

## Writing and Presenting IEPs

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*The IEP is  
"the centerpiece of the statute's education delivery system  
for disabled children . . . ."*

*Honig v. Doe, 484 U.S. 305, 311 (1998).*

### The Enduring Rowley Standard:

- *J.L. v. Mercer Island School District, 2009 WL 2393323 (9<sup>th</sup> Cir. Wash. Aug. 6, 2009).* The Ninth Circuit reaffirmed that Rowley's test still applies:
  - "First, has the state complied with the procedures set forth in the Act? And second, is the [IEP] developed through the Act's procedures reasonably calculated to enable the child to receive educational benefits? If these requirements are met, the state has complied with the obligations imposed by Congress and the courts can require no more.
  - Rowley's "some benefit" standard is equivalent to prior Ninth Circuit discussions of "meaningful educational benefit."

## Writing the IEP

### Pre-IEP Meeting Activities

- Be mindful of applicable timing requirements:
  - Initial IEP within 30 days of initial eligibility determination.
  - Review of initial IEP at least annually thereafter.
- Leave your team adequate time to prepare, present, and revise draft IEPs before each of those deadlines.

### Pre-IEP Meeting Activities (cont'd)

- If possible, prepare a draft IEP:
  - IDEA permits school districts to conduct preparatory activities to develop a proposal or respond to a parent's proposal that will be discussed at a later meeting with parents. 34 C.F.R. § 300.501(b)(3)
  - Base the draft IEP on evaluations, parent and teacher/provider input on academic achievement and functional performance.
  - To the extent appropriate, draft IEP should address each of the required elements, as discussed next.

**Required Elements of the IEP (34 C.F.R § 300.320)**

Each student's IEP must include:

- A statement of the student's present levels of academic achievement and functional performance across all educational disciplines, including how the student's disability affects involvement and progress in general education
  - (i.e., adverse educational impact).

**OSPI Examples of Compliant Present Levels**

- "According to curriculum-based assessment results, Sue is working at the 4.2 grade level for reading. While her fluency skills are strong, comprehension remains her primary challenge, which greatly impacts her ability to participate in general education reading assignments."
- "Bob is able to complete single-digit multiplication problems with 70% accuracy and simple division problems with 60% accuracy. This is well-below his age-level peers, and he needs small group instruction in this area."

**OSPI Examples of Non-compliant Present Levels**

- "Based on the Woodcock Johnson, Sue is below grade level in reading and math. Her comprehension skills are weak and she struggles with double-digit multiplication."
- "Bob continues to have challenges with his behavior. Some of the behaviors impeding him in the general education classroom include talking out, not waiting his turn, inappropriate language, and poor peer interactions."

**Required Elements of the IEP: Goals/Objectives**

- A statement of measurable annual goals, including academic and functional goals, designed to:
  - Meet the student's needs that result from the student's disability to enable the student to be involved in and progress in the general education curriculum; and
  - Meet each of the student's other educational needs that result from the student's disability.
- Benchmarks or short-term objectives are also required for students who take alternative assessments aligned to alternate achievement standards.

**OSPI Training Module 2008 Guidance:**

- In order to be measurable, the goal statement should include the following:
  - a baseline ("from"),
  - a target ("to"),
  - and a unit of measure.
- It is acceptable for the baseline to be indicated in the present levels section of the IEP, as long as the baseline is presented using the same unit of measure as the target in the annual goal.

**OSPI Examples of Compliant Goals**

- "When given a beginning 2<sup>nd</sup> grade level passage, Bob will fluently read the passage and answer comprehension questions with 90% accuracy by (date)."  
  - *Note: Present levels indicated student was currently at a beginning 1<sup>st</sup> grade level with 70% comprehension.*
- "When given a non-academic, unstructured setting, Sue will independently follow established rules, improving compliant behavior from 0 of 5 to 5 of 5 trials over a 1-month period as measured by formal weekly teacher observations."
- "When given a prompt, Bob will select the correct example/picture, improving receptive language skills from age 5.6 to 6.3 as measured by SLP data and/or standardized tests."

**OSPI Examples of Non-compliant Goals**

- "Sue will participate in activities involving reading for a variety of purposes (EALR 3.1) from 40% participation to 70% participation with 7 of 10 trials at 70% accuracy by *(date)*."
- "Bob will increase his behavioral/classroom skills from an 80% success rate to 85% success rate by *(date)* and will be measured by classroom assessment."
- "Bob will increase his daily living skills as measured by objectives 5.1 through 5.5."

