Indiana Part B
State Performance Plan

As required by 20 U.S.C. 1416 Sec. 616(b)
of the
Individuals with Disabilities Education Act

Submitted to the United States Department of Education,
Office of Special Education Programs

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Overview of the Part B State Performance Plan (SPP)

The Indiana Department of Education (IDOE) serves the citizens of Indiana by fulfilling its statutory responsibilities, implementing the policies of the Indiana State Board of Education (SBE), and supporting the priorities of the State Superintendent of Public Instruction. The IDOE focuses its resources to promote higher standards and greater levels of achievement for all students. The Office of Special Education functions as an integral component of the IDOE, in ensuring the free and appropriate public education (FAPE) in the least restrictive environment (LRE) of all students with disabilities within the state.

The Office of Special Education provides leadership and state-level support for students with disabilities from ages 3-21. The Office of Special Education also ensures that Indiana is in compliance with the Individuals with Disabilities Education Improvement Act (IDEA), through monitoring of special education programs, oversight of community and residential programs, provision of mediation and due process rights and sound fiscal management.

In 2004, the United States (US) Congress reauthorized IDEA as IDEA 2004. Inclusive in IDEA 2004 is the mandate that the US Secretary of Education monitor states in three priority areas, including: the provision of a FAPE in the LRE, state exercised general supervision, and disproportionate representation; this monitoring is done through consideration of 20 indicators. [See 20 U.S.C. 1416(a)(3)(A)-(C)].

Additionally, IDEA 2004 requires each state to submit monitoring reports, the SPP and the Annual Performance Report (APR). The SPP is effective through FFY 2012 (SY 12-13) and includes an overview of each of the 20 indicators, a description of the system or process, baseline data and discussion of that data for each indicator, measurable and rigorous targets for all six years, and improvement activities (including timelines and resources for implementation). States were required to submit their SPPs for the first time no later than December 3, 2005. At that time, Indiana submitted its original SPP, which was approved by the Office of Special Education Programs (OSEP).

Due to an innovative restructuring and reorganization of Indiana's monitoring system during the summer and fall of 2007 and summer of 2009, Indiana's SPP has been revised and is now being resubmitted in order to provide the most updated articulation of the monitoring process. A major component of this restructuring and reorganization process is an awareness of the magnitude of responsibility associated with a special education monitoring system. A number of notable and significant changes to the monitoring process have been made. The monitoring team consists of a broad range of staff members at the IDOE with varied backgrounds and expertise, each focused on a smaller number of individual indicators, while working collaboratively towards a unified, encompassing approach to general supervision. Additionally, careful consideration has been made regarding the activities and strategies for assisting Indiana schools in overall improvement in areas of education of students with disabilities, including a problem solving process that assists local educational agencies (LEAs) in data based decision making that impacts student outcomes. Presently the Office of Special Education is exploring the possibility of collaborative monitoring with other IDOE divisions, including Title I, which already conducts regular on-site monitoring activities. A collaborative effort between the Office of Special Education and Title I also supports a statewide initiative called 'One Plan,' which is an effort to combine a wide array of required LEA plans currently collected by a number of IDOE divisions for different purposes into one unified plan to be submitted to the IDOE that encompasses all the relevant divisions' requirements. More details regarding the IDOE 'One Plan' can be found in Indicator 20 of this SPP.

With the growing concern for meeting all students' needs, Response to Intervention (RTI) is being implemented by many states across the nation. The IDOE has set a priority to establish an Integrated and Focused System (IFS) to support student success. The IFS is a service delivery approach that guides educators to anticipate, recognize and document student learning, and to provide timely, well-targeted and effective instruction. This initiative, which ultimately will result in a complete change in how the department will do business, has three broad goals:

- Integrate and assemble activities with all stakeholders into an integrated focused system to support the success of all children;
- Advance the current P-20 data system/toolbox initiative to further develop the technological capacity to screen, evaluate and judge the effectiveness of a unified system for Indiana; and
- Develop a comprehensive plan for providing technical assistance and training for all professionals, parents, and community members to ensure the on-going development of all stakeholders.

In addition to the progress being made with the updated monitoring process, the IDOE 'One Plan', and the IFS approach, the IDOE has a Technology Initiative, which was recently awarded $5.2 million in federal funding. This Initiative supports the design and implementation of Project P-20, a statewide longitudinal data system that will enhance the state's ability to manage, analyze and use education data to drive student achievement by linking a wide assortment of data currently collected in individualized pieces into a single system. More details regarding the IDOE's Technology Initiative can be found in Indicator 20 of this SPP.

Development Process
During the development of this SPP, the Office of Special Education's staff members attended and participated in a number of federally sponsored and supported technical assistance events, including but not limited to:

- Attended North Central Regional Resource Center (NCRRC) SPP/APR Conferences
- Participation in OSEP Monthly TA calls
- Regular communication with OSEP state contacts
- Regular communication with NCRRC state contacts and Technical Assistance (TA) Centers

In addition to capitalizing on these federal resources, the IDOE is committed to ongoing stakeholder input and involvement. In the course of this development, input was sought from parent groups, LEAs, other state agencies, and institutions of higher education. The IDOE will continue to gain stakeholder input in an advisory capacity by maintaining existing relationships in addition to considering new ways in which to incorporate more stakeholder involvement.

Pursuant to the OSEP instructions, the IDOE, in collaboration with the State Advisory Council (SAC) has gathered broad stake holder input and extended all SPP targets through FFY 2012 (SY 12-13).

Public Reporting
The IDOE will publicly disseminate this SPP by publishing it on the Office of Special Education's website at http://www.doe.in.gov/achievement/individualized-learning/monitoring.

Indicator 1 of the Part B State Performance Plan (SPP)

Monitoring Priority:	**Free and Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE)**

Indicator 1: Percent of youth with IEPs graduating from high school with a regular diploma. [1]
(20 U.S.C. 1416 (a)(3)(A))

Measurement: States must report using the graduation rate calculation and timeline established by the Department under the ESEA.[2]

Overview of the State Performance Plan (SPP) Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
The OSEP APR response letter dated October 14, 2005 required that the State must provide comparable data for children with and without disabilities in reporting graduation and drop-out rates.

Indiana's requirements for earning and graduating with a diploma are the same for all students. All students must meet state and local graduation requirements, have earned a minimum of 40 credits (though LEAs may require more credits to graduate) in required and elective courses, and have met the Graduation Qualifying Examination (GQE) requirement. The GQE may be met in one of three ways, either by passing the GQE test, by meeting the Core 40 waiver requirement, or through the alternate documentation process that ensures students have mastered at least the ninth grade academic standards and met other alternate documentation requirements such as attendance rate and grades. The teacher of record and case conference committee (CCC) are involved in determining whether a student with a disability has met the GQE requirement. Graduation requirements are specified in Indiana Code at IC 20-32-4 Graduation Requirements. These are:

Sec. 1. A student must meet:
- (1) the academic standards tested in the graduation examination; and
- (2) any additional requirements established by the governing body of the student's school corporation; to be eligible to graduate.
- (3) A waiver or alternate documentation process is available for all students who meet all graduation requirements except passing the GQE. This process is described in Section 5 of IC 20-32-4:

Sec.5.: (a) This section applies to a student who is a child with a disability (as defined in IC 20-35-1- 2).
(b) If the student does not achieve a passing score on the graduation examination, the student's case conference committee may determine that the student is eligible to graduate if the case conference committee finds the following:
- (1) The student's teacher of record, in consultation with a teacher of the student in each subject area in which the student has not achieved a passing score, makes a written recommendation to the case conference committee. The recommendation must:
  - (A) be concurred in by the principal of the student's school; and
  - (B) be supported by documentation that the student has attained the academic standard in the subject area based upon:
    - (i) tests other than the graduation examination; or
    - (ii) classroom work.
- (2) The student meets all of the following requirements:

[1] Definition changed with the submission of the Indiana Part B FFY 2008 (SY 08-09) APR.
[2] Measurement changed with the submission of the Indiana Part B FFY 2008 (SY 08-09) APR.

(A) Retakes the graduation examination in each subject area in which the student did not achieve a passing score as often as required by the student's individualized education program.
(B) Completes remediation opportunities provided to the student by the student's school to the extent required by the student's individualized education program.
(C) Maintains a school attendance rate of at least ninety-five percent (95%) to the extent required by the student's individualized education program with excused absences not counting against the student's attendance.
(D) Maintains at least a "C" average or the equivalent in the courses comprising the credits specifically required for graduation by rule of the board.
(E) Otherwise satisfies all state and local graduation requirements.

Graduation Rate: The Cohort Survival Rate
The official graduation rate used by the IDOE is based on a calculation known as the cohort survival rate. It was adopted as an official rule by the SBE in the Indiana Administrative Code (511 IAC 6.1-1.2). This method was developed from a federal study published to help create consistency among statistical methods.

The graduation rate is determined every year at each high school by figuring the percentage of students dropping out at each of the four grade levels during that same year. The definition of dropout was changed in 1996. As a result, students are no longer counted as dropouts if they leave during any given school year but return the following Fall. It is estimated that this change increased the State's statewide graduation rate by approximately 2%.

Computing the Current Graduation Rate
Each of the four dropout rates for Grades 9, 10, 11, and 12 are subtracted from 1.0, and then the rates are multiplied by each other and by 100 to create that year's graduation rate.

For example, if a sample year's dropout rates from grades 9 through 12 are 5 percent, 3 percent, 2 percent, and 2 percent, then the current year's graduation rate is figured by multiplying .95 x .97 x .98 x .98 x 100, resulting in an example graduation rate of 88.5%.

New Graduation Rate Formula: 2006[3]
TO CALCULATE THE DENOMINATOR FOR THE GRADUATION COHORT RATE:
STEP ONE: Determine the grade 9 enrollment at the beginning of the reporting year three years before the reporting year for which the graduation rate is being determined.

(EXAMPLE: If the graduation year being determined is 2008-2009, the grade 9 enrollment from 2005-2006 would be calculated for each school).

STEP TWO: Add the number determined under step one, and:
- The number of students who have enrolled in the high school after the date on which the original cohort (STEP ONE) was determined and have the same expected graduation year

(EXAMPLE): A student enrolls in the school as a 10th grader in 2006-2007. The student's expected graduation year is 2008-2009. The student is added to the cohort.

STEP THREE: Subtract from the sum (STEPS ONE and TWO) the number of students who have left the cohort for any of the following reasons:
- Transfer to another public or nonpublic school
- Removal by the student's parents to provide homeschooled instruction
- Withdrawal because of a long term medical condition or death
- Detention by a law enforcement agency or the department of correction

[3] With submission of FFY 2008 APR, added this calculation to add clarity to SPP.

- Placement by a court order or the department of child services
- Enrollment in a virtual school
- Leaving school, if the student attended school in Indiana for less than one school year and the location of the student cannot be determined
- Leaving school, if the location of the student cannot be determined and the student has been reported to the Indiana clearinghouse for information on missing children and missing endangered adults
- Withdrawing from school before graduation, if the student is a high ability student (defined in IC 20-36-1-3) who is a full-time student at an accredited institution o higher education during the semester in which the cohort graduates.

All of these types of students do not "count against" a school's graduation rate and are removed from the denominator.

TO CALCULATE THE NUMERATOR FOR THE GRADUATION COHORT RATE:
STEP FOUR: Determine the total number of students from STEP ONE and STEP TWO who have graduated during the current reporting year OR a previous reporting year (early graduates).

TO CALCULATE THE GRADUATION COHORT RATE:
STEP FIVE: Divide the numerator (number of graduates) by the denominator (number in the cohort, minus students who were removed due to reasons described in STEP THREE).

TIPS:
- A student never "switches" cohorts; the student remains with the same cohort throughout.
- Early graduating students don't "count against" a school district or school—instead they are counted for the school district/school in the cohort year that the student would have graduated.

Baseline Data for FFY 2004 (SY 04-05):
The data and data sources used to calculate the percent for all students graduating with a diploma during FFY 2004 (SY 04-05) and the percent of youth with disabilities graduating with a diploma during FFY 2004 (SY 04-05) are as follows:

All Students (General Education and Special Education)[4]

Enrollment[5] 11/15/05	Number
FFY 2004 (SY 04-05) Grade 9	88,079
FFY 2004 (SY 04-05) Grade 10	80,642
FFY 2004 (SY 04-05) Grade 11	73,481
FFY 2004 (SY 04-05) Grade 12	66,643
Dropout[6]	**Number**
FFY 2004 (SY 04-05) Grade 9	1,183
FFY 2004 (SY 04-05) Grade 10	1,724
FFY 2004 (SY 04-05) Grade 11	2,320
FFY 2004 (SY 04-05) Grade 12	2,491

[4] http://mustang.doe.state.in.us/TRENDS/grad_sub.cgm?year=2005&pub=1
[5] Data source: IDOE Educational Information Systems (EIS) preliminary data
[6] Data source: EIS preliminary data, 11/15/05

NOTE: Three high schools had not reported FFY 2004 (SY 04-05) dropout data as of November 15, 2005. These three high schools are small, represent less than .5% of grade 9-12 enrollment, and overall results for general education graduation and dropout rates are minimally affected. See Additional Note below.

ADDITIONAL NOTE: Indiana's final graduation rate calculation, which includes the 3 above LEAs, for FFY 2004 (SY 04-05), State Average, is 89.9%.

Special Education Students

Enrollment[7]	Number
FFY 2004 (SY 04-05) Grade 9 (age 15)	12,391
FFY 2004 (SY 04-05) Grade 10 (age 16)	11,033
FFY 2004 (SY 04-05) Grade 11 (age 17)	9,477
FFY 2004 (SY 04-05) Grade 12 (age 18-21)	7,906
Dropouts[8]	**Number**
FFY 2004 (SY 04-05) Grade 9 (age 15)	394
FFY 2004 (SY 04-05) Grade 10 (age 16)	743
FFY 2004 (SY 04-05) Grade 11 (age 17)	998
FFY 2004 (SY 04-05) Grade 12 (age 18-21)	805

Data Sources: The data sources used include the following:
Special education enrollment for grades 9-12 from page 19 of the FFY 2004 (SY 04-05) Statistical Report.
Special education dropouts for grades 9-12 from page 8 of the FFY 2004 (SY 04-05). Exit Report Total enrollment FFY 2004 (SY 04-05) for grades 9-12 from EIS (prelim data 11/15/05).
Total dropouts FFY 2004 (SY 04-05) for grades 9-12 from EIS (prelim data 11/15/05).

Students with disabilities graduating with a diploma during FFY 2004 (SY 04-05) will be compared to all students graduating with a diploma during FFY 2004 (SY 04-05).

Discussion of Baseline Data:
Pages 9 and 10 of the IDOE's APR for FFY 2004 (SY 04-05) describe Indiana's official graduation rate calculation as follows:

Using the data provided above in addition to Indiana's official graduation calculation (described above) for all graduates and for special education graduates, per the requirements for this indicator and the APR response letter dated October 14, 2005 requiring comparable calculations and data, the results are:

Graduation rate for all students for FFY 2004 (SY 04-05) (data as of 11-15-05)	90.1%
Graduation rate for all students for FFY 2004 (SY 04-05), final figures	89.9%
Graduation rate for special education for FFY 2004 (SY 04-05)	72.7%

[7] Data source: page 19, SY 04-05 Statistical Report
[8] Data source: Page 8, 04-05 Exit Report

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	Special education graduation rate, with diploma, will be ≥ 73% using the calculation in effect for FFY 2004 (SY 04-05). Graduation targets will be re-calibrated using the new formula.
2006 (SY 06-07)	Special education graduation rate, with diploma, will be ≥ 74% using the calculation in effect for FFY 2004 (SY 04-05). Graduation targets will be re-calibrated using the new formula.
2007 (SY 07-08)	Special education graduation rate, with diploma, will be ≥ 75% using the calculation in effect for FFY 2004 (SY 04-05). Graduation targets will be re-calibrated using the new formula.
2008[9] (SY 08-09)	Special education graduation rate, with diploma, will be one percent improvement over the prior year with the goal of ≥ 95% as established under ESEA and defined under 511 IAC 6.2-7-8.[10]
2009 (SY 09-10)	Special education graduation rate, with diploma, will be one percent improvement over the prior year with the goal of ≥ 95% as established under ESEA and defined under 511 IAC 6.2-7-8.[11]
2010 (SY 10-11)	Special education graduation rate, with diploma, will be one percent improvement over the prior year with the goal of ≥ 95% as established under ESEA and defined under 511 IAC 6.2-7-8.[12]
2011 (SY 11-12)	Special education graduation rate, with diploma, will be one percent improvement over the prior year with the goal of ≥ 95% as established under ESEA and defined under 511 IAC 6.2-7-8.[13]
2012 (SY 12-13)	Special education graduation rate, with diploma, will be one percent improvement over the prior year with the goal of ≥ 95% as established under ESEA and defined under 511 IAC 6.2-7-8.[14]

Improvement Activities/Timelines/Resources No Longer Active:

Activity	Timelines	Resources
INDEPENDENCE, an original collection of 15 articles of interest and importance to secondary level students with disabilities. **Discontinued as of FFY 2008 (SY 08-09).**	FFY 2005 (SY 05-06) through FFY 2010 (SY 10-11)	The Office of Special Education, contributing authors, local directors of special education.
Indiana General Assembly has passed Graduation Legislation including School Flex and Fast Track diploma options. **Completed as of FFY 2008 (SY 08-09).**	FFY 2005 (SY 05-06) through FFY 2010 (SY 10-11)	Indiana General Assembly, constituents, IDOE legislative liaison.

