

2009-2010 Procedural Compliance Self-Assessment Requirements
Ranked by Number of Agencies with Corrective Action Plans – Total Number of Agencies = 86

Rank	# Agencies with CAPs	% Agencies with CAPs 2009-10	% Agencies with CAPS 2008-09	Item	Compliance Statement	Standards for Assessing Compliance
1	39	45%	49%	T-8.	<i>Beginning not later than age 16, the IEP includes coordinated, measurable annual IEP goals and transition services that will reasonably enable the student to meet the student's postsecondary goals. (State Performance Plan Indicator 13)</i>	<p><i>Individualized Education Program: Transition Services (Form I-8)</i></p> <p>The transition item is comprised of seven parts, T-1 through T-7.</p> <p>T-1: If one purpose of the IEP team meeting is to consider the student's transition needs, the student must be invited. Look to see if the student is listed on the <i>Evaluation Report and IEP Cover Sheet (I-3)</i> as a participant. If the student is listed, consider the requirement met. If the student is not listed, look at <i>Individualized Education Program: Transition Services (Form I-8)</i> for the date and method used to invite the student. If Form I-8 includes how the student was invited and the date of the invitation, the requirement is met. If not, look to see if an <i>Invitation to a Meeting of the IEP Team (I-1)</i> is addressed to the student. If a written invitation is addressed to the student, the requirement is met.</p> <p>T-2:</p> <ul style="list-style-type: none"> • Find the postsecondary goal(s) in the IEP. • If there is a goal (or goals) that is <i>measurable</i>, occurs <i>after</i> high school, and address <i>education or training, and employment</i>, and (if needed) independent living, the requirement is met. • If one or more goals are not <i>measurable</i>, the requirement is not met. • If one or more goals do not occur <i>after</i> high school, the requirement is not met. • If the goals do not address <i>education or training, and employment</i>, the requirement is not met.

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						<p>A measurable goal is one that can be counted. Goals are measurable even though they contain words like “intends, “plans,” or “wants.”</p> <p>Goals do not need to contain the words, “after graduation” or “after high school.” However, the language of the goal must clearly indicate the activity will take place after high school.</p> <p>When no independent living goal is listed, assume the IEP team correctly determined an independent living goal was not needed. However, if an independent living goal is present it must be measurable and occur after high school.</p> <p>T-3:</p> <ul style="list-style-type: none"> • Find information related to transition assessment in the student’s IEP or file. • If there is <i>evidence</i> age-appropriate transition assessment provided information on the student’s needs, <i>taking into account strengths, preferences, and interests</i> regarding <i>each</i> stated postsecondary goal, the requirement is met. • If there is no <i>evidence</i> age-appropriate transition assessment provided information on the student’s needs, <i>taking into account strengths, preferences, and interest</i> regarding <i>each</i> stated postsecondary goal, the requirement is not met. <p>If the “Age-Appropriate Transition Assessment” box (see DPI Sample Special Education Forms, I-8) is checked, “yes” the evidence is sufficient. If the box is not checked look for other documentation in the student’s IEP or file. Age-appropriate transition assessments range from formal aptitude tests and interest inventories, to observations of the student, to discussions with the student. Assessments</p>

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						<p>must be reasonably linked to the student's strengths, preferences, and interests regarding postsecondary goals.</p> <p>T-4:</p> <ul style="list-style-type: none"> • Find where transition services/activities are listed on the IEP. • If there is <i>at least one</i> transition service/activity that will reasonably enable the student to meet <i>each</i> stated postsecondary goal, the requirement is met. • If there is not <i>at least one</i> transition service/activity that will reasonably enable the student to meet <i>each</i> stated postsecondary goal, the requirement is not met. • Transition services/activities may include: (a) instruction, (b) related service(s), (c) community experience, (d) development of employment and other post-school adult living objectives, (e) if appropriate, acquisition of daily living skills, or (f) if appropriate, provision of a functional vocational evaluation. <p>A single transition service associated with meeting all postsecondary goals may satisfy the requirement.</p> <p>T-5:</p> <ul style="list-style-type: none"> • Find where persons responsible and/or agencies are listed on the IEP • Guiding Question 1. Are there transition services listed on the IEP that are <i>likely to be provided or paid for by outside agencies</i>? If yes, continue with guiding question 2. If no, enter NA on the recording form and move on to item T-6. • Guiding Question 2. Was parent or child (once the age of majority) <i>consent</i> to invite the outside