**Annual Goals (cont'd)**

**Practical Consideration**

- Effective December 31, 2008, parents may revoke consent in writing to a district's continued provision of special education services. 34 C.F.R. § 300.300(b)(4).
- May parents revoke consent for services in only specific goal areas, e.g., math, but not SLP?
  - According to the U.S. Department of Education, parents may only revoke consent for all services offered by a district; disputes about continuation of individual services are to be resolved by agreement with the district and/or a parent's due process rights.

**Required Elements of the IEP: Progress Reporting**

- A description of:
  - How the student's progress toward meeting the annual goals described will be measured; and
  - When periodic reports on the progress the student is making toward meeting the annual goals (such as through the use of quarterly or other periodic reports, concurrent with the issuance of report cards) will be provided.

**Required Elements of the IEP: Services**

- A statement of the special education and any necessary related services and supplementary aids and services to be provided to the student, based upon peer-reviewed research to the extent practicable, *which are related to each of the IEPs goals*, and a statement of the program modifications or supports for school personnel that will be provided for the student:
  - *To advance appropriately toward attaining the annual goals;*
  - *To be involved and progress in the general curriculum and to participate in extracurricular and other nonacademic activities; and*
  - *To be educated and participate with other special education students and nondisabled students.*
- The projected date for the beginning of the services and modifications specified in the IEP, as well as the anticipated frequency, location, and duration of those services and modifications.

	Projected Date for Initiation of Services	Anticipated Frequency	Location	Duration	Position(s) Responsible for Providing Instruction	Position(s) Responsible for Monitoring Progress
Math	5/27/07	300 min/wk	Resource room/Gen. ed. class	5/26/08	Sp. Ed./Gen. Ed. Teacher	Sp. Ed. Teacher
Reading/Writing/Math	5/27/07	3 hours per week	Washington Elem. School	5/27/08	Resource Rm. Teacher	Resource Rm. Teacher
Special Education	5/27/07	1450 min/wk	Special education	1 year	Sp. Ed. Staff	Sp. Ed. Teacher
Life Skills/Adaptive	2007	1 class/wk. (1 hour/wk)	Community	1 year	Sp. Ed. Teacher/Para	Sp. Ed. Teacher
Behavior	5/07	As needed	High School	5/08	Parapro	Sp. Ed. Teacher
Occupational therapy	next year	15 to 30 min/wk	Therapy Room	5/26/08	COTA	OT

The sections highlighted in pink above are non-compliant according to OSPI.

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**Required Elements of the IEP: LRE Statement**

- An explanation of the extent, if any, to which the student will not participate with non-disabled students in the regular class and other mainstream activities.
  - To the maximum extent appropriate, students with disabilities must be educated with children who are non-disabled; removal from the regular educational environment to occur only if the nature and severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily. 34 C.F.R. § 300.114.
  - Unless the IEP of a special education student requires some other arrangement, the student must be educated in the school that s/he would attend if non-disabled; if other arrangements are necessary, placement must be as close as possible to the student's home. 34 C.F.R. § 300.116.

**Required Elements of the IEP: District-wide Assessments**

- A statement of any individual modifications in the administration of state or district-wide assessments of student achievement necessary to measure the academic achievement and functional performance of the student.
  - If the IEP team determines that a student will take an alternate assessment, a statement must indicate why the student cannot participate in regular assessments and why the selected alternative is appropriate.

**Required Elements of the IEP: Transition Components**

- Beginning no later than the year in which a student will turn sixteen years old, statements of measurable postsecondary goals that are based upon age appropriate assessments related to training, education, employment, and where appropriate, independent living skills; and the transition services including courses of study needed to assist the student attain such goals.
  - OSPI provided links:
    - OSPI-funded project called Center for Change in Transition Services ([www.seattleu.edu/ccis/](http://www.seattleu.edu/ccis/));
    - Project funded by the United States Department of Education, the National Secondary Transition Technical Assistance Center ([www.nsttac.org](http://www.nsttac.org)).

