrated compliance in all areas, 10 of 11 areas, etc.

Additionally, the mean number of areas in compliance was calculated for each sample. The percentage of IEPs in compliance with each specific requirement was also determined.

Finally information regarding the level of internal consistency was obtained. As the computer program accompanying this evaluation tool provided only a "yes/no" statement of internal consistency, this portion of the IEP Evaluator was modified. As the purpose of this study was to document changes in the level of internal consistency, a more sensitive measure was needed. For this reason, six internal consistency scores were calculated for each IEP. These scores were as follows:

1. NEED/GOAL--The percentage of identified educational needs, found in the current levels of performance, which are directly addressed by at least one annual goal.
2. GOAL/NEED--The percentage of annual goals which could be directly related to at least one stated educational need.
3. OBJECTIVE/GOAL--The percentage of short term objectives which were directly related to an annual goal. As short term objectives are, by definition, intermediary steps toward the achievement of the goal, statements presented in

the STO section which did not meet the definition of an STO were not considered related to the goal.

4. OBJECTIVE/SERVICE--The percentage of STOs which were addressed by at least one special education or related service.
5. SERVICE/OBJECTIVE--The percentage of services which were justified by at least one annual goal or short term objective.
6. OVERALL LEVEL OF INTERNAL CONSISTENCY--The mean of the five previous measures of internal consistency.

#### Data Analysis

Statistical analysis of the data collected was completed using the AbStat computer software package. Descriptive data, illustrating the actual status of IEPs in relation to both compliance and internal consistency, is presented in table format. This data consists of the following information.

1. A table describing the percentage of participation of both required and optional members of the IEP team by year and level.
2. A table describing the percentage of compliance

with each required item of information by year and level.

3. A table describing the percentage of compliance (by number of items in compliance) for each year and level.

4. A table describing the mean level of internal consistency in each area by year and level.

Using this data, the following statistical tests were performed.

Hypothesis 1. A one-way ANOVA was carried out using the mean level of compliance for each annual sample of 50 IEPs and a significance level of  $p < .05$ . If any significant difference was noted a t-test was also carried out to determine which differences between groups were significant.

Hypothesis 2. A one-way ANOVA was carried out using the mean level of overall internal consistency for each annual sample of 50 IEPs and a significance level of  $p < .05$ . As above, if a significant F value was obtained a t-test was also conducted.

Hypothesis 3. A Student's T analysis was carried out using the mean level of compliance for Level 1 and Level 2 samples ( $N=75$ ), and a significance level of  $p < .05$ . A distinction between years was not made in this analysis.



Thus, all Level 1 IEPs constituted the Level 1 sample regardless of year.

Hypothesis 4. A Student's T analysis was carried out using the mean level of overall internal consistency for Level 1 and Level 2 samples (N=75), and a significance level of  $p < .05$ . As mentioned above, a distinction between years was not made in this analysis.

## Chapter IV

### Results

#### Changes in Legal Compliance from 1987-1990

Based upon EAHCA mandates, an IEP document is required to contain eleven specific items of information.

Hypothesis 1 stated that no difference was expected to exist among the mean levels of compliance for the three year period 1987-90. Table I lists the mean number of items in compliance by year. This ranged from 7.8 in the 1987-88/2 sample to 9.64 in the 1989-90/2 sample.

Table I

Mean Number of Items in Compliance by Year

	1987-88 Level 1	1987-88 Level 2	1988-89 Level 1	1988-89 Level 2	1989-90 Level 1	1989-90 Level 2
$\bar{X}$	8	7.8	8.9	9.32	9.12	9.64
SD	.75	.94	1.56	1.38	1.18	1.13

As indicated in Table II, a one-way ANOVA calculated using the means of the three annual samples without respect to level (n=50) showed a significant difference between groups.

Table II  
Differences in Mean Level of Legal Compliance by Year  
ANOVA Summary Table

Source	DF	SS	MS	F
Year	2	63.0933	31.5467	21.4395**
Residual	147	216.3000	1.4714	
Total	149	279.3930		

\*p<.05

\*\*p<.01

Tables III-V summarize the results of independent t-tests performed on the means of the three groups. These results indicated a significant improvement in the level of legal compliance between the 1987-88 and 1988-89 school years and between the 1987-88 and 1989-90 school years. No significant change, either positive or negative was noted between 1988-89 and 1989-90.