[9] Per OSEP guidance, targets will be revised to align with targets for department under ESEA with submission of FFY 2008 submission of Annual Performance Report.
[10] For high schools, graduation rate as determined under Indiana code 511 IAC 6.2-2.5-9 , for classes of students who expect to graduate in the 2005-2006 school year and subsequent school years; that increases toward a rate of ninety-five percent (95%)
[11] For high schools, graduation rate as determined under Indiana code 511 IAC 6.2-2.5-9 , for classes of students who expect to graduate in the 2005-2006 school year and subsequent school years; that increases toward a rate of ninety-five percent (95%)
[12] For high schools, graduation rate as determined under Indiana code 511 IAC 6.2-2.5-9 , for classes of students who expect to graduate in the 2005-2006 school year and subsequent school years; that increases toward a rate of ninety-five percent (95%)
[13] For high schools, graduation rate as determined under Indiana code 511 IAC 6.2-2.5-9 , for classes of students who expect to graduate in the 2005-2006 school year and subsequent school years; that increases toward a rate of ninety-five percent (95%)
[14] For high schools, graduation rate as determined under Indiana code 511 IAC 6.2-2.5-9 , for classes of students who expect to graduate in the 2005-2006 school year and subsequent school years; that increases toward a rate of ninety-five percent (95%)

Activity	Timelines	Resources
Post-School Follow-up Study data will include data and analysis. **Discontinued as of FFY 2008 (SY 08-09); now reported in Indicator 14.**	FFY 2005 (SY 05-06) through FFY 2010 (SY 10-11)	The Office of Special Education, students who exited, local directors of special education, Post-School Follow-up Project
ISTEP+ Program Manual updates on graduation requirements, testing accommodations, and waiver/alternative documentation process. **Discontinued as of FFY 2008 (SY 08-09).**	FFY 2005 (SY 05-06) through FFY 2010 (SY 1-11)	Center for Assessment, input from field, the Office of Special Education.
Essential Tools, dropout prevention strategies from National Center for Secondary Education and Transition provided to LEAs. **Completed as of FFY 2006 (SY 06-07).**	FFY 2006 (SY06-07)	The Office of Special Education
Analysis of monitoring data to identify best practices. **Discontinued as of FFY 2008 (SY 08-09).**	FFY 2006 (SY 06-07) through FFY 2010 (SY 10-11)	The Office of Special Education local directors
Implementation of new graduation rate formula to be used statewide. **Completed as of as of FFY 2008 (SY 08-09).**	FFY 2006 (SY 06-07) through FFY 2010 (SY 10-11)	IDOE will calculate on statewide, district wide and specific high school basis.
Realigned Vision Statement **Completed as of FFY 2008 (SY 08-09).**	FFY 2008 (SY 08-09)	The IDOE realigned its Vision statement to include the goal that 90% of all students in Indiana will graduate from high school by 2012.
Participation in the Indiana High School Summit an annual IDOE sponsored summit promoting innovative High School reforms. **Discontinued as of FFY 2011 (SY 11-12) .**	FFY 2005 (SY 05-06) through FFY 2012 (SY 12-13)	IDOE, LEAs, stakeholders

Improvement Activities/Timelines/Resources Ongoing:

Activity	Timelines	Resources
Foster Mentoring/Tutoring relationships such as the Best Buddies project.	FFY 2005 (SY 05-06) through FFY 2012 (SY 12-13)	Best Buddies state office, support from IDOE Part B funds, articles promoting Best Buddies disseminated by IDOE

Activity	Timelines	Resources
The transition school to work Interagency Coordinating Council, (known as the "290 Committee") address statewide issues as they relate to transition. **Added to Indicator 1 as of FFY 2011 (SY 11-12).**	FFY 2006 (SY 06-07) through FFY 2012 (SY 12-13)	Family Advocates, the IDOE, Vocational Rehabilitation Services, Mental Health and Addictions, Developmental Disabilities, Workforce Development, Corrections, Social Security, Indiana and Ball State Universities, Indiana State Improvement Grant, Community Rehabilitation Provider, Special Education and postsecondary follow-up consultant .
Dropout Prevention Grant Proposal Competition **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) Through FFY 2010 SY 12-13)	IDOE Office of College and Career Readiness(CCR)
Alternative Education Grant Proposal **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) Through FFY 2010 SY 12-13)	IDOE CCR
Define policies and procedures for data collection and reporting. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education and Office of Data and Accountability

Indicator 2 of the Part B State Performance Plan (SPP)

Monitoring Priority: Free and Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE)

Indicator 2: Percent of youth with IEPs dropping out of high school.[15]

Measurement: States must report using the dropout data used in the ESEA graduation rate calculation and follow the timeline established by the Department under the ESEA.[16]

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
The same data and data sources used for determining graduation rate referenced in Indicator 1 are used for determining the drop-out rate in this indicator. The method of determining the drop-out rate for students with and without disabilities must be the same so as to provide comparable data.

The Synthetic Cohort Dropout Rate uses the same raw data as is used in Indicator #1 to calculate the Graduation Rate. Below is a description of the formula to determine the Synthetic Cohort Dropout Rate[17]:

The Total Student Dropout Rate For FFY 2004 (SY 04-05) (Based On Data As Of 11-15-05)	9.9%
The Final Total Student Dropout Rate For FFY 2004 (SY 04-05)	10.1%
The Special Education Dropout Rate For FFY 2004 (SY 04-05)	27.3%

Baseline Data for FFY 2004 (SY 04-05):
The calculation begins by identifying the enrollment for grades 9, 10, 11, and 12 and identifying the number of students dropping out at each of these grades. The number of students dropping out at each of these grades is divided by the enrollment. This will result in a percentage for each of the four grade levels. The percentage for each grade level is then subtracted from 1.00 resulting in a "retention rate" for each grade. Each of the four grade's retention rates are then multiplied resulting in a synthetic cohort graduation rate. The synthetic cohort graduation rate is then subtracted from 1.00 and the resulting number is the synthetic cohort dropout rate in percentage.

The OSEP APR response letter dated October 14, 2005 requires the State to provide data in the SPP that includes comparable data for students with and without disabilities for graduation and drop-out rates. The data and data sources used to calculate the percent for all students dropping out during the FFY 2004 (SY 04-05) and the percent of youth with disabilities dropping out during the FFY 2004 (SY 04-05) are as follows:

All Students (General Education and Special Education)[18]

Enrollment[19] 11/15/05	Number
FFY 2004 (SY 04-05) Grade 9	88,079

[15] Definition changed with the submission of the Indiana Part B FFY 2008 (SY 08-09) APR.
[16] Measurement changed with the submission of the Indiana Part B FFY 2008 (SY 08-09) APR.
[17] Calculating Graduation and Dropout Rates: A Technical Assistance Guide, prepared for the U.S. Department of Education, OSEP. (Westat, December 1999, Contract # HS97020001).
[18] http://mustang.doe.state.in.us/TRENDS/grad_sub.cgm?year=2005&pub=1
[19] data source: Educational Information Systems (EIS) preliminary data.

FFY 2004 (SY 04-05) Grade 10	80,642
FFY 2004 (SY 04-05) Grade 11	73,481
FFY 2004 (SY 04-05) Grade 12	66,643
Dropout[20]	**Number**
FFY 2004 (SY 04-05) Grade 9	1,183
FFY 2004 (SY 04-05) Grade 10	1,724
FFY 2004 (SY 04-05) Grade 11	2,320
FFY 2004 (SY 04-05) Grade 12	2,491

Special Education

Enrollment[21]	**Number**
FFY 2004 (SY 04-05) Grade 9 (age 15)	12,391
FFY 2004 (SY 04-05) Grade 10 (age 16)	11,033
FFY 2004 (SY 04-05) Grade 11 (age 17)	9,477
FFY 2004 (SY 04-05) Grade 12 (age 18-21)	7,906
Dropouts[22]	**Number**
FFY 2004 (SY 04-05) Grade 9 (age 15)	394
FFY 2004 (SY 04-05) Grade 10 (age 16)	743
FFY 2004 (SY 04-05) Grade 11 (age 17)	998
FFY 2004 (SY 04-05) Grade 12 (age 18-21)	805

Data sources used include:

- Special education enrollment for grades 9-12 from page 19 of FFY 2004 (SY 04-05) Statistical Report.
- Special education dropouts for grades 9-12 from page 8 the FFY 2004 (SY 04-05) Exit Report (Q 13).
- Total enrollment FFY 2004 (SY 04-05) for grades 9-12 from Educational Information Systems (preliminary data 11/15/05).
- Total dropouts FFY 2004 (SY 04-05) for grades 9-12 from Educational Information Systems (preliminary data 11/15/05).

Discussion of Baseline Data:
Students with disabilities dropping out of school during FFY 2004 (SY 04-05) were compared to all students dropping out of school during FFY 2004 (SY 04-05). The dropout formula used is the dropout formula described on Page 9 of *Calculating Graduation and Dropout Rates: A Technical Assistance Guide*, prepared for the U.S. Department of Education, OSEP. (Westat, December 1999, Contract # HS97020001). This calculation is known as the *Synthetic Cohort Dropout Rate*. The same data and calculations are used to report graduation and drop-out rates for students with and without disabilities as required in the SPP instructions and the OSEP APR response letter dated October 14, 2005.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	The drop-out rate for students with disabilities is ≤ 27%, using the FFY 2004 (SY 04-05) formula. Drop-out target will be re-calibrated using the new formula.
2006 (SY 06-07)	The drop-out rate for students with disabilities is ≤ 26%, using the FFY 2005 (SY 05-06) formula. Drop-out target will be re-calibrated using the new formula.

[20] Data source: EIS preliminary data, 11/15/05.
[21] Data source: page 19, SY 04-05 Statistical Report.
[22] Data source: Page 8, 04-05 Exit Report

FFY	Measurable and Rigorous Target
2007 (SY 07-08)	The drop-out rate for students with disabilities is ≤ 25%, using the FFY 2006 (SY 06-07) formula. Drop-out target will be re-calibrated using the new formula.
2008[23] (SY 08-09)	The drop-out rate for students with disabilities is ≤ 24% using the 4 four year dropout methodology.
2009 (SY 09-10)	The drop-out rate for students with disabilities is ≤ 23% using the 4 four year dropout methodology.
2010 (SY 10-11)	The drop-out rate for students with disabilities is ≤ 22% using the 4 four year dropout methodology.
2011 (SY 11-12)	The drop-out rate for students with disabilities is ≤ 21% using the 4 four year dropout methodology.
2012 (SY 12-13)	The drop-out rate for students with disabilities is ≤ 20% using the 4 four year dropout methodology.

Improvement Activities/Timelines/Resources No Longer Active:

Activity	Timelines	Resources
Indiana High School Dropout Prevention Taskforce will be initiated and coordinated by the IDOE's new High School Design Coordinator. **Discontinued as of FFY 2008 (SY 08-09).**	FFY 2005 (SY 05-06) through FFY 2010 (SY 10-11)	The IDOE, Taskforce members, high school counselors and principals
The IDOE Strategic Planning Initiative, announced October 2006, will support dropout prevention initiatives and create an Office of Best Practices. **Completed as of FFY 2008 (SY 08-09).**	FFY 2006 (SY 06-07) through FFY 2010 (SY 10-11)	The IDOE, all IDOE staff responsible for parts of Strategic Plan.
Improvement activities from Indicator #1 (Graduation Rate) will positively impact a reduction in dropouts. **Removed as of FFY 2008 (SY 08-09).**	FFY 2005 (SY 05-06) through FFY 2010 (SY 10-11)	See Resources from Indicator 1, Graduation Rate.
Essential Tools, dropout prevention strategies from National Center for Secondary Education and Transition, sent from the IDOE/Office of Special Education to all planning district directors. **Completed as of the FFY 2006 (SY 06-07).**	FFY 2006 (SY 06-07)	IDOE/Office of Special Education (See IDOE Press Release of 11-27-06 listing strategies)
Realigned Vision Statement **Completed as of FFY 2008 (SY 08-09).**	FFY 2008 (SY 08-09)	The IDOE realigned its Vision statement to include the goal that 90% of all students in Indiana will graduate from high school by 2012.

[23] Per OSEP guidance, targets will be revised to align with targets for department under ESEA with submission of FFY 2008 submission of Annual Performance Report.

Improvement Activities/Timelines/Resources Ongoing:

Activity	Timelines	Resources
Regional Program Specialists (12) employed by IN*SOURCE (the Indiana Resource Center for families with special needs), collaborate with IDOE, parents, schools to keep students in school.	FFY 2005 (SY 05-06) through FFY 2012 (SY 12-13)	IN*SOURCE, Regional Program Specialists, the Office of Special Education
Partner with Regional Resource Center for multi-state strategy identification.	FFY 2006 (SY 06-07) through FFY 2012 (SY 12-13)	IDOE Divisions including the Office of Special Education and Division of Student Services
The transition school to work Interagency Coordinating Council, (known as the "290 Committee") address statewide issues as they relate to transition. **Added as of FFY 2011 (SY 11-12).**	FFY 2006 (SY 06-07) through FFY 2012 (SY 12-13)	Family Advocates, the IDOE, Vocational Rehabilitation Services, Mental Health and Addictions, Developmental Disabilities, Workforce Development, Corrections, Social Security, Indiana and Ball State Universities, Indiana State Improvement Grant, Community Rehabilitation Provider, Special Education and postsecondary follow-up consultant.
Define policies and procedures for data collection and reporting. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education and Office of Data and Accountability

Indicator 3 of the Part B State Performance Plan (SPP)

Monitoring Priority: Free Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE)

Indicator 3: Participation and performance of children with disabilities on statewide assessments:

A. Percent of districts that have a disability subgroup that meets the State's minimum "n" size meeting the State's adequate yearly progress (AYP) objectives for progress for disability subgroup.
B. Participation rate for children with IEPs.[24]
C. Proficiency rate for children with IEPs against grade level, modified and alternate academic achievement standards.[25]

[20 U.S.C. 1416 (a)(3)(A)]

Measurement:[26]
A. AYP percent = [(# of districts with a disability subgroup that meets the State's minimum "n" size that meet the State's AYP targets for the disability subgroup) divided by the (total # of districts that have a disability subgroup that meets the State's minimum "n" size)] times 100.
B. Participation rate percent = [(# of children with IEPs participating in the assessment) divided by the (total # of children with IEPs enrolled during the testing window, calculated separately for reading and math)]. The participation rate is based on all children with IEPs, including both children with IEPs enrolled for a full academic year and those not enrolled for a full academic year.
C. Proficiency rate percent = ([(# of children with IEPs enrolled for a full academic year scoring at or above proficient) divided by the (total # of children with IEPs enrolled for a full academic year, calculated separately for reading and math)].

