**Department of Public Instruction**

**Results Driven Accountability: Procedural Compliance Self-Assessment (PCSA)**

**Common Errors and Solutions**

**2020**

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.

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| **RDA: PCSA Item** | **Common Errors** | **Solutions** |
| IEP-3: The IEP includes a statement of the student's present levels of academic achievement and functional performance. | 1. No age/grade level comparison.
2. No present levels of reading achievement.

1. No present levels of academic achievement in areas other than reading.
2. Data without explanation.
 | 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?

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].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](https://dpi.wi.gov/ela/standards/standardsmodules)Is functional performance compared to social and emotional learning competencies for the grade in which the student is enrolled? [Social and Emotional Learning Competencies](https://dpi.wi.gov/sites/default/files/imce/sspw/SEL-Competencies-Guide-web.pdf) Are staff and parents provided with resources on age/grade-level standards and competencies in preparation of and for reference during IEP team meetings? Is there input from regular education teachers?1. Have staff received training on the requirement to include present levels of reading achievement for all students?

Do teachers know how to assess reading achievement as it relates to the standards and grade level curriculum? Did the IEP team provide information about access to the general education curriculum and environment (e.g., can the student read course materials)?1. Is there current information on the student’s academic achievement in content areas, including reading?
2. Is an explanation of raw scores and other testing results included that is understandable to IEP team members?

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.Additional ResourcesCCR IEP Step 1 Technical Assistance: [I-4 instructions](https://dpi.wi.gov/sped/laws-procedures-bulletins/procedures/sample/forms) I. E., [Form’s Guide](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/forms-guide.pdf), [Step 1 Webinar](https://dpi.wi.gov/sped/college-and-career-ready-ieps/5-step-process/step1), [Step 1 At-a-Glance](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-step1.pdf) |
| IEP-6: The student's IEP includes a description of how the student's disability affects the student's progress toward grade-level reading standards, or for preschoolers early literacy standards for language development, communication, and/or early literacy. | 1. Does not include **how** disability affects reading e.g. simply states “it affects reading.”
2. Does not describe how the child's disability affects involvement and progress in the general education curriculum.

1. Not compared to grade-level standards or competencies.

1. Focus on impairment area.
 | 1. Does the statement include specific reading skills that are affected (e.g., phonics, fluency, key ideas)?
2. Does the statement include how the disability affects involvement and progress in the general education curriculum (e.g., student is not able to read grade-level textbook)?

Have you considered other areas (in addition to reading) that are affected (e.g., math, science, social studies, art, P.E.)?1. [What academic standards is the student struggling to meet?](https://dpi.wi.gov/sites/default/files/imce/standards/pdf/ela-stds-app-a-revision.pdf)

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](https://dpi.wi.gov/ela/standards/standardsmodules)[What social and emotional learning competencies is the student struggling to meet?](https://dpi.wi.gov/sites/default/files/imce/standards/pdf/ela-stds-app-a-revision.pdf) [Social and Emotional Learning Competencies](https://dpi.wi.gov/sites/default/files/imce/sspw/SEL-Competencies-Guide-web.pdf)Use sentence starter:The student is not meeting age/grade-level standards in the area of X (effect).Example: The student is not meeting age/grade-level **reading** standards in the area of foundational skills (effect)Use the [CCR IEP technical assistance checklist](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-iep-checklist.pdf) to help ensure IEP team has considered all areas affected by the disability.1. Is there a description beyond the impairment area?Is the description more than just a mere restatement of the eligibility criteria?

Additional Resources:CCR IEP Step 2 Technical assistance: [I-4 instructions](https://dpi.wi.gov/sped/laws-procedures-bulletins/procedures/sample/forms) I. E., [Form’s Guide](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/forms-guide.pdf) p.70, [Step 2 Webinar](https://dpi.wi.gov/sped/college-and-career-ready-ieps/5-step-process/step2), [Step 2 At-a-Glance](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-step2.pdf) |
| IEP-8: 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 literacy standards. | 1. There is no goal to enable the student to make progress toward grade-level reading achievement.
2. There is no early literacy goal.
3. Unable to determine if the goal addresses the disability-related need that affects reading.
4. Goal does not match disability-related need.
 | 1. If the student is behind in reading, is there a goal to help the student increase reading skills? If not, review *how* 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 *how* 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).
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)?
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)?