Table III  
Comparison of Legal Compliance in 1987-88 vs. 1988-89  
Student's t Analysis

Year	N	Mean	Std. Deviation	DF	t
1987-88	50	7.90	0.8631	98	-1.07056**
1988-89	50	9.14	1.4984		

\*two-tailed  $p < .05$

\*\*two-tailed  $p < .01$

Table IV  
Comparison of Legal Compliance in 1987-88 vs. 1989-90  
Student's t Analysis

Year	N	Mean	Std. Deviation	DF	t
1987-88	50	7.90	0.8631	98	-7.1059**
1989-90	50	9.38	1.19335		

\*two-tailed  $p < .05$

\*\*two-tailed  $p < .01$

Table V  
Comparison of Legal Compliance in 1988-89 vs. 1989-90  
Student's t Analysis

Year	N	Mean	Std. Deviation	DF	t
1988-89	50	9.14	1.49843	98	-1.01375
1989-90	50	9.38	1.19335		

one-tailed  $p=.19$

two-tailed  $p=.38$

#### Differences in Legal Compliance by Level of Service

Hypothesis 2 stated that no difference was expected to exist in the mean levels of compliance of IEPs of students receiving Level 1 and Level 2 special education services. As indicated in Table VI, a comparison of the mean levels of compliance by level of service ( $n=150$ ) showed that while the number of items in compliance was slightly higher for Level 2 IEPs ( $M=8.92$ ) than for Level 1 IEPs ( $M=8.69$ ), this difference was not significant at the  $p<.05$  level.

Table VI  
Comparison of Mean Level of Compliance by Level of Service  
Student's  $t$  Analysis

Level	N	Mean	Std. Deviation	DF	t
1	75	8.69	1.3149	148	-1.01375
2	75	8.92	1.4215		

one-tailed  $p=.16$

two-tailed  $p=.31$

#### Differences in Internal Consistency from 1987-1990

Hypothesis 3 stated that no difference was expected to exist in the mean levels of internal consistency among IEPs over the three year period 1987-1990. However, differences were noted among years for both Level 1 and Level 2 IEPs. The mean level of internal consistency increased annually over the three year period for Level 1 IEPs. A marked increase was noted between the 1987-88 ( $M=64\%$ ) and 1988-89 ( $M=95\%$ ) school years. An additional 2% increase occurred between the 1988-89 and 1989-90 school years. Level 2 IEPs also showed significant improvement from 1987-88 ( $M=57\%$ ) to 1988-89 ( $M=98\%$ ), however a 7% decrease in overall internal consistency was observed between 1988-89 and 1989-90.

As indicated in Table VII, a one-way ANOVA using the mean level of overall consistency for each of the three

academic years (n=50) without respect to Level of service showed a significant difference existed between the means of these groups.

Table VII  
Differences in Overall Internal Consistency by Year  
ANOVA Summary Table

Source	DF	SS	MS	F
Year	2	42562.8	21281.4	189.453**
Residual	147	16512.7	112.331	
Total	149	59075.5		

\*p<.05

\*\*p<.01

As illustrated in Tables VIII-X, independent t-tests performed on the means of the three groups indicated a significant improvement in the level of internal consistency between the 1987-88 and 1988-89 school years and between the 1987-88 and 1989-90 school years. No significant difference, either positive or negative, was observed between 1988-89 and 1989-90.

Table VIII

Comparison of Internal Consistency in 1987-88 vs. 1988-89

Student's  $t$  Analysis

Year	N	Mean	Std. Deviation	DF	t
1987-88	50	60.48	14.7361	98	-15.7165**
1988-89	50	96.5	6.74386		

\*two-tailed  $p < .05$ \*\*two-tailed  $p < .01$ 

Table IX

Comparison of Internal Consistency in 1987-88 vs. 1989-90

Student's  $t$  Analysis

Year	N	Mean	Std. Deviation	DF	t
1987-88	50	60.48	14.7361	98	-14.6774**
1989-90	50	95.92	8.62327		

two-tailed  $p < .05$ \*\*two-tailed  $p < .01$



Table X  
Comparison of Internal Consistency in 1988-89 vs. 1989-90  
Student's  $t$  Analysis

Year	N	Mean	Std. Deviation	DF	t
1988-89	50	96.5	6.74386	98	0.374638
1989-90	50	95.92	8.62327		

one-tailed  $p=.35$

two-tailed  $p=.70$

#### Differences in Internal Consistency by Level of Service

Hypothesis 4 stated that no difference was expected to exist in the level of internal consistency between IEPs for Level 1 and Level 2 students. As indicated in Table XI, a comparison of overall internal consistency by level of service showed that while Level 1 IEPs ( $M=85\%$ ) were slightly more internally consistent than Level 2 IEPs ( $M=83\%$ ) this difference was not significant at the  $p<.05$  level.