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
State mandated and large-scale assessments are not new concepts for schools in Indiana. Indiana has had a mandated assessment system known as ISTEP (the Indiana Statewide Testing for Educational Progress) since 1988 [Indiana Code (IC) 20-10] and a high-stakes assessment, the GQE, began when the graduating class of the year 2000 were sophomores. In Indiana, students must achieve a passing score on the GQE in both English/Language Arts and Mathematics in order to be eligible for a high school diploma. The GQE is, however, only one component of a number of requirements that students must meet in order to be eligible for a diploma. Other requirements include attendance rates, grade point average, and actual courses taken. In 2004, ISTEP became ISTEP+, with the plus being the addition of a constructed response component (in addition to the multiple choice element). The assessment system for Indiana underwent Peer Review from ED in 2006 and has been approved for use under the No Child Left Behind Act (NCLB) for AYP.

The Indiana statewide assessment system includes two components, the ISTEP+ and the Indiana Standards Tool for Alternate Reporting (ISTAR). The ISTEP+ is Indiana's general assessment instrument, is currently a paper and pencil test, and is administered to students in the 3rd through 10th grade on an annual basis (currently in the fall of each school year). At the 10th grade level, ISTEP+ includes the GQE referenced earlier. The ISTAR assessment is a portfolio and teacher rating assessment used with students who perform significantly below grade-level. The assessment is approved for use with students who may have personal learning goals that cannot be adequately measured with a grade-level standardized test. Some LEAs choose to use ISTAR as a supplemental assessment to ISTEP+ and several LEAs use the ISTAR ratings as part of the local level appeals process for the GQE. This permits students with disabilities to be eligible for a high school

[24] Definition changed with the submission of the Indiana Part B FFY 2008 (SY 08-09) APR.
[25] Definition changed with the submission of the Indiana Part B FFY 2008 (SY 08-09) APR.
[26] Definition changed with the submission of the Indiana Part B FFY 2008 (SY 08-09) APR.

diploma if they are able to demonstrate 9th grade proficiency through alternate means due to an inability to achieve a passing score on the GQE. It is the combination of the ISTEP+ and ISTAR results that are used to determine data points for this Indicator.

The groundwork for the ISTAR assessment began in June 1996, with the Purdue University Assessment Center and an assessment that was at that time called IASEP or Indiana's Assessment System of Educational Proficiencies. Throughout its development, a variety of input was considered, both from stakeholders within the state, including local special education teachers and directors; high-ability educators; institutions of higher education; the IDOE, Office of Special Education personnel; and from federally funded resource centers throughout the country, including the National Center on Education Outcomes (NCEO), and the NCRRC. During its development, research on the ISTAR assessment system has been conducted in the areas of inter-rater reliability, content validity, and the overall efficacy of its use. Through the dedicated work of the ISTAR team, Indiana's assessment system was federally approved in 2006.[27]

The ISTAR assessment uses a three-point rubric, which includes the areas of English/Language Arts, Mathematics, and Functional Achievement. Teachers rate students on discrete, measurable skill statements that are linked to the Indiana State Academic Standards using the ratings of *Not Evident*, *Developing*, or *Demonstrated*. The assessment is completed by the school staff member most familiar with the individual student and has an option for integrating input from various personnel if warranted. From a tally of all the categories, each eligible student is given a final score for the individual three areas of either basic, pass, or pass plus. The student's final score for the content areas of English/Language Arts and Mathematics then becomes a component of each building, LEA, and statewide AYP calculation under NCLB.

In order to participate in the ISTAR assessment, students must meet participation eligibility criteria. These eligibility standards were developed by the same collaboration responsible for the ISTAR assessment development. These criteria were field-tested at pilot sites throughout the state, and input from local directors of special education was considered in finalizing the eligibility standards. The ISTAR assessment eligibility standards were approved by the Indiana SBE in 2003 and are comprised of three requisites[28].

Beginning with FFY 2002 (SY 02-03), NCLB has required schools to show annual improvements in the academic achievement of the overall student population and by student groups within the general population, including economic background, race and ethnicity, English proficiency, and special education. Under NCLB, schools must make AYP in all student subgroups in order to be identified as having achieved AYP. In Indiana, AYP designations are determined by calculating student achievement (proficiency) and participation rates on the ISTEP+ and ISTAR assessments in English/Language Arts and Mathematics. A secondary factor given consideration in the calculation is student attendance rates (for elementary and middle schools) and high school graduation rates (for high schools). Indiana's statewide assessment, ISTEP+, is administered in September of each year to students in grades 3 through 10. Accommodations are allowed on the ISTEP+ according to the relevant guidance contained in the ISTEP+ Program Manual[29]. Accommodations must be documented in a student's IEP in order to be allowed. Ratings for ISTAR are to be completed by teachers annually and harvested by Indiana at midnight on October 31.

OSEP conducted an onsite monitoring visit in Indiana. In the annual performance report (APR) response letter from OSEP dated October 14, 2005 it states, "The State did not provide an analysis of its compliance data to determine whether any students with disabilities did not participate in the statewide assessment due to a failure of the public agency to meet the requirements…" An analysis of the participation data indicates that the lowest percentage of reported participation is at the third grade level. However, this percentage is adversely distorted toward special education participation as the state has identified that some third grade teachers did not count students with identified communication disorders as their sole disability area as

[27] See http://www.ed.gov/admins/lead/account/nclbfinalassess/in2.html.
[28] Details regarding the criteria for use of the ISTAR assessment in lieu of ISTEP+ can be accessed at https://ican.doe.state.in.us/istar/Criteria/criteriadocs/updates/criteriaspecneeds.pdf.
[29] This manual is updated annually and may be found at http://ideanet.doe.state.in.us/istep/ProgramManual.html.

students with disabilities[30]. This analysis for FFY 2003 (SY 03-04), FFY 2004 (SY 04-05), and FFY 2005 (SY 05-06) is described in more detail in the FFY 2006 (SY 06-07) APR, submitted simultaneously to OSEP with this SPP on February 1, 2008.

Baseline Data for FFY 2004 (SY 04-05):
A. 91.1% Statewide AYP for Students with Disabilities.
In FFY 2004 (SY 04-05), 267 LEAs out of the total 293 LEAs made AYP, equating to a 91.1% rate of LEAs meeting AYP for the students with disabilities subgroup.
267 ÷ 293 = 91.1%

Discussion of Baseline Data:
Data reported and used for this indicator comes from the Indiana Accountability System for Academic Progress (ASAP) website on the IDOE homepage for AYP; in particular the data contained in the IDOE Press Release of June 8, 2005, and related appendix and website links[31].

For FFY 2004 (SY 04-05), the "n" for this data set was 293 LEAs. Of the total number of LEAs, 267 met AYP in the subgroup of students with disabilities (91.1%).

Of the 293 total LEAs, 26 did not meet AYP for one content area (either Mathematics or English/Language Arts) for the subgroup of Students with Disabilities; 21 of which failed to meet AYP on the English/Language Arts portion. Five of the 26 LEAs did not meet AYP in the Students with Disabilities subgroup on the Mathematics portion.

Many of the LEAs that did not make AYP for the Students with Disabilities subgroup did not meet AYP on either the English/Language Arts portion or the Mathematics portion were also LEAs that did not make AYP in one or more of the other subgroups (e.g., free and reduced lunch, ethnicity, etc.)

FFY	Measurable and Rigorous Target, 3A
2005 (SY 05-06)	LEAs meeting AYP in the subgroup of students with disabilities ≥ 92%.
2006 (SY 06-07)	LEAs meeting AYP in the subgroup of students with disabilities ≥ 92.5%.
2007 (SY 07-08)	LEAs meeting AYP in the subgroup of students with disabilities ≥ 93%.
2008 (SY 08-09)	LEAs meeting AYP in the subgroup of students with disabilities ≥ 93.5%.
2009 (SY 09-10)	LEAs meeting AYP in the subgroup of students with disabilities ≥ 94%.
2010 (SY 10-11)	LEAs meeting AYP in the subgroup of students with disabilities ≥ 94.5%.
2011 (SY 11-12)	LEAs meeting AYP in the subgroup of students with disabilities ≥ 95.0%.
2012 (SY 12-13)	LEAs meeting AYP in the subgroup of students with disabilities ≥ 95.5%.

Revised Baseline Data for FFY 2004 (SY 04-05):
B. 92.2% Statewide Participation Rate for Students with Disabilities.
The following revised calculations[32] are offered for FFY 2004 (SY 04-05).
For English/Language Arts: 26,538 + 64,347 + 6,186 ÷ 105,320 = 92.2%

[30] Students with solely a communication disorder are frequently referred to as 'CD only'.
[31] This information is accessible at http://www.doe.state.in.us/ayp/welcome.html.
[32] Indiana does not have an alternate assessment against grade level achievement standards. Therefore, there is no (d) in any calculations for Target 3B.

For Mathematics: 27,703 + 63,182 + 6,186 ÷ 105,320 = 92.2%

FFY 2004 (SY 04-05)	3rd	4th	5th	6th	7th	8th	9th	10th
ISTEP+ Statewide Participation Rates								
Total GENERAL EDUCATION Pupils Participating	64,808	64,703	65,196	67,816	69,291	69,694	70,500	66,856
October 1, 2004 ChildCount	14,611	14,070	13,267	13,073	12,984	12,659	13,204	11,452
Total SPECIAL EDUCATION Pupils Participating	12,795	12,835	12,561	12,528	12,359	12,210	11,335	10,448
Difference	1,816	1,235	706	545	625	449	1,869	1,004
Participation Rate	87.6%	91.2%	95.7%	95.8%	95.8%	96.5%	85.8%	91.2%

FFY 2004 (SY 04-05)	3rd	4th	5th	6th	7th	8th	9th	10th
ISTEP+ GENERAL EDUCATION PUPILS PARTICIPATING								
English/Language Arts	64,808	64,703	65,196	67,816	69,291	69,694	70,500	66,856
Total Passing	52,392	51,015	51,468	52,506	52,554	52,056	51,955	49,933
Mathematics	64,808	64,703	65,196	67,816	69,291	69,694	70,500	66,856
Total Passing	50,097	50,386	50,655	54,493	55,014	54,286	52,446	46,794
ISTEP+ SPECIAL EDUCATION PUPILS PARTICIPATING								
E/LA w/Accommodations	5,898	7,063	7,846	8,693	9,093	9,231	8,454	8,069
Total Passing	1,347	1,605	1,687	1,788	1,646	1,734	1,293	1,499
Math w/Accommodations	5,750	6,891	7,671	8,434	8,856	9,082	8,436	8,062
Total Passing	1,589	2,217	2,468	2,767	2,605	2,355	2,143	1,679
E/LA w/o Accomms	6,158	5,062	3,959	3,033	2,521	2,156	2,043	1,606
Total Passing	4,274	3,256	2,325	1,608	1,116	891	619	511
Math w/o Accomms	6,306	5,234	4,134	3,292	2,758	2,305	2,061	1,613
Total Passing	4,374	3,546	2,538	2,000	1,507	1,137	826	552
ISTAR PUPILS PARTICIPATING	739	710	756	802	745	823	838	773
Total Passing	673	573	577	623	551	623	624	594

Discussion of Baseline Data:
In FFY 2004 (SY 04-05), Indiana began looking at a student test number (STN) data collection system[33] to help facilitate the analysis of our student data. In doing so, the Student Information Questionnaire (SIQ) collection grid system was redesigned but not in a timely enough manner to be implemented for the 2004 assessment session because Indiana is a Fall Test Session state and the contact with the test publisher did not include such a change for FFY 2004 (SY 04-05). In preparation for the transition from the SIQ system to the STN system, the State discontinued collecting data on the number of general education students who used accommodations during the assessment.

The IDOE contends that significant steps have been taken toward more efficiently managing Indiana's data and would like to present an overview of the FFY 2004 (SY 04-05) data in a manner similar to the one used to present the FFY 2003 (SY 03-04) data. This analysis includes data from three sources: the IDOE 2004 ISTEP+ data from the InfoCenter, specifically:
http://www.doe.state.in.us/istep/2004/Data/F04StateDisag368.xls,
http://www.doe.state.in.us/istep/2004/Data/StateDisag47.xls,
http://www.doe.state.in.us/istep/2004/Data/F04StateDisag5.xls,
http://www.doe.state.in.us/istep/2004/Data/F04StateDisag9.xls and
http://www.doe.state.in.us/istep/2004/Data/F04StateDisag10.xls), the DEL report #DOE-5 (the total unduplicated child count by grade for FFY 2004) and the ISTAR DEL report for October 31, 2004.

When a new data collection system is set in place it typically takes two to three years to work through the assortment of issues that arise. The failure to include Communication Disorder only (CD Only) students as children with a disability on the SIQ could again be attributable to some of the differences in the data for students in the 3rd through 5th grades. According to the October 1, 2004 count, there were 6,811 3rd grade students, 4,829 4th grade students, and 3,003 5th grade students counted as having a Communication Disorder

[33] For more information on the STN reporting process, see http://www.doe.in.gov/improvement/accountability/data-collection.

(CD). In addition there were 3,895 students who were enrolled in non-public schools[34] who were identified as having a CD for the 2004-2005 school year. An average of those pupils across grade levels would be 354 pupils per grade level. The inability to back out the non-public school students from the data reported to the OSEP may be a contributing factor to inconsistencies, especially at grades below 7th grade (where the larger numbers of non-public school students were served).

FFY	3B Measurable and Rigorous Target
2005 (SY 05-06)	The rate of participation of students with disabilities in state-wide assessments is ≥ 95%.
2006 (SY 06-07)	The rate of participation of students with disabilities in state-wide assessments is ≥ 95%.
2007 (SY 07-08)	The rate of participation of students with disabilities in state-wide assessments is ≥ 95%.
2008 (SY 08-09)	The rate of participation of students with disabilities in state-wide assessments is ≥ 95%.
2009 (SY 09-10)	The rate of participation of students with disabilities in state-wide assessments is ≥ 95%.
2010 (SY 10-11)	The rate of participation of students with disabilities in state-wide assessments is ≥ 95%.
2011 (SY 11-12)	The rate of participation of students with disabilities in state-wide assessments is ≥ 95%.
2012 (SY 12-13)	The rate of participation of students with disabilities in state-wide assessments is ≥ 95%.

Revised Baseline Data for FFY 2004 (SY 04-05):

C. 30.4% Statewide English/Language Arts Proficiency Rate for Students with Disabilities
37.2% Statewide Mathematics Proficiency Rate for Students with Disabilities

The Federal formula for this indicator is Overall Percent = [(b + c + d[35] + e) ÷ (a)]

English/Language Arts: 14,600 + 12,599 + 4,838 ÷ 105,320 = 30.4%
Mathematics: 16,480 + 17,823 + 4,838 ÷ 105,320 = 37.2%

FFY 2004 (SY 04-05)	3rd	4th	5th	6th	7th	8th	9th	10th
STUDENTS WITH DISABILIITES OVERALL PROFICIENCY RATES								
October 1, 2004 ChildCount	14,611	14,070	13,267	13,073	12,984	12,659	13,204	11,452
Overall E/LA Proficient	43.1%	38.6%	34.6%	30.7%	25.5%	25.7%	19.2%	22.7%
Overall Math Proficient	45.4%	45.0%	42.1%	41.2%	35.9%	32.5%	27.2%	24.7%

FFY 2004 (SY 04-05)	3rd	4th	5th	6th	7th	8th	9th	10th
ISTEP+ PUPILS PROFICIENT								
E/LA w/Accommodations	5,898	7,063	7,846	8,693	9,093	9,231	8,454	8,069
Total Passing	1,347	1,605	1,687	1,788	1,646	1,734	1,293	1,499
Math w/Accommodations	5,750	6,891	7,671	8,434	8,856	9,082	8,436	8,062
Total Passing	1,589	2,217	2,468	2,767	2,605	2,355	2,143	1,679
E/LA w/o Accomms	6,158	5,062	3,959	3,033	2,521	2,156	2,043	1,606
Total Passing	4,274	3,256	2,325	1,608	1,116	891	619	511
Math w/o Accomms	6,306	5,234	4,134	3,292	2,758	2,305	2,061	1,613
Total Passing	4,374	3,546	2,538	2,000	1,507	1,137	826	552
ISTAR PUPILS PROFICIENT	673	573	577	623	551	623	624	594

Discussion of Baseline Data:

[34] In Indiana, a nonpublic school is any school not maintained by a LEA, including home schooled students. The term includes private or parochial schools accredited by the Indiana State Board of Education. See http://www.in.gov/legislative/iac/20061213-IR-512060039FRA.xml.pdf.

