

## IEP Compliance Activity

Bethany Hagberg  
December 1, 2021

### Summary of the Student

William “Bill” Shakespeare is a 15-year-old student in the tenth grade at Hamlet High School in Midsummers Night County Schools. He was found eligible under the category of Specific Learning Disabled due to a severe discrepancy between ability and achievement in the areas of reading and written language.

### Present Level of Performance Critique

	Yes/True	No/False	Explanation of why true or false and, if false, how it could be improved.
The PLAAFP includes very specific quantitative test data about the child’s <b>reading</b> ability.		√	<p><b>What is Wrong?</b> The IEP states that Bill is reading below grade level but does not give us data on his reading grade level. The IEP references (SS70) but does not tell the reader what assessment the score came from or what (SS70) means. There is also no information on what specific areas of reading Bill is having trouble with. For example, is he having issues with his decoding skills or fluency?</p> <p><b>How to Improve?</b> The PLAAFP should state Bill’s reading level and what reading assessment tool was used to test him.</p> <p>The IEP should explicitly state the scores he received from his evaluation. In this case, he was tested with the Woodcock-Johnson IV Test of Achievement and received a standard score of 70 (SS70). This score indicates that Bill is performing in the low range compared to students his age in reading. Standard scores allow for comparisons between students of the same age or grade level, and scores between 85 and 115 are considered average. The PLAAFP should also have the individual scores for the different battery of tests so that the team can see</p>

			Bill's strengths and weaknesses in reading. Other test scores that could be reported are Letter-Word Identification, Passage Comprehension, Word Attack, Oral Reading, and Sentence Reading Fluency. Writing these scores in the PLAAFP will give a better picture of Bill's reading abilities.
The PLAAFP includes very specific quantitative test data about the child's <b>writing</b> ability.	√		The PLAAFP does list quantitative test data. Bill was tested with the Woodcock-Johnson IV Test of Achievement and received a Standard Score in his Broad Written Language of 74. It was explained how his score compared to his same-aged peers. It presents the difficulties he has with his writing skills and explains his strengths and weaknesses with writing.
The PLAAFP includes very specific quantitative data and observable descriptions about the exact nature of the child's <b>behavioral difficulties</b> .		√	<b>What is Wrong?</b> There is no quantitative data on how many times Bill has gotten into trouble in the classroom or sent to the office, and the statement only says it has been escalating since the beginning of school. The IEP only lists one possible trigger for his behaviors: when he is asked to write on a topic, he is not interested in. <b>How to Improve?</b> The IEP Team should suggest that they do a Functional Behavior Assessment (FBA) with Bill to try and better understand what is creating his behaviors and what supports he might need to help him with this. The special education teacher and general education teacher should have documentation of every time Bill has been sent to the office or has been disruptive in class. They should also note possible triggers for these behaviors and list them in the PLAAFP.  The PLAAFP should not include gossip or hearsay from others about the student; only facts are needed.
The PLAAFP contains at least some minimum input from the parent about her	√		The PLAAFP does have a statement from the parent.

<p>child's needs and progress.</p>			
<p>The language used in the PLAAFP is <u>objective</u> and <u>professional</u> throughout. It does not contain any unprofessional language or descriptions.</p>		<p>√</p>	<p><b>What is Wrong?</b> The language in the PLAAFP is not objective and professional. The writer has added their thoughts into Bill's information. For example, "Unfortunately, we can't always be writing about basketball and video games, can we?" They have also added gossip from other teachers and have passed this off as "real" information on the IEP.</p> <p><b>How to Improve?</b> The language in the PLAAFP needs to be objective and professional and not contain any writer's opinions. There should be no gossip or hear-say added to the student's information.</p> <p>When addressing behavior in the PLAAFP, the writer only needs to explain Bill's behaviors in class, possible reasons why, and consequences. They may talk about Bill's emotions but not those of others.</p>
<p>The statement about the impact of the disability on the child's ability to progress in the curriculum is strong, clear, and specific.</p>		<p>√</p>	<p><b>What is Wrong?</b> This statement only says, "It has a huge impact." This statement should discuss how Bill's disability affects his involvement and progress in the general education curriculum.</p> <p><b>How to Improve?</b> The statement could look more like this: <u>Bill's disability in reading affects his ability to learn through reading text written above his independent grade level across all subject areas. Bill's disability in writing affects his ability to write independently at grade level across all subject areas.</u></p>

