

Special Education Cyclical Monitoring Process

IEP File Review

Purpose of the Webinar

- To outline the essential components and required content of students' IEPs, enabling staff to assess whether the expectations of a Free Appropriate Public Education (FAPE), as guaranteed by the Individuals with Disabilities Education Act (IDEA), have been met.

IEP File Review

- As part of its cyclical monitoring process, the Illinois State Board of Education (ISBE) Special Education Department requires Local Education Agencies (LEAs) to conduct comprehensive file reviews utilizing the ISBE File Review Form. Files are selected at random and the sample size of review is determined based on the districts special education population.
- This form was created to ensure student IEPs are aligned with federal and state regulations and will be reviewed by an ISBE monitor.
- **Important:** Any noncompliance identified in a student's IEP during the file review must be corrected within one year of notification of the noncompliance. If noncompliance is identified, ISBE will provide the LEA with a corrective action plan outlining each item of noncompliance identified.

LEA Action Steps for reviewing IEPs

LEA Action Step 1

Using the IEP File Review form:

1. Review the student's IEP, ensuring that all necessary components are included and completed.
2. Note the presence or absence of information on the IEP File Review document.

LEA Action Step 2

Analyze the alignment of the PLAAFP and the rest of the IEP including:

1. Parental input/concerns,
2. Annual goals,
3. Accommodations/Modifications,
4. Services, and
5. Placement.
6. Document observations in the comments section on the IEP File Review form.

LEA Action Step 3

Determine if the student's IEP is

1. Compliant with the procedural requirements of IDEA
2. Adequately designed to enable the student to receive educational benefit.

LEA Action Step 4

If the student's IEP is noncompliant with the procedural requirements of IEP or is not adequate to enable the student to benefit educationally:

1. Correct the IEP, in accordance with the requirements in the ISBE issued corrective action plan.
2. ISBE monitor will verify correction.

Using the IEP Review Form to Ensure Free Appropriate Public Education (FAPE)

Guidance Questions:

1. If I were explaining this IEP to a hearing officer, could I clearly show how the IEP is tailored to this student's unique needs and potential?
2. Would I feel confident telling a parent — or a hearing officer — that the IEP is designed for more than just minimal progress?

Components of the IEP Review Form

IEP File Review Components:

Cover Page- Section 8

- Cover Page
- 1: Needs of an English Learner with an IEP
- 2: Parent/Guardian Notification of Conference and IEP Team
- 3: Present Levels of Academic Achievement and Functional Performance (PLAAFP)
- 4: Behavior Intervention Plan
- 5: Annual Goals and Short-term Objectives/Benchmarks
- 6: Consideration of Special Factors
- 7: Linguistic Accommodations (including Deaf, Hard of Hearing, Blind, and Deaf-Blind accommodations)
- 8: Supplementary Aids, Accommodations, and Modifications

IEP File Review Components:

Section 9-18

- 9: Supports for School Personnel and Parent Training
- 10: Assessment Accommodations
- 11: Participation in General Education Classes and Special Education Classes/ Services
- 12: Education Placement in Alignment with IEP
- 13: Educational Environment Considerations
- 14: Potential Harmful Effects
- 15: Transportation
- 16: Extended School Year
- 17: Autism Considerations
- 18: Secondary Considerations

The IEP Review Form Format

Cover Page Format

The cover page is a total of three pages long that includes a series of tables that LEAs are responsible for completing to begin the File Review process.