**OSPI Training Module 2008 Guidance:**

- Measurable Postsecondary Goals are the student's identified goals for after the student leaves high school, and must address postsecondary education or training, employment, and (if appropriate) independent living skills.
- Measurable Annual Goals are the annual IEP goals, covering what the student will accomplish during that particular school year in each identified area of service.

**OSPI Examples: Compliant Postsecondary & Annual IEP Goals**

- Measurable Postsecondary Goal example:  
"After graduation, Bob will attend a 2-year community college program in order to become an auto mechanic."
- Measurable Annual IEP Goal example:  
"Bob will increase his reading skills, using technical manuals relating to auto mechanics, from a 5<sup>th</sup> grade level to a 6<sup>th</sup> grade level by (date) as measured by curriculum-based assessments."

**OSPI Examples: Non-compliant Post-secondary Goals**

- "Bob will attend a job fair on the college campus."
- "Sue hopes to work with young children someday."
- "Sue should continue to use her facial expressions as a reliable mode to communicate her preferences as well as practice increasing her communication skills via eye gaze at concrete objects."

**Transition Assessments: OSPI Training Module 2008**

- Transition assessment is the ongoing process of collecting data on the individual's needs, preferences, and interests as they relate to the demands of current and future working, educational, living, and personal and social environments. Assessment data serves as the common thread in the transition process and forms the basis for defining goals and services to be included in the IEP.

**Examples of Transition Assessment Sources: OSPI Training Module 2008**

- Formal interest/aptitude tests and/or surveys,
- Quarterly or semester grades throughout high school,
- Current psychological assessment data indicating areas of strength and weakness,
- College entrance exam scores if applying to 4-year colleges,
- Informal interviews with students,

**Examples of Transition Assessment Sources: OSPI Training Module 2008 (cont'd)**

- Student completion of interest inventories,
- Questionnaires to establish student interests and preferences,
- Functional vocational evaluations,
- Interviews with the family, and
- Student observations.

**Transition: Courses of Study**

- OSPI's Training Module 2008 definition: "A multi-year description of coursework to achieve the student's desired post-school goals, from the student's current to anticipated exit year."
- OSPI's IEP Review Form asks:
  - Are there transition services in the IEP that focus on improving the academic and functional achievement of the child to facilitate their movement from school to post-school outcomes?
  - Do the transition services include courses of study needed to assist student in reaching post secondary goal(s) (outcomes)?

**OSPI Examples: Compliant Courses of Study/Services**

- The box on the IEP is checked showing that the student will engage in the school district's standard College Preparatory courses of study during the next 4 years of high school.
- "For Bob's upcoming 12th grade year the courses listed include Psychology, English 12, Algebra II, Band, Phys Ed, Work Experience, Child Development, and Resource Room."
- Courses are listed identifying what the student will take each year of high school.

**OSPI Examples: Non-compliant Courses of Study/Services**

- The IEP lists the student's courses for the current year: English II, Algebra I, Physical Science, Government, and Theatre Arts II.
- The box is checked on the IEP indicating that the student is completing the coursework for a standard diploma.
- "The student took wood shop, auto body repair, and metal working last year."
- "Bob attends the self-contained classroom for students with developmental disabilities who are older than 18."

**Required Elements of the IEP: Miscellaneous**

- Consideration of special factors
  - The team must also, as appropriate, consider a student's behavior, special sensory needs, second language issues, and assistive technology. 34 C.F.R. § 300.324(a)(2).
  - Beginning at least one year before a student reaches age 18, a statement that the student has been informed of his or her rights under Part B that will transfer to the student on reaching the age of majority. 34 C.F.R. § 300.320(c).

**Required Elements of the IEP: Miscellaneous (cont'd)**

- Physical Education
  - Unless the student is participating in regular P.E., or enrolled full time at a separate facility, any specially designed P.E. must be described in the IEP. 34 C.F.R. § 300.108.
- Describe any required aversive interventions.
  - *May be required as a matter of state regulations, but not under IDEA statute.*
- Describe extended school year services, if needed. 34 C.F.R. § 300.106.

**Extended School Year Services**

- Federal regulation requires that ESY services meet state standards. 34 CFR § 300.106(b)(2).
- In Washington State, the regulation continues to indicate that ESY services are those necessary beyond normal school year to provide FAPE, but adds:
  - Purpose of ESY is maintenance of student's learning skills or behaviors, not teaching new ones; and
  - Districts are to develop criteria for determining ESY, including regression and recoupment time based upon documented evidence or professional judgment considering nature and severity of disability, rate of progress and emerging skills. WAC 392-172A-02020.