**Measurable Annual Goals Critique**

	Yes/True	No/False	Explanation of why true or false and, if false, how it could be improved.
The reading goal is clearly measurable and appropriate.		√	<p><b>What is Wrong?</b> Bill’s reading goal is not measurable and appropriate, and this goal is not data-driven. The goal should answer what the team wants the student to do, how well they want them to do it, and how they will know when they do it.</p> <p><b>How to Improve?</b> To improve Bill’s reading goal, first, his PLAAFP needs to be updated with testing information as to how his disability is affecting his ability to read. Once we have a clearer picture of Bill’s weaknesses, we can create a better goal for him. If he has an issue with decoding, a possible goal could look like this: <u>While reading a passage, Bill will use decoding and word recognition skills with 80% accuracy in four out of five trials.</u></p>
The writing goal is clearly measurable and appropriate.	√		<p>This goal tells us what the students should do (independently write a five-paragraph essay), how well to do it (passes a grade level rubric), and how they know when they do it (on three of five occasions.)</p>
The behavior goal is clearly measurable and appropriate.		√	<p><b>What is Wrong?</b> This goal addresses what they want Bill to do (control his temper), but they do not explain how.</p> <p><b>How to Improve?</b> Once a Functional Behavioral Assessment (FBA) has been done, the team will better know what is causing Bill’s behaviors and can align his behavior goal with what he needs. The team then can create a Behavioral Intervention Plan (BIP) that uses positive behavioral interventions and supports to address Bill’s behaviors that interfere with his learning and the learning of others. A possible goal for Bill could be: <u>By 01/04/2022, Bill will increase his use of coping/calming strategies (i.e., request a break, deep breathing) from a rate of 50% of</u></p>

			<u>opportunities to a rate of 90% of opportunities, as measured by daily teacher observations.</u>
--	--	--	--

**Accommodations and Modifications Critique**

	Yes/True	No/False	Explanation of why true or false and, if false, how it could be improved.
All accommodations are directly linked to the student's disability in reading and written language or his behavioral difficulties.		√	<p><b>What is Wrong?</b> The accommodations are not all directly linked to the student's disability in reading, written language, and behavioral difficulties.</p> <p><u>Audio administration of tests:</u> We don't have actual documentation of Bill's reading disability, and it is hard to say that he needs audio administration of all tests. If this is correct, ok, but it should say Audio administration of all tests, except reading tests. (There is no documentation other than "it will be helpful for him" that Bill needs the read-aloud accommodation for reading.)</p> <p><u>Use of Laptop:</u> This accommodation is not necessary because, in the PLAAFP, it says that Bill can write three-paragraph essays. "The use of Laptop" is an unnecessary accommodation for Bill.</p> <p><u>Use of Calculator:</u> This accommodation is not necessary because Bill does not have a documented math disability.</p> <p><u>Teacher to sign assignment book:</u> It is unclear why Bill has this as an accommodation.</p> <p><u>Counseling services with school psychologist</u> is listed wrongly as an accommodation.</p> <p><b>How to Improve?</b></p> <p><u>Audio administration of tests:</u> If needed, it should read: <u>Audio administration of all tests, except reading tests.</u></p> <p>Take out these accommodations: Use of laptop, Use of a calculator.</p>