STUDENT IDENTIFIER		NOTIFICATION OF CONFERENCE (NOC) DATE	DATE REVIEWED
RESIDENT SCHOOL		INDIVIDUALIZED EDUCATION PROGRAM (IEP) MEETING DATE	ISBE REVIEWER
SERVING SCHOOL		REEVALUATION DUE DATE	
In accordance with, 23 IAC 226.530 , the Notification of Conference was provided to the parent/guardian at least 10 Days prior to IEP Meeting? ☐ YES ☐ NO		If the previous answer was 'No', did the parent agree via signature to waive their rights to the 10-day notification provision? ☐ YES ☐ NO	
Purpose of Conference (Please check all that apply) ☐ IEP Review/Revision ☐ Review of Existing Data ☐ Reevaluation ☐ Functional Behavioral Assessment (FBA) / Behavior Intervention Plan (BIP) ☐ Initial IEP ☐ Secondary Transition ☐ Manifestation Determination ☐ Initial Evaluation/Eligibility ☐ Graduation			
Purpose of Notification of Conference AND Conference Summary Report is the same? ☐ YES ☐ NO			
STUDENT'S DATE OF BIRTH		STUDENT'S RACE/ETHNICITY	GENDER
CURRENT GRADE ☐ PK ☐ 2 ☐ 5 ☐ 8 ☐ 11 ☐ K ☐ 3 ☐ 6 ☐ 9 ☐ 12 ☐ 1 ☐ 4 ☐ 7 ☐ 10		☐ Asian ☐ American Indian or Alaska Native ☐ Black or African American ☐ Hispanic/Latino ☐ Middle Eastern or North African ☐ Native Hawaiian or Pacific Islander ☐ Two or More Races ☐ White	☐ Female ☐ Male ☐ Non-Binary

Cover Page: Student Information and Notice of Conference (page 1)

- Student's personally identifiable information
 - Student Identifier (SIS Number)
 - Date of Birth
 - Race/ Ethnicity
 - Current Grade
 - Gender
 - Resident School
 - Serving School
- Notification of Conference Date
- Date IEP Reviewed
- IEP Meeting Date
- ISBE Reviewer Name
- Verification Notice of Conference (NOC) was issued at least 10 days prior to IEP Meeting
- If applicable, NOC parent consent to waive 10-day notice
- Verification that purpose of NOC and Conference Summary report is the same

Cover Page : Disability, Educational Environment, and Related Services (page 2)

The cover page continues with verifying the following information through a series of check boxes you must select for the following categories:

- Primary Disability
- Secondary Disability
- Educational Environment
- Related Services
- Verification that all written material was considered by the IEP team and provided to the parent at least three days prior to the IEP meeting
 - If yes, verification indicating the delivery method utilized

Cover Page: Illinois IEP Regulation Verification (page 3)

The last section of the cover page includes a series of check boxes verifying the following was completed in accordance with Illinois IEP Regulations' timelines:

- Notice of Procedural Safeguards
- Transfer of Rights
- Prioritization for Urgency of Need for Services (PUNS)
- Achieving a Better Life Experience (ABLE)
- District Behavior Intervention Policy
- Behavior Intervention Policy at Initial Evaluation
- Evidence the IEP was reviewed at least annually

IEP File Review Format

- Each section of the File Review Form is identified by a heading
 - i.e. Language and Interpreter Needs for Parents
- If a section is not applicable to the student, a fillable check box titled N/A can be marked
- The review form contains three columns
 - LEA Response
 - ISBE Response
 - Review Criteria
- The LEA is only responsible for completing the column entitled “LEA Response”
- Each response column contains check boxes that will be marked with either “yes” or “no” based on the IEP information being reviewed in accordance with criteria in the third column
- A comment box is below each section if corrections are needed

Form Section Explanations and Common Errors

Section 1: Language and Interpreter Needs

Section 1 should be completed if:

- A parent, guardian, or student communicates in a language or mode other than English
- Student has been identified as having limited English proficiency as a special factor
- Important: students who use sign language or other non-English modes of communication are considered English learners
- If these do not apply to the student, mark 'N/A' and continue to section 2

Two common errors for Section 1 include:

1. No documentation that an interpreter was provided, when needed—and the language used.
2. No documentation of the language in which written materials were provided

Section 2: Notice of Conference and the IEP Team

Section 2 addresses whether the Parent/Guardian was properly notified of the conference and whether all required team members attended the IEP meeting, as documented in the Conference Summary Report.