**ESY (cont'd)**

**Practical consideration**

- If the team is unsure whether the student requires ESY services, it can be helpful to:
  - Identify those factors the team will focus on during the year as indicators as to whether ESY is necessary;
  - Plan to meet again to review the accumulated data; and
  - Schedule the meeting with sufficient time before the end of the school year to develop an ESY program.

**A.d.; L.d. v. Sumner School District, Wn. App. (2007)**

- Washington State Court of Appeals decided that district had ultimate duty to determine what additional data was needed to determine if ESY was needed to provide the student FAPE.
  - New Horizon staff, who currently served student, said he needed ESY, but would not provide supporting data.
  - District could not use lack of data from New Horizon or parents about regression/recoupment as reason to deny ESY, particularly where student had received ESY in previous years.

# Presenting the IEP

The IDEA "imposes upon the school district the duty to conduct a meaningful meeting *with* the appropriate parties."

*W.G. v. Bd. of Trustees of Target Range Sch. Dist.*,  
960 F.2d 1479, 1485 (9th Cir. 1992) (emphasis added).

**The IEP Team**

- Parents;
- Not less than one regular education teacher of such child (if the child is, or may be, participating in the regular education environment);
- Not less than one special education teacher, or where appropriate, not less than one special education provider of such child;
- An LEA representative with appropriate qualifications and knowledge;
- An individual who can interpret the instructional implications of evaluation results;
- At parent or LEA's discretion, other individuals who have knowledge or special expertise regarding the child, including related services personnel as appropriate.
  - This must include Part C representative and transition service agency representative, when appropriate, and when consented to by parents.

549 20 U.S.C. §1414(d)(1)(B); 34 C.F.R. §200.22 and §200.321

**The IEP Team (cont'd)**

- If appropriate, the student with a disability.
  - The student must be invited to attend if the IEP meeting will involve discussion of postsecondary goals and necessary transition services.
  - If transition will be discussed, with the consent of the parents or adult student, the district must invite a representative of any other agency that is likely to be responsible for providing or paying for transition services.
  - If the student does not attend an IEP meeting related to transition services, the district must take other steps to ensure that the student's preferences and interests are considered.

**Procedural Error in IEP Team Composition**

- ***R.B. v. Napa Valley Unified School Dist.***, 496 F.3d 932 (9<sup>th</sup> Cir. 2007)
  - District did not violate IDEA's 1997 procedural requirements when it invited student's former kindergarten teacher (who had taught student 6 years prior) to participate as general education teacher at student's IEP team meeting
    - Court distinguished prior decisions as interpreting pre-1997 IDEA requirements, and thus no longer applicable.

**IEP TEAM – STATUTORY CHANGES**

- Pre-1997
  - Must include ***“the teacher”*** of the child (*current teacher* or teacher from proposed placement, depending on whether child is receiving IDEA services at the time of meeting)
- 1997-2004
  - Must include ***at least one regular education teacher*** of the child, if the child is, or *may be*, participating in the regular education environment;
  - ***at least one special education teacher*** of the child, or if appropriate, at least one special education provider of the child
- 2004-current
  - Must include ***not less than one regular education teacher*** of the child, if the child is, or may be, participating in the regular education environment;
  - ***not less than one special education teacher*** of the child, or where appropriate, not less than one special education provider of the child.

***R.B. v. Napa Valley Unified Sch. Dist.* (cont'd)**

- Participation of a regular education teacher
    - “We conclude that, after the 1997 amendments, the IDEA no longer requires the presence of the child's current regular education teacher on the IEP team.”
- R.B.*, 496 F.3d at 939.

***R.B. v. Napa Valley Unified Sch. Dist.* (cont'd)**

- Participation of a special education teacher
  - *R.B.* found the district violated IDEA's 1997 procedural requirements because it had a ***special education teacher*** who had never taught student, rather than student's current teacher from the private residential placement (unilaterally selected by parents) on IEP team.
    - District's special education teacher did not qualify as “*at least one special education teacher of the child*” because the record did not demonstrate the teacher had ever taught the student.