Additional Resources:Use [CCR IEP technical assistance checklist](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-iep-checklist.pdf) to help ensure IEP team has considered if there is an annual goal to address the disability-related need that affects reading.CCR IEP Step 3 Technical assistance: [I-4 instructions](https://dpi.wi.gov/sped/laws-procedures-bulletins/procedures/sample/forms) IV.B., [Form’s Guide](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/forms-guide.pdf) p.75, [Step 3 Webinar](https://dpi.wi.gov/sped/college-and-career-ready-ieps/5-step-process/step3), [Step 3 At-a-Glance](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-step3.pdf) |
| IEP-9: If the student has a disability-related need affecting reading, each annual goal 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 literacy standards, contains a **baseline** from which progress can be measured. | 1. Baseline does not match level of attainment (LAO).

 1. No baseline/baseline unclear.
2. No grade level comparison.

1. The baseline was different than the information in the PLOP.
 | 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% accuracyLOA: 90% accuracy

Does the baseline align with the level of attainment (e.g., if baseline is a percentage, LOA is a percentage)?Establish a system of internal control which routinely monitors annual goals to ensure alignment between baseline and level of attainment.1. 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.

Is the baseline objectively measurable (e.g., does not use subjective terms like “struggles less”)?1. 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.

A missing or unclear baseline may also indicate the goal itself is unclear. Consider revising the goal. 1. Ensure the baseline in the goal is consistent with data reflected in the present level.

Additional Resources:Use [CCR IEP technical assistance checklist](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-iep-checklist.pdf) to help ensure IEP team has reviewed the level of attainment for each goal (or short-term objective when required).CCR IEP Step 3 Technical Assistance: [I-4 instructions](https://dpi.wi.gov/sped/laws-procedures-bulletins/procedures/sample/forms) IV.B., [Form’s Guide](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/forms-guide.pdf) p.76, [Step 3 Webinar](https://dpi.wi.gov/sped/college-and-career-ready-ieps/5-step-process/step3), [Step 3 At-a-Glance](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-step3.pdf) |
| IEP-10: If the student has a disability-related need affecting reading, each annual goal 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 literacy standards includes a measurable **level of attainment**. | 1. No level of attainment (LOA).
2. LOA not aligned with baseline.

1. LOA is unclear.

1. LOA not measurable.
 | 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% accuracyLOA: 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 5 sentence paragraph with less than 5 prompts, 80% of the time with 90% accuracy and respond correctly to ⅘ comprehension questions”)?
4. Is the level of attainment objectively measurable (e.g., does not use subjective terms like “struggles less”)?

Additional Resources:Use the [CCR IEP technical assistance checklist](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-iep-checklist.pdf) to help ensure IEP team has reviewed the level of attainment for each goal (or short-term objective when required).CCR IEP Step 3 Technical Assistance: [I-4 instructions](https://dpi.wi.gov/sped/laws-procedures-bulletins/procedures/sample/forms) IV.B., [Form’s Guide](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/forms-guide.pdf) p.76, [Step 3 Webinar](https://dpi.wi.gov/sped/college-and-career-ready-ieps/5-step-process/step3), [Step 3 At-a-Glance](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-step3.pdf)[DPI Monitoring Progress of IEP Goals Webpage](https://dpi.wi.gov/sped/college-and-career-ready-ieps/learning-resources/monitoring-iep-goals)  |
| IEP-11: If the student has a disability-related need affecting reading, each annual goal 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 literacy standards includes a **statement of how the student's progress toward achieving the goal will be measured**. | 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).
4. Measurement instrument or tool does not align with goal being measured (e.g., growth on STAR does not measure progress in fluency).
 | 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.

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)?Does the method for measuring progress yield measurable/accurate data?1. Does the method or tool for measuring progress align with the goal being measured (e.g. reading words in isolation does not measure comprehension)?