Table XI  
Differences in Internal Consistency by Level of Service  
Student's  $t$  Analysis

Level	N	Mean	Std. Deviation	DF	t
1	150	85.3333	19.1024	148	0.634312
2	150	83.2667	20.7666		

one-tailed  $p=.26$

two-tailed  $p=.53$

## Chapter V

### Discussion

As indicated in Table XII, few IEPs were in total compliance with all eleven mandates of the EAHCA. Initially, during the 1987-88 school year, none of the IEPs reviewed demonstrated total compliance. Overall compliance levels improved during the 1988-89 school year with 20% of the Level 1 and 24% of the Level 2 IEPs demonstrating 100% compliance. A significant decrease (16%) was seen in the number of Level 1 IEPs in total compliance the following year with a smaller (4%) decrease in the compliance rate of Level 2 IEPs. The number of items in compliance within each IEP tended to increase over the three year period. During that time, the mean number of items in compliance per IEP increased from 8 to 9.12 for Level 1 IEPs and from 7.8 to 9.64 for Level 2 IEPs.

Table XII  
Mean % of Compliance by Year

% IEP COMPLIANCE BY NUMBER OF ITEMS

NO. OF ITEMS IN COMPLIANCE	87/88-1	87/88-2	88/89-1	88/89-2	89/90-1	89/90-2
11	0	0	20	24	4	20
10 OR MORE	0	4	44	52	52	68
9 OR MORE	24	20	60	72	72	84
8 OR MORE	80	64	80	84	84	92
7 OR MORE	96	92	92	100	100	100
6 OR MORE	100	100	100			
$\bar{X}$	8	7.8	8.9	9.32	9.12	9.64
SD	.75	.94	1.56	1.38	1.18	1.13

Participants in the IEP process

As indicated in Table XIII, the majority of IEPs in this sample complied with legal mandates regarding the required participants in an IEP conference. Compliance rates ranged from 84% to 100% in this area. At least one parent was involved in the IEP process for all but three of the IEPs reviewed. A special education teacher was involved in all but one of the IEPs and a school district representative was involved 84% of the IEPs. While Level 1 students spend the majority of their school day with a regular education teacher, regular education teachers only participated in from 56% to 84% of the Level 1 IEPs. Although improvement was noted in the level of regular education teacher participation from the 1987-88 to 1988-89 school years, participation again decreased to 64% in the 1989-90 school year. This raises some concern as to the coordination and overall integration of the Level 1 students' educational programs.

**Table XIII**  
**Summary of IEP Participants by Year**

PARTICIPANT	% OF IEPs IN WHICH PARTICIPANT WAS INVOLVED					
	87/88-1	87/88-2	88/89-1	88/89-2	89/90-1	89/90-2
BOTH PARENTS	16	32	16	21	12	36
PARENT	100	96	92	100	100	100
SPECIAL EDUCATOR	100	96	100	100	100	100
REGULAR EDUCATOR	56	24	84	17	64	28
L.E.A. REPRESENT.	84	92	100	100	96	100
PSYCHOLOGIST	16	8	28	29	52	20
SPEECH PATHOLOGIST	20	32	28	75	0	56
OCCUPATIONAL THERAPIST	0	12	0	17	4	16
PHYSICAL THERAPIST	0	8	0	21	4	12
STUDENT	0	0	12	0	12	8
COUNSELOR	0	0	16	0	8	0
SOCIAL WORKER	4	4	4	0	0	4
OTHER	4	4	4	0	0	0
# OF PARTICIPANTS IN IEP CONFERENCE						
	87/88-1	87/88-2	88/89-1	88/89-2	89/90-1	89/90-2
MEAN	4.04	4.2	5.04	4.88	4.52	5.04
SD	0.87	1.17	1	1.36	0.81	1.18
MEDIAN	4	4	5	5	5	5
RANGE	2-6	3-7	3-7	3-8	3-6	3-7
MODE	4	3	5	4	5	5

### Compliance Attributes

The IEPs reviewed varied greatly in degree of legal compliance by year, level of service, and mandated item. As illustrated in Table XIV, consistently high rates of compliance were noted in the areas of annual goals (100% across samples), projected duration of services (96-100%), and assurance of an annual review of the IEP (96-100%). With the exception of current levels of performance, description of participation in regular education, and a description of services to be provided, a trend toward increased compliance was noted over the three year period. This trend was most significant in the areas of short term objectives (STOs), statement of evaluation criteria, and specific dates for initiation of services. With regard to the description of services to be provided, Level 1 IEPs showed a decrease in compliance from 84% to 72% over the three year period. Level 2 IEPs, however, showed a trend of increasing compliance in this area. With regard to a description of regular education participation, a slight decrease in the compliance level of Level 1 IEPs was noted while a more marked decrease in compliance was noted in the level 2 IEPs. The most notable negative change in compliance levels occurred in the area of current levels of performance. In this case, compliance levels consistently

decreased over the three year period for both Level 1 and Level 2 IEPs.