[35] Indiana does not have an alternate assessment against grade level achievement standards. Therefore, there is no (d) in any calculations for Target 3C.

At this time, students with disabilities continue to perform below their grade-level peers in both English/Language Arts and Mathematics. However, progress continues to be made in terms of participation, use of appropriate accommodations, and performance for many students. Overall students with disabilities consistently perform better in Mathematics as compared to the English/Language Arts portion of the statewide assessment system. This may be due to the fact that students are allowed to have all the Mathematics questions read to them if those conditions are applicable to that student and specified in that student's IEP, whereas the reading comprehension questions cannot be read. Additionally when these accommodations are applicable, some students with disabilities are permitted to use a calculator for the Mathematics portion provided that they show their work.

FFY	3C Measurable and Rigorous Target
2005 (SY 05-06)	The number of students with disabilities with reported proficiency on statewide and alternate assessment is ≥ 32% for English/Language Arts and ≥ 38% for mathematics.
2006 (SY 06-07)	The number of students with disabilities with reported proficiency on statewide and alternate assessment is ≥ 33% for English/language Arts and ≥ 39% Mathematics.
2007 (SY 07-08)	The number of students with disabilities with reported proficiency on statewide and alternate assessment is ≥ 34% English/Language Arts and ≥ 40% Mathematics.
2008 (SY 08-09)	The number of students with disabilities with reported proficiency on statewide and alternate assessment is ≥ 35% English/Language Arts and ≥ 41% Mathematics.
2009 (SY 09-10)	The number of students with disabilities with reported proficiency on statewide and alternate assessment is ≥ 36% English/Language Arts and ≥ 42% Mathematics.
2010 (SY 10-11)	The number of students with disabilities with reported proficiency on statewide and alternate assessment is ≥ 37% English/Language Arts and ≥ 43% Mathematics.
2011 (SY 11-12)	The number of students with disabilities with reported proficiency on statewide and alternate assessment is ≥ 38% English/Language Arts and ≥ 44% Mathematics.
2012 (SY 12-13)	The number of students with disabilities with reported proficiency on statewide and alternate assessment is ≥ 39% English/Language Arts and ≥ 45% Mathematics.

Improvement Activities/Timelines/Resources:
The SPP that was previously submitted provided the following improvement activities and timelines/resources for Year 1 of the SPP.

FFY 2005 (SY 05-06)

a. The use of highly qualified teachers will positively influence student achievement.
b. LEAs will continue to align curriculum, instruction, and assessment through web-based the IDOE resources.
c. All special educators will be highly qualified by the end of the FFY 2005 (SY 05-06).

Resources: The IDOE Office of Special Education, the IDOE Division of Professional Standards, Indiana institutions of higher education (IHEs), highly qualified educators from throughout the state, Indiana's University Forum[36], and other interested stakeholders.

After thorough review and careful consideration, the following changes are being made to the improvement activities in this revised SPP. These improvement activities will be implemented over the next four years.

Improvement Activities/Timelines/Resources No Longer Active:

Activity	Timelines	Resources

[36] For more information on the University Forum, see https://www.indstate.edu/soe/iseas/forum1.html.

Activity	Timelines	Resources
LEAs identified as not making AYP for students with disabilities on the state assessment will be required to develop a corrective action plan for ensuring compliance. **Discontinued as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	The Office of Special Education, the ISTAR Project, and other grant activities sponsored by the Office of Special Education.
LEAs identified as not meeting the required participation rate for students with disabilities on the state assessment will be required to develop a corrective action plan for ensuring compliance. **Discontinued as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	The Office of Special Education, the ISTAR Project, and other grant activities sponsored by the Office of Special Education.
LEAs identified as not achieving targeted levels of proficiency for students with disabilities on the state assessment will be required to develop a corrective action plan for ensuring compliance. **Discontinued as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	The Office of Special Education, the ISTAR Project, and other grant activities sponsored by the Office of Special Education.

Improvement Activities/Timelines/Resources Ongoing:

Activity	Timelines	Resources
Develop and implement the Alternate Assessment based on Modified Achievement Standards (AAMAS). **Added as of FFY 2008 (SY 08-09).**	Through FFY 2012 (SY 12-13)	The IDOE, the SBE
Indiana Resource Network **Added as of FFY 2008 (SY 08-09).**	Through FFY 2012 (SY 12-13)	The 6 IRNs will assist LEAs and schools in reforming and improving their supports and services
Focused efforts at developing standards based IEPs, especially at the middle and high school level. **Added as of FFY 2008 (SY 08-09).**	Through FFY 2012 (SY 12-13)	The IDOE, GSEG

Indicator 4 of the Part B State Performance Plan (SPP)

Monitoring Priority:	**Free and Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE)**

Indicator 4: Rates of suspension and expulsion:

A. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than 10 days in a school year; and
B. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of greater than 10 days in a school year of children with disabilities by race and ethnicity.*

(20 U.S.C. 1416(a)(3)(A); 1412(a)(22))

Measurement: [37]

A. Percent = [(# of districts identified by the State as having significant discrepancies in the rates of suspensions and expulsions of children with disabilities for greater than 10 days in a school year) divided by the (# of districts in the State)] times 100.
B. Percent = [(# of districts that have: (a) a significant discrepancy, by race or ethnicity, in the rates of suspensions and expulsions of greater than 10 days in a school year of children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards) divided by the (# of districts in the State)] times 100.

Include State's definition of "significant discrepancy."

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process, 4A:
Due to the past inaccuracies of the SPP, the entire SPP for this indicator has been revised to bring Indiana in compliance with the OSEP's recommendations for the State.

In order to ensure access to FAPE in the LRE as a means of improving services and results for children with disabilities, the Indiana Office of Special Education, the Equity Project at Indiana University (Equity Project), the Indiana State Improvement Grant (INSIG), and the Indiana Civil Rights Commission (ICRC), in consultation with the National Technical Assistance Center on Positive Behavior Interventions and Supports, have been collaborating to develop an initiative known as Culturally Responsive School Wide Positive Behavior Supports (CRSWPBS). The state of Indiana values the importance of School Wide Positive Behavior Supports and culturally responsive classroom management in the education of students with disabilities. Beginning in FFY 2008 (SY 08-09), the Office of Special Education will establish and maintain a positive behavior supports network in the state of Indiana. The Office of Special Education will work with a statewide advisory board, external consultants, and the National Technical Assistance Center on Positive Behavior and Intervention Supports to determine the best way to build and maintain such a network.

Following consultation with OSEP staff members, NCRRC staff and the Data Accountability Center, the Office of Special Education refined the definition (and subsequently the criteria) for significant discrepancy in suspension and expulsion.

[37] Measurement changed with the submission of the Indiana Part B FFY 2008 (SY 08-09) APR.

On January 13, 2012, in response to the downward trend in the number of LEAs that were exceeding the established incident rate threshold, the Indiana Special Education Advisory Council (SAC) reviewed and provided input on Indiana's revised significant discrepancy definition (Indicator 4A). The state lowered the Indicator 4A incident rate threshold from three times or higher than the state average to two times or higher than the state average for two consecutive years.

Indiana's revised definition defines significant discrepancy in the rates of suspensions and expulsions of students with disabilities greater than ten days as an incidence rate that is two times or higher than the state incidence rate for two consecutive years. Sample "n" size is set at a minimum of ten students in a given population. A review of policies, procedures and practices is conducted on those LEAs designated as having significant discrepancy. The review is to determine if the discrepancy is due to the LEA's failure to comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and/or the execution of the procedural safeguards.

Indiana compares the rates of suspensions and expulsions of greater than ten days in a school year for children with IEPs among LEAs in the State when determining if significant discrepancies are occurring (34 CFR §300.170(a)).

Two data sets are used to explore the extent for which significant discrepancy is prevalent in the disciplining of students with disabilities in Indiana schools. General enrollment figures for each local educational agency (LEA) are obtained from the IDOE September ADM report. As required, the discipline data the state utilizes is collected on Table 5 of Information Collection 1820-0621 (Report of Children with Disabilities Unilaterally Removed or Suspended/Expelled for More Than 10 Days) for the previous school year (due November 1 the following school year).

The DOE utilizes a two-step system to annually determine if an LEA has significant discrepancy due to policies, procedures or practices:

- Step one: Data is analyzed for every LEA to determine if an LEA has significant discrepancy defined as a risk ratio for a given racial/ethnic group that is greater than two for two consecutive years.
- Step two: Analysis is implemented for those LEAs who are determined to have significant discrepancy in disciplining students with disabilities as indicated by step one. Identified LEAs are required to complete the Indiana Disproportionality/Significant Discrepancy Self-Assessment. The IDOE and its contracted agent review and analyze the completed self-assessment surveys. Follow up telephone interviews are conducted with the LEAs to clarify information regarding their self-assessments as needed. Based upon the review of the LEA's data, self-assessment and phone interviews, it is determined if the LEA's significant discrepancies may or may not be due to inappropriate policies, procedures or practices. If it is determined that the LEA's significant discrepancy may be due to inappropriate policies, procedures or practices, an individual file review is conducted to assure compliance with 34 CFR § 300.201 and 20 U.S.C. 1416(a)(3)(A); 1412(a)(22). The file selection is based upon a ten percent random sample (no less than five, no more than ten) of case files of students with disabilities that were suspended or expelled for more than ten cumulative days during the school year.

If the significant discrepancies are due to inappropriate policies, practices, and procedures that do not comply with the requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards, a finding of noncompliance is issued and the LEA is informed that it is required to:

- review and revise their policies, procedures, and practices to assure compliance with 34 CFR § 300.201 and 20 U.S.C. 1416(a)(3)(A); 1412(a)(22); and,
- correct each specific instance of noncompliance as soon as possible and in no case later than one year from the date of notification.

Progress on this indicator will be monitored through the general supervision component of the IDOE special education monitoring process.

Those LEAs whose rates are two times or higher the state incidence rate for the most recent year only are identified as being *at-risk* for significant discrepancy in the rates of suspensions and expulsions of students with disabilities. Both categories require further monitoring as described in Indicator 15.

Baseline Data for FFY 2004 (SY 04-05), 4A:
In the original SPP 2005 - 2010, the baseline for FFY 2004 (SY 04-05) indicated there were seven LEAs that evidenced a significant discrepancy in the number of suspensions/ expulsions of 10 days or greater for students with disabilities given a sample size greater than 30 students which represented 2.3% of the LEAs in the state. In consultation with OSEP staff after the initial SPP was submitted, the State recognized that there were errors in these calculations. Following consultation with the OSEP staff members, the IDOE's criteria for identification of *significant discrepancy* with respect to suspension and expulsion have been changed, and the numbers were recalculated for the FFY 2003 (SY 03-04), FFY 2004 (SY 04-05) and FFY 2005 (SY 05-06) data. Based on the FFY 2010 revised significant discrepancy definition, there were four LEAs with significant discrepancies due to inappropriate policies, procedures or practices. This represents 1.16 % (4 out of 346) of the total LEAs in Indiana.

LEAs identified as having *significant discrepancies* that are greater than or equal to two times the state incidence rate due to the failure to comply with the requirements relating to the development and implementation of IEPS and the use of positive behavioral interventions and safeguards are required to examine their data and develop a Corrective Action Plan. Corrective Action Plans will specify the LEA's intentions to review and revise (when appropriate) their policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and the use of procedural safeguards to ensure compliance with IDEA requirements. In addition, the LEA will be required to work with the Indiana Resource Network to assist in the development and implementation of the LEA's corrective action plan.

FFY	Measurable and Rigorous Targets, 4A
2005 (SY 05-06)	The percent of LEAs meeting the criteria for statistical significance as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than ten days in a school year will be equal to/or less than 1.50%.
2006 (SY 06-07)	The percent of LEAs meeting the criteria for statistical significance as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than ten days in a school year will be equal to/or less than 1.25%.
2007 (SY 07-08)	The percent of LEAs meeting the criteria for statistical significance as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than ten days in a school year will be equal to/or less than 1.00%.
2008 (SY 08-09)	The percent of LEAs meeting the criteria for statistical significance as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than ten days in a school year will be equal to/or less than 0.75%.
2009 (SY 09-10) *(using 2008-2009 data)*	The percent of LEAs meeting the criteria for statistical significance as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than ten days in a school year will be equal to/or less than 0.50%.
As the result of the state revising its significant discrepancy definition by lowering the threshold, the state revised its baseline data and its measurable and rigorous targets effective FFY 2010.	
2010 (SY 10-11) *(using 2009-2010 data)*	The percent of LEAs meeting the criteria for statistical significance as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than ten days in a school year will be equal to/or less than 1.50%.
2011 (SY 11-12) *(using 2010-*	The percent of LEAs meeting the criteria for statistical significance as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than ten days in a school year will be equal to/or less than 1.25%.

FFY	Measurable and Rigorous Targets, 4A
2011 data)	
2012 (SY 12-13) *(using 2011-2012 data)*	The percent of LEAs meeting the criteria for statistical significance as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than ten days in a school year will be equal to/or less than 1.00%.

Improvement Activities/Timelines/Resources No Longer Active, 4A:

Improvement Activity	Timelines	Resources
a. Review, update and disseminate the IDOE/ICASE publication, Alternatives to Suspension and Expulsion b. Conduct an analysis of efforts of schools with positive suspension/expulsion data to determine whether Alternative Programs are effective interventions. c. Collaborate with Indiana High School Dropout Prevention Taskforce, led by IDOE's new High School Redesign Coordinator, to identify effective strategies for reducing suspensions and expulsions. **Discontinued as of FFY 2007 (SY 07-08).**	FFY 2005 (SY 05-06) through FFY 2010 (SY 10-11)	a. The Office of Special Education, Indiana Council of Administrators of Special Education (ICASE) and stakeholders b. The Office of Special Education c. The Office of Special Education and Taskforce on Dropout Prevention
Expand technical assistance to identified LEAs provided by the Equity Project. **Discontinued as of FFY 2007 (SY 07-08).**	FFY 2006 (SY 06-07) through FFY 2010 (SY 10-11)	The Office of Special Education, Center for Evaluation and Education Policy, LEAs and staff.
Review the current established definition of Significant Discrepancy and revise, if determined appropriate, to ensure access to FAPE in the LRE as a means of improving services and results for children with disabilities. **Completed as of FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08)	The IDOE, Equity Project, ICRC and INSIG
LEAs identified with significant discrepancy will form a district-wide Local Equity Action Development (LEAD) team to address discrepancy issues. With technical assistance from the Office of Special Education and the Equity Project, the LEAD team will develop and evaluate a plan for addressing all areas of significant discrepancies. **Discontinued as of FFY 2008 (SY 08-09); will be covered under the IRN improvement activity.**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	The Office of Special Education and Equity Project personnel; NCRRC
Professional development activities and/or technical assistance will be provided statewide on: • Closing Indiana's opportunity gaps (e.g., academic, social, and behavioral) by creating culturally responsive instructional systems; • Embedding early interventions in the culture of daily practice;	FFY 2007 (SY07-08) through FFY 2010 (SY 10-11)	The IDOE and projects supported by the Office of Special Education

Improvement Activity	Timelines	Resources
• Utilizing Problem Solving Process to enhance the effectiveness of early intervention teams; • Designing IEPs aligned with the general education curriculum to ensure education benefit; • Ensuring culturally responsive instructional and classroom management practices with all children; • Ensuring culturally responsive communication/interaction with all families; • Differentiated instruction in all classrooms • Effective use of assessment and progress monitoring tools; • Understanding language proficiency and academic achievement issues for ELL students; • Continuation and expansion of "Courageous Conversations about Race"; and, • Continuation of training on inclusive education, multilevel instruction, scheduling, and peer supports. **Discontinued as of FFY 2008 (SY 08-09); will be covered under the IRN improvement activity.**		
A statewide "Closing the Opportunity Gap" institute will be held each Summer or Fall each year. Attendance will be open to all LEAs in the state, but will be required for any LEA with significant discrepancy or at-risk of significant discrepancy. **Discontinued as of FFY 2008 (SY 08-09).**	FFY 2008 (SY 08-09) through FFY 2010 (SY 10-11)	The Office of Special Education and Equity Project personnel; NCRRC

Improvement Activities/Timelines/Resources Ongoing, 4A:

Improvement Activity	Timelines	Resources
Coordinate activities with the School Wide Positive Behavior Support (PBS) initiative, a systems approach to effective school-wide management that provides a comprehensive continuum of supports.	FFY 2008 (SY 08-09) through FFY 2012 (SY 12-13)	The IDOE
LEAs identified with significant discrepancies will receive training in Culturally Responsive School Wide Positive Behavior Supports.	FFY 2008 (SY 08-09) through FFY 2012 (SY 12-13)	The IDOE, Equity Project, ICRC and INSIG
Indiana Resource Network (IRN) **Added as of FFY 2008 (SY 08-09).**	Through 2012 (SY 12-13)	The 6 IRNs will assist LEAs and schools in reforming and improving their supports and services
Track monthly compliance for LEAs with uncorrected Findings. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education specialists
Distribute a Monitoring Workbook to LEAs found out of	FFY 2010	IDOE Office of Special Education,

Improvement Activity	Timelines	Resources
compliance containing an in-depth analysis of areas of noncompliance. **Added as of FFY 2011 (SY 11-12).**	(SY 10-11) through FFY 2012 (SY 12-13)	LEAs
Gather data on disproportionality of racial and ethnic groups in special education and disseminate to stakeholders. **Added as of FFY 2011 (SY 11-12).**	FFY 2010 (SY 10-11) through FFY 2012 (SY 12-13)	IDOE, IRN, CEEP

Overview of Issue/Description of System or Process, 4B:
In order to ensure access to FAPE in the LRE as a means of improving services and results for children with disabilities, the IDOE/Office Special Education, the Equity Project, INSIG, and ICRC, in consultation with the National Technical Assistance Center on PBIS, collaborated to develop an initiative known as Culturally Responsive School Wide Positive Behavior Supports. The State of Indiana values the importance of School Wide Positive Behavior Supports and culturally responsive classroom management in the education of students with disabilities.

