



Results Driven Accountability: Procedural Compliance Self-Assessment (PCSA)
Common Errors and Solutions from the Previous PCSA Cycle
Updated October 2022 with 2022-27 PCSA Item Numbers

This document was developed following a review of common errors identified by districts during their Procedural Compliance Self-Assessment. The first column includes the items from the PCSA, the second column is a list of reasons for noncompliance reported by districts in the Special Education Web Portal, and the third column includes questions and suggestions for consideration, as well as resources to review, to avoid these types of errors.

RDA: PCSA Item	Common Errors	Solutions
<p>IEP 3 - The IEP includes a statement of the student's present levels of academic achievement. For preschool children, the IEP includes a statement of the child's acquisition and use of knowledge and skills.</p>	<p>1. No age/grade level comparison.</p>	<p>1. Is achievement compared to academic content standards for the grade in which the student is enrolled / or for preschool – compared to same-aged peers?</p> <p>Example: We would expect students in this grade to be able to demonstrate x, y and z. The student is able to demonstrate x as evidenced by [provide data].</p> <p>Is there input from regular education teachers? Is training provided on age/grade-level standards and the requirement to include age/grade level comparisons in the statement of academic and functional performance?</p>

	<p>2. No present levels of reading achievement.</p> <p>3. No present levels of academic achievement in areas other than reading.</p> <p>4. Data without explanation.</p> <p>5. Did not include multiple sources of data</p>	<p>Professional Learning: Wisconsin's 2020 Standards for ELA</p> <p>2. Have staff received training on the requirement to include present levels of reading achievement for all students?</p> <p>Do teachers know how to assess reading achievement as it relates to the standards and grade level curriculum?</p> <p>Did the IEP team provide information about access to the general education curriculum and environment (e.g., can the student read course materials)?</p> <p>3. Is there current information on the student's academic achievement in content areas?</p> <p>4. Is an explanation of raw scores and other testing results included that is understandable to IEP team members?</p> <p>Is the data provided in a manner that is purposeful, sufficient, and at an appropriate level of detail so as not to overwhelm? Excessive data can complicate explanations.</p> <p>5. Does the IEP include sources of data besides just standardized test scores?</p> <p>Additional Resources</p> <p>CCR IEP Step 1 Technical Assistance:</p>
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		I-4 instructions I. E., Form's Guide , Step 1 Webinar , Step 1 At-a-Glance
<p>IEP 4 The IEP includes a statement of the student's present levels of functional performance. For preschool children, the IEP includes a statement of the child's positive social and emotional skills and use of appropriate behaviors to meet their needs.</p>	<p>1. No age/grade level comparison.</p>	<p>Is functional performance compared to social and emotional learning competencies for the grade in which the student is enrolled? Social and Emotional Learning Competencies</p> <p>Are staff and parents provided with resources on age/grade-level standards and competencies in preparation of and for reference during IEP team meetings?</p> <p>Is training provided on age/grade-level standards and the requirement to include age/grade level comparisons in the statement of academic and functional performance? Professional Learning: Wisconsin's 2020 Standards for ELA</p> <p>Additional Resources</p> <p>CCR IEP Step 1 Technical Assistance:</p> <p>I-4 instructions I. E., Form's Guide, Step 1 Webinar, Step 1 At-a-Glance</p>

IEP-8 The student's IEP includes a description of **how the student's disability affects** the student's involvement and progress in the general education curriculum and environment, **including how the disability affects reading**. For preschool children, describe how the disability affects participation in age-appropriate activities, including language development, communication and/or early literacy.

1. Does not include **how** disability affects reading (e.g. simply states "it affects reading") or connection to reading is unclear.
2. Inconsistencies - description of *how* states the student's reading performance is affected by the student's disability, but the Yes box is not checked, or Yes box is checked, but description indicates the student is reading at grade level.
3. Student is "speech-only" so the effect on reading was not considered. More information is needed on *how* expressive language impacts early literacy.
4. Does not describe how the child's disability affects involvement and progress in the general education