Table XIV

Percent of Items in Compliance by Year and Level

PERCENTAGE OF COMPLIANCE BY ITEM

COMPLIANCE ITEM	87/88-1	87/88-2	88/89-1	88/89-2	89/90-1	89/90-2
REQUIRED PARTICIPANTS IN ATTENDANCE	84	92	100	96	96	100
ANNUAL GOALS	100	100	100	100	100	100
SHORT TERM OBJECTIVES (80% MINIMUM REQUIRED CONT)	0	0	44	52	60	72
STATEMENT OF EVALUATION PROCEDURES (80% STO'S)	96	96	80	92	96	100
STATEMENT OF EVALUATION CRITERIA (80% STO'S)	24	24	56	60	68	72
SPECIFIC DATE OF INITIATION OF SERVICES	28	16	84	80	92	92
PROJECTED DURATION OF SERVICES	96	100	100	100	100	100
STATEMENT OF SERVICES TO BE PROVIDED	84	88	84	96	72	100
STATEMENT REGARDING PARTICIPATION IN REG. ED.	100	88	100	92	92	80
ASSURANCE OF ANNUAL REVIEW OF IEP	96	100	100	100	100	100
STATEMENT OF CURRENT LEVEL OF PERFORMANCE	92	76	48	64	36	48



As both federal and state monitoring criteria specify a compliance level of 80% for the components of short term objectives, that criteria was also adopted for this study. That is, the STOs within an IEP were considered to be in compliance if the four required components (behavior, duration, criteria, evaluation procedure) were present in at least 80% of the objectives. Although some STOs did tend to specify teacher/therapist behavior rather than student behavior, this issue did not preclude compliance in any case. Evaluation procedures were also specified in the majority of objectives. In most situations where this was not the case, it appeared to be the result of oversight in completing the IEP form (e.g. of six objectives on a page all but the last would have the space for evaluation procedures completed).

The areas regarding duration of short term objectives and evaluation criteria posed more significant compliance problems. No STOs were in compliance during the 1987-88 school year due to the lack of a statement of projected duration of the objective. The IEP form used at that time provided no space for such information nor did it request the information. This was changed with the form revision occurring during the 1988-89 school year. A specific blank for information regarding the intended duration of each objective was added to the IEP form at this time. This

dramatically increased the level of compliance for STOs. A new difficulty arose however in that many IEPs listed a projected duration of a full year for all objectives. This trend continued during the 1989-90 school year. It was unclear whether this was the result of a lack of understanding of the concept of STOs, inability to project the time necessary to teach a given skill, or the desire of staff members to minimize the "paperwork" related to the IEP process.

A statement of evaluation criteria also posed significant difficulty in achieving compliance with respect short term objectives. STOs often included no objective means of evaluating student progress. In some cases the statement "to teacher satisfaction" was included following each behavioral description. In the majority of these cases, however, this was not an objective measure of achievement and could vary widely from one teacher to another. Although compliance was achieved if objective criteria were stated in 80% of the STOs, it was questionable in many cases whether the stated criteria were appropriate or even related to the targeted behavior. This was especially true for the large number of STOs specifying a percentage level as the criterion for achievement (e.g. "interact appropriately with peers 70%").

Compliance difficulties related to the initiation of special education services also appeared to be related to the IEP form. Initial levels of compliance were quite low during the 1987-88 school year (16-28%) during which time no space for such information was provided on the IEP form. Although the revised IEP form did not initially request this information, a second revision, implemented during the 1989-90 school year, did specifically request this information. Following these revisions, compliance rates rose to a level of 92%.

A significant decrease in compliance in the area of current level of performance was noted over the three year period. Although the decrease was consistent, the most significant drop (92%-48%) occurred following the form revision implemented in 1988-89. However, since a decrease in compliance was also noted during the following year, other factors must also be considered. Future research in this area definitely appears warranted.