Beginning in FFY 2008 (SY 08-09), the IDOE established and maintain a positive behavior supports network in the state of Indiana. The IDOE worked with a statewide advisory board, external consultants, and the National Technical Assistance Center on Positive Behavior and Intervention Supports to determine the best way to build and maintain such a network.

In April 2010 the IDOE restructured and renamed the INRCIA technical assistance support network, by establishing the IRN which is comprised of six centers that provide targeted, comprehensive technical assistance and professional development to schools across the state to improve teaching and learning. The areas addressed through the IRN are: autism, effective assessment and instruction, effective evaluations, effective and compliant IEPs, positive behavior supports, and transition to adulthood. Additionally, LEAs will be supported by three sole source projects that focus on: parent training and information, assistive and accessible technologies, and training for teachers of students who are deaf, blind or have low vision.

The Indiana University Equity Project at the CEEP in collaboration with the Center for Education and Lifelong Learning at IIDC is the IRN center whose focus is to develop and establish a statewide network of culturally responsive school-wide positive behavior support sites and increase educators' knowledge and understanding of how PBIS impacts student achievement, family engagement, dropout rate and least restrictive environment placements. The center has the following goals:

- Develop an expanded RTI-based model of PBIS that addresses issues of culture and contributes to improved outcomes in achievement, graduation, and LRE;
- Develop six model demonstration sites committed to the full implementation of the PBIS Indiana framework;
- Work with sites assigned by the IDOE to address identified insufficiencies through the implementation of the PBS Indiana framework;
- Work with schools partially implementing PBIS, providing professional development and technical assistance as needed to move schools at any level of implementation to more complete implementation;
- Increase capacity by building the knowledge base; and,
- Develop a fully functioning and sustainable network of culturally responsive PBIS in Indiana.

Significant Discrepancy Definition:
As a result of OSEP and the Data Accountability Center's (DAC) review of Indiana's Significant Discrepancy definition for Indicator 4B, Indiana was required to change its 4B definition of Significant Discrepancy in the rates of suspensions and expulsions of greater than ten days in a school year for children disabilities by race

and ethnicity. On January 13, 2012, the Indiana SAC reviewed and provided input on Indiana's revised Indicator 4B significant discrepancy definition. As directed by OSEP, the State changed its calculation methodology to assure compliance with 20 U.S.C. 1412(a)(22). The state also elected to lower the risk ratio threshold from greater than 2.5 to greater than 2.0. Due to the OSEP required changes in the State's calculation methodology and the newly adopted lower threshold, the State is reporting new baseline data for FFY 2010.

Indiana's revised definition defines Significant Discrepancy of racial and ethnic groups (*American Indian, Asian/Pacific Islander, African American, Hispanic, White*) in discipline (suspensions/ expulsions) as a risk ratio[38] for a given racial/ethnic group that is greater than 2.0 for two consecutive years. Sample "n" size is set at a minimum of ten students in a given population. A review of policies, procedures and practices is conducted on those LEAs designated as having significant discrepancy to determine if the discrepancy is due to the LEA's failure to comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and the implementation of procedural safeguards. Indiana compares the rates of suspensions and expulsions of greater than ten days in a school year for children with IEPs among LEAs in the State when determining if significant discrepancies are occurring (34 CFR §300.170(a)).

Risk ratios tend to become unstable in the case of low frequencies of the target groups. The IDOE conducts a statistical analysis only in cases where the numbers of students from a given racial/ethnic category experienced suspensions/expulsions at a rate of ten days or higher. The IDOE maintains and reserves the right, however, to use its discretion in identifying disproportionate representation if a pattern of representation raises concerns including instances of fewer than ten students from a given group (e.g., if there are four African American students in the school district but all four are identified as having been suspended/expelled greater than 10 days in a school year).

Significant Discrepancy Due to Inappropriate Policies, Procedures and Practices Determination Process:

The IDOE utilizes a two-step system to annually determine if an LEA has significant discrepancy due to policies, procedures or practices:

- Step one: Data is analyzed for every LEA to determine if significant discrepancy (defined as a risk ratio for a given racial/ethnic group) is greater than two for two consecutive years.
- Step two: Analysis is implemented for those LEAs who are determined to have significant discrepancy in discipline in one or more of the five racial/ethnic groups (African American, Hispanic, American Indian, Asia/Pacific Islander and White) as indicated by step one. These LEAs are required to complete the Indiana Disproportionality/Significant Discrepancy Self-Assessment.
  The IDOE and its contracted agent review and analyze the LEA's self-assessment surveys. As needed follow up telephone interviews are conducted with the LEAs to clarify information regarding their self-assessments. Based upon the review of the LEA's data, self-assessment and phone interviews, it is determined if the LEA's significant discrepancies are due to inappropriate policies, procedures or practices. If it is determined that the LEA's significant discrepancy may be due to inappropriate policies, procedures or practices, an individual file review is conducted to assure compliance with 34 CFR § 300.201 and 20 U.S.C. 1416(a)(3)(A); 1412(a)(22). The file selection is based upon a ten percent random sample (no less than five, no more than ten) of case files of students with disabilities that were suspended or expelled for more than ten cumulative days during the school year.

If the significant discrepancies are due to inappropriate policies, practices, and procedures that do not comply with the requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and/or the execution of the procedural safeguards, a finding of noncompliance is issued and the LEA is informed that it is required to:

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[38] Risk Ratio – The risk ratio is a comparison of the risk index of the target racial/ethnic group in the LEA and the risk index of all races in the State.

- review and revise their policies, procedures, and practices to assure compliance with 34 CFR § 300.201 and 20 U.S.C. 1416(a)(3)(A); 1412(a)(22); and,
- correct each specific instance of noncompliance as soon as possible and in no case later than one year from the date of notification.

Progress on this indicator will be monitored through the general supervision component of the IDOE special education monitoring process.

Significant Discrepancy Due to Inappropriate Policies, Procedures or Practices LEA Notification Process:
LEAs determined to have significant discrepancy by race or ethnicity in the rate of suspensions and expulsions of greater than ten days in a school year for children with IEPs, due to policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards will be issued a finding of noncompliance. The notification letter will indicate that the LEA must take action to correct the issue of noncompliance as soon as possible and in no case later than one year from the date of the notification. The LEA will be notified that it must review and revise its policies, procedures, and practices to assure compliance with 34 CFR § 300.201 and 20 U.S.C. 1416(a)(3)(A); 1412(a)(22).

In addition, any LEA identified with compliance issues are required to work with the IDOE and their assigned IRN technical assistance provider to develop and implement a corrective action plan. The action plan must specify how the LEA will examine and revise if appropriate, policies, procedures, and practices related to child find, RTI practices, referral, and evaluation procedures. The LEA must report to the State the required corrections consistent with OSEP Memorandum 09-02 dated October 17, 2008.

Baseline Data for FFY 2009 (using 2008-2009 data), 4B:

FFY	Measurable and Rigorous Targets, 4B
2009 (SY 09-10) *(using 2008-2009 data)*	Percent of districts reporting that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards will be 0%.
2010 (SY 10-11) *(using 2009-2010 data)*	Percent of districts reporting that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards will be 0%.
2011 (SY 11-12) *(using 2010-2011 data)*	Percent of districts reporting that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards will be 0%.
2012 (SY 12-13) *(using 2011-2012 data)*	Percent of districts reporting that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards will be 0%.

Discussion of FFY 2009 Baseline Data, 4B:
FFY 2009 (SY 09-10) Step One: Significant Discrepancy
The FFY 2009 (SY 09-10) reporting period, based on the FFY 2008 (SY 08-09) and FFY 2007 (SY 07-08) data indicates that five LEAs present the statistical criteria of significant discrepancy. This represents 1.45% of LEAS (5 out of 346) in the State.

273 LEAs were excluded from the calculation because they did not meet the required n-size of 10 or more students with disabilities within any racial/ethnic group suspended or expelled for more than 10 days in a school year.

FFY 2009 (SY 09-10) Step Two: Review of Policies, Procedures, and Practices - completed in FFY 2009 using 2008-2009 data
The 5 LEAs were notified on April 27, 2010 of the preliminary determination of significant discrepancy and were requested to complete the Indiana Disproportionality Self-Assessment. The IDOE reviewed and analyzed the 5 LEA's Indiana Disproportionality Self-Assessment and their policies, practices and procedures. Based upon the DOE review and analysis of the assessment, as well as the local policies, procedures and practices it was determined that the significant discrepancy was due to policies, procedures or practices that did not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, or procedural safeguards. This represents 1.45% of the LEAs (5 out of 346) in the state.

On May 11, 2010 the five LEAs were notified that based upon the review and analysis of their assessment, as well as the local policies, procedures and practices it was determined that the significant discrepancy was due to policies, procedures or practices that did not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, or procedural safeguards. The LEAs were instructed that they must examine their data and develop an action plan with support from the IDOE and their assigned IRN grant. The action must specify how the LEA will examine and revise if appropriate, policies, procedures, and practices relating to the development and implementation of an IEP, the use of positive behavioral interventions and supports, as well as desired outcomes, and the use of procedural safeguards to ensure compliance with IDEA requirements pursuant to 34 CFR § 300.170(b).

Discussion of FFY 2010 Revised Baseline Data, 4B:
FFY 2010 (SY 10-11) Step One: Significant Discrepancy
The FFY 2010 (SY 10-11) reporting period, based on the FFY 2009 (SY 09-10) and FFY 2008 (SY 08-09) data, indicates that 13 LEAs present the statistical criteria of significant discrepancy. This represents 3.76% of LEAS (13 out of 346) in the State.

288 LEAs were excluded from the calculation because they did not meet the required "n" size of ten or more students with disabilities within any racial/ethnic group suspended or expelled for more than ten days in a school year.

FFY 2010 (SY 10-09) Step Two: Review of Policies, Procedures, and Practices - completed in FFY 2010 using 2009-2010 data

a. The FFY 2010 (SY10-11) statistical analysis based the on FFY 2009 (SY 09-10) and FFY 2008 (SY 08-09) data indicated 13 LEAs had significant discrepancies in the rates for suspension and expulsion of students by race/ethnicity. The 13 LEAs were notified on December 9, 2011 of the significant discrepancies. The notification informed the LEA that they were required to review their policies, procedures and practices; and to complete the *Indiana FFY 2010 (SY 10-11) Disproportionate Representation/Significant Discrepancy Self-Assessment Survey* by December 23, 2011.

   The IDOE and its contracted agent reviewed and analyzed the LEAs self-assessment surveys. Follow-up telephone calls and email exchanges were conducted with the LEAs to clarify information regarding their self-assessments, policies procedures and practices, as needed. Based upon the review of the LEAs data, self-assessments and follow-up information, it was determined that two of the 13 LEAs significant

discrepancies was not due to inappropriate policies, procedures or practices. However, it was determined that it would be necessary to conduct individual file reviews on the 11 remaining LEAs with significant discrepancies to determine if appropriate policies, procedures and practices were in place to assure compliance with 34 CFR § 300.201 and 20 U.S.C. 1416(a)(3)(A); 1412(a)(22). The IDOE selected the files based upon a ten percent random sample (no less than five, no more than ten) of case files of students with disabilities that were suspended or expelled for more than 10 cumulative days during the FFY 2010 (SY 09-10).

b. The file review analysis indicated that the significant discrepancies in eight of LEAs were due to inappropriate policies, procedures or practices, and these eight LEAs were determined to be noncompliant with 34 CFR § 300.201 and 20 U.S.C. 1416(a)(3)(A); 1412(a)(22).

c. Seven of the eight LEAs that were determined to have significant discrepancies due to inappropriate policies, procedures or practices were notified on March 30, 2012 of FFY 2010 (SY 10-11) Indicator 4B finding of noncompliance. The notification informed the LEA that it must:
   1) Correct the issue of noncompliance as soon as possible and in no case later than one year from the date of the notification of the finding pursuant to 20 USC § 1416(a)(3);
   2) Review and revise if appropriate, their policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards to ensure that these policies, procedures, and practices comply with IDEA; and,
   3) Correct each individual case of noncompliance identified in the file review, unless the student is no longer under the jurisdiction of the LEA.

   In addition, the LEAs identified with FFY 2010 (SY10-11) noncompliance are required to work with the IDOE and their assigned IRN technical assistance provider to develop and implement a corrective action plan. Progress on this Indicator will be monitored through the general supervision component of the IDOE special education monitoring process.

   The remaining LEA with FFY 2010 (SY 10-11) significant discrepancies due to inappropriate policies, procedures or practices was notified on March 30, 2012 that it had failed to correct the FFY 2009 (SY08-09) Indicator 4B finding on noncompliance issued on May 11, 2010 within one year of the State's notification, or subsequently correct the noncompliance; therefore the LEA must correct the noncompliance as soon as possible. The LEA will is required to work directly with the assigned technical assistance support center to evaluate the LEAs current Plan of Correction and modify the plan as needed. The technical assistance center will also work with the LEA in reviewing and modifying the LEAs policies, procedures, and practices related to the development and implementation of IEPs, implementation of positive behavioral interventions and supports, and procedural safeguards to ensure that their policies, procedures, and practices are in compliance with 34 CFR § 300.201 and 20 U.S.C. 1416(a)(3)(A); 1412(a)(22).

4B(a). LEAs with Significant Discrepancy, by Race or Ethnicity, in Rates of Suspension and Expulsion:

Year	Total Number of LEAs[39]	Number of LEAs that have Significant Discrepancies by Race or Ethnicity	Percent
2009 (SY 09-10) *(using 2008-2009 data)*	**346**	**5**	**1.45%**
Revised baseline data: As the result of the state revising its significant discrepancy definition by lowering the threshold, the state revised its baseline data effective FFY 2010.			