Three common problems for IEP Section 2 include:

1. Staff who were invited to the IEP meeting but did not attend, and no waiver and written report was provided when required.
2. No documentation of the efforts made to ensure the parent's or guardian's attendance at the IEP meeting.
3. Missing signatures from IEP team members on the Conference Summary Report or lack of documentation when team members participated virtually or by phone

Section 3: Present Levels of Academic Achievement and Functional Performance

Section 3 requires thorough critique to the level of detail the students' strengths, academic performance, and functional performance are described.

Five errors typically found in the PLAAFP, including:

1. Parent concerns and input are not clearly and appropriately documented within the IEP or there isn't evidence that the LEA made several, varied attempts to request information from the parent.
2. The initial or re-evaluation results are not included in the PLAAFP
3. Assessment results list only scores, without accompanying descriptions in a parent friendly narrative
4. Not documenting students' progress towards their IEP goals and how unsatisfactory progress will be addressed.
5. The adverse effects of the disability do not clearly explain how the disability impacts the student's involvement or progress in the general education curriculum and the functional implications of the student's skills.

Additional Errors for transition aged and preschool children:

- For transition aged students or students' 14 ½ and older, the adverse effects do not describe how the disability impacts the student's pursuit of postsecondary employment, education, and independent living. OR
- For preschool children, an explanation was not provided of how the student's disability impacts their involvement in appropriate activities.

Section 4: Behavior Intervention Plan

Section 4 should be completed if a student has a Behavior Intervention Plan (BIP) developed after a Functional Behavior Assessment (FBA) is completed. If the student does not have a BIP, simply check "N/A" and proceed to Section 5.

Five Common errors found in BIPs include:

1. Providing a general and subjective description of inappropriate or undesirable behaviors. The target behaviors should be specific, measurable, and observable
2. No documentation of prior, current, and planned interventions used
3. Failure to identify the function of the student's behavior
4. Failure to identify measurable behavior changes expected and how progress will be evaluated.
5. Not providing the method staff will use to teach the replacement behavior or appropriate/desirable behaviors

Section 5: Annual Goals and Objectives/Benchmarks

Section 5 requires measurable annual goals and short-term objectives/benchmarks designed to meet each of the student's educational needs to enable the child to be involved in and make progress in the general education curriculum.

Four common errors in annual goals and benchmarks include:

1. Failure to include the student's baseline
2. Providing a statement of a desired outcome or general goal such as, the student will receive a C in algebra. Goals should target a skill and must include behaviors that are specific, measurable, and observable.
3. Using accuracy to measure goals when other methods of measurement, such as duration, are more appropriate.
4. Failure to align benchmarks to the annual goal

Section 6 : Considerations of Special Factors

Section 6 addresses language, communication, behavioral intervention supports and supports for students who are blind or have low vision.

Two common errors for IEP 6 include:

1. Not identifying special factors that are indicated in the PLAAFP or other sections of the IEP. For example, not checking the box to indicate that the student exhibits behaviors that impede their own learning or that of their peers, despite having a BIP.
 2. Failing to identify the student's language needs, even though the student is an English learner.
- Checking "yes" to communication, language, and or cultural needs will require additionally explanation in the next section, IEP 7.

Section 7: Linguistic Accommodations

Section 7, linguistic accommodations, must be completed if language and/or communication needs were identified as a special factor in Section 6, including for students who are deaf, hard of hearing, or DeafBlind.

Section 8: Supplementary Aids, Accommodations, and Modifications

Section 8 addresses supports for students with IEPs receiving supplementary aids, accommodations, and/or modifications as part of their special education supports and services.

- The IEP should include a clear statement of the supplementary aids, accommodations, or program modifications that will be provided.

Section 9: Supports for School Personnel and Parent Training

Section 9 focuses on the supports and training provided to school staff, parents, and guardians.

- This includes indirect related service minutes designed to support the students.
- This section does not include general professional development for staff.