1. Does the description of **how** include if the student is reading above, at or below grade level? Is the student able to read grade-level materials? Consider reading performance observed in the classroom. Does the statement include specific reading skills that are affected (e.g., phonics, fluency, identification of main ideas)?
2. If a description of the student's disability adversely affecting reading is included in E.1., ensure the Yes box (E.2.) is also checked to align with the description. Conversely, if the Yes box is checked in E.2., ensure there is a description of the adverse effect on reading in E.1. If there is no adverse effect, check No.
3. Regardless of the disability category, the impact of the disability on reading must always be considered. Is the student reading below grade level standards? Is the student's speech or language impairment adversely impacting the student's ability to read at grade level (perhaps affecting phonemic awareness) or for preschoolers, impacting their early literacy skills?
4. Does the statement include how the disability affects involvement and progress in the general education

curriculum or age-appropriate activities, for preschool children?

5. How the student's disability affects reading is not consistent with the information in the present levels of performance.
6. Not compared to grade-level standards or competencies.

curriculum (e.g., student is not able to read grade-level textbook)? Is the student able to access and make progress in age-appropriate activities, for preschool children?

Have you considered other areas (in addition to reading) that are affected (e.g., math, science, social studies, art, P.E.)?

5. Data and information about the student's reading performance documented in the present levels of performance should inform how the student's disability affects reading. Is the information consistent?
6. What academic standards is the student struggling to meet?

Consider effects on meeting grade-level reading standards:

- Reading standards for literature and informational text – key ideas and details, craft and structure, integration of knowledge and ideas.
- Reading standards for foundational skills – print concepts, phonological awareness, phonics, word recognition, fluency.

[Professional Learning: Wisconsin's 2020 Standards for ELA](#)

What social and emotional learning competencies is the student struggling to meet? [Social and Emotional Learning Competencies](#)

	<p>7. Focus on impairment area.</p>	<p>Consider using sentence starter:</p> <p>The student is not meeting age/grade-level standards in the area of X (effect).</p> <p style="padding-left: 40px;">Example: The student is not meeting age/grade-level reading standards in the area of foundational skills (effect)</p> <p>Use the CCR IEP technical assistance checklist to help ensure IEP team has considered all areas affected by the disability.</p> <p>7. Is there a description beyond the impairment area?</p> <p style="padding-left: 40px;">Is the description more than just a mere restatement of the eligibility criteria?</p> <p>Additional Resources:</p> <p>CCR IEP Step 2 Technical assistance: I-4 instructions I. E., Form's Guide, Step 2 Webinar, Step 2 At-a-Glance</p>
<p>IEP-9 The IEP includes a statement of the student's disability-related needs.</p>	<p>1. The disability adversely affects reading or early literacy (E.1. & 2.), but there is no corresponding disability-related need.</p>	<p>1. Review <i>how</i> the disability affects reading. Conduct a root cause analysis to determine the specific skills (phonemic awareness, decoding, fluency, literal comprehension) the student needs to develop, increase, improve in order to read at grade level. Ask <i>why</i> 5 times to conduct a root cause analysis.</p>