Additional Resources:Use the [CCR IEP technical assistance checklist](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-iep-checklist.pdf) to help ensure IEP team has identified procedures for measuring progress towards the goal.CCR IEP Step 3 Technical Assistance: [I-4 instructions](https://dpi.wi.gov/sped/laws-procedures-bulletins/procedures/sample/forms) IV.B., [Form’s Guide](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/forms-guide.pdf) p.76, [Step 3 Webinar](https://dpi.wi.gov/sped/college-and-career-ready-ieps/5-step-process/step3), [Step 3 At-a-Glance](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-step3.pdf)[DPI Monitoring Progress of IEP Goals Webpage](https://dpi.wi.gov/sped/college-and-career-ready-ieps/learning-resources/monitoring-iep-goals) |
| IEP-12: 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?1. 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.).
2. 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](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-iep-checklist.pdf) 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](https://dpi.wi.gov/sped/laws-procedures-bulletins/procedures/sample/forms) V., [Form’s Guide](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/forms-guide.pdf) p.78, [Step 4 Webinar](https://dpi.wi.gov/sped/college-and-career-ready-ieps/5-step-process/step4), [Step 4 At-a-Glance](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-step4.pdf) |
| IMP-1: The LEA ensures the specially designed instruction listed in the IEP is provided as described. | 1. Teacher absent. No sub available.
2. Online services not provided.
3. School assembly prevented services from being provided (one week).

1. Student refuses to access service.
2. Paraprofessional provided the service.
3. Location of service was not consistent with IEP.

1. Change in schedule when student moved from elementary to middle school, but IEP was not revised to align with schedule change.
 | 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.

Have a backup plan to provide coverage when a staff person is absent and the sub is not available.Provide additional services when staff member returns to make up for lost minutes. Document in teacher log.1. A school district must ensure IEP services are provided in an online environment at the frequency specified in the IEP. Have a backup plan to provide alternate services, if online services are not available.

Provide additional services when online services are available and document in teacher log.1. 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](https://dpi.wi.gov/sped/laws-procedures-bulletins/bulletins/10-07) Question 2.

Provide additional services to make up the time lost during a pattern of missed services. Document in teacher log.1. 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.
2. Only licensed special education teachers can provide specially designed instruction. Licensed reading teachers can provide specially designed instruction in reading.
3. 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.

Ensure staff are familiar with location, duration, frequency and amount of services. See [Information Update Bulletin 10.07](https://dpi.wi.gov/sped/laws-procedures-bulletins/bulletins/10-07).General education environment means children with disabilities are educated with children who are nondisabled. 1. 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.Clarify a change in schedule in the duration section of the program summary.

Additional Resources:[Information Update Bulletin 10.07](https://dpi.wi.gov/sped/laws-procedures-bulletins/bulletins/10-07) |
| IMP-2: The LEA ensures the supplementary aids and services listed in the IEP are provided as described. | 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.”

1. Cannot verify that directions were always repeated or clarified.
2. There is an extensive list of services and frequency and amount are unclear.
 | 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](https://dpi.wi.gov/sped/laws-procedures-bulletins/bulletins/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 service and for how long. Is the frequency written so that it can be verified as implemented? 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.
7. Are services appropriately tailored to address the student’s needs? An extensive list of accommodations provided at all times throughout the day may be overbroad and result in inconsistent implementation. Clearly identify key modifications and clarify when, where and for how long they are provided such that successful implementation can be determined).
8. Make sure the IEP is based on the individualized needs of the student and reflects the services provided.

Additional Resources:[Information Update Bulletin 10.07](https://dpi.wi.gov/sped/laws-procedures-bulletins/bulletins/10-07) |
| IMP-3: In the case of a student whose behavior impedes his or her learning or that of others, the positive behavioral interventions and supports and other strategies to address that behavior were implemented as described in the student's IEP. | 1. There are no positive behavioral interventions and supports documented in the IEP.
2. Frequency, amount, location, and duration of positive behavioral interventions and supports are not documented in the IEP.
3. Extensive list of positive behavioral supports.
 | 1. If behavior impedes the student’s learning or that of others, ensure the Program Summary includes positive behavioral interventions and supports to address the student’s behavior.
2. If the IEP includes positive behavioral interventions and supports, ensure frequency, amount, location, and duration are clear.
3. Are positive behavioral supports appropriately tailored to address the student’s needs (e.g. an extensive list of behavioral supports provided at all times throughout the day may be overbroad and result in inconsistent implementation)? Clearly identify key supports and clarify when, where and for how long they are provided such that successful implementation can be determined).
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| IMP-4: Periodic reports are provided to the parents as specified in the IEP on the progress the student is making toward meeting each goal. | 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.
 | 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 annual goal?

Do staff *carefully* 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.1. Are staff aware of the requirement in progress reporting forms to include data to support progress for each annual goal?

Has sufficient data been obtained to allow meaningful progress reporting?Additional Resources:[Monitoring Progress of IEP Goals](https://dpi.wi.gov/sped/college-and-career-ready-ieps/learning-resources/monitoring-iep-goals) |