#### Internal Consistency

As indicated in Table XV, the overall level of internal consistency of the IEP documents ranged from 57% to 98%. Improvement was noted in the internal consistency in all areas from the 1987-88 to 1988-89 school years. This change was most pronounced in the areas of need/goal

Table XV

Mean Percentages of Internal Consistency by Year and Level

AREA		SAMPLE					
		87/88-1	87/88-2	88/89-1	88/89-2	89/90-1	89/90-2
IDENTIFIED NEED ADDRESSED BY ANNUAL GOAL	$\bar{X}$	22	4	94.32	95.64	92.68	93.44
	SD	40.2	19.6	20.36	11.39	22.14	21.56
ANNUAL GOAL JUSTIFIED BY STATED NEED	$\bar{X}$	17	4	90.04	96.92	91.36	89.04
	SD	32.19	19.6	24.03	8.14	22.64	20.56
SHORT TERM OBJECTIVES JUSTIFIED BY ANNUAL GOALS	$\bar{X}$	94.8	91.56	96.56	98.36	98.16	98.72
	SD	10.23	14.16	7.26	3.04	8.23	2.69
SHORT TERM OBJECTIVES ADDRESSED BY SPECIAL EDUCATION SERVICE	$\bar{X}$	95.72	96.8	96.32	98.76	99.6	100
	SD	19.59	15.68	12.58	4.76	1.96	0
SPECIAL EDUCATION SERVICES JUSTIFIED BY SHORT TERM OBJECTIVES	$\bar{X}$	92	87.32	100	98	100	96
	SD	23.15	25.86	0	9.8	0	13.56
TOTAL % OF INTERNAL CONSIST.	$\bar{X}$	64.24	56.72	95.44	97.56	97.12	91.92
	SD	16.28	11.5	8.61	3.58	5.52	19.67

and goal/need relationships. The percent of IEPs internally consistent with respect to the need/goal relationship increased from 22% to 94% for Level 1 IEPs and from 4% to 96% for Level 2 IEPs. With respect to the goal/need relationship, internal consistency rates increased from 17% to 90% for Level 1 IEPs and from 4% to 97% for Level 2 IEPs.

A decrease in internal consistency was noted in three areas (need/goal, goal/need, service/objective) from the 1988-89 to 1989-90 school years. With respect to need/goal relationships the percentage of internal consistency for Level 1 IEPs decreased from 94% to 93%, while the internal consistency of Level 2 IEPs decreased from 96% to 93%. The two remaining areas only showed a decrease in internal consistency with respect to Level 2 IEPs. In the area of goal/need relationships, internal consistency decreased from 91% to 89%; a two percent decrease was also noted with respect to service/objective relationships.

#### Hypothesis 1: Changes in Legal Compliance 1987-1990

Hypothesis 1 stated that no significant differences in the level of legal compliance would be observed among a random sample of IEPs over a three year period. Based upon the data stated in the previous chapter, this hypothesis was rejected. A significant improvement in the overall

level of compliance was noted during the 1988-89 school year. Although a slight improvement was again noted the following year, it was not statistically significant. A specific cause for this improvement could not be conclusively identified, however it would appear that the form revision implemented during the 1988-89 school year was a significant factor. As mentioned previously, massive increases in compliance levels in some areas were noted following the inclusion of space for information related to those items. As specific in-service training related to compliance issues was not provided until a later date, it would appear that although in-service training might have impacted on the continuing increase in compliance, it did not play a significant role in the initial increase.

#### Hypothesis 2: Changes in Internal Consistency 1987-90

Hypothesis 2 stated that no difference would be observed in the overall level of internal consistency of a random sample of IEP documents over a three year period. Based upon the results presented in chapter four, this hypothesis was also rejected. A significant increase in the level of internal consistency was also noted following the form revision implemented during the 1999/89 school year. A major change in the form involved separating the current level of performance section into three distinct

parts--strengths, weaknesses, and instructional needs. Prior to that time, no specific area of the IEP requested information regarding a student's specific needs nor was space to include such information provided. As a major component of internal consistency involved the relationships between instructional needs, goals, and objectives, the request for information regarding instructional needs could have significantly impacted the level of internal consistency.

Due to the large difference noted in the need/goal and goal/need scores with respect to other areas during the 1987/88 school year, an additional statistical test was performed. To determine whether the identified changes in internal consistency during the 1988-89 school year were primarily related to differences in need/goal and goal/need scores, and thus attributable to the form revision, an additional one-way ANOVA was computed using the mean of the remaining three measures of internal consistency as the score for overall internal consistency.