Section 10: Assessment Accommodations

Section 10 addresses any assessments the student will participate in.

This criteria includes

- Accessibility features and/or accommodations
 - Appropriate supports should be clearly listed, described, and documented.
- Classroom-based, district-wide, and, if applicable, state assessments.

Section 11: Environment Participation

Section 11 addresses whether staff have documented services and modifications in the IEP for the student.

The IEP should contain:

- Projected start date for special education and related services
- Anticipated frequency and location of services
- Duration of services

Section 12: Educational Placement in Alignment with IEP

Section 12 focuses on the appropriateness of the student's placement, in consideration to their strengths, challenges, and needs.

- The IEP team must select the option that aligns with the student's academic, developmental, and functional needs.
- Services should only be in areas with documented needs
- Lastly, confirm whether parent's or guardian's right to be informed if their child may be eligible for services from state-operated or residential special education facilities and to be offered the option to consider comparable in-state facilities first

Section 13: Educational Environment Considerations

Section 13 focuses on the maximum extent appropriate, all students with IEPs shall be educated and participate in extracurricular activities with students who are nondisabled.

Review this section by confirming

- the IEP explains the extent to which the student will not participate with nondisabled peers in academic, extracurricular, and nonacademic activities
- Justification of any removal from the general education setting based on the severity of the disability, even with the use of supplementary aids and services.

Section 14: Potential Harmful Effects

Section 14 focuses on the selection of least restrictive environment (LRE), consideration was given to any potential harmful effects on the student or on the quality of services.

Review this section by confirming IEP team addressed any potential harmful effects on the student or quality of services while selecting the least restrictive environment.

A Common error is failure to provide individualized statements of potential harmful effects

Section 15: Transportation

Section 15 addresses the consideration/provision of transportation services.

When reviewing, there must be evidence the IEP considered transportation as a special education service and documented the decision in the IEP, regardless of whether the student needs transportation services.

Section 16: Extended School Year (ESY)

Section 16 focuses on each public agency ensuring that extended school year services are available and necessary to provide Free Appropriate Public Education (FAPE).

When reviewing, confirm that the IEP team considered and documented whether services beyond the standard school year were needed to maintain the student's skills.

If ESY was required, the IEP must specify the plan. This includes:

- Special education services that were provided
- Description of the way these services were delivered
 - frequency and duration of services.

Section 17: Autism Considerations

Section 17 addresses documented autism considerations, for any student who has a disability on the autism spectrum. This section is only completed if a student has been identified with a disability on the autism spectrum.

When reviewing, confirm that the IEP team considered and documented whether services beyond the standard school year were needed to maintain the student's skills.

If ESY was required, the IEP must specify the plan. This includes:

- Special education services that were provided
- Description of the way these services were delivered
 - frequency and duration of services

Secondary Transition IDEA Requirements

Transition and a Free and Appropriate Public Education (FAPE)

“A primary purpose of IDEA is to ensure that **all children with disabilities** have available to them a **FAPE** that emphasizes special education and related services designed to meet their unique needs and prepare them for further **education, employment, and independent living.**”

Excerpt from “A Transition Guide to Postsecondary Education and Employment For Students and Youth With Disabilities”
Revised August 2020



Indicator 13: Secondary Transition

- In accordance with 105 ILCS 5/14-8.03, beginning no later than the first IEP in effect when the student turns age 14 ½ (or younger if determined appropriate by the IEP team) and updated annually thereafter, the IEP must include:
 - Measurable post-secondary goals based upon age-appropriate transition assessments and other information available regarding the student that are related to training, education, employment, and independent living skills and
 - The transition services needed to assist the student in reaching those goals, including courses of study.

Secondary Transition Process

Listed below are the series of steps that need to be taken to ensure transition plans are aligned to the student's post secondary goals that satisfy the requirements of IDEA.

