

Proficio Conference 2025

Illinois State Board of Education Updates

*Mary Lanoue, Supervisor
Special Education Department*

Agenda



Introduction to the team



Lessons learned during the 2025 renewal cycle



Data



Part 401 Updates



Additional Information / Resources



Panel Discussion Questions

Meet the Team

Juliana
Amoruso

Rocio
Casillas

Amanda
Clay

Laura Fowler

Marlee
Goldsworthy

William
Hrabe

Helen
Kossler

Monika
Miller

Areas of specialty

- Nonpublic Special Education program compliance
- Educational Surrogate Parent Program
- Residential Placement Support & Applications for Reimbursement
- Cooperatives
- Charter Schools
- Private / Parochial Placements
- Home/Hospital placements
- Homeless Youth
- Public Separate Day Schools
- Attorney focused on Special Education

New Name / Website Changes

Nonpublic



Specialized Placements



Specialized Placements

- Nonpublic: Special Education Programs
- Nonpublic: Private /Parochial Schools
- Residential Placements
- Separate Public Day Schools



Lessons Learned from the 2025 Renewal Cycle

Deficiency Findings

- 92% of Renewals had deficiencies
- Down from 2024 at 94%
- Residential only deficiencies due to
 - DCFS licensure expired
 - Violation Free / Current Fire Inspection
- The personnel record was the single most source of deficiencies

Common errors included

- Missing/incorrect staff,
- IEIN numbers that were missing or incorrect,
- Missing start/termination dates
- Missing classroom type information

Additional Errors

**Personnel Rosters
compared with
classroom rosters**

**Policies -
Medication,
Behavior and
Privacy/Dignity**

**Program Description
Terminology
Goals**

Helpful Tips

- **Maintain staff through IWAS- Ongoing Process following notification guidelines**
 - Out of State facilities submit copies of licenses
- **Confirm that all licenses and IEIN numbers are valid and up-to-date as they appear on the Personnel Record**
- **Cross-check all Classroom Rosters with the Personnel Record:**
 - Each classroom must have a roster showing current and appropriately licensed staff assigned from the personnel record
 - Check class sizes and ensure a classroom aide is assigned on the roster to all classrooms where necessary
 - Remove the names of staff no longer employed by the program from the personnel record and the classroom rosters
- **Ensure hire dates and hours are accurate for all staff and that staff names on the personnel record match the records in ELIS**

Helpful Tips

- Make sure that the written program description aligns with the disabilities served by the program, with a description of the unique instructional approaches used for each disability category included
- Residential only, ensure there is a current, passing fire inspection, residential licensure and program description attached to the application
- Calendar submission- make sure ALL calendars match
- Submit applications early, processed in the order received

Additional Notes

New Special Education Teachers

Must replace a substitute teacher prior to opening a new classroom

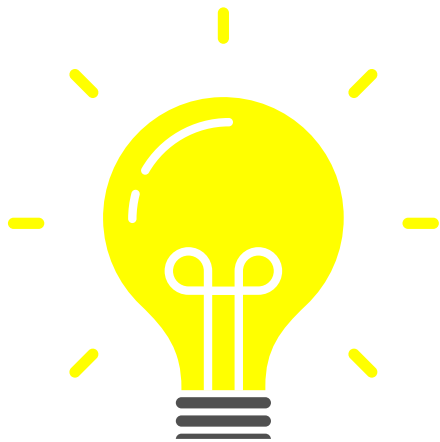
Statements of Assurance

If a statement of assurance is requested during a two-year or continuing renewal to address an identified deficiency, and the program exhibits the same deficiency the following year, the program may be subject to a change in status and required to implement corrective actions to ensure ongoing compliance in that area.

Programs to Spotlight

- Nurture School
- Turning Pointe Center
- Bridgepoint Academy
- Hopewell Career Academy
- Hopewell School
- Glen Oaks
- Britten School
- Connect Academy





Two-Year Renewal Applications 2026-2028

- **December 4-5, 2025**

Two-year renewal application packets distributed electronically via email by ISBE.

- **Monday, December 8, 2025**

Contact your program's assigned principal consultant if two-year renewal application packet has not been received.

- **Monday, March 16, 2026**

Two-year renewal applications due by electronic submission to your program's assigned principal consultant.

Continuing Applications 2026-2027

- **December 11-12, 2025**

Continuing application packets distributed electronically via email by ISBE.

- **Monday, December 15, 2025**

Contact your program's assigned principal consultant if continuing application packet has not been received.