As indicated in Table XVI, a significant difference continued to exist among the three groups when the instructional needs factor was eliminated. Thus it would appear that additional factors, most likely related to the concurrent inservice training, also influenced the observed increase in internal consistency levels.

Table XVI

Differences in Overall Internal Consistency Discounting  
Need/Goal and Goal/Need Scores

ANOVA Summary Table

Source	DF	SS	MS	F
Year	2	972.093	486.047	6.64140**
Residual	147	10758.1	73.1844	
Total	149	11730.2		

\*p<.05

\*\*p<.01

Hypotheses 3 and 4: Differences in Legal Compliance and  
Internal Consistency by Level of Service

Hypothesis 3 stated that no difference would be observed in the level of legal compliance between random samples of Level 1 and Level 2 IEPs obtained over a three year period. Hypothesis 4 stated that no difference in the overall level of internal consistency would be observed under the same conditions. The data presented in the previous chapter led to the acceptance of both of these hypotheses. Although slight differences were noted in both compliance and internal consistency between Level 1 and Level 2 IEPs, none of these differences were statistically significant. Level 1 IEPs were slightly more internally consistent than Level 2 IEPs, however, Level 2 IEPs showed



a slightly higher level of compliance. These findings tended to support earlier studies which also showed little difference in IEPs based upon level of service.

### Limitations

Several limitations must be taken into account when considering the results of this study. As the sample was drawn from a single suburban school district, it was not intended to be representative of any population other than that school district. Therefore any generalizations to other samples of IEPs should be made with caution.

While extreme care was taken to insure the randomness of the samples of IEPs, the fact that some IEPs might have been involved in a previous OCR audit must be taken into account. This could have conceivably inflated the compliance level as any audited IEPs were required to be revised until they were in compliance following the OCR audit. As previously mentioned, this factor was unable to be controlled for and was dealt with through random sampling procedures.

While form revision appeared related to improvements in both compliance and internal consistency, due to lack of controls, a definite causal relationship could not be established. Nor could a causal relationship between

internal consistency and inservice training be established for the same reason.

Finally, this study focussed only on the technical quality of IEP documents. No subjective evaluation of the actual quality of the information provided was attempted. In addition, it was assumed that the assessment data and instructional needs presented in the IEP were accurate and reflected the actual needs and abilities of the student. Thus it is conceivable that a given IEP could have been rated as exceptionally compliant and internally consistent, yet still have been inappropriate for a specific student.

### Summary

The results of this study suggested that many early findings regarding IEP quality and compliance levels continue to be true. Although compliance levels of the IEPs in this sample were somewhat higher than those in earlier studies, many previously identified difficulties were also found in this sample. Specifically, problems related to short term objectives, evaluation criteria, and quality of information related to current levels of performance continued to be found. However, significant improvement in parental participation was noted with regard to earlier findings.

Although no significant difference was found between IEPs of Level 1 and Level 2 students, significant differences were noted over the three year period. Specifically, significant improvements in the levels of both legal compliance and internal consistency were noted between the 1987-88 and 1988-89 school years. Due to lack of control factors, a causal effect for these changes could not be conclusively determined. It did appear, however, that the majority of improvement in compliance levels could be attributed to form revision. The improvement in internal consistency appeared to be related both to form revision (increase in need/goal and goal/need scores) as well as inservice training.

### Implications

The results of this study strongly suggest that both form revision and inservice training can have a positive effect on the quality of IEP documents. Unfortunately, as in the case of current level of performance, the opposite can also be true. Further research, attempting to determine the cause for the continued decrease of compliance with respect to statements of current levels of performance, is definitely warranted. In addition, inservice training regarding the determination of appropriate criteria for the evaluation of short term

objectives and methods of estimating realistic duration instruction related to those objectives would appear beneficial. Finally, some form of monitoring of IEPs for completeness would likely further increase the level of compliance as many incidences of non-compliance, especially during the 1989-90 school year appeared to simply involve a failure to complete one or more items on the IEP form.