			<p>Once a Functional Behavioral Assessment is done, a Behavioral Intervention Plan can be created, and it would be added to the accommodations page. There should be accommodations for Bill to address his behavior, and a possible accommodation could be the ability to request a break when he needs one.</p> <p>Teacher to sign assignment book: A better way of stating this accommodation would be: Student will have assignment book signed by the teacher after he has written his assignments for the day. The parent will sign after the student has completed his assignments.</p> <p><u>Counseling services with school psychologist:</u> needs to be moved to services/placement page.</p> <p>ADD these accommodations:  Bill could benefit from <u>Extra Time for Tests, writing assignments, and reading assignments.</u> Info. in his PLAAFP says that he has a hard time completing his work in a timely manner. This accommodation will allow him more time to complete his assignments. Frequency would be for all tests, writing, and reading assignments. The instructional setting would be both SPED/General Ed. Classroom. The <u>Extra Time for Tests</u> accommodation would need to be added to the SOL Accommodations page as well.</p>
<p>The frequency of accommodations is appropriate and very specific (never conditional on availability, parent action, or “as needed”).</p>		<p>√</p>	<p><b>What is Wrong?</b> The frequency of accommodations is not appropriate in some situations.</p> <p>Text on CD or audio: Frequency says, “Only if available from the publisher.” Frequency can not be conditional on availability.</p>

			<p>Teacher to sign assignment book. Frequency: “Only if parent also signs.” Frequency cannot be conditional.</p> <p>Graphic organizer for writing assignments over one paragraph in length. Frequency: Only when all students are provided graphic organizers. This frequency does not make sense. If all students are being provided graphic organizers, Bill would be one of those students. He would not need this as an accommodation.</p> <p><b>How to Improve?</b> Text on CD or audio: If the team is unsure the book will have a CD or audio, they should not list it as an accommodation.</p> <p>Teacher to sign assignment book: If the team wants to have the teacher sign the assignment book, the frequency would need to be changed to: “Daily.”</p> <p>Graphic organizer for writing assignments over one paragraph in length. Frequency needs to change to say: On all writing assignments over one paragraph in length.</p>
<p>The frequency of accommodations is realistic – (hint: for example, if a child is allowed use of a laptop all the time, according to the IEP, that child would never be required to write anything by hand, including his name on the top of a paper or writing as</p>		√	<p><b>What is Wrong?</b> Use of laptop. Frequency: “All work involving any writing.” This accommodation would need Bill to have a laptop at all times for every class. This is an unnecessary frequency.</p> <p><b>How to Improve?</b> Use of laptop. Frequency: Use for assignments over one paragraph in length.</p>

little as a word or two.)			
The accommodations the student uses for testing in the classroom are the same accommodations used during SOL testing.		√	<p><b>What is Wrong?</b> The IEP has Bill using the Audio administration of tests for SOL Tests only.</p> <p>If Bill used the calculator on all math and science tests, he would need to have this same accommodation for his math and science SOL.</p> <p><b>How to Improve?</b> If Bill is going to have Audio administration of tests accommodation, he needs to have it when he is taking tests in the classroom. Frequency would say: All tests, including SOL tests.</p> <p>Calculator use for math and science would need to be added to his SOL testing accommodation page.</p>
If the student has any documented behavioral difficulties, a Behavior Intervention Plan is listed as an accommodation.		√	<p><b>What is Wrong?</b> The student does have documented behavioral difficulties, but there is no attached Behavior Intervention Plan listed as an accommodation.</p> <p><b>How to Improve?</b> The team must meet to discuss doing a Functional Behavioral Assessment (FBA). This is a process to determine the underlying cause or functions of a child's behavior that impedes the student's learning or the learning of the child's peers. Once the FBA has been completed, the team would meet again to create a Behavioral Intervention Plan (BIP). This is using positive behavioral interventions and supports to address behaviors that interfere with the student's learning. The BIP would then be listed as an accommodation.</p>