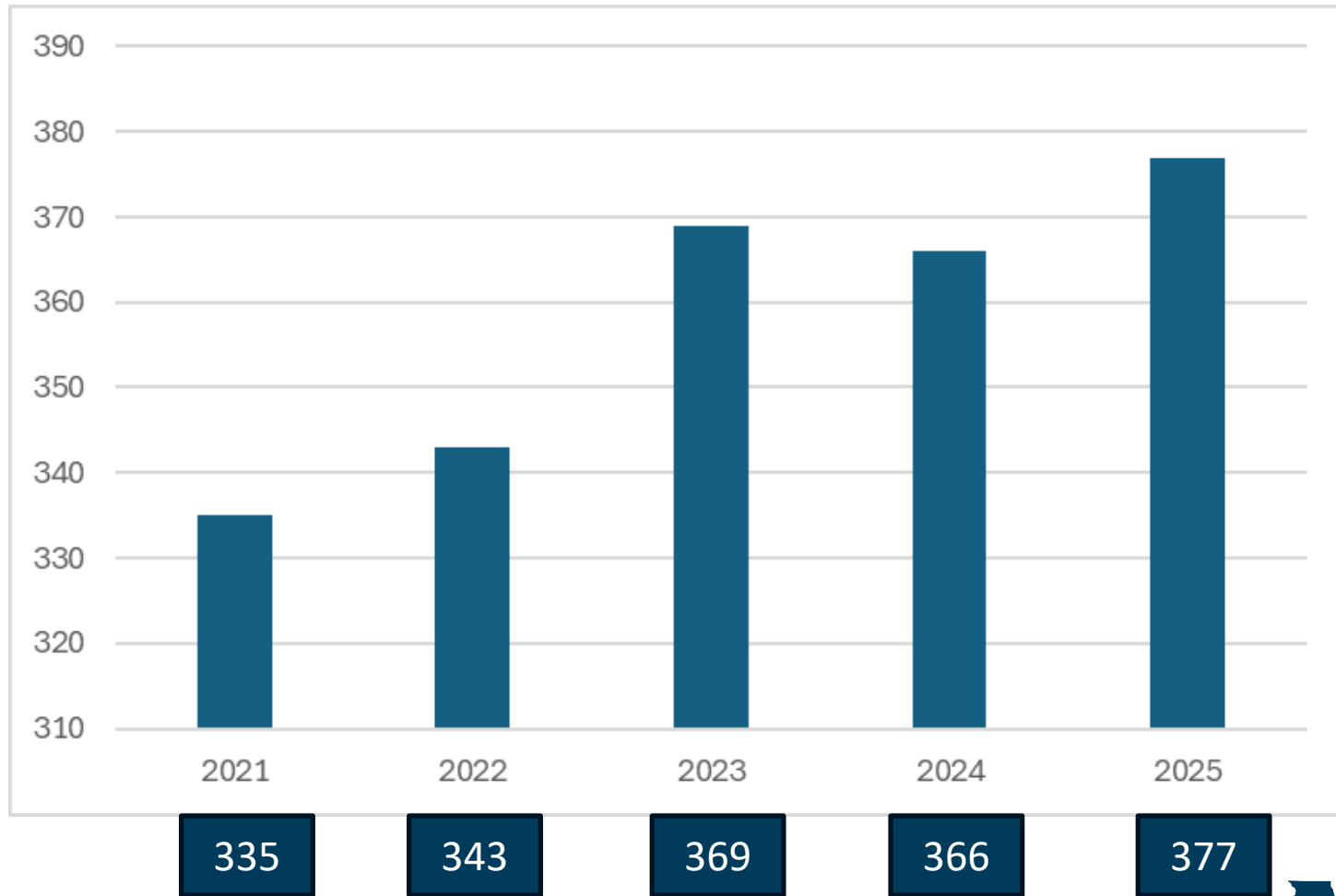
- **Wednesday, February 18, 2026**

Continuing applications due by electronic submission to your program's assigned principal consultant.