	<ol style="list-style-type: none"> 2. The disability-related need is a restatement of the impairment only. 3. Specific skills not identified or are vague. Disability-related need is very broad (improve reading, math, writing skills). 4. All effects of the disability do not have a corresponding disability-related need. 5. Disability-related needs are services the student needs. The drop-down category is a service. 6. The disability-related needs address speech and language skills (e.g., articulation) and behavior only although reading is adversely affected. 7. IEP does not include “so that” statement as part of the disability-related need. (The student needs to 	<ol style="list-style-type: none"> 2. The disability-related need is not the impairment, but the effect of the impairment on access, engagement and progress. The disability-related need must identify the skills the student needs to develop, increase or improve in order to meet grade-level standards or expectations. Conduct a root cause analysis. 3. Conduct a root cause analysis to determine why the student is not meeting grade-level standards or expectations. 4. Some effects of the disability may be attributed to a common disability-related need. Conduct a root cause analysis of each effect to determine the skill(s) a student needs to develop, increase, improve. 5. Disability-related needs must be student-centered. Consider using the sentence starter, “The student needs to develop/improve...” 6. <u>This is likely not an error</u>; improving articulation may have a direct relationship on improving reading outcomes. Likewise, improving ability to focus (behavior) may result in improved academic outcomes. If reading is not improving after addressing behavior (or speech/language), consider adding a disability-related need specific to reading. 7. <u>This is not an error</u>. The “so that” statement is not required but is helpful in connecting the disability-related need to the effect. The student needs to
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	<p>develop/improve/increase X area/skill/behavior (related to root cause), so that the student can Y (effect to address re: access, engagement, progress) ...and outcomes will improve.)</p>	<p>develop/improve/increase X area/skill/behavior (related to root cause), so that the student can Y (effect to address re: access, engagement, progress) ...and outcomes will improve</p> <p>Use the CCR IEP technical assistance checklist to help ensure IEP team has identified the disability-related needs.</p> <p>Additional Resources:</p> <p>CCR IEP Step 2 Technical assistance: I-4 instructions I.F., Form's Guide, Step 2 Webinar, Step 2 At-a-Glance</p>
<p>IEP-10 If the student has a disability-related need affecting reading, the IEP includes one or more annual goals designed to enable the student to be involved in the general education curriculum and progress toward grade level reading achievement, or for preschool children, to participate in age-appropriate activities and progress toward early learning standards for language development,</p>	<ol style="list-style-type: none"> 1. There is no goal to enable the student to make progress toward grade-level reading achievement. 2. There is no early literacy goal. 	<ol style="list-style-type: none"> 1. If the student is behind in reading, is there a goal to help the student increase reading skills? If not, review <i>how</i> the disability is affecting reading (e.g., perhaps behavior is affecting reading and there needs to be a goal to address behavior so the student can be more engaged in reading instruction). 2. Is there an early literacy goal for preschool students? If not, review <i>how</i> the disability is affecting reading (e.g., perhaps behavior is affecting reading and there needs to be a goal to address behavior so the child can be more engaged in early literacy activities).

<p>communication, and/or early literacy.</p>	<p>3. Unable to determine if the goal addresses the disability-related need that affects reading.</p> <p>4. Goal does not match disability-related need.</p>	<p>3. Is there linkage (identifying number) from the effects of the disability (I.E.2.) to the disability-related needs (I.F.)? Does the goal clearly address the disability-related need that affects reading (e.g., If the student needs to improve decoding skills, the goal addresses decoding skills. If the student's behavior is affecting ability to engage in reading instruction, the goal addresses behavior so the student can engage in reading instruction)?</p> <p>4. Does the goal clearly address the disability-related need that affects reading (e.g., If the student needs to improve decoding skills, the goal addresses decoding skills. If the student's behavior is affecting ability to engage in reading instruction, the goal addresses behavior so the student can engage in reading instruction)?</p> <p>Additional Resources:</p> <p>Use CCR IEP technical assistance checklist to help ensure IEP team has considered if there is an annual goal to address the disability-related need that affects reading.</p> <p>CCR IEP Step 3 Technical assistance: I-4 instructions III.B., Form's Guide, Step 3 Webinar, Step 3 At-a-Glance</p>
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IEP 11 - If the student has a disability-related need affecting reading, the IEP must include **special education services** to address the need.

1. The type of service was unclear as to whether the service was addressing needs that affect reading.
2. There was no service addressing the disability-related need that affects reading.
3. The student's disability adversely affects their progress toward meeting age/grade-level reading standards (I-4, E.2. was checked Yes), but reading was not identified as a disability-related need (I-4, F.) or there was no goal.

1. Is there linkage (identifying number) from the goals (III. B.) to the services (IV.).

Is there a description of the specially designed instruction (e.g., specially designed reading instruction)?

Will this service help to improve the student's ability to read at grade-level?

Is there at least one service to address goal related to disability-related need affecting reading?

2. Ensure there is no break in the linkage from the effects of the disability (I.E.2.), to the disability-related needs (I.F.), to the goals (III. B.) to the services (IV.).
3. If I-4, I.E.2. is checked Yes (the disability adversely affects reading), has the IEP team conducted a root cause analysis to determine why?

Additional Resources:

Use the [CCR IEP technical assistance checklist](#) to help ensure IEP team has aligned special education services to address the disability-related needs that affect reading.