**Services/Placement Critique**

	Yes/True	No/False	Explanation of why true or false and, if false, how it could be improved.
--	----------	----------	---

<p>All services are listed on this page and not elsewhere in the IEP.</p>		<p>√</p>	<p><b>What is Wrong?</b> Bill’s reading and writing services are on this page, but his Counseling services with the school psychologist are listed wrongly under the Accommodations/Modifications page.  <b>How to Improve?</b> Move Bill’s Counseling services to the services/placement page.</p>
<p>The frequency of services is time-specific and avoids the use of terms such as “as needed.”</p>		<p>√</p>	<p><b>What is Wrong?</b> The frequency of services is not time-specific for Bill’s reading and behavior services. Reading frequency says, “As needed,” and the behavior frequency says, “When referred to the office.”  <b>How to Improve?</b> Change Reading services frequency to a time-specific number. For example: 120 minutes/weekly.   Change Behavior services frequency to a time-specific number: 60 minutes/weekly.</p>
<p>If social skills or behavioral services are indicated, it identifies time for preventative direct instruction, not simply time related to disciplinary action.</p>		<p>√</p>	<p><b>What is Wrong?</b> Behavioral/Social Skills services are indicated, but there is no time-specific number for preventative direct instruction. For frequency, “When referred to the office” is listed.  <b>How to Improve?</b> Behavioral/Social Skills should have a time-specific number—for example, Frequency: 60 minutes/weekly. The location should be changed from office to General Education Classroom.</p>
<p>The LRE statement is specific and <u>clearly and quantifiably</u> identifies exactly when a child will be with non-disabled peers.</p>		<p>√</p>	<p><b>What is Wrong?</b> The LRE statement is not specific and does not quantify when Bill is with his non-disabled peers.  <b>How to Improve?</b> Re-write the statement: <u>Bill will receive all core content in the general education classroom with support from the special education teacher in reading, writing, and behavior skills. Bill will also receive writing instruction in the special education room for 120 minutes/week. Bill requires individualized instruction of below grade-level content within</u></p>

			<u>the general education setting, which would be mutually distracting to both Bill and his general education peers. Bill will be moved to the special education classroom for the administration of tests for the read-aloud accommodation. Bill will receive counseling services in the Psychologist's office for 20 minutes/two times a week. Bill will participate in all non-academic and extracurricular activities as his non-disabled peers.</u>
The LRE statement refers to the determined placement as "appropriate" and not "best" in keeping with the concept of FAPE.		√	<b>What is Wrong?</b> The LRE statement states that the placement decision is the "absolute best placement for Billy." <b>How to Improve?</b> Take out the word "best" and add, " <u>The IEP team determined that the most appropriate placement for Bill would be in the General Education classroom with special education supports.</u> "

**Overall impression of the IEP/Other Comments**

After reading this IEP, I am very frustrated because I am still unsure how Bill's disability affects his learning. The PLAAFP gives data for his writing disability but not for his reading, and there is also no data for his behavior issues. It would be hard to write effective goals for the IEP without the data to back it up. If I received this student, I would immediately pull his evaluations to see what other scores he received to get a more accurate account of Bill's strengths and weaknesses.

At times, the writer is professional. There are parts of the PLAAFP that are strong and a few goals that are almost okay. However, I find most of the IEP to be written in the writer's opinion and not about the student's actual needs. I find the IEP to be not very professional, and if I were checking it for the special education teacher, I would be using a lot of red pen.

**Other issues that should have been noted:**

- Strengths of the Student
  - At no point should an IEP team say that the student has "no real academic strengths."
  - The statement is written non-objectively with the writer's opinion. It states that other students do better when Bill is absent because he is a distraction.