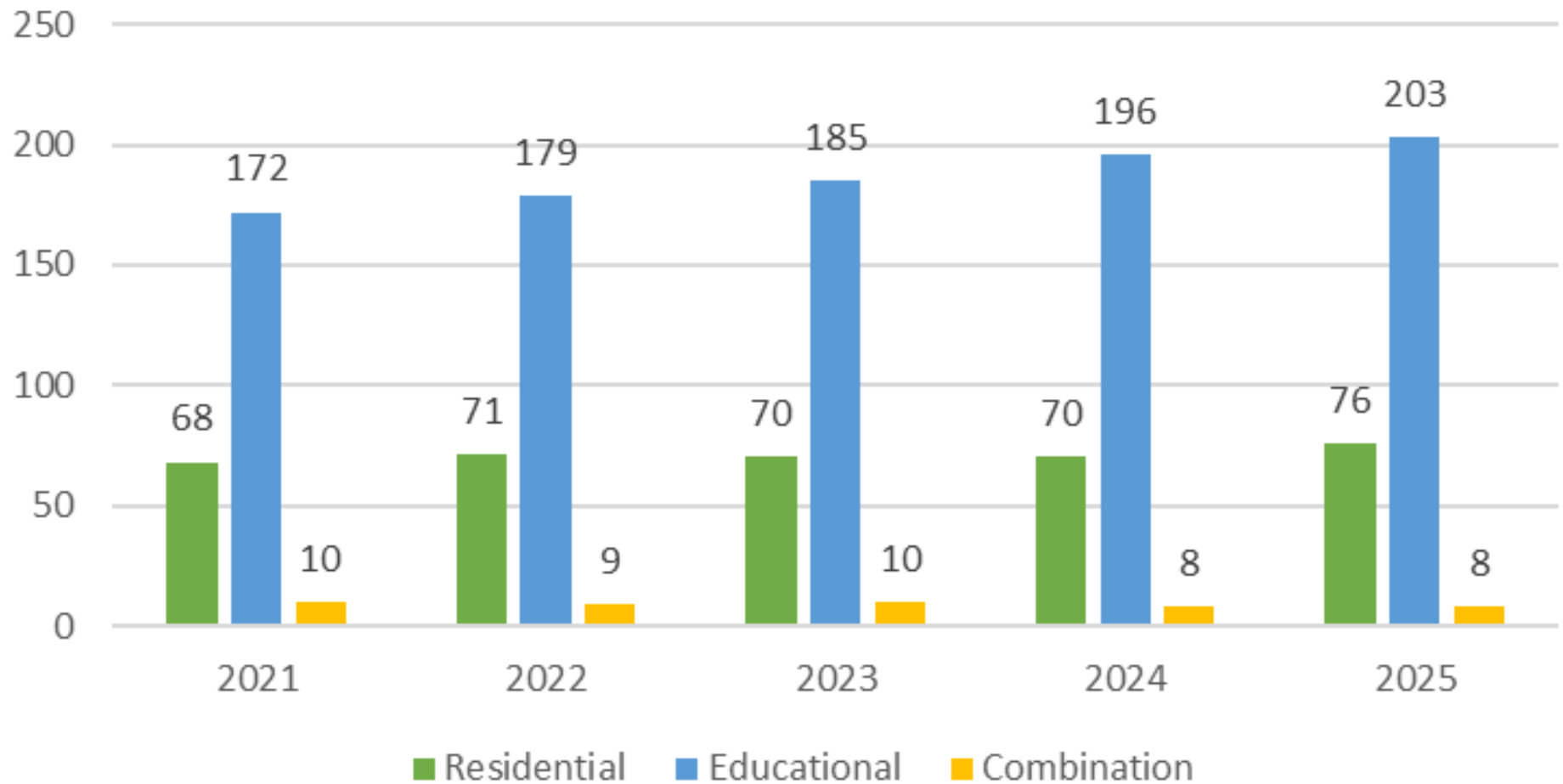


Data, Data, Data

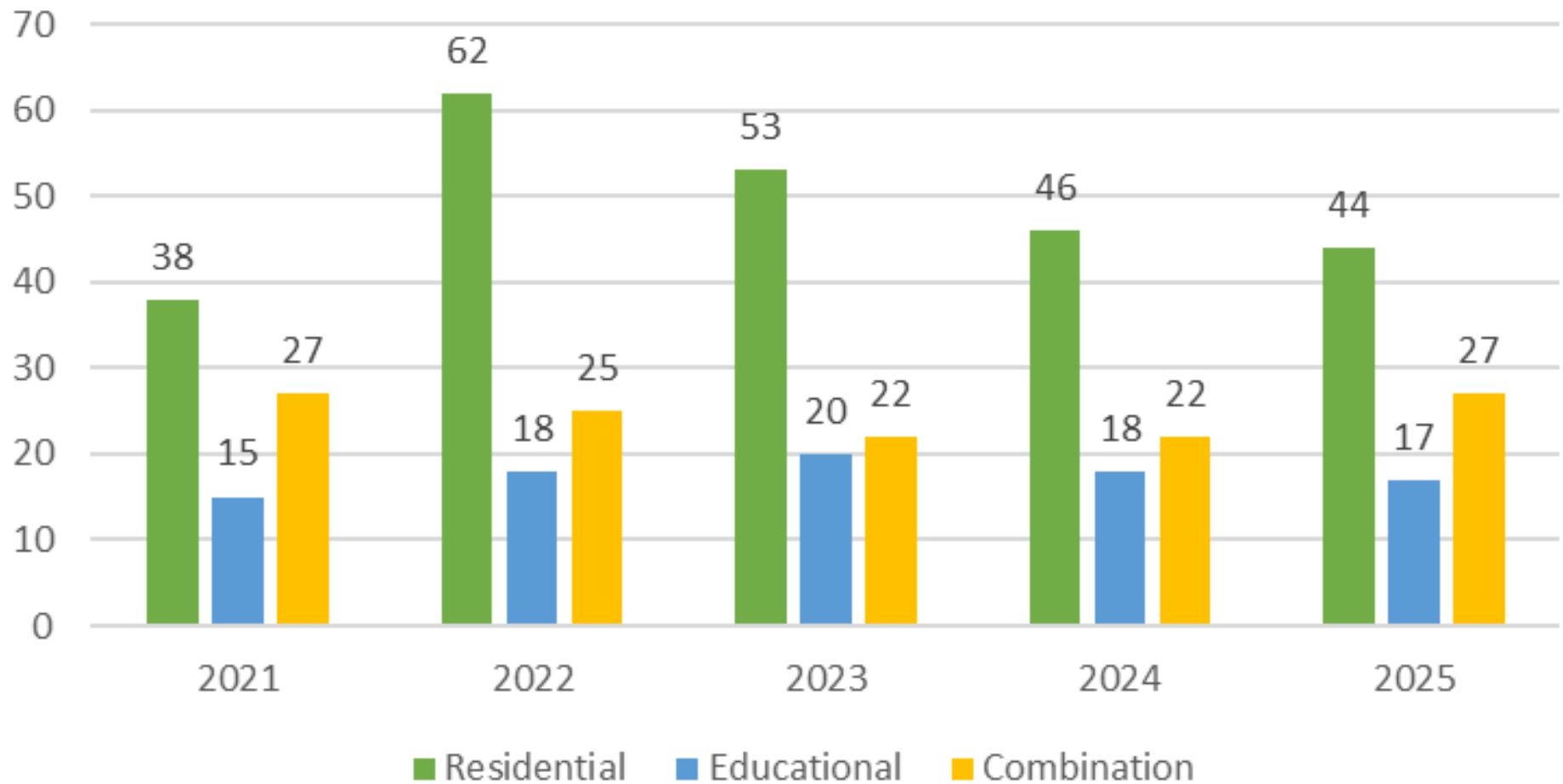
Total Approved Programs



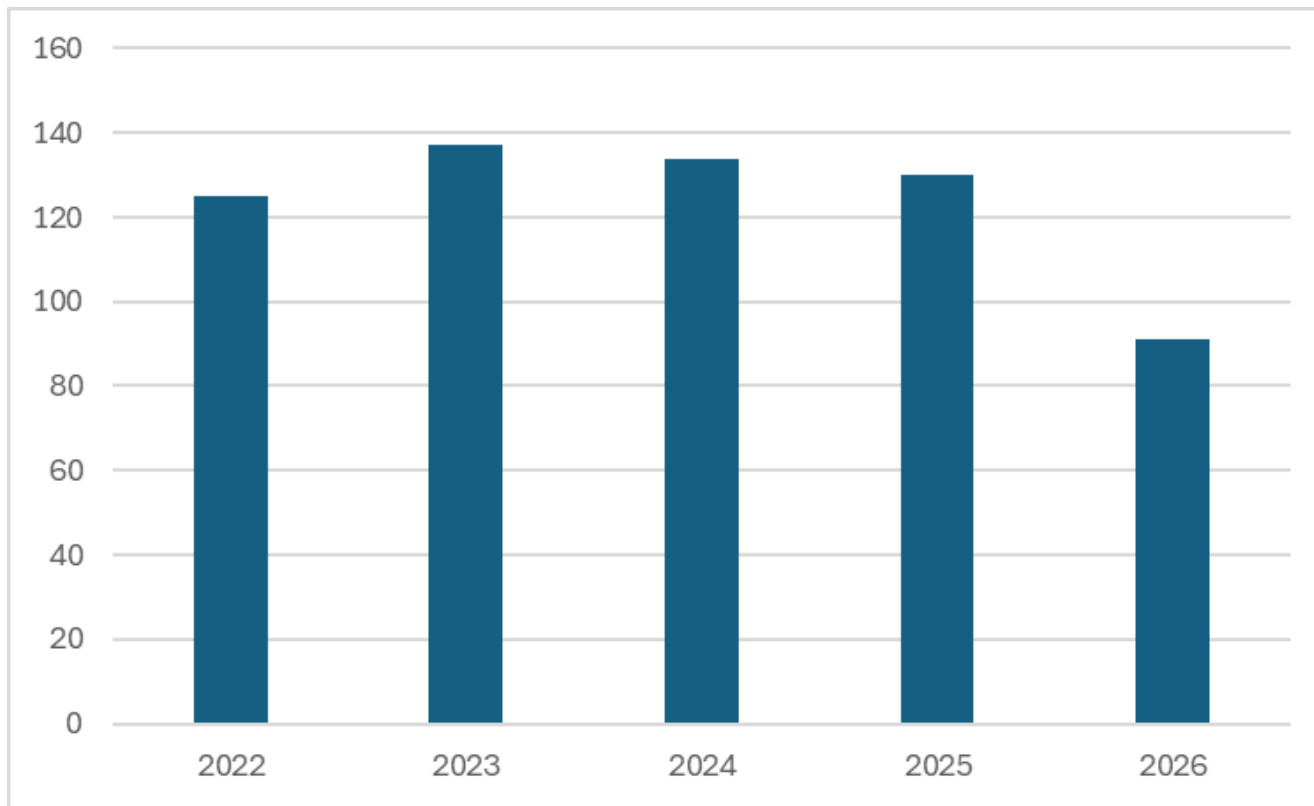
Illinois Programs



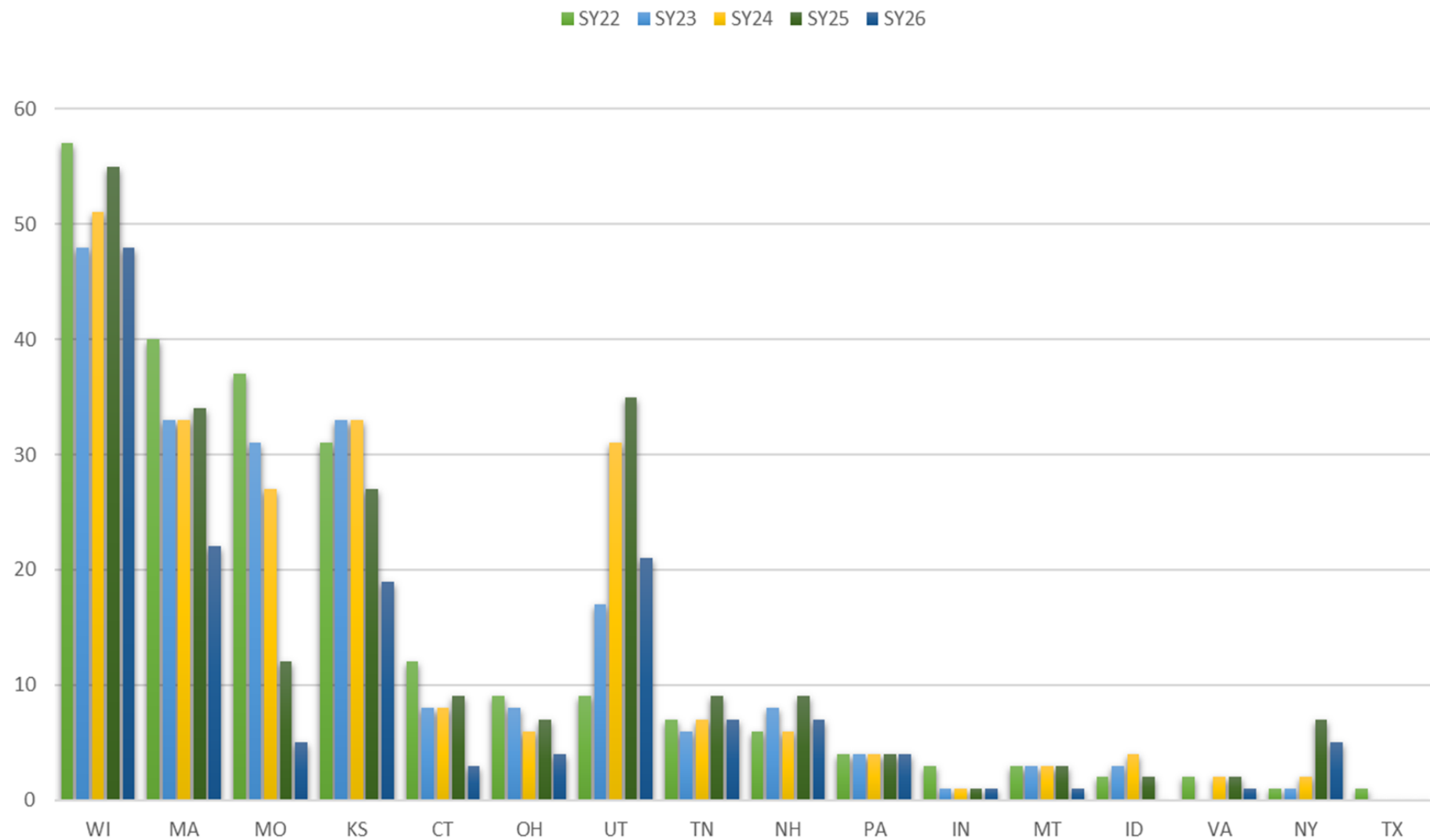
Out of State Programs



Residential In-State Placements (ISBE Approved Facilities)



Residential Out-of-State Placements (ISBE-Approved Facilities)



Request for Reviews

Trends:

- Notifications to parents / districts
- 1:1 Aides not being provided
- IEP accommodations not being followed
- Transportation concerns
- RTO concerns

2024/2025	30
2025-2026	10

Residential Needs

- 18-22
- Autism
- Individual
- IQ b
- Looking

**Residential Capacity
Reporting: What We've
Learned and Where We're
Headed**

**10:15-11:30
Center/Grand Ballroom**

**Amanda Clay
Michael Stiehl**

needs



Part 401 Update Reminders

401.20(b)(A) Notification Requirements

A) If any professional staff position subject to the notification requirements of this subsection (b)(4) remains vacant, the provider shall provide written notification to the State Superintendent and to the placing public school districts after 20 business days, after 40 business days, and again every 40 business days thereafter until the vacant position has been filled or its attempts to permanently fill those positions and of other efforts, **including the use of substitutes or the use of virtual instruction,** undertaken in order to provide necessary instruction and related services to the students enrolled.