**R.B. v. Napa Valley Unified Sch. Dist. (cont'd)**

- Failure to have at least one sped teacher of student was *harmless error*, because district correctly found student ineligible for services under IDEA.
- Court noted that procedural errors in the composition of the IEP Team could be cured through the administrative hearing process.
  - But testimony of the Team members who did not participate must allow hearing officer/courts to find their participation would not have changed the original Team's determination.

**Additional Pre-IEP Meeting Activities**

- Preplanning for the actual Team meeting:
  - Utilize appropriate pre-planning to assist district staff in identifying potential issues and how team members might effectively discuss contentious issues during the Team meeting.
  - Such strategies can include preparing agendas, identifying notetakers, meeting facilitators, etc., as discussed further below.

**IEP Team Meetings –****Other Practical Considerations (cont'd)**

- Example of the pre-IEP meeting dispute
  - Disagreement between Divorced Parents
    - Under IDEA, determinations of parental authority with respect to a child's educational decision-making is general a matter left to State law.

**IEP Team Meetings –****Other Practical Considerations (cont'd)**

- Pre-IEP meeting dispute example (cont'd)
  - Absent a valid court order specifying that a parent's parental rights have been terminated or parent is otherwise restricted from access to his/her child, districts should carefully consider any request to exclude a person claiming to be a parent from the IEP Team meeting process.
    - Granting such requests may result in excluded parent claiming a procedural violation in the composition of child's IEP Team.
    - Note that the statute defines the mandatory IEP Team members as including "parents of a child with a disability," rather than an individual parent or custodial parent. 20 U.S.C. §1414(1)(B)(i).

**IEP Team Meetings –****Other Practical Considerations (cont'd)**

- Parental Disagreement with IEP Team Member Participation –
  - Disagreement with Specific School District Staff
    - Staffing is generally not subject to challenge by parents, if district-selected IEP Team members meet the state's minimum qualifications. *See, e.g., In re Student with a Disability*, 44 IDELR 86 (SEA WA, 2005) (personnel decisions are outside authority of hearing officers under the IDEA).

**IEP Team Meetings –****Other Practical Considerations (cont'd)**

- Nonetheless, it may be useful to consider whether different staff members who are knowledgeable about student and his/her disability might more effectively serve on the student's IEP Team.
- Consider using the procedures under 34 C.F.R. §300.321(e) to not invite and/or excuse a contested member's participation from a particular IEP Team meeting.

**IEP Team Member Participation**

Three Key Changes for Attendance and Participation at IEP Team Meetings under IDEA 2004

1. A member of the IEP Team is no longer required to attend an IEP meeting, in whole or in part, if:
  - parent and the LEA *agree*, in writing, that the attendance of such member is not necessary because that member's area of the curriculum or related services is not being modified or discussed in the IEP Team meeting.

**IEP Team Member Participation (cont'd)**

2. A member of the IEP Team may be *excused* from attending an IEP Team meeting, in whole or in part, when the meeting involves a modification to or discussion of that member's area of the curriculum or related services, if:
  - the parent and the LEA consent, in writing, to the excusal; and
  - the excused team member submits, in writing to the parent and the IEP Team, input into the development of the IEP prior to the meeting.

See 20 U.S.C. §1414(d)(1)(C); 34 C.F.R. § 300.321(e).

**IEP Team Member Participation (cont'd)**

3. In making changes to a child's IEP after the annual IEP Team meeting for a school year, the parent(s) and the LEA may *agree not to convene an IEP Team meeting* for the purposes of making such changes, and instead may develop a written document to amend or modify the child's current IEP, provided that:
  - If changes are made to the child's IEP, the LEA must ensure that the child's IEP Team is informed of those changes; and
  - Upon request, parent(s) shall be provided with a revised copy of the IEP with the amendments incorporated.

See 20 U.S.C. §1414(d)(3)(D) and (F); 34 C.F.R. §300.324(a)(4) and (6).

**IEP Team Member Participation –****Practical Considerations**

- Determining whether an IEP Team member may not participate in a team meeting:
  - Are you sure that a particular subject area within that team member's area of expertise will not be discussed at the meeting?
    - If so, do you have a form to document the agreement between the district and parent that the member(s) need not attend?

**IEP Team Member Participation –****Practical Considerations (cont'd)**

- What if, despite written agreement, issues related to the absent member's area of expertise come up during the meeting?
  - Can you continue the meeting?
  - Should you adjourn and reconvene at a later date with the member?
- Is it a better practice to ensure that the entire team is present at each meeting?