		CCR IEP Step 4 Technical Assistance: I-4 instructions IV. , Form's Guide , Step 4 Webinar , Step 4 At-a-Glance
IEP - 12 Each annual goal contains a baseline from which progress can be measured.	<p>1. Baseline does not match level of attainment (LAO).</p> <p>2. No baseline/baseline unclear.</p>	<p>1. The baseline may be included in the goal statement or as a standalone baseline statement. Examples: Given a 3rd grade reading passage, the student will improve identification of the main idea from 20% to 90% accuracy. Given a 3rd grade reading passage, the student will improve identification of the main idea. Baseline: 20% accuracy LOA: 90% accuracy</p> <p>Does the baseline align with the level of attainment (e.g., if baseline is a percentage, LOA is a percentage)?</p> <p>Establish a system of internal control which routinely monitors annual goals to ensure alignment between baseline and level of attainment.</p> <p>2. If a goal is overly complex because it contains multiple measures within one goal, consider reducing the number of measures for clearer understanding or use short-term objectives with their own measures.</p>

	<p>3. No grade level comparison.</p> <p>4. The baseline was different than the information in the PLOP.</p>	<p>Is the baseline objectively measurable (e.g., does not use subjective terms like “struggles less”)?</p> <p>3. Is there sufficient information about a student’s present levels of academic and functional performance on which to base a goal? Review and revise the present levels to include sufficient data and align the baseline.</p> <p>A missing or unclear baseline may also indicate the goal itself is unclear. Consider revising the goal.</p> <p>4. Ensure the baseline in the goal is consistent with data reflected in the present level.</p> <p>Additional Resources:</p> <p>Use CCR IEP technical assistance checklist to help ensure IEP team has reviewed the level of attainment for each goal (or short-term objective when required).</p> <p>CCR IEP Step 3 Technical Assistance: I-4 instructions III.B., Form’s Guide, Step 3 Webinar, Step 3 At-a-Glance</p>
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<p>IEP-13 Each annual goal includes a measurable level of attainment.</p>	<ol style="list-style-type: none"> 1. No level of attainment (LOA). 2. LOA not aligned with baseline. 3. LOA is unclear. 4. LOA not measurable. 	<ol style="list-style-type: none"> 1. Is the level of attainment included in the goal statement or in the box under the goal baseline? Examples: Given a 3rd grade reading passage, the student will improve identification of the main idea from 20% to 90% accuracy. Given a 3rd grade reading passage, the student will improve identification of the main idea. Baseline: 20% accuracy LOA: 90% accuracy 2. Does the level of attainment align with the baseline (e.g., if baseline is a percentage, LOA is a percentage)? If there are multiple measures in the baseline, the LOA must include each of the measures, as well. 3. Does the level of attainment make sense (e.g., the LOA includes multiple measures, such as, "Student will read a 5-sentence paragraph with less than 5 prompts, 80% of the time with 90% accuracy and respond correctly to 4/5 comprehension questions")? 4. Is the level of attainment objectively measurable (e.g., does not use subjective terms like "struggles less")? <p>Additional Resources:</p>
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		<p>Use the CCR IEP technical assistance checklist to help ensure IEP team has reviewed the level of attainment for each goal (or short-term objective when required).</p> <p>CCR IEP Step 3 Technical Assistance: I-4 instructions III.B., Form's Guide, Step 3 Webinar, Step 3 At-a-Glance</p> <p>DPI Monitoring Progress of IEP Goals Webpage</p>
<p>IEP 14 - Each annual goal includes a statement of how the student's progress toward achieving the goal will be measured.</p>	<ol style="list-style-type: none"> 1. No method for monitoring progress. 2. Progress measure not aligned with LOA. 3. Method for monitoring progress is unclear (e.g., Google Form, gradebook). 	<ol style="list-style-type: none"> 1. The IEP team should consider how progress will be measured when writing the goal. Are the methods for monitoring goal progress from baseline to LOA documented in the IEP? 2. Will the methods for measuring progress produce a score that aligns with the LOA, so that progress can be compared (e.g., percentage compared to percentage)? 3. Are the methods for measuring progress aligned with the level of attainment (LOA)? For example, if a running record was used to establish the baseline and LOA, then a running record is used to measure progress. <p>Does the statement address the method for measuring progress, not just reporting progress (e.g., use running record to measure word analysis skills vs. report card/gradebook)?</p>