401.140(c) Provision of Educational Program

- c) Each classroom in a program subject to this Part shall have a maximum enrollment of five students per licensed/certified special education teacher in the classroom. The enrollment in a class may be increased by a maximum of five students when a full-time paraprofessional or other professional staff is provided, for a maximum of 10 students. In circumstances in which virtual instruction is being provided, there must be additional staff physically present in the classroom to maintain a ratio of 5:1

401.10 (b)(1) Application of Eligibility –Residential Only

1) An accurate, written description of each program for which ISBE approval is requested shall include the following:

- A) The disability categories and ages of students with disabilities for whom it is specifically intended;
- B) The purpose and scope of the provider and its specific program services;
- C) The maximum number of students the program is intended to accommodate; and
- D) Program history and mission/vision statement

401.220(a)(1) Health and Safety Requirements

1) For purposes of this subsection (a), a program operated within a facility that houses public school students or is otherwise used for public school purposes shall not be considered to be located in a "facility subject to this Part" because 23 Ill. Adm. Code 180 (Health/Life Safety Code for Public Schools) applies. In the case of a report that contains violations, a copy of the occupancy permit is required.

401.240(a) Staffing Requirements

Beginning with **2026-2027 school year**, each facility's staff must include a full-time chief administrator of a special school or, in the instance the chief administrator oversees multiple program locations, a full-time supervisor or administrator who is located onsite and meets the requirements of 23 Ill. Adm. Code 226.800(g) or holds a valid professional educator license and a general administrative, principal, or director of special education endorsement, unless a head teacher is serving as permitted by Section 10-21.4a of the School Code, in which case the head teacher shall be required to hold a supervisory endorsement. This shall be allowable at educational programs with no more than three teachers, including the head teacher.



Additional Information / Resources

Available Now!!

- [Nonpublic Mandated Trainings](#)
- [Nonpublic Special Education Allowable Fees Document](#)

BCBA Licensure Change

- Illinois passed a new law that BCBAAs must now also be Licensed Behavior Analysts (LBA) through the IDFPR in order to be properly licensed to practice.
- BCBAAs will still apply for their licensure through the Behavior Analyst Certification Board (BACB), and then once received, can apply for their LBA license through the IDFPR.
- BCaBAAs must also go through a similar process to be a licensed Assistant Behavior Analyst through the IDFPR.
- Here are some references:
- <https://idfpr.illinois.gov/profs/behavior-analysts.html>.
- <https://idfpr.illinois.gov/content/dam/soi/en/web/idfpr/core/dpr/152-qualifications-for-licensure.pdf>
- <https://idfpr.illinois.gov/content/dam/soi/en/web/idfpr/core/dpr/154-qualifications-for-licensure.pdf>
- <https://idfpr.illinois.gov/news/2025/idfpr-announces-additional-license-types-on-core.html>

Resources

[Autism Professional Learning and Supports \(A+\) Project](#)

Helps address the significant behavior needs of children and youth with autism spectrum disorder and related behavior and communication disorders.



Resources

[Illinois Assistive Technology Support Project \(IATP\)](#)

Technical assistance that offers free training on the related topics

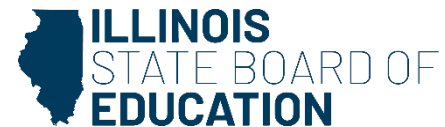
- Introduction to AT and accommodations

- Transition and employment

- AT policies and advocacy

- Accessible educational materials and resources

- Implementing best practices



Resources

Specific Learning Disability Support Project

Offer training and resources to meet the educational needs of all students with specific learning disabilities.



Resources



[DeafBlind Project / Project Reach](#)

Provides technical assistance, information, and training to address early interventions, special education, related services and transitional services for students with deaf-blindness.

Recourses

Illinois Assistive Technology SupportProject (Infinitec)

technical assistance
resource that provides
state of the art assistive
technology, information,
training, equipment
services and technical
assistance.

www.at4IL.org



Resources

[Center for Intensive Behavioral Supports \(CIBS\)](#)

Free online professional training to support a reduction in the need to use physical restraint, time out, and/or isolated time out (RTO).



**Center for Intensive
Behavioral Supports**



Panel Discussion Questions

Question #1

- As Illinois prepares for school-based mental-health screenings, could you update us on the guidance timeline and approach? We're especially interested in how trauma-informed screening tools are being considered, and what training and supports schools can expect to receive to ensure implementation that is safe, equitable, trauma-informed and leads to effective supports for students.