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						<p>agencies obtained? If yes, continue with guiding question 3. If the parent or child (once the age of majority) refused consent; or there is documentation of three good faith, but unsuccessful, attempts to get the parent or child (once the age of majority) to provide consent, enter NA on the recording form and move on to item T-6.</p> <ul style="list-style-type: none"> • Guiding Question 3. Were outside agencies <i>invited</i> to the student’s IEP meeting to discuss transition? If yes, the requirement is met. If no, the requirement is not met. <p>When no outside agencies are listed, assume the IEP team correctly determined that there are no transition services likely to be provided or paid for by outside agencies. Consent, or attempts to gain consent, must be documented in writing in the student’s IEP or file. T-5 requires agencies be invited to the meeting, it does not require agencies attend the meeting. Invitations, or agency attendance at the meeting, must be documented in the student’s IEP or file.</p> <p>T-6:</p> <ul style="list-style-type: none"> • Find the course of study in the student’s IEP. • If the course of study <i>aligns</i> with the stated postsecondary goal(s), the requirement is met. • If the course of study does not <i>align</i> with the stated postsecondary goal(s), the requirement is not met. <p>A direct one-to-one relationship between particular classes and each postsecondary goal is not required. The course of study may be limited to the term of the student’s</p>

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						<p>current IEP. "Pass all classes" is not a course of study.</p> <p>T-7:</p> <ul style="list-style-type: none"> • Find the annual goals in the IEP. • If there is <i>at least one</i> annual goal or short-term objective included in the IEP that will reasonably help the student <i>make progress</i> towards <i>each</i> of the stated postsecondary goals, the requirement is met. • If there is not <i>at least one</i> annual goal or short-term objective included in the IEP that will reasonably help the student <i>make progress</i> towards <i>each</i> of the stated postsecondary goals, the requirement is not met. <p>T-7 requires you only to find a reasonable link between annual goals and postsecondary goals. Do not apply the compliance standards for annual goals (Item I-11) when assessing this item.</p> <p>A single annual goal or short-term objective that helps the student make progress in all of the postsecondary goals may satisfy the requirement.</p> <p>Assess whether there is a reasonable link between annual goals and postsecondary goals.</p>
2	33	38%	53%	I-15	The statement of supplementary aids and services, if any, includes anticipated frequency including the amount.	<p><i>Individualized Education Program: Program Summary, (Form I-9)</i></p> <p>The IEP team must address whether a student needs supplementary aids and services or supports provided in regular education classes or other settings to enable the student to be educated with nondisabled children to the maximum extent appropriate.</p>

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						<p>As with special education services, the description of the supplementary aids and services must include the frequency and amount. The services must be stated in the IEP so the level of the LEA's commitment of resources is clear to the parents and other IEP team members. The statement must be appropriate to the specific service and stated in a manner that can be understood by all involved in developing and implementing the IEP.</p> <p>Stating the amount of service as a minimum is not acceptable because it is not a clear commitment of resources, e.g., "a minimum of 15 minutes three times per week" or "at least 30 minutes four times per week." Statements such as, "as needed," "upon teacher request," or "when appropriate" do not make clear the LEA's level of commitment of resources and should not be used. While "40 minutes/week" or "one hour daily" are acceptable statements of amount and frequency, supplementary aids and services often need to be stated in terms of the circumstances under which they will be provided. For example:</p> <ul style="list-style-type: none"> • "Use a computer for writing assignments longer than one page," or • "Give multiple choice tests in place of fill-in-the-blank tests in biology." <p>Sometimes the IEP team decides a student's self-advocacy skills need to be developed. They want to encourage the student to realize when he/she needs help and to ask for it. In this case, it is appropriate to include an annual goal to develop the behavior. However, in such a case, it is not appropriate to state the amount and frequency of the service as "upon student request." The IEP team must still decide the needed amount and</p>