- Administer age-appropriate assessments
- Create measurable postsecondary outcome goals
- Determine transition services/ course of study
- Write measurable annual IEP goals
- Provide linkages to adult agencies for continued support

Secondary Transition: IEP File Review

Section 18: Postsecondary Transition (For students 14.5 or older) Subsection 1

Section 18, subsection 1 addresses measurable postsecondary goals for employment, education and/or training, and independent living

When reviewing, confirm that the IEP team has identified postsecondary goals for employment, education and/or training, and independent living. It is permissible to have a goal that is either education or training but may not be necessary to have both.

Two common errors found in postsecondary goals include:

1. Outcome goals are not measurable and include subjective words like "want", "wish" or "would like"
2. Goals that are unclear whether they will be achieved after the student completes high school.

Section 18: Postsecondary Transition (For students 14.5 or older) Subsection 2

Section 18, subsection 2 focuses on annual updates to postsecondary goals in conjunction with the development of the current IEP

When reviewing, confirm that there is evidence that postsecondary goals have been reviewed by the IEP team at least once within the previous 12 months.

Section 18: Postsecondary Transition (For students 14.5 or older) Subsection 3

Section 18, subsection 3 addresses the evidence of age-appropriate assessments administered to the student to provide information on the student's needs, strengths, preferences, and interests regarding this postsecondary goal.

Two common problems with assessments include

1. Using one assessment for all three domains: employment, education and/or training, and independent living.
2. Only using informal student inventories to drive transition planning. Data should be gathered from a variety of transition assessments to establish baseline data and to monitor progress.

Section 18: Postsecondary Transition (For students 14.5 or older) Subsection 4

Section 18, subsection 4 addresses transition services outlined in the IEP are meeting the student's postsecondary goal(s).

Five common issues with subsection four:

1. Providing a generic list of activities available to non-disabled students, rather than individualizing transition services.
2. Failure to include at least one transition service per transition domain that reasonably supports the student in meeting their postsecondary goals.
3. Not including the title of the staff member responsible for coordinating or providing each service.
4. No documentation showing that assistive technology related to employment, education and/or training, or independent living was considered for the student during or after high school.
5. No evidence of consideration regarding the availability and accessibility of appropriate technology devices and services for the student after high school.

Section 18: Postsecondary Transition (For students 14.5 or older) Subsection 5

Section 18, subsection 5 focuses on a complete course of study that includes all years of high school, specific titles of courses, and courses that ensure progress towards meeting the post-secondary goals are included in the transition plans.

The course of study must be reviewed and updated annually.

Two common errors in this subsection:

1. Not completing all four years
2. Using “electives” instead of explicitly naming the course.

Section 18: Postsecondary Transition (For students 14.5 or older) Subsection 6

Section 18, subsection 6 addresses that annual goals or short-term objectives are related to the student's transition service needs and are reviewed and updated annually

Two common errors in this subsection:

1. Not having one annual goal and one objective for each transition domain
 1. Employment
 2. Education and/or training
 3. Independent living
2. Goals are not related to the student's transition service's needs

Section 18: Postsecondary Transition (For students 14.5 or older) Subsection 7

Section 18, subsection 7 focuses on evidence that the student was invited to the IEP meeting.

Section 18: Postsecondary Transition (For students 14.5 or older) Subsection 8

Section 18, subsection 8 addresses that any outside agencies responsible for transition services were invited to the IEP meeting with parent consent

Outside agencies should be invited unless

1. Parent has not provided written consent
2. It is too early to determine whether the student will require outside agency involvement

Consent must be obtained before inviting outside agencies as evidence by including them on the Notice of Conference.

Instructions on Saving the IEP File Review Document

Saving the IEP File Review

Once finished completing the IEP File Review for each student, save the document as a PDF document before uploading into the shared folder.

1. Click 'File'
2. Choose 'Save As'
3. Title the document with the student's SIS number followed by 'IEP File Review'
4. Choose 'PDF' for document type
5. Press 'Save'

Questions?

If you have specific questions, contact your district's primary ISBE principal consultant at 217-782-5589.