[39] Indiana utilizes the total number of LEAs in the State (including those that do not meet the minimum n-size) in the denominator

2010 (SY 10-11) *(using 2009-2010 data)*	**346**	**13**	**3.76%**

4B(b). LEAs with Significant Discrepancy, by Race or Ethnicity, in Rates of Suspensions and Expulsions; and policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

Year	Total Number of LEAs[39]	Number of LEAs that have Significant Discrepancies, by Race or Ethnicity, and policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.	Percent
2009 (SY 09-10) *(using 2008-2009 data)*	**346**	**5**	**1.45%**
Revised baseline data: As the result of the state revising its significant discrepancy definition by lowering the threshold, the state revised its baseline data effective FFY 2010.			
2010 (SY 10-11) *(using 2009-2010 data)*	**346**	**8**	**2.31%**

Improvement Activities/Timelines/Resources, 4B:

Improvement Activity	Timelines	Resources
Develop and establish a statewide network of culturally responsive school-wide positive behavior support sites and increase educators' knowledge and understanding of how PBIS impacts student achievement, family engagement, dropout rate and least restrictive environment placements.	FFY 2008 (SY 08-09) through FFY 2012 (SY 12-13)	IDOE, Center for Education and Lifelong Learning at the Indiana Institute on Disability and Community (IIDC)and The Indiana University/ CEEP
Continue to gather data on significant discrepancy of racial and ethnic groups in special education and disseminate to stakeholders through a variety of formats, including the IDOE website.	FFY 2008 (SY 08-09) through FFY 2012 (SY 12-13)	Office of Special Education, Equity Project personnel
Provide targeted, comprehensive support to schools across the state to improve teaching and learning via the six IRN centers whose areas of focus are: • Autism; • Effective assessment and instruction; • Effective evaluations; • Effective and compliant IEPs; • Positive behavior supports; and, • Transition to adulthood. Statewide support IDOE will also be provided on: • Parent training and information; • Assistive and accessible technologies; and,	FFY 2008 (SY 08-09) through FFY 2012 (SY 12-13)	DOE; Effective & Compliant IEP Resource Center, Effective Evaluation Processes Resource Center, HANDS in Autism Resource Center; Indiana Center for Accessible Instructional Materials; Indiana Center for Assessment & Instruction; PBIS Indiana Resource Center; PATINS Project; and INSOURCE.

Improvement Activity	Timelines	Resources
• Training for teachers of students who are deaf, blind or have low vision.		
Track monthly compliance for LEAs with uncorrected Findings. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education specialists
Distribute a Monitoring Workbook to LEAs found out of compliance containing an in-depth analysis of areas of noncompliance. **Added as of FFY 2011 (SY 11-12).**	FFY 2010 (SY 10-11) through FFY 2012 (SY 12-13)	IDOE Office of Special Education, LEAs
Gather data on disproportionality of racial and ethnic groups in special education and disseminate to stakeholders. **Added as of FFY 2011 (SY 11-12).**	FFY 2010 (SY 10-11) through FFY 2012 (SY 12-13)	IDOE, IRN, CEEP

Indicator 5 of the Part B State Performance Plan (SPP)

Monitoring Priority:	**Free and Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE)**

Indicator 5: Percent of children with IEPs aged 6 through 21 served:

A. Inside the regular class 80% or more of the day;
B. Inside the regular class less than 40% of the day; and
C. In separate schools, residential facilities, or homebound/hospital placements.

(20 U.S.C. 1416(a)(3)(A))

Measurement: [40]

A. Percent = [(# of children with IEPs served inside the regular class 80% or more of the day) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.
B. Percent = [(# of children with IEPs served inside the regular class less than 40% of the day) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.
C. Percent = [(# of children with IEPs served in separate schools, residential facilities, or homebound/hospital placements) divided by the (total # of students aged 6 through 21 with IEPs)] times 100.

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
During the IEP development process, the Case Conference Committee (CCC) determines that appropriate goals and objectives have been written, students are placed in the LRE according to the amount of time they are removed from the regular classroom setting. At the federal level, NCLB and the reauthorization of IDEA have further motivated schools to deliver the core content to students with disabilities in the general education classroom staffed by content-certified teachers meeting NCLB's highly qualified requirements. Indiana educators developed a method by which teachers not new to the profession can demonstrate competency in each subject they teach on the basis of a "High Objective Uniform State Standard of Evaluation" (HOUSSE). The IDOE began revising the current HOUSSE in February 2005. The Highly Qualified Teachers (HQT) committee met monthly for a little over a year, from February 2005 to April 2006, and had all of the HQT documents – HOUSSE, HQT definitions and certain policies reviewed and approved by the US Department of Education's Office of Elementary and Secondary Education.

Additionally, members of the committee participated in monthly conference calls provided by the Chief Council for State Superintendents Organization's (CCSSO) Center for Improving Teacher Quality (CTQ). Committee members also attended CCSSO's CTQ conference in October 2005 & the committee used this knowledge in the development of the HOUSSE. The HOUSSE standard provides "objective coherent information about the teacher's attainment of core content knowledge in the academic subjects in which a teacher teaches" [Section 9101(23)(C)(ii)(III)].

As part of the December 1 Child Count, all LEAs are responsible for entering the placement data for all students within their LEAs into the Integrated Electronic Management system (IEM). The data is sent to the CODA Project[41]. The Office of Special Education staff disaggregates the data to analyze specific LRE placement by LEA. The data is transmitted to the LEAs for verification and review as described in the Continuous Improvement Focused Monitoring System (CIFMS). (see indicator 15).

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[40] Definition changed with the submission of the Indiana Part B FFY 2008 (SY 08-09) APR.
[41] The CODA Project is Indiana's data collection system for special education funding. For more details on the CODA Project, please see: http://www.thecodaproject.org/.

Baseline Data for FFY 2004 (SY 04-05): [42]
Percent of children with IEPs ages 6 – 21

A. Removed from regular class less than 21% of the day	60.35%;
B. Removed from regular class greater than 60% of the day	15.32%;
C. Served in either public/private separate schools or in residential placements	1.24%.

Discussion of Baseline Data:
After the data has been collected at the CODA Project, the percentage per placement category is calculated for each special education planning district and LEA.

Although Indiana's trend data indicates that the percentage increase per year is minimal, it is still above the national average. Also noted is the combined percentage of *A. regular class placement* and *B. resource room placement* exceeds 82.88%. Office of Special Education will continue to use trend analysis to monitor and determine the appropriateness of the measurable and rigorous targets. These targets will be adjusted as needed.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	A. The percent of students with IEPs removed from regular class less than 21% of the day is equal to or greater than 60.36%. B. The percent of students with disabilities removed from regular class greater than 60% of the instructional day is equal to or less than 15.31%. C. The percent of students with disabilities served in either public/private separate schools or in residential placements is equal to or less than 1.23%.
2006 (SY 06-07)	A. The percent of students with IEPs removed from regular class less than 21% of the day is equal to or greater than 60.37%. B. The percent of students with disabilities removed from regular class greater than 60% of the instructional day is equal to or less than 15.30%. C. The percent of students with disabilities served in either public/private separate schools or in residential placements is equal to or less than 1.22%.
2007 (SY 07-08)	A. The percent of students with IEPs removed from regular class less than 21% of the day is equal to or greater than 60.38%. B. The percent of students with disabilities removed from regular class greater than 60% of the instructional day is equal to or less than 15.29%. C. The percent of students with disabilities served in either public/private separate schools or in residential placements is equal to or less than 1.21%.
2008 (SY 08-09)	A. The percent of students with IEPs inside the regular class 80% or more of the day will be equal to or greater than 60.39%. B. The percent of students with disabilities inside the regular class less than 40% of the instructional day is equal to or less than 15.28%. C. The percent of students with disabilities served in either public/private separate schools or in residential placements is equal to or less than 1.20%.
2009 (SY 09-10)	A. The percent of students with IEPs inside the regular class 80% or more of the day will be equal to or greater than 60.4%. B. The percent of students with disabilities inside the regular class less than 40% of the instructional day is equal to or less than 15.27%. C. The percent of students with disabilities served in either public/private separate schools or in residential placements is equal to or less than 1.19%.

[42] Data Source: 2005-2006 Statistical Report, March 2006 Page 13

FFY	Measurable and Rigorous Target
2010 (SY 10-11)	A. The percent of students with IEPs inside the regular class 80% or more of the day will be equal to or greater than 60.41%. B. The percent of students with disabilities inside the regular class less than 40% of the instructional day is equal to or less than 15.26%. C. The percent of students with disabilities served in either public/private separate schools or in residential placements is equal to or less than 1.18%.
2011 (SY 11-12)	A. The percent of students with IEPs inside the regular class 80% or more of the day will be equal to or greater than 60.42%. B. The percent of students with disabilities inside the regular class less than 40% of the instructional day is equal to or less than 15.25%. C. The percent of students with disabilities served in either public/private separate schools or in residential placements is equal to or less than 1.17%.
2012 (SY 12-13)	A. The percent of students with IEPs inside the regular class 80% or more of the day will be equal to or greater than 60.43%. B. The percent of students with disabilities removed from regular class greater than 60% of the instructional day is equal to or less than 15.24%. C. The percent of students with disabilities served in either public/private separate schools or in residential placements is equal to or less than 1.16%.

Improvement Activities/Timelines/Resources No Longer Active:

Improvement Activity	Timelines	Resources
a. Indiana Creative Problem Solving Initiative b. Indiana Facilitated Case Conference Training c. Indiana State Improvement Grant d. Continuous Improvement Focused Monitoring **Discontinued as of FFY 2008 (SY 08-09); will be covered by IRN improvement activity.**	FFY 2005 (SY 05-06) through FFY 2010 (SY 10-11)	a./b. Bloomberg Center, Indiana State University c. Indiana State Improvement Grant (IN-SIG) staff d. The Office of Special Education staff
Investigate the need for research and evaluation regarding LRE policies and practices in Indiana. **Completed as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2008 (SY 08-09)	The IDOE and projects supported by the Office of Special Education
LEAs not meeting the determined targets for LRE categories will complete a self-assessment process that includes a tool addressing factors influencing LRE placements. **Discontinued as of FFY 2008 (SY 08-09); will be covered by the Onsite monitoring and desktop audits improvement activity.**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	The IDOE and projects supported by the Office of Special Education
LEAs not meeting the determined targets for LRE categories will as a district-wide team, with technical assistance from the Office of Special Education and the indicated project personnel, develop and evaluate a plan for addressing factors influencing LRE placements (see Indicator 15, Level 4). **Discontinued as of FFY 2008 (SY 08-09); will be covered by the onsite monitoring and desktop audits improvement activities.**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	The IDOE and projects supported by the Office of Special Education

Improvement Activity	Timelines	Resources
Professional development activities and/or technical assistance will be provided statewide on: • Closing Indiana's opportunity gaps (e.g., academic, social, and behavioral) by creating culturally responsive instructional systems; • Embedding early interventions in the culture of daily practice; • Designing IEPs aligned with the general education curriculum to ensure education benefit; • Ensuring culturally responsive instructional and classroom management practices with all; • Ensuring culturally responsive communication/interaction with all families; • Differentiated instruction in all classrooms; • Understanding language proficiency and academic achievement issues for English Language Learners; • Assessment and progress monitoring tools; • Continuation of training on inclusive education, multilevel instruction, scheduling, and peer supports; and • Facilitated IEP training. **Discontinued as of FFY 2008 (SY 08-09); will be covered under the IRN improvement activity.**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	The IDOE and projects supported by the Office of Special Education
Revise state guidelines for eligibility determination and service, and provide statewide training on appropriate identification of students with disabilities. **Completed as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	The IDOE personnel and Statewide stakeholder groups

Improvement Activities/Timelines/Resources Ongoing:

Improvement Activity	Timelines	Resources
Support training and information sharing sessions conducted by other public or private agencies on LRE for families and school/agency personnel.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The IDOE and projects supported by the Office of Special Education
Conduct parent/family support in LRE through training and material dissemination.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The IDOE and projects supported by the Office of Special Education
Indiana Resource Network (IRN) **Added as of FFY 2008 (SY 08-09).**	Through FFY 2012 (SY 12-13)	The 6 IRNs will assist LEAs and schools in reforming and improving their supports and services
Improvement Grants focusing on LRE **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12)	Office of Special Education
Statewide Inclusion Conference **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12)	Office of Special Education, Effective and Compliant IEP Resource Center

Improvement Activity	Timelines	Resources
Define policies and procedures for data collection and reporting. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education and Office of Data and Accountability

Indicator 6 of the Part B State Performance Plan (SPP)

Monitoring Priority:	**Free and Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE)**

Indicator 6[43]: Percent of children aged 3 through 5 with IEPs attending a:

A. Regular early childhood program and receiving the majority of special education and related services in the regular early childhood program; and
B. Separate special education class, separate school or residential facility.

Measurement[44]:
A. Percent = [(# of children aged 3 through 5 with IEPs attending a regular early childhood program and receiving the majority of special education and related services in the regular early childhood program) ÷ (total # of children aged 3 through 5 with IEPs)] × 100.
B. Percent = [(# of children aged 3 through 5 with IEPs attending a separate special education class, separate school or residential facility) ÷ (total # of children aged 3 through 5 with IEPs)] ×100.

Overview of the State Performance Plan (SPP) Development:
See Overview of State Performance Plan Development

Overview of Issue/Description of System or Process:
During the individualized education program (IEP) development process, the Case Conference Committee (CCC) determines that appropriate goals and objectives have been written, students are placed in the least restrictive environment (LRE) according to the amount of time they are removed from the regular early childhood setting. As part of the December 1 Child Count, all local educational agencies (LEAs) are responsible for entering the placement data for all students via a secure site known as the Student Test Number (STN) Application Center. As part of the DOE-SE (Special Education) report, each LEA must upload child count data to the STN Application Center. After submission, each LEA has approximately one week to review and make any necessary adjustments to their data. Following his cleanup period, each LEA must submit a copy of the report summary page signed b the LEA's Superintendent. This data is then stored in the IDOE data warehouse where it can be extracted and used for state and federal funding, performance indicators, and compliance indicators.

Baseline Data for FFY 2011 (SY 11-12):
Percent of children aged 3 through 5 with IEPs attending a:

A. Regular early childhood program and receiving the majority of special education and related services in the regular early childhood program: **38.70%**
B. Separate special education class, separate school or residential facility: **35.20%**

Discussion of Baseline Data:
After the data has been collected through the DOE-SE report, the percentage per placement category is calculated for each LEA. The IDOE will continue to use trend analysis to monitor and determine the appropriateness of the measurable and rigorous targets. These targets will be adjusted as needed.

[43] Indicator 6 definition was changed per submission of Annual Performance Report with submission of FFY 2008 Annual Performance Report.
[44] Indicator 6 Measurement was changed per submission of Annual Performance Report with submission of FFY 2008 Annual Performance Report.

FFY	Measurable and Rigorous Target
2012 (SY 12-13)	D. The percent of students with attending a regular early childhood program and receiving the majority of special education and related services in the regular early childhood program is equal to or greater than 38.71%. E. The percent of students with attending a separate special education class, separate school, or residential facility is equal to or less than 35.19%.

Improvement Activities/Timelines/Resources Ongoing:

Improvement Activity	Timelines	Resources
Support training and information sharing sessions conducted by other public or private agencies on LRE for families and school/agency personnel.	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	The IDOE and projects supported by the OSE
Conduct parent/family support in LRE through training and material dissemination.	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	The IDOE and projects supported by the OSE
Statewide Inclusion Conference	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	OSE, Effective and Compliant IEP Resource Center
Define policies and procedures for data collection and reporting. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education and Office of Data and Accountability

Indicator 7 of the Part B State Performance Plan (SPP)

Monitoring Priority: FAPE in the LRE

Indicator 7: Percent of preschool children aged 3 through 5 with IEPs who demonstrate improved:

A. Positive social-emotional skills (including social relationships);
B. Acquisition and use of knowledge and skills (including early language/ communication and early literacy); and
C. Use of appropriate behaviors to meet their needs.

(20 U.S.C. 1416 (a)(3)(A))

Measurement:
Outcomes:
A. Positive social-emotional skills (including social relationships);
B. Acquisition and use of knowledge and skills (including early language/communication and early literacy); and
C. Use of appropriate behaviors to meet their needs.

Progress categories for A, B and C:

a. Percent of preschool children who did not improve functioning = [(# of preschool children who did not improve functioning) divided by (# of preschool children with IEPs assessed)] times 100.
b. Percent of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.
c. Percent of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it) divided by (# of preschool children with IEPs assessed)] times 100.
d. Percent of preschool children who improved functioning to reach a level comparable to same-aged peers = [(# of preschool children who improved functioning to reach a level comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.
e. Percent of preschool children who maintained functioning at a level comparable to same-aged peers = [(# of preschool children who maintained functioning at a level comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.