**IEP Team Member Participation –****Practical Considerations (cont'd)**

- Should you excuse a member whose input will be reviewed during the IEP Team meeting:
  - What is the difference between "agreement" to not invite a member and "consent" by parents to excuse a member's attendance?

**IEP Team Member Participation –  
Practical Considerations (cont'd)**

- Consent means:
    - Parent has been fully informed of all relevant information (in his or her native language, or other mode of communication)
    - Parent understands and agrees in writing to carry out the activity for which consent is provided and describes that activity, and lists the records, if any, that will be released and to whom; and
    - Parent understands the granting of consent is voluntary and may be revoked at any time
- 34 C.F.R. § 300.9.

**IEP Team Member Participation –  
Practical Considerations (cont'd)**

- What if parents do not consent to allow transition services agency rep's attendance?
  - Must a district invite the representative and seek parental consent for participation?
  - Can the team plan and develop postsecondary goals and transition services without the participation of transition services agency at a team meeting?

**IEP Team Member Participation –  
Practical Considerations (cont'd)**

- Consider:
  - Discussing need for transition services agency rep at the meeting with parent(s).
  - If no consent – document in PWN.
  - If no consent – attempt to obtain written information from the transition services agency BUT without relaying personally identifiable information about the student.

**IEP Team Member Participation –  
Practical Considerations (cont'd)**

- Amending an IEP without convening an IEP Team meeting to review the proposed amendments:
  - IEP Amendment form documents agreed upon changes and consent to amendment without IEP meeting.
  - At a minimum, parents and LEA rep sign.
  - Form is circulated to the entire IEP Team for signatures to reflect knowledge and/or approval of the amendment(s).
  - Consider whether to instead provide parents and IEP Team a copy of a revised IEP incorporating all of the written amendments.

**IEP Team Member Participation –  
Practical Considerations (cont'd)**

- Amending an IEP without a Meeting
  - Districts should also use PWN, as described in 34 C.F.R. §300.503, to fully document:
    - why the change was proposed,
    - why the change was made,
    - a description of each evaluation procedure, assessment, record or report used by district as basis for the changes,
    - parents' rights to procedural safeguards,
    - other options the school district and parents considered and rejected and why options were rejected, and
    - description of any other factors relevant to agreed-upon change.

**Managing IEP Team Group Dynamics**

- Managing IEP Team Group Dynamics
  - During IEP Team meetings, challenges can arise in managing the group dynamics and maintaining professional and positive discussions. What are some useful strategies?

**Managing IEP Team Group Dynamics (cont'd)**

- Anticipate reactions and how to best deliver difficult messages:
  - Anticipate when it is likely that a difficult conversation may occur, e.g., a disputed evaluation finding and/or placement discussion, in advance.
  - Consider who to invite: a facilitator, a family friend, an attorney?
  - Consider when telephone conferencing or other alternative means will facilitate a member's participation.

**Managing IEP Team Group Dynamics (cont'd)**

- Set expectations for a positive meeting:
  - Consider using agendas to identify issues to be discussed and to provide the parties an opportunity to schedule additional discussions, if necessary.
  - If necessary, remind participants of the mutual expectation for professional and civil communications and interactions.

**Managing IEP Team Group Dynamics (cont'd)**

- Foster positive and productive discussions during the meeting:
  - Pick your best facilitator to run the meeting.
  - Take breaks to allow the participants to cool off or separately regroup mid-meeting and/or refocus on the priorities for that meeting.
  - Remind participants (always) that the focus is on the student and student's needs.

**Managing IEP Team Group Dynamics (cont'd)**

- Redirect misconduct during the meeting:
  - If participants engage in disruptive, unprofessional, or hostile conduct, be prepared to enforce reasonable expectations.
  - If necessary, remind participants that disruptive team members may be excused from the meeting and may cause the meeting to be adjourned until a later date.

**Post-IEP Team Meeting Actions**

- Provide parents a prior written notice, along with copy of completed IEP, prior to implementation of services.
- Ensure completed IEP is accessible to each of the student's teachers and service providers. Inform those with responsibility for implementation of their specific responsibilities under the IEP and of the specific accommodations, modifications, and supports to be provided.
- Monitor continued implementation of the IEP.

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