Response - #1

Information about [Universal Mental Health Screening](#) is available on ISBE.net now. ISBE and Lurie Children's will also offer two webinars in January and February. These webinars are open to anyone who is interested in hearing the recommendations & best practices for creating a district-wide plan for mental health screening. The mandate (which begins in the 2027-2028 school year applies to public school districts and guidance (including any impact to nonpublic facilities) will be provided to the field by September 2026.

Question #2

- How is the cyclical monitoring affecting therapeutic day schools?

Response - #2

Therapeutic day schools will not directly be impacted during a districts cycling monitoring. IEPs for students placed in out of district placements will be pulled to ensure all required components are included.

The requirement for assuring that the IEP meets federal compliance is the responsibility of the public placing district.

Question #3

Various questions related to updated IEP forms:

- Present Levels of Academic, Developmental, and Functional Performance (34-54G)
 - In the section where it asks to describe the effects of the individual's disability on involvement and progress in the general education curriculum and the functional implications of the students' skills, a training stated we should write that every year. Another training stated we should take it directly from the latest evaluation. For a therapeutic day school, what is the correct response?
- Goals and Objectives / Benchmarks (34-54M)
 - On goal pages, newly added is the line: ""Date(s) parent will be provided with the student's progress on the annual goal: Month, Day, Year"". What is the appropriate response for this? Is it the final end all of the goal? Is it the last date we're doing updates? Do we give specific dates or say in words, ""One week after the quarter""? Please clarify.
- Educational Accommodations and Supports (34-54N)
 - The accommodations/modifications page was updated recently. What is the best qualifier for checking yes to the second box under Consideration of Special Factors (Communication needs)? Then, if you click yes, you have to fill out the "Linguistic Accommodations". Where it says please list the accommodations, do we list them separate after the colon or is the next section the part where we just check the boxes? Or do we both? Does that count as the accommodations?
- Assessment (34-54O)
 - So the "Assessment" page was just updated to where it is now just one page, which is great. To be clear though, are there any other pages that go with that assessment page?

Response - #3

ISBE is developing a brief FAQ document addressing questions the Agency has received in response to the updated 34-57 (Required Notice and Consent) and 34-54 (IEP) forms.

- Please note: 34-57 forms are required, 34-54 forms are not!
- The ISBE 34-54 forms contain all regulatory components but are only recommended template forms.

Current resources about the updated forms and using them:

- [Explanation of IEP Form \(34-54\) Changes \(Updated 10/2025\)](#)
- [IEP Form Instructions \(Updated 10/2025\)](#)
- Similar documents are available for the 34-57 forms [here](#).

Response - #3

Consult with your legal counsel about how to complete forms.

- Many schools / districts do not use ISBE's template forms.
- What is needed to meet applicable legal requirements may vary based on the individual student.
- While ISBE's template forms contain all regulatory components (i.e., all information that must be included in the IEP), that doesn't necessarily mean there is specific information that must be included or a specific way in which that information needs to be recorded in order to meet the regulatory requirement.

Response - #3

- Present Levels (34-54G): Should this information be taken from the most recent evaluation or be updated every year?
 - IEP must be updated at least annually, but the appropriate information to include will depend on the individual student.
 - Note re "results of initial or most recent evaluation" section.
 - Updated form notes content remains the same as prior version.
- Goals (34-54M): What is the appropriate response for "date(s) parent will be provided with the student's progress" section?
 - Per the Explanation of Form Changes, see [34 CFR §300.320\(a\)\(3\)\(ii\)](#).
 - IEP must include a description of "When periodic reports on the progress the child is making toward meeting the annual goals...will be provided."
 - Intent of update is to ensure IEP reflects when, not just how.

Response - #3

- Accommodations (34-54N): How should we complete the communication needs / linguistic accommodations?
 - Depends on the formatting of your form and the needs of the student.
 - On the ISBE template, this could be included in the text box provided directly under linguistic accommodations, below that under the portion specific to deaf / hard of hearing students, or both.
- Assessment (34-54O): Is it really only one page now?
 - Yes! In ISBE's template, at least.
 - Adapted the form to allow for more flexibility when documenting the accommodations for the assessments that the district utilizes. (ISBE Explanation of Form Changes).

Question #4

How will the field of special education be impacted by the changes made by the current administration?

What is the best way to advocate for our students?

Response - #4

ISBE continues to monitor the changes at the federal level. These changes do not impact the legal requirements as outlined in IDEA.

Weekly messages from Dr. Tony Sanders have outlined areas impacted such as:

- Snap Disruption & Supports for Students and Families
- Supporting students academically and emotionally
- Supporting students of immigrant families

Response - #4

Stay connected by subscribing to the ISBE Weekly Message to remain up to date on current updates s from ISBE

To join the Illinois State Board of Education Weekly Message listserv, please visit [ISBE.net/subscribe](https://isbe.net/subscribe).