	<p>4. Measurement instrument or tool does not align with goal being measured (e.g., growth on STAR does not measure progress in fluency).</p>	<p>Does the method for measuring progress yield measurable/accurate data?</p> <p>4. Does the method or tool for measuring progress align with the goal being measured (e.g. reading words in isolation does not measure comprehension)?</p> <p>Additional Resources:</p> <p>Use the CCR IEP technical assistance checklist to help ensure IEP team has identified procedures for measuring progress towards the goal.</p> <p>CCR IEP Step 3 Technical Assistance: I-4 instructions III.B., Form's Guide, Step 3 Webinar, Step 3 At-a-Glance</p> <p>DPI Monitoring Progress of IEP Goals Webpage</p>
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<p>IEP-17 - The statement of supplementary aids and services is stated in a manner appropriate to the service and includes anticipated frequency, including the amount.</p>	<ol style="list-style-type: none"> 1. The frequency and amount included terms such as “as needed,” “when appropriate,” or “on student request.” 2. The program summary described the frequency of the service but not the amount. For example, “Extra time on all assignments,” without specifying how much extra time would be given. 	<ol style="list-style-type: none"> 1. Is the district’s commitment of resources clear to parents and other IEP team members? Statements such as “as needed” or “on student request” do not make clear the district’s commitment of resources. Have district staff been instructed to use specific, objective criteria, in describing the supplementary aids and services to be provided? 2. Is the frequency of the service and the amount of the service provided? Have district staff been instructed to include both components when describing the supplementary aids and services to be provided? <p>Additional Resources:</p> <p>Information Bulletin 10.07</p>
<p>IEP-20 - The IEP describes the extent, if any, to which the student will not participate with non-disabled students in the regular education environment.</p>	<ol style="list-style-type: none"> 1. The minutes in the extent of removal section does not align with the program summary 2. Did not include the entire school day and services 	<ol style="list-style-type: none"> 1. Do the services in the program summary sections include a location which clearly indicates whether the service will be provided in the regular education or special education environment? Did the IEP update the extent of removal following a review/revise IEP meeting? 2. Did the IEP team consider the entire school day (lunch, recess, specialized transportation, testing, and other non-academic activities) when determining and documenting removal?

	<ol style="list-style-type: none"> 3. Unclear frequency and duration in the program summary 4. Does not include minutes of removal in the description 	<ol style="list-style-type: none"> 3. Does the frequency and amount address <u>where</u> the student will be taught, not <u>what</u> they will be taught? Is the extent of removal appropriate and is it clear to the IEP team? Is the location specific as to where the student will be taught? 4. This may not be an error. IEP teams do not have to include the minutes of removal in this section. However, if minutes are included, they must align with the program summary. <p>Additional Resources:</p> <p>Information Bulletin 10.03</p> <p>Information Bulletin 00.04</p>
<p>IMP 1 - The LEA ensures the specially designed instruction listed in the IEP is provided as described.</p>	<ol style="list-style-type: none"> 1. Teacher absent. No sub available. 	<ol style="list-style-type: none"> 1. A district must provide special education and related services to a child with a disability in accordance with the child's IEP. A district is responsible for determining the appropriate level of staffing necessary to meet the needs of students as specified in the IEP. <p>Have a backup plan to provide coverage when a staff person is absent and a substitute teacher/provider is not available.</p>