Summary Statements for Each of the Three Outcomes (use for FFY 2008-2009 reporting):
Summary Statement 1: Of those preschool children who entered the preschool program below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they turned 6 years of age or exited the program.
Measurement for Summary Statement 1:
Percent = # of preschool children reported in progress category (c) plus # of preschool children reported in category (d) divided by [# of preschool children reported in progress category (a) plus # of preschool children reported in progress category (b) plus # of preschool children reported in progress category (c) plus # of preschool children reported in progress category (d)] times 100.
Summary Statement 2: The percent of preschool children who were functioning within age expectations in each Outcome by the time they turned 6 years of age or exited the program.
Measurement for Summary Statement 2: Percent = # of preschool children reported in progress category (d) plus [# of preschool children reported in progress category (e) divided by the total # of preschool children reported in progress categories (a) + (b) + (c) + (d) + (e)] times 100.

Overview of the SPP Development:
See Overview of State Performance Plan Development.

The Indiana Part B FFY 2007 (SY 07-08) SPP/APR Response Table for this Indicator stated:

- The State reported the required progress data and improvement activities. The State must provide baseline data, targets and improvement activities with the FFY 2008 APR, due February 1, 2010.

Overview of Issue/Description of System or Process:
OSEP requires information on early childhood outcomes baseline data, targets and improvement activities in the FFY 2008 (SY 08-09) submission of the SPP/APR. Pursuant to OSEP's instructions, the IDOE has provided Indicator 7 baseline data, targets and improvement activities in OSEP's SPP template for both the SPP and the APR.

Since 2004, as a condition of eligibility for Part B and 619 funds, LEAs in Indiana have been required to use the state assessment system to measure progress of all early childhood students with disabilities that have received preschool services for at least six months. This assessment has been expected during the quarter of entry, exit and birth date of each child in an early childhood program. The ratings are completed by teachers, speech language pathologists and related services personnel who know the child best. A case conference committee process has been recommended for considering available evidence. For items that exceeded the experience of school personnel, collaboration with the parent was expected. The data has been harvested quarterly and historical data tables were stored for analysis of progress for every student in a Part B program.

From August 2004 until August 2008, the IDOE utilized ISTAR[45] to measure and monitor individual child process and to report on the three early childhood outcomes. Beginning with the spring of FFY 2008 (SY 08-09), the instrument was improved and standardized based on the findings of studies conducted through a General Supervision Enhancement Grant (GSEG). The new version was named the Indiana Standard Tool for Reporting – Kindergarten Readiness (ISTAR-KR).

An original team of early childhood experts worked with the IDOE to develop the early childhood performance indicators based on the *Foundations to Standards*, Indiana's early learning standards. For the purpose of measuring student progress on mathematics, language arts and communication during and before FFY 2007 (SY 07-08), performance was considered according to four levels of proficiencies prior to kindergarten. These levels were referred to as Birth 1 (B1) = birth to two years of age, Birth 2 (B2) = two to three years of age, Foundation 1 (F1) = three to four years of age, and Foundation 2 (F2) = four to five years of age. The team reached consensus that when a child demonstrates 70% of the skills in English/language arts and mathematics relevant to age, the student was determined to be functioning "comparable to same aged peers." This was done as a "best estimate" in absence of forthcoming normative data.

In addition, the functional indicators in the original ISTAR were grouped into physical skills, personal care skills and social emotional skills. Since the continuum was intended to measure growth throughout the student's life, children in an early childhood program were expected to score low in these areas. When children demonstrated 15% (age 3-4), 20% (age 4-5), or 25% (age 5-6) in personal care skills, this was determined to be "comparable to same age peers." When children demonstrated 40% (age 3-4), 50% (age 4-5), 60% (age 5-6) in physical skills this was determined to be "comparable to same aged peers." When children demonstrated 20% (age 3-4), 25% (age 4-5), or 30% (age 5-6) in social-emotional skills, this was determined to be "comparable to same aged peers."

A series of studies analyzed the reliability, alignment, and validity of the items in the original ISTAR resulting in the identification of statistically useful items and standardized scores. A correlative study measured 300 same-aged peers with ISTAR and the Assessment Evaluation and Programming System (AEPS). Alignment studies identified the items that were relevant to the constructs and eliminated those that were found irrelevant. Additionally, a study involving assessing 600 typically developing children distributed in three-

[45] Details regarding the criteria for use of the ISTAR assessment in lieu of ISTEP+ can be accessed at: http://www.doe.in.gov/sites/default/files/assessment/criteria-determining-participation-istar.pdf

month age ranges produced evidence used for a standard-setting process. This resulted in a statistical model that gives the minimum expected score at each quarter of a child's age for each of the three outcomes.

Beginning with the new ISTAR-KR, the three outcome areas are featured rather than the discipline and domain areas of the previous early childhood assessment. ISTAR-KR utilizes an improved method for capturing the statistical construct of achievement with peers. The ISTAR-KR scoring rubric and cut scores were established by a standard setting task force comprised of a diverse range of stakeholders including parents, First Steps, LEAs, FSSA, health care providers and child development specialists. Based on a student's birth data, a score that is equal to or above this expected score would be considered evidence of achievement at a level that is "comparable to same age peers".

The primary reasons for the transition from the ISTAR to the ISTAR-KR is as follows:

- Measuring the progress of children in early childhood programs requires the measurement of three outcome areas rather than discipline or domain areas.
- The original ISTAR allowed students who were only receiving speech services to be rated only on the items relevant to the speech deficiency. This deficit model was unable to capture and represent proficiencies beyond those addressed in speech services. The new assessment addresses the entire construct of each of the three outcome areas.
- The ISTAR-KR assessment leverages the findings from a series of validation studies and broad stakeholder input to permit a more efficient, valid and robust assessment that is feasible for evaluation teams of any size.
- The ISTAR-KR was developed in collaboration with First Steps with the eventual intention that one assessment system could be used to aid in the transition process and the utility of longitudinal data.

Discussion of Progress Data Analysis:
From the child count data system of quarterly reports, a table of student identification numbers called student test numbers (STNs), was produced. This table contained the STNs of all students reported for the first time before July 1, 2008. This list was then reduced to include only the STNs that were discontinued prior to June 30, 2009. An STN was considered discontinued or exited if the student was no longer reported for child count purposes, if the student reached kindergarten age, or if it were indicated on the assessment screen that this was an "exit" assessment. If a student did not remain in the early childhood program for six months, this STN was removed from the list as well. This process produced a list of 2,013 students, the entire population of children relevant to this indicator.

This list of STNs was then merged with the ISTAR assessment history tables to identify the scores of these particular students at the various points of assessment. The dates of the first completed assessment and the exit assessment were then mapped to birthdates to create a chart of the ages of the students at the time of the assessments. The assessment technology was designed to allow for the direct harvesting of student progress by the state. The data included individual scores for each of the outcome areas with comparisons to age expectancy in three month increments. Additionally, the birth date, school association, gender and ethnicity are associated with each student identification number.

A cut score directory was created as a reference table to determine if the score would be considered to be peer level at the time of the assessment. For the original ISTAR, the cut scores were based on the consensus process of early childhood experts as described previously. For the new ISTAR-KR, cut the scores were based on the results of a two-year study involving the assessment of 600 typically developing children using the ISTAR-KR. In both cases, scores were associated with each quarter of typical development from birth to six years of age. For the analysis of progress required for this indicator, the construct of "same age proficiency" was cross-walked between the initial ISTAR and the new ISTAR-KR. In this way, a chart was utilized to show the expected score in either instrument for any given age.

In the final steps of the analysis, the list of STNs was sorted into the five progress categories for each outcome by first identifying all of the STNs with neither scores achieving peer equivalency. The children whose first

score in ISTAR aligned to a lower or equal score at exit in ISTART-KR were counted in category (a) Per*centage of children who did not improve functioning.*

For the remaining STNs, the ISTAR entry assessments scores were used to sort the students that had achieved peer level from the group that had not achieved a peer level equivalency upon entering preschool for each of the three outcomes. Of the first group, if both ISTAR entry and ISTAR-KR exit were equal to or above the age expectancy score, this STN was counted in category (e) *Percentage of children who maintained functioning at a level comparable to same-aged peers.*

If ISTAR score at entry was below age expectancy but the ISTAR-KR score at exit was at or above peer level, this score was counted in the category (d) *Percentage of children who improved functioning to reach a level comparable to same-aged peers.*

If the entry and exit scores were below peer level but the second score was improved from the first score, the child was considered to be improving. A secondary cut score was used which was set at the median of this remaining set. This secondary cut score will remain constant for future analysis in years to come. If the most recent score did not reach this secondary cut score, this STN was counted in the category (b) *Percentage of children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers.* If the second score was above this secondary cut score, this STN is counted in category (c) *Percentage of children who improved functioning to a level nearer to same-aged peers but did not reach it.*

Training and Support:
Assessment procedures are outlined in the ISTAR-KR manual. Training included sessions during semi-annual administrative conferences as well as several hands-on trainings which occurred during the fall months in preparation for the deployment of the ISTAR-KR. Quality assurance activities focused on the completeness and timeliness of the assessment with the provision of a dynamic compliance chart that administrators could use to visually track the students records that were ready for state collection and those that remained incomplete as the deadline approached. The software has particular features that alert the user to required data and assure completeness of the assessment. Additionally, a manual has been created for distribution which connects the assessment process to instructional design, classroom management, and progress monitoring.

For local purposes, the data can be examined according to the alignments with the kindergarten readiness standards of mathematics (counting/quantity, computation, time, location, length/weight/size/capacity, sorting/classifying), language arts (awareness of sounds, awareness of symbols, print for pleasure/information, comprehension, writing, receptive language, expressive language), physical (sensory integration, physical stability, gross motor skills, object control, precision hand skills), personal care (oral motor, self-feeding, dressing/undressing, care of face/hands/nose), and social emotional (sense of self and others, manages emotions, interpersonal skills, responsibility, problem solving, and learning).

Baseline Data for FFY 2008 (SY 08-09):

Percent of preschool children aged 3 through 5 with IEPs who demonstrate improved:			
Measurement:	**Social Emotional Skills**	**Acquiring and Using Knowledge and Skills**	**Taking Appropriate Actions to Meet Needs**
a. Percent of preschool children who did not improve functioning:	329	149	131
	16.3%	7.4%	6.5%
b. Percent of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers:	432	451	293
	21.5%	22.4%	14.6%

c. Percent of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it:	432	451	292
	21.5%	22.4%	14.5%
d. Percent of preschool children who improved functioning to reach a level comparable to same-aged peers:	392	668	1101
	19.5%	33.2%	54.7%
e. Percent of preschool children who maintained functioning at a level comparable to same-aged peers:	428	294	196
	21.3%	14.6%	9.7%
f. Total	2013	2013	2013
	100.0%	100.0%	100.0%
g. **Summary Statement 1**[46]: Of those children who entered the program below age expectations in the outcome, the percent that substantially increased their rate of growth in the outcome by the time they exited:	52.0%	65.1%	76.7%
h. Summary Statement 2[47]**:** Percent of children who were functioning within age expectations in the outcome by the time they exited:	40.7%	47.8%	64.4%

Discussion of Baseline Data:
Our statisticians cross-walked the previous assessment results to the scores from the current assessment. This required charting any given ISTAR score to the expected ISTAR-KR score based on the age of the child. This process was reasonable since both of the assessments were designed to measure the construct of age expectations. Additionally, the ISTAR-KR is based on the same fundamental items as the ISTAR, which have gone through rigorous analysis. This crosswalk model will be required until all of the children who entered the early childhood program during the time when ISTAR was used have graduated into kindergarten.

One statistical challenge that continues to exist in historical data is that it was once permitted in Indiana for children receiving speech only services to be rated on speech-only items. In Indiana, speech-only services may be limited to articulation or may include social pragmatics. This means that some of the ISTAR entry assessments are without a robust measurement of all three outcomes. In the APR submitted for FFY 2007 (SY 07-08), each outcome includes scores using the full ISTAR compared to scores for students rated with the speech interface only. Consistently, the students needing speech support and rated only for their speech performance produced results that focus on the communication deficit. This is evidenced particularly in the data of outcomes 1 and 3 since these represented social pragmatics and articulation respectively for those students who were only receiving speech services. For this reason, we believe we are seeing a deficit scoring phenomenon that needs to work its way through the system. The scores produced by the new ISTAR-KR more closely align to the results that were discovered with the full ISTAR assessment in previous years.

Because the data reported in FFY 2009 presented an improvement scenario that was satisfactory to a group convened to consider baseline and target scores, the targets were set to represent this year or slightly better than this year. Those involved with target setting recommended reconsideration once the system was fully dependent on the ISTAR-KR assessment in FFY 2010.

In FFY 2010 (SY 10-11) Indiana met with the SAC and members of Indiana Council Administrators of Special Education (ICASE) to establish new baselines, targets and improvement activities for Indicator 7. The consensus was that these elements were accurately reflective of the data from students who took the

[46] The IDOE used the Early Childhood Outcome's Center (ECO) I-7 tool to calculate each summary statement, located here: http://www.fpg.unc.edu/~eco/pages/fed_req.cfm#TargetSetting
[47] The IDOE used the Early Childhood Outcome's Center (ECO) I-7 tool to calculate each summary statement, located here: http://www.fpg.unc.edu/~eco/pages/fed_req.cfm#TargetSetting

entrance and exit assessment exclusively in ISTAR-KR at this time. Therefore they will remain the same during FFY 2010 (SY 10-11). Indiana will continue to review and analyze the results from ISTAR-KR in the following reporting year, FFY 2011 (SY 11-12), and discuss the possible establishment of new baseline data, targets and improvement activities at that time.

FFY	Measurable and Rigorous Target
2009 (SY 09-10)	Summary Statement 1: The number of children who entered the Early Childhood program below age expectations in Outcome 1, the percent that substantially increased their rate of growth in Outcome 1 by the time they exited will be 52.5%
	Summary Statement 1: The number of children who entered the Early Childhood program below age expectations in Outcome 2, the percent that substantially increased their rate of growth in Outcome 2 by the time they exited will be 65.5%
	Summary Statement 1: The number of children who entered the Early Childhood program below age expectations in Outcome 3, the percent that substantially increased their rate of growth in Outcome 3 by the time they exited will be 77.0%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 1 by the time they exited will be 41.0%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 2 by the time they exited will be 48.0%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 3 by the time they exited will be 64.5%
2010 (SY 10-11)	Summary Statement 1: The number of children who entered the Early Childhood program below age expectations in Outcome 1, the percent that substantially increased their rate of growth in Outcome 1 by the time they exited will be 53.0%
	Summary Statement 1: The number of children who entered the Early Childhood program below age expectations in Outcome 2, the percent that substantially increased their rate of growth in Outcome 2 by the time they exited will be 66.0%
	Summary Statement 1: The number of children who entered the Early Childhood program below age expectations in Outcome 3, the percent that substantially increased their rate of growth in Outcome 3 by the time they exited will be 77.5%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 1 by the time they exited will be 41.5%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 2 by the time they exited will be 48.5%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 3 by the time they exited will be 65.0%
2011 (SY 11-12)	Summary Statement 1: The number of children who entered the Early Childhood program below age expectations in Outcome 1, the percent that substantially increased their rate of growth in Outcome 1 by the time they exited will be 53.5%
	Summary Statement 1: The number of children who entered the Early Childhood program below age expectations in Outcome 2, the percent that substantially increased their rate of growth in Outcome 2 by the time they exited will be 66.5%
	Summary Statement 1: The number of children who entered the Early Childhood program below age expectations in Outcome 3, the percent that substantially increased their rate of growth in Outcome 3 by the time they exited will be 78.0%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 1 by the time they exited will be 42.0%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 2 by the time they exited will be 49.0%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 3 by the time they exited will be 65.5%
2012	Summary Statement 1: The number of children who entered the Early Childhood program

FFY	Measurable and Rigorous Target
(SY 12-13)	below age expectations in Outcome 1, the percent that substantially increased their rate of growth in Outcome 1 by the time they exited will be 54.0%
	Summary Statement 1: The number of children who entered the Early Childhood program below age expectations in Outcome 2, the percent that substantially increased their rate of growth in Outcome 2 by the time they exited will be 67.0%
	Summary Statement 1: The number of children who entered the Early Childhood program below age expectations in Outcome 3, the percent that substantially increased their rate of growth in Outcome 3 by the time they exited will be 78.5%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 1 by the time they exited will be 42.5%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 2 by the time they exited will be 49.5%
	Summary Statement 2: The percent of children who were functioning within age expectations in Outcome 3 by the time they exited will be 66.0%

Improvement Activities/Timelines/Resources Ongoing:

Improvement Activity	Timelines	Resources
Provide child progress data to LEAs by LEA, reported disability and by the length of time in service.	FFY 2009 (SY 09-10) through FFY 2012 (SY 12-13)	Office of Special Education, Office of Assessment, Office of Information Technology and Reporting, Adaptive Systems, Inc.
Utilize the IDOE's data collection system to verify that all early childhood students are being assessed at the time of entry and exit.	FFY 2009 (SY 09-10) through FFY 2012 (SY 12-13)	Office of Special Education, Office of Assessment, Office of Information Technology and Reporting, Adaptive Systems, Inc.
The IDOE's Departments of Assessment and Special Education will provide regional training opportunities, video modules, FAQ's, newsletters, conferences, onsite training when requested, reference materials and ISTAR-KR troubleshooting.	FFY 2009 (SY 09-10) through FFY 2012 (SY 12-13)	Office of Special Education, Office of Assessment, Office of Information Technology and Reporting, Adaptive Systems, Inc.