Question #5

CPS does evaluate private school student who attend a private school in the city of Chicago, but CPS does not provide the IEP or 504 plan. Is the student's residing school district responsible for creating the IEP or 504 plan? CPS would not develop it because the student would not go to a CPS school since they live outside of Chicago. Some suburban school districts will develop the IEP or 504 based off of the CPS evaluation, but many will not UNLESS the student withdraws from the private school and enrolls in the suburban district. Is there any legal recourse or way to support these students as CPS meet the Child Find agreement and FAPE by providing the evaluation and if eligible, the service plan.

Response - #5

The responsibilities of the resident school district and the serving school district where the private/parochial school is located differ in the case of a parentally-placed private school student who is attending a private/parochial school that is located outside of their resident school district. In this case, the serving school district where the private/parochial school is located is not responsible for making free appropriate public education (FAPE) available to the student. However, it is responsible for ensuring equitable participation in programs assisted or carried out under IDEA Part B. The student's resident school district is responsible for making FAPE available to the child.

Once a student is evaluated by the LEA where the private/parochial school is located, then the district of residence must be prepared to make FAPE available, including drafting an IEP if the parent is considering enrolling the student in public school.

Alternatively, a request may be made to the resident school district for evaluation. This may be preferable in cases where the parent is considering re-enrolling the student in public school, as the resident district is responsible for making FAPE available.

Response #5

- Every LEA is responsible for locating, identifying, and evaluating all students with disabilities enrolled by their parents at a private/parochial school within the LEA's boundaries.
- Once a parent has decided to keep the student at a private school placement, the LEA where the private/parochial school is located is responsible for providing services on an Individual Service Plan
- Students at private schools do not receive services on an IEP or 504s
- Resident LEA must always be prepared with an offer of FAPE should the parents re-enroll into LEA
- [ISBE NPPS Guidance](#)

Question #6

What are the requirements when needing to terminate a student's placement?

Response - #6

23 IAC 401.20(c)

c) Before a provider that operates a nonpublic special education facility terminates a student's placement in a facility, the provider must request an IEP meeting from the contracting school district. If the provider elects to terminate the student's placement following the IEP meeting, the provider must give written notice to this effect to the contracting public school district, the student's parent or guardian, and the State Board of Education no later than 20 business days before the date of termination, unless the health and safety of any student are endangered. The notice must include the detailed reasons for the termination and any actions taken to address the reasons for the termination.

Response - #6

- Request an IEP meeting from the contracting school district.
- Give written notice to the contracting public school district, the student's parent or guardian, and ISBE no later than 20 business days before the date of termination.
- If the health and safety of any student are endangered, the program may issue an immediate termination notice. All IEP meeting and notification requirements will still apply.
- The notice must include the detailed reasons for the termination and any actions taken to address the reasons for the termination.

Question #7

If we've accepted a residential placement from an Illinois public agency (e.g., DCFS, FSP, etc.) does the school district need to update the IEP to reflect either residential or therapeutic day school as their placement recommendation?

Response - #7

No. If a student eligible for special education services is placed in a residential facility by an Illinois public agency and there is a dispute regarding the student's LRE, the resident school district is considered the decision maker regarding the LRE determination. However, arrangements could be made for the student to receive services in the nearest school district while residentially placed in your facility in which case the resident school district would remain responsible for providing transportation.

(See [Residential Guidance 2024](#), Question G3)

Question #8

Whose responsibility is it to request an Educational Surrogate Parent for youth in care placed at a Nonpublic facility?

Response #8

III. Admin. Code tit. 23, § 226.550

a) When a child who is a ward of the State is placed in a residential facility, a representative of that facility shall submit to the State Board of Education a request for the appointment of a surrogate parent. Upon enrollment of a student, the resident school district is responsible for ensuring the assignment of a surrogate parent if the residential facility has not already done so.

d) When a child living in a residential facility no longer requires a surrogate parent, a representative of the facility shall notify the State Board of Education in writing to that effect. This notification shall include the reason for withdrawal of the request.

[ESP FAQ for Facilities](#)

Question #9

What fees can a program charge outside of their daily tuition rate? Can we charge for non-academic field trips?

Response #9

See Scenario #2 from ISBE's Non-Public Special Education Allowable Fee Guidance Document:

2. Can fees be charged for students to attend field trips?

Instructional - if attending the field trip is required for the course work, cost should be covered by program.

Incentive Behavioral - Cost of these trips should be covered by program.

Transitional Life Skills Outings - Do not count as field trips and are part of the instructional day.

Response #9

Nonpublic programs should not be charging district or parents/guardians additional fees above or beyond what is in their established rate. Any extra fees must be **optional** and not necessary for a student to participate in instruction; otherwise, the program should request a new rate from the IPCRB to include the additional fee(s).

Source: [Non-Public Special Education Allowable Fee Guidance Document](#)

Thank you