- This should be a statement of what Bill does well in and out of the classroom, how he interacts with his peers, his interests, and how he takes care of himself.
- In the Prior Notice, there were no notes on what was discussed, especially regarding placement. There should be a detailed description of what was discussed instead of a note to “see attached.”
- The next Re-evaluation needs to happen before 12/5/2023. The date on the IEP needs to be 12/14/2023.
- Factors for the IEP Team Consideration Page
  - Questions 1-7 should be filled out instead of just putting “See Present Level of Performance.”
  - Question 8 should be filled out because the team is creating a behavior goal.
- Under the Services Page, the IEP did not list the school name of where services would occur.
- Accommodations/Modifications Page
  - The accommodation for graphic organizer should just say “graphic organizer.” The frequency would be “all writing assignments over one paragraph in length.”
  - Under Instructional Setting, they have “SPED Classroom” and “Classroom” listed. I would change the “Classroom” to say “General Education Classroom.”
- Participation in the State and Division-wide Accountability/Assessment system
  - The IEP has Bill signed up to take Math, Science, and History/Social Science SOL Assessments
  - However, they have only selected “Retakes of SOL” on History/Social Science. Would they not want to select retakes on all of the SOL’s he is signed up for?
  - IEP writer selected Geometry and wrote very unprofessionally, “Better chance of passing this than Algebra 1.”
  - Accommodations for Statewide Assessments list Audio administration. The math and science should also have a “calculator” because it is listed on his accommodations for use for tests in both his math and science class.

**Problems I found that needed to be addressed but would not be out of compliance.**

- Accommodations/Modifications Page
  - Bill should be provided a graphic organizer to help him organize information before completing the assignment.
    - Frequency would be for all writing assignments.
    - The instructional setting would be both SPED/General Ed. Classroom.
  - I would change the “Sit in front of the classroom” to “Have student sit in a location near the teacher.” That allows for the teacher to move about and change his seating if necessary.

- Transition Goal Pages- **I do not think the goals are “out of compliance.” However, the language used was not effective for writing measurable post-secondary goals.**
  - Documentation of Transition Assessments
    - The team has marked “yes” that the post-secondary goals are based on age-appropriate formal and informal transition assessments. However, they only list “Review of file and parent interview.” They do not record any formal or informal transition assessments they have given to Bill. Even though Bill is not at the meeting, there should be documentation of these assessments for the IEP.
  - Measurable Postsecondary Employment Goal
    - This goal needs to be created after talking to Bill about his interests, preferences, strengths and given age-appropriate formal and informal transition assessments.
    - If Bill is interested in the automotive repair industry, a possible goal could be: Bill will work in the automotive repair industry.
    - “The student’s course of study support attainment of this postsecondary goal could then be:” 1) Complete courses in automotive career and technical education. 2) Complete necessary coursework for graduation with a standard diploma.
  - Measurable Postsecondary Education Goal
    - This goal needs to be created after talking to Bill about his interests, preferences, strengths and given age-appropriate formal and informal transition assessments.
    - There was no goal written for the Postsecondary Education Goal, only a statement that Bill did not plan on attending college because of finances. I would explain to mom that this goal is not something that has to happen but a goal for Bill to have in the future. Students are not locked into the plans. There are possible scholarships, and finances could change. By putting it in the IEP, it does not mean it has to happen.
    - Possible goal: After high school, Bill will enroll in an Automotive Technician Program to receive his ASE Certification (Automotive Service Excellence).
    - “The student’s course of study support attainment of this postsecondary goal” could then be: Complete necessary coursework for graduation with a standard diploma.
  - Measurable Post Secondary Training Goal
    - This goal needs to be created after talking to Bill about his interests, preferences, strengths and given age-appropriate formal and informal transition assessments.

- Possible goal: After high school, Bill will participate in on-the-job training in an automotive repair shop.
- “The student’s course of study support attainment of this postsecondary goal could then be:” 1) Complete courses in automotive career and technical education. 2) Complete necessary coursework for graduation with a standard diploma.
- Measurable Independent Living/Community Participation Goal
  - I would write, “Based on assessment data, Bill has the skills to live independently, and no goal is needed.”