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						frequency or the specific circumstances when the service is needed and include it in the IEP. Including this information in the IEP will make clear to those implementing the IEP what the student needs, even if the student doesn't recognize the need and ask for the service.
3	30	35%	27%	E-5	A review of existing evaluation data on the child to identify what additional data, if any, were needed to complete the evaluation or reevaluation included a local educational agency representative.	See Item E-3, below
4	26	30%	28%	E-3	A review of existing evaluation data on the child to identify what additional data, if any, were needed to complete the evaluation or reevaluation included not less than one regular education teacher of such child (if the child is, or may be, participating in the regular education environment).	<p><i>Worksheet for Consideration of Existing Data</i> (Form EW-1).</p> <p>The documentation on Form EW-1 must include the name of each individual, a description of the input, and the date the input was given. The date of the required individual's input must be after the notice of referral was sent and before consent for additional testing is obtained. If you do not know the title or position of a person listed on Form EW-1, you may find it on Form IE-1, <i>Notice of Receipt of Referral and Start of Initial Evaluation</i> or on Form RE-1, <i>Notice of Reevaluation</i>.</p> <p>A common error is failing to obtain the input of the LEA representative. Another common error occurs when the IEP team participant, who fills out the <i>Worksheet for Consideration of Existing Data</i>, fails to include his or her own input.</p> <p>Also an error occurs when a case review by a problem-solving team (teacher assistance teams, building consultation teams) prior to referral for special education</p>

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						is documented, instead of the IEP team's review to decide whether additional evaluation data is needed to complete an IEP team evaluation.
5	23	27%	5%	E-2	The child's parents were contacted and afforded an opportunity to participate in the review of existing evaluation data.	<p>Both the method and the date the parent's input was obtained must be documented. The date of the parent's input must be after the notice of referral has been sent and before consent for additional testing is obtained.</p> <p>The review may be conducted without a parent's participation if the LEA is unable to convince the parent to participate. If the parent did not participate, the LEA must document at least three reasonable attempts to convince the parent to participate.</p> <p>Examples of documentation include:</p> <ul style="list-style-type: none"> • detailed records of telephone calls and the results of those calls; • copies of correspondence sent to parent and any response received; • and detailed records of visits made to the parent's home or place of employment and results of the visits.
6	22	26%	35%	I-16	The statement of program modifications or supports for school personnel, if any, includes anticipated frequency including the amount.	<p><i>Individualized Education Program: Program Summary, (Form I-9)</i></p> <p>The team should identify the program modifications or support needed by the staff to carry out the IEP. Examples might include consultation between regular and</p>

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						<p>special education teachers, in-service training, or assistance for a teacher modifying an assignment or highlighting a textbook.</p> <p>The services must be stated in the IEP so the level of the LEA's commitment of resources is clear to the parents, other IEP team members, and staff who implement the IEP. The statement must be appropriate to the specific service and stated in a manner that can be understood by all involved in developing and implementing the IEP. Acceptable statements of amount and frequency could include "the physical therapist will consult 20 minutes once weekly with the special education teacher."</p> <p>If the modifications or supports for school personnel are to be provided under certain circumstances, the IEP needs to clearly specify the circumstances. Statements such as, "as needed," or "upon teacher request" do not make clear the LEA's level of commitment of resources. Stating the amount of service as a minimum is not a clear commitment of resources, e.g., "a minimum of 20 minutes per week."</p>
7	18	21%	27%	I-10	The IEP includes how the child's disability affects the child's involvement and progress in the general curriculum or for a preschool child in appropriate activities.	<p><i>Individualized Education Program: Present Level of Academic Achievement and Functional Performance (Form I-4)</i></p> <p>A description of the impact of the child's disability on the child's progress and involvement in the general curriculum must be included.</p> <p>The present level of educational performance must include <u>how</u> the child's disability affects the child's involvement and progress in the general curriculum. The term "general curriculum," refers to the same curriculum as for nondisabled children. It is the common core of</p>