	<p>2. Online services not provided.</p> <p>3. School assembly prevented services from being provided (one week).</p> <p>4. Student refuses to access service.</p>	<p>Provide additional services when staff member returns to make up for lost minutes. Document in teacher log.</p> <p>2. A school district must ensure IEP services are provided in an online environment at the frequency specified in the IEP.</p> <p>Have a backup plan to provide alternate services, if online services are not available.</p> <p>Provide additional services when online services are available and document in teacher log.</p> <p>3. A school district is responsible for making alternative arrangements to provide services set out in a student's IEP when there is a pattern of school-related activities that make either the student or the service provider unavailable during the time the services are regularly scheduled. See Information Update Bulletin 10.07 Question 2.</p> <p>Provide additional services to make up the time lost during a pattern of missed services. Document in teacher log.</p> <p>4. If there is a pattern of refusal, reconvene IEP team to discuss revising the IEP to address the student's concerns and other possible options for meeting the student's needs.</p>
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	<p>5. Paraprofessional provided the service.</p> <p>6. Location of service was not consistent with IEP.</p> <p>7. Change in schedule when student moved from elementary to middle school, but IEP was not revised to align with schedule change.</p>	<p>5. Only licensed special education teachers can provide specially designed instruction. Licensed reading teachers can provide specially designed instruction in reading.</p> <p>6. The location refers to the setting in which services will be provided. For example, a service may be provided in a general education classroom with nondisabled peers, a special education resource room, or in both. The extent of removal from the regular education environment, if any, must be clear.</p> <p>Ensure staff are familiar with location, duration, frequency and amount of services. See Information Update Bulletin 10.07.</p> <p>General education environment means children with disabilities are educated with children who are nondisabled.</p> <p>7. When student advances to a new building level, review schedule and number of minutes in a class period to ensure IEP aligns. Reconvene IEP team to revise placement (number of minutes of service), as appropriate.</p> <p>Clarify a change in schedule in the duration section of the program summary.</p> <p>Additional Resources:</p>
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		Information Update Bulletin 10.07
<p>IMP 2 - The LEA ensures the supplementary aids and services listed in the IEP are provided as described.</p>	<ol style="list-style-type: none"> 1. Aide was not informed of IEP service (test not read to student). Roles and responsibilities related to supplementary aids and services not clear to staff. 2. Service no longer needed and not being provided, but IEP not revised. 3. Services not provided due to an assembly. 4. Services not provided to student who is enrolled online. 5. Services minutes were not aligned with minutes in a school day (there were more minutes for services than minutes in the day). 6. Frequency stated as “as needed” or “upon student request.” 	<ol style="list-style-type: none"> 1. Are staff aware of their roles and responsibilities? Is it clear who will provide the service, when, where, and for how long? 2. Is the IEP revised when there is a change in services (e.g., the student no longer requires the service)? 3. If there is a pattern of missed services due to an assembly, are there procedures for staff to follow to make up the services? See Information Update Bulletin 10.07 Question 2. 4. Is there a system of internal controls to monitor the implementation of IEPs, including services in a virtual environment? 5. The commitment of district resources must be clear. 6. Is the frequency of a service clear? “As needed” must be further described to indicate when a student needs the

	<p>7. Cannot verify that directions were always repeated or clarified.</p> <p>8. There is an extensive list of services and the frequency and amount are unclear.</p>	<p>service and for how long.</p> <p>Is the frequency written so that it can be verified as implemented?</p> <p>If the student doesn't request the service, the IEP must specify the circumstances when the student needs the service and the service must be provided.</p> <p>7. Are services appropriately tailored to address the student's needs?</p> <p>An extensive list of accommodations provided at all times throughout the day may be overbroad and result in inconsistent implementation.</p> <p>Clearly identify key modifications and clarify when, where and for how long they are provided such that successful implementation can be determined).</p> <p>8. Make sure the IEP is based on the individualized needs of the student and reflects the services provided.</p> <p>Additional Resources:</p> <p>Information Update Bulletin 10.07</p>
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<p>IMP 3 -Periodic reports are provided to the parents as specified in the student’s IEP on the progress the student is making toward meeting each annual goal.</p>	<ol style="list-style-type: none"> 1. Progress reports not provided as scheduled. 2. Measurement of progress does not match measurement specified in annual goals. 3. No data provided to support determination of progress for each annual goal. 4. Progress reports were provided but only included updates for some, not all, of the annual goals. 	<ol style="list-style-type: none"> 1. Has a system of internal controls been established which identifies when IEP progress reports are to be provided as specified in the IEP and verifies they have been provided? 2. Do IEP teams consider how progress will be reported when specifying methods of measuring progress for each annual goal? Do staff <i>carefully</i> review the student’s annual goal, baseline and level of attainment before completing the progress report? Ensure the measurement tool provides data to report on progress and is aligned with baseline, level of attainment and progress measurements. 3. Are staff aware of the requirement in reporting progress to include data to support progress for each annual goal? Has sufficient data been obtained to allow meaningful progress reporting? 4. Do the provided progress reports include updates for all of the annual goals? Has each of the goals been addressed and has progress been monitored for each goal? Additional Resources: Monitoring Progress of IEP Goals
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