## APPENDIX A

## ITEM ANALYSIS OF NEBRASKA IEP EVALUATOR

CONTENT REQUIREMENT AS SPECIFIED IN P.L. 94-142	ITEM(S) ASSESSING REQUIRED INFORMATION ON EVALUATION INSTRUMENT	ITEM ASSESSES COMPLIANCE (C) QUALITY (Q)
REQUIRED PERSONS INVOLVED IN DEVELOPMENT OF THE IEP	1, 2	C, Q
DESCRIPTION OF CURRENT LEVEL OF PERFORMANCE	3	C, Q
STATEMENT OF ANNUAL GOALS	4B	C
SHORT TERM OBJECTIVES	4C, 9	C, Q
DESCRIPTION OF SPECIAL EDUCATION SERVICES TO BE PROVIDED	4D, 8	C, Q
SPECIFIC DATE FOR INITIATION OF SERVICES	11	C,
INFORMATION REGARDING ANTICIPATED DURATION OF SERVICES	12	C, Q
AMOUNT OF TIME STUDENT WILL SPEND IN THE REGULAR EDUCATION ENVIRONMENT	13	C
SCHEDULE FOR MONITORING PROGRESS ON AT LEAST AN ANNUAL BASIS	14	C, Q
OBJECTIVE CRITERIA FOR DETERMINING ACHIEVEMENT OF OBJECTIVES	9D	C
EVALUATION PROCEDURES FOR DETERMINING ACHIEVEMENT OF OBJECTIVES	9C	C
INTERNAL CONSISTENCY	5, 6, 7	Q

## APPENDIX B

## DATA COLLECTION FORM

ACADEMIC YEAR: \_\_\_\_\_

COMPUTER CODE: \_\_\_\_\_

LEVEL OF SERVICE: \_\_\_\_\_

IDENTIFIER: \_\_\_\_\_

1. _____ PARENT _____ TEACHER _____ MEMBER OF ASSESSMENT TEAM _____ STUDENT _____ IEP MANAGER _____ _____				2. _____ 3. _____ 4A. _____ 4B. _____ 4C. _____ 4D. _____			
5A. GOAL: _____ A: _____ NO GOAL: _____				5B. JUSTIFY _____ B: _____ NOT JUSTIFY _____			
6. ONE OBJECTIVE: _____ A: _____ TWO OR MORE: _____ B: _____				6C. JUSTIFY _____ C: _____ NOT JUSTIFY _____			
7A. ADDRESSED: _____ A: _____ NOT ADDRESSED: _____				7B. JUSTIFY _____ B: _____ NOT JUSTIFY _____			
8. _____	9A. _____	9B. _____	9C. _____	9D. _____	10. OMIT	11. _____	
12. _____	13. _____	14. _____	16.           YES           NO		17. _____  18. OMIT  19. OMIT		
15 A.   1   2   3   4   5 B.   1   2   3   4   5 C.   1   2   3   4   5 D.   1   2   3   4   5 E.   1   2   3   4   5 F.   1   2   3   4   5 G.   1   2   3   4   5 H.   1   2   3   4   5 I.   1   2   3   4   5 J.   1   2   3   4   5			A. _____ B. _____ C. _____ D. _____ E. _____				

## APPENDIX C

## INDIVIDUALIZED EDUCATION PROGRAM

Sp. Svc. 5.3 7/86 (1 of 4 pages)

1. Name \_\_\_\_\_ Birthdate \_\_\_\_\_ Age \_\_\_\_\_  
 School \_\_\_\_\_ Grade \_\_\_\_\_ Post Evaluation Date \_\_\_\_\_  
 Parent or Guardian \_\_\_\_\_ Phone \_\_\_\_\_  
 Address \_\_\_\_\_ Date Written \_\_\_\_\_
2. This educational plan covers the school year as defined by Bellevue Public Schools Board of Education. This educational plan shall be reviewed and updated by \_\_\_\_\_
3. Present Level of Educational Performance

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4. Placement and Justification

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## Distribution:

White— School  
 Canary—Special Services  
 Pink— Parent





Name \_\_\_\_\_

Date \_\_\_\_\_

12. Describe regular education activities in which the student will participate.

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13. Comments

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14. Related Services

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15. Special Media and Materials

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## 16. I.E.P. Team Signatures

<p>Signature</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>	<p>Name _____</p> <p>Date _____</p> <p>Title</p> <p>Regular Classroom Teacher</p> <p>Special Educator</p> <p>L.E.A. Representative</p> <p>Parent(s)</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
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Parent has a copy of this I.E.P.

<p>_____</p> <p>Date Received</p>	<p>_____</p> <p>Signature of Person Transmitting I.E.P. to Parent</p>
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## Directions:

- White — Should be updated at annual review or when student withdraws and included in student's cum folder.
- Canary— Should be updated at annual review or when student withdraws and sent to Special Services.
- Pink — Parents should bring their copy to conferences for updating.