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						<p>subjects and curriculum areas adopted by each LEA or schools within the LEA that applies to all children within each general age grouping from preschool through secondary school.</p> <p>For a preschool child, the present level must address <u>how</u> the child's disability affects the child's participation in age-appropriate activities. "Appropriate activities" means activities children of that chronological age typically engage in as part of a formal preschool program or in informal activities; for example, coloring, pre-reading activities, play time, sharing time, listening to stories read by teachers or parents.</p> <p>A statement that just acknowledges a student's disability impacts his/her performance is <u>not</u> sufficient. Look for statements that tell how the child's progress is impacted by the disability.</p>
8	18	21%	16%	E-4	A review of existing evaluation data on the child to identify what additional data, if any, were needed to complete the evaluation or reevaluation included not less than one special education teacher, or where appropriate, not less than one special education provider of such child.	See Item E-3, above
9	13	15%	20%	E-8	<p>At the IEP team meeting to determine whether the child is a child with a disability, the IEP team reviewed previous interventions and the effects of those interventions.*</p> <p>*Not required for charter schools authorized under s.118.40, Wis. Stats.</p>	<p><i>Evaluation Report: including Determination of Eligibility and Need for Special Education(Form ER-1)</i></p> <p>At the IEP team meeting to determine eligibility, the IEP team must review previous interventions for the child and the effects of those interventions. Ensure not only the interventions, but <u>also</u> their effects are documented. For example, "Child participated in Title I Reading, but has made little progress" or "Moved the child to front of room, which increased his time on task." In some cases, there</p>

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						may have been no previous interventions. In such cases, the requirement is met if the IEP team documented there were no previous interventions.
9	13	15%	11%	I-7	The IEP teams must, in the case of a child whose behavior impedes the child's learning or that of others, consider the use of positive behavioral interventions and supports and other strategies to address that behavior.	Locate <i>Individualized Education Program: Present Level of Academic Achievement and Functional Performance</i> (Form I-4). Look under "Special Factors." If "no" is checked, enter "NA" (not applicable). If "yes" is checked or neither box is checked on I-4 under "Special Factors," locate <i>Individualized Education Program: Special Factors</i> (Form I-5). If neither box is checked on I-4, and there is no Form I-5, the IEP does <u>not</u> meet the standard and the requirement is <u>not</u> met. If there is an I-5, look at Section A. If "no" is checked in Section A, enter "NA" (not applicable). If "yes" is checked in Section A, determine whether the IEP includes positive behavioral intervention, strategies, and supports to address the behavior impeding learning. Look for positive measures such as social skills instruction, self-awareness training, anger management training, or sessions with a guidance counselor, social worker, or psychologist. If there are such positive measures, the requirement is met. An IEP that includes only negative measures, such as suspension, detention, or punishment does <u>not</u> meet the standard.
9	13	15%	21%	I-9	The IEP contains a statement of the child's present levels of academic achievement and functional performance.	The IEP must contain a statement identifying the student's present levels of academic achievement and functional performance related to his or her educational needs. The statement should be written in language understandable to all, including the parent. The statement must address both academic achievement and functional performance. Functional performance includes: <ul style="list-style-type: none"> • Activities and skills not considered academic or directly related to a child's academic achievement. Academic achievement generally refers to a