Indicator 8 of the Part B State Performance Plan (SPP)

Monitoring Priority:	**Free and Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE)**

Indicator 8: Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities. [20 U.S.C. 1416(a)(3)(A)]

Measurement:
Percent = [(# of respondent parents who report schools facilitated parent involvement as a means of improving services and results for children with disabilities) divided by the (total # of respondent parents of children with disabilities)] times 100.

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
The State of Indiana values the importance of parent involvement in the education of students with disabilities. With hopes of ensuring facilitated parent involvement as a means of improving services and results for children with disabilities, the IDOE, Office of Special Education is implementing a revised sampling plan to collect survey information on this indicator from parents throughout Indiana. The Office of Special Education will sample the State's LEAs, which include public school corporations, charter schools, and state-operated facilities, in order to collect survey data from parents of students with disabilities ages 3-21.

The Office of Special Education collaborated with the NCRRC to develop the sampling strategies for this indicator. The Office of Special Education utilized parent survey components developed by the National Center for Special Education Accountability Monitoring (NCSEAM). The Office of Special Education incorporated selected portions of the NCSEAM survey into the State's current parent survey, which consists of 33 questions. The Office of Special Education collaborated with the staff from the Indiana State Improvement Grant (IN-SIG) and families around the state to determine the most appropriate questions for the survey.

Due to the past inaccuracies of the SPP and faulty sampling plan, the entire SPP for this indicator has been revised to bring Indiana in compliance with the OSEP recommendations for our state with Indicator 8.

Description of Methodology:
The original scope of work required Indiana's contractor, WestEd, to implement the OSEP approved sampling plan for the Indicator 8 parent survey as described in the SPP to obtain a representative sample of the parents or caregivers of children receiving special education services in Indiana. The original sampling plan used a two-fold stratified sampling technique: stratification by LEA category (i.e., school corporations/charter schools and state run schools) and LEA enrollment. By use of the two-fold stratification method, Indiana's sampling process would have allowed the State to select a sample that was representative of the age, gender, race/ethnicity, disability category and community of its students with IEPs. According to the SPP, there are a total of 337 LEAs in Indiana: 293 School Corporations, 40 Charter Schools and four State-operated Schools. One fourth of these (n = 85) were to have been sampled according to the original 2009-2010 parent survey research design. After the selection of the 85 LEAs for 2009-2010 data collection, a second stage of sampling would be utilized to select the eligible parents of students with disabilities. WestEd would have been provided with the decision rules regarding the process for selecting a student(s) whose parents were to be asked to complete the survey. The resultant sample would have included 383 parents, based on a desired confidence interval of 95% and a confidence level of + / – 5%.

For a number of reasons, the sampling plan for the 2009-2010 parent survey was modified during the planning and design activities to include all parents throughout the state for a total of approximately 171,500 parents. The 2010-2011 Parent Survey was similarly administered to all parents throughout the state.

Sampling Categories
To provide a clear context that supports the overall rationale for the data collection process, it will be necessary to define some basic terms about the entities from which the sample will be selected, particularly with regard to ensuring inclusion of all relevant educational entities (e.g., Charter Schools and State-Operated Schools). Students with disabilities receiving Part B special education services in Indiana are served by 337 LEAs that can be operationally defined by three specific categories. These include:

Category 1 – LEAs designated as "school corporations,"
The State recognizes a total of 293.

Category 2 – LEAs in which all schools are designated as "Charter Schools."
The State recognizes a total of 40 charter schools who are considered their own LEA.

Category 3 – LEAs in which all schools are designated as "State-Operated Schools"
This category includes Indiana School for the Blind and Visually Impaired, Indiana School for the Deaf, the Department of Corrections, and Indiana Soldiers' and Sailors' Children's Home.

The three categories described above include 100% of Indiana's approximately 179,043 students with disabilities, ages 3-21, served by IDEA Part B special education services during the reporting year. Table 1 shows the number of LEAs within each category, along with the number of students with disabilities receiving special education services.[48]

Indicator 8, Table 1: Number of LEAs by Category and Students Ages 3-21 with Individualized Education Programs (IEPs)

Category #	Category Title	LEAs in Category	Students with IEPs
1	School Corporations	293	176,931
2	Charter Schools	40	1,098
3	State-Operated Schools	4	1,014
Total		**337**	**179,043**

Together the three categories above represent all possible combinations of LEAs in which Part B students with disabilities provide special education services in the State. Table 2 shows the general configuration of these categorical areas, along with information about the number of entities in each category (i.e., "n"), percent of n, "status" of local educational agency (i.e., "LEA Status"), and percent of students aged 3-21 served within each categorical area (i.e., "Percent Served in Part B").

Instrumentation:
The Office of Special Education will use a modified version of the Part B Parent Survey developed by the National Center for Special Education Accountability Monitoring (NCSEAM). Feedback from varied stakeholders was received to ensure language was parent-friendly, including IN-SIG and families across the state. See Appendix 8-1.

Data Collection Procedures:
As noted previously, the Office of Special Education's designee will be responsible for data collection at the IDOE. However, support will be sought as necessary from individuals who represent Parent Information Resource Centers (PIRCs) and/or Parent Resource Centers(PRC) from Indiana Resource Center for Families

[48] Indiana does not have any LEAs that exceed an average daily membership (ADM) of 50,000.

with Special Needs (IN*SOURCE), About Special Kids (ASK), or other organizations. Beginning in FFY 2009 (SY 09-10), data collection procedures will largely involve the utilization of an internet Parent Survey, along with a range of other options to ensure widest coverage and return rate possible. Internet and non-internet options are described below:

1. Internet Survey—The Office of Special Education will work with its designated vendor to make the modified NCSEAM Parent Survey available on the web. This strategy will be used when after selecting parents' names by the prescribed procedures, the Office of Special Education's designee will contact the parent to notify them they have been selected to participate in the survey. The initial contact will be made by phone, followed by a set of instructions, consent forms, assurance of confidentiality, and other documents sent either through e-mail, or the United States Postal Service; depending on the method that is agreed to be most efficient. The internet administered survey will only be used in cases where the proper consent has been obtained and parents and primary caregivers indicated that they either (1) have immediate access to the internet, or (2) are able to obtain access (e.g., from friend, relative, neighbor). Once internet access capacity has been determined, the parent or primary caregiver will be issued a unique password to enter the site and complete the NCSEAM Parent Survey. Once completed, an auto-message will be sent to the Office of Special Education's designee to confirm completion of the survey. In the event the parent or primary caregiver has not completed the survey within a two-week period, the Office of Special Education's designee will contact the prospective respondent via phone and remind them to complete the survey or ask if another method of administration might be preferred.

2. Non-Internet Options—In the event the parent or primary caregiver indicates they do not have access to the internet, or would prefer not to participate using the internet, the Office of Special Education's designee will offer the following options: (1) mail the Parent Survey to the parent or primary caregiver, or (2) administer and record survey responses over the phone. With regard to the former, the Office of Special Education's designee would mail the Parent Survey and conduct a follow-up two weeks after receipt of the survey. The Office of Special Education's designee would track what surveys have been completed through the NCRRC since the NCRRC is assuming responsibility for data entry. As such, the NCRRC would know what surveys have been sent via mail and which have not. In the event a mail survey has not been submitted after a two-week period, the Office of Special Education's designee will offer the parent or primary caregiver another option (e.g., phone survey).

If the parent or primary caregiver elects to have the NCSEAM survey administered via telephone, the Office of Special Education's designee will offer the parent the following options: (1) the Office of Special Education's designee will administer the survey, (2) the Office of Special Education's designee will offer to have a PIRC or PRC to administer the survey over the phone or face-to-face as preferred by the parent or primary caregiver. The latter option will ensure that the survey design incorporates the needs of culturally and linguistically diverse populations. Given the combination of options to complete the survey, it is anticipated that these internet and non-internet strategies will help to ensure a very high response rate.

Data Analysis Procedures

Both internet and non-internet methods of data collection will be processed in the manner in which the raw data are obtained. In the case of the internet, where the majority of completed surveys will be obtained, responses will be processed through a web-based database. That is, once all of the items are completed and survey results are submitted, the data will be available on the server used by NCRRC. In the case of mailed or parent surveys completed face-to-face responses will be entered into a data base. In the case of phone surveys, the survey administrator will enter data into the web-based survey form. This data will be processed essentially the same as data collected through having parents or primary caregivers complete the survey over the internet.

Once all possible surveys have been collected, the data will be analyzed for outliers, cleaned, and prepared for data analysis. Data analysis will largely involve descriptive statistics along with cross-tabulations in order to make multiple comparisons. Non-parametric statistics, such as the Chi-square will be used to identify significant differences in aggregated responses where necessary. Missing data will be treated either through a

process of weighting or extrapolating the data to provide at least predicative information about the variable in question. Because the web-based survey will be designed to require a response before submitting the data, it is anticipated that very few, if any, will have any missing data. There is a similar expectation for surveys which have been administered over the phone. Only mailed surveys will likely have any missing data. As indicated, missing data will be treated through automatic controls within the statistical program or, if necessary, by weighting or extrapolation.

A report will be prepared by the NCRRC summarizing the results using a descriptive narrative accompanied with charts and graphs. To maintain confidentiality, no data will be reported in which it is possible to identify a particular LEA. Once prepared, the results will be submitted to the Office of Special Education for inclusion in future APRs.

The Office of Special Education will work with the vendor that receives the raw data to determine if consistently missing answers are related to the method(s) of survey administration, grade level of child, LEA or other consistent factor. If a factor can be corrected during the administration period, it will be; if not, it will be used to inform subsequent years of administration.

Baseline Data for FFY 2010 (SY 10-11):
As noted within the FFY 2009 (SY 09-10) submission of the SPP and APR, Indiana's collection method for Indicator 8 moved from a sampling method to a census of the total population of the State's parents and/or guardians of students with disabilities. The number of surveys distributed increased from approximately 400 to approximately 150,000. As such a change warrants, with the FFY 2009 (SY 09-10) submission of the SPP and APR, Indiana is adjusting its baseline data on the Indicator to 42.2%.

Discussion of Baseline Data:
In the FFY 2005 (SY 05-06) SPP, the sampling plan and procedures have been determined faulty. Although the sampling plan did not produce feedback from the variety of families needed, the returned parent surveys represented parents from 62 (92 %) of the 72 planning districts. A total of 1,595 surveys were completed and returned. Analysis of the returned parent surveys documented that 17 parent surveys lacked identifiable information to be assigned to a LEA. However, these parent surveys (unknowns) were counted in the total number of returned parent surveys.

OSEP's June 15, 2007 response table indicated that the states sampling plan for the Indicator was not technically sound. The State submitted a revised sampling plan for the Indicator in the FFY 2006 (SY 06-07) APR. The revised sampling plan was approved by the OSEP and was used to collect FFY 2007 (SY 07-08) and FFY 2008 (SY 08-09) data. Upon analysis of the data gathered with the approved sampling plan, Indiana, in coordination with its stakeholder group, the SAC, determined that the approved sampling plan was no longer adequate. Therefore, Indiana issued an RFP for a vendor to conduct Indiana's parent survey as a census of the total state population of parents and/or guardians of students with disabilities. For the aforementioned changes to Indiana's collection methods for Indicator 8, the data reported in the FFY 2009 (SY 09-10) APR represent new baseline data and not actual target data.

The parent survey was administered statewide via mail, telephone calls and online surveys. The survey was distributed to approximately 162,438 parents, guardians and/or parent/guardian pairings. Of the administered surveys, Indiana received 12,060 valid and complete responses to the survey. A copy of the administered survey can be found as an attachment to the Indicator.

As the survey demonstrates, Indiana's survey response tool used a Likert Scale method based on thirty-one Likert Items that parents and/or guardians must rate on a scale of 1 to 5. Parents may rate each item as one of the following:

1. Strongly Disagree
2. Disagree
3. Neutral
4. Agree

5. Strongly Agree

Indiana and the SAC, while exploring different options for new, more reliable survey methods, noted many concerns over using a Likert Scale model for the parent survey. Likert Scale scoring might be inherently distorted by several factors. Many respondents tend to respond demonstrating a central tendency bias, acquiescence bias or social desirability bias.[49] For these reasons, the IDOE and the SAC determined that a more accurate way to analyze Likert Scale data was by assessing positive responses against negative responses, unlike the mean calculation of responses used during previous years

After statistical analysis of the survey responses, roughly 70% of parents on average responded favorably to the 11 "yes/no" questions. In general, parents were the most likely to report that they had discussed options concerning services in the Least Restrictive Environment (92%), received reports about their child's progress toward goals as outlined in his or her Individualized Education Program (91%) and discussed and planned for accommodations and modifications that their child would need (91%). On the other hand, parents were the least likely to report that they had attended training sessions relating to the needs of children with disabilities and their families (29%), discussed extended school year options (49%), and been given information about organizations that offer support for parents of students with disabilities (51%).

The questionnaire used for the 2010-2011 Parent Survey was modified slightly to better meet the information-making needs of IDOE. More specifically, the response options for 11 of the 31 statements were changed to a "yes/no" format, and the five-point rating scale for the remaining statements was changed to a four-point scale (1= Strongly Disagree / 2=Disagree / 3=Agree / 4=Strongly Agree).

The 2010-2011 Parent Survey asked parents to respond to eleven "yes/no" questions, and to rate the extent to which they agree/disagree with a series of 20 statements (using a scale of 1= Strongly Disagree / 2=Disagree / 3=Agree / 4=Strongly Agree) pertaining to both their experience and their child's experience with special education throughout the 2010-2011 academic year.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	Targets to be provided in FFY 2005 APR due February 1, 2007. For the baseline year, 88% of parents with a child receiving special education services report that schools facilitated parent involvement.
2006 (SY 06-07)	88.2% of parents with a child receiving special education services report that schools facilitated parent involvement.
2007 (SY 07-08)	88.4% of parents with a child receiving special education services report that schools facilitated parent involvement.
2008 (SY 08-09)	88.6% of parents with a child receiving special education services report that schools facilitated parent involvement.
2009 (SY 09-10)	There is no established target on the Indicator for FFY 2009 (SY 09-10); Indiana is establishing a new baseline data of 42.2% for the reporting year.
2010 (SY 10-11)	42.4% of parents with a child receiving special education services report that schools facilitated parent involvement.
2011 (SY 11-12)	42.6% of parents with a child receiving special education services report that schools facilitated parent involvement.
2012 (SY 12-13)	42.8% of parents with a child receiving special education services report that schools facilitated parent involvement.

[49] Babbie, Earl R. (2005). The Basics of Social Research. Belmont, CA: Thomson Wadsworth. p. 