## APPENDIX D

## Individual Education Program

## I. DEMOGRAPHIC INFORMATION

Name \_\_\_\_\_ Birthdate \_\_\_\_\_ Age \_\_\_\_\_

Home School \_\_\_\_\_ Attending School \_\_\_\_\_ Grade \_\_\_\_\_

Mother \_\_\_\_\_ Home Phone \_\_\_\_\_ Bus. Phone \_\_\_\_\_

Father \_\_\_\_\_ Home Phone \_\_\_\_\_ Bus. Phone \_\_\_\_\_

Student's Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Duration of IEP \_\_\_\_\_ to \_\_\_\_\_  
month/day/year month/day/year

Case Manager for the IEP \_\_\_\_\_

## II. PARTICIPATION IN PROGRAMS

Regular Education \_\_\_\_\_

Hours/Week

Special Education

Hours/Week

### Early Childhood Special Education

Hrs/Day    Day/Week    Months

Date Special Education Begins \_\_\_\_\_

### III. RELATED SERVICES

Hrs/Week	Duration	Svc. Provider
_____	____/____/____ to ____/____/____	_____
_____	____/____/____ to ____/____/____	_____
_____	____/____/____ to ____/____/____	_____
_____	____/____/____ to ____/____/____	_____
	mo. day year mo. day year	

Transportation:

Student is eligible for Special Education Transportation YES NO

Complete Transportation Form if District is to provide transportation.

This education plan covers the school year as defined by \_\_\_\_\_ Board of Education  
and shall be reviewed at least annually for school-age students and bi-annually for Early Childhood  
Special Education students.

**Distribution:** White—School    Canary—Special Services    Pink—Parent

Sp. Svcs. 53-9/88 (Page 1 of 4 pages)

## Individual Education Program

Name \_\_\_\_\_ Date \_\_\_\_\_

Sp. Svcs. 53-9/88 (Page 2 of 4 pages)

## IV. CURRENT LEVELS OF PERFORMANCE

Strengths: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Weaknesses: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Instructional Needs: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date of last MDT verification: \_\_\_\_\_

Indicate with "T" CLP's relating to transition.

Distribution: White—School    Canary—Special Services    Pink—Parent

### Individual Education Program

Name \_\_\_\_\_ Date \_\_\_\_\_

## V. GOALS AND OBJECTIVES

Annual Goal \_\_\_\_\_

[illegible]

Goals and objectives on the transition plan should be marked by a "T".

- |                         |                              |                           |
|-------------------------|------------------------------|---------------------------|
| 1. Date Initiated       | 3. Evaluation Procedure      | 4. Person                 |
| 2. Anticipated Duration | A. Professional Observation  | P-Parent                  |
| A. Week                 | B. Criterion Referenced Test | T-Teacher                 |
| B. Month                | C. Standardized Test         | Other _____               |
| C. Quarter              | D. Behavior Charting         | 5. Annual Review Progress |
| D. Semester             | E. Frequency Count           | (write in review date)    |
| E. Year                 | F. Time Sample               | A. Achieved               |
|                         | G. Parent Report             | B. Progress Made; not     |
|                         | H. End Product               | achieved                  |
|                         | I. Other _____               | C. Little/No Progress     |
|                         |                              | D. Continue/ongoing       |
|                         |                              | E. Terminate              |

Distribution: White--School    Canary--Special Services    Pink--Parent

## Individual Education Program

Name \_\_\_\_\_ Date \_\_\_\_\_

## VI. IEP CONFERENCE PARTICIPANTS

I participated in the development of this child's IEP and understand the content and purpose of this child's IEP Conference and the IEP.

_____ Parent/Guardian	_____ Parent/Guardian
_____ Case Manager	_____ MDT Representative (for initial IEP)
_____ LEA Representative/Position	_____ Regular Education Teacher
_____ Student	_____ Special Education Staff

Date of IEP Conference \_\_\_\_\_

## VII. DISTRIBUTION

Yes No

☐☐

Parent was provided a copy of this IEP.

☐☐

Parent was provided a copy of 92 NAC 55 and 92 NAC 51 (Section 9).

Signature of parent receiving IEP, 92 NAC 55,  
92 NAC Rule 51 (Section 9)Signature of person delivering IEP, 92 NAC 55,  
and NAC Rule 51 (Section 9) to parents

Date Received

Date Delivered

## VIII. ANNUAL REVIEW SIGNATURES

## ANNUAL REVIEW DATES

_____	_____
_____	_____
_____	_____
_____	_____

Directions: White – Should be updated at annual review or when student withdraws and included in student's special education folder.

Canary – Should be sent to Special Services

Pink – Parents should bring their copy to conference for updating.

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