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						<p>child's performance in academic content areas (e.g., reading or language arts, math, science, history).</p> <ul style="list-style-type: none"> • Routine activities of daily living. • Skills needed for independence and performance at school, in the home, in the community, for leisure time, and for postsecondary and life-long learning. • Motor skills, personal care, time and money, school/work habits, home/community orientation. • Behavior and interpersonal relationships. <p>If after conducting a review, the IEP team determines the child does not have deficits in functional performance, it is sufficient to document this in the child's IEP.</p>
9	13	15%	5%	1-12	The IEP includes a statement of how the child's progress toward achieving the annual goals will be measured.	For each of the annual goals the IEP must identify how the child's progress is to be measured. Such methods may include keeping a log, work samples, classroom exams, attendance records, or point sheets.
9	13	15%	21%	I-17	Following the development or revision of the individualized education program, and prior to its implementation, the child's parent(s) were provided a notice.	<p><i>Determination and Notice of Placement: Consent for Initial Placement (Form P-1) or the Determination and Notice of Placement (Form P-2)</i></p> <p>Annually, an IEP team must meet to review the IEP. Parents must receive written notice, including a copy of their child's IEP, a reasonable time prior to its implementation.</p> <p>If the IEP was revised after, ensure that following its revision the parents were provided a notice. An IEP may be revised after the annual meeting. This may be done without conducting an IEP team meeting. If the IEP is revised without conducting a meeting, parents must be provided a notice and a copy of the revised IEP. Determine whether the IEP has been revised without a</p>

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						meeting. Look for Form I-10-A, <i>Changes to IEP</i> or other evidence of an IEP revision. Then look for Form I-10-B, <i>Notice of Changes To IEP Without an IEP Team Meeting</i> to determine whether a notice was provided to the parents with a copy of the revised IEP. For the requirement to be met, proper notice must be provided after the annual IEP review and following any subsequent IEP revisions.
10	9	10%	17%	I-6	The child's placement is determined at least annually.	<p>If the child's initial placement in special education was in the last 12 months, enter "NA" (not applicable) and go to the next item. If the initial placement in special education was more than 12 months ago, locate the date of the current placement determination on the <i>Determination and Notice of Placement (P-2)</i>. Next, locate the previous placement notice, P-1 or P-2. Compare the dates on the current notice and the previous notice to verify that no more than 12 months elapsed between the date the current placement was determined and the previous date the child's placement was determined.</p> <p>In monitoring of public agencies, DPI found agencies sometimes made an error by arranging IEP team meeting dates based upon the dates of notices of placement, rather than the dates of the last IEP team meetings to determine placements.</p>
10	9	10%	17%	I-11	The child's IEP includes a statement of measurable annual goals for the child.	<p>Review the <i>Individualized Education Program: Annual Goal</i> pages (Form I-6). All of the IEP annual goals must be measurable and include a level of attainment. The annual goal must address disability-related needs of the child. Goals such as, "pass all classes" or "take classes to meet graduation requirements" apply to all students. They do not meet the standard because they do not address a child's specific disability-related needs.</p> <p>If a student is taking an alternate assessment, during the year the IEP is in effect, aligned to alternate achievement</p>

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						<p>standards, the IEP must include benchmarks or short-term objectives for all IEP annual goals. Benchmarks describe the amount of progress the child is expected to make within specific segments of the year. Short-term objectives break the skills, described in the annual goal, into discrete measurable intermediate steps. There is no requirement to develop a benchmark or short-term objective for each alternate achievement standard.</p> <p>Review the <i>Individualized Education Program: Annual Goal</i> pages (Form I-6). Look at Form I-7, <i>Individualized Education Program: Participation in Statewide Assessments</i>, to determine whether the student takes an alternate assessment aligned to alternate achievement standards in one or more areas. If a student is taking an alternate assessment, the requirement is met if there are benchmarks or short-term objectives for all annual goals.</p> <p>Sometimes the IEP team will develop benchmarks or short-term objectives even though the student will not participate in an alternate assessment. If there are benchmarks or short-term objectives associated with an annual goal, consider the annual goal to be measurable if a majority of the benchmarks or short-term objectives are measurable and include a level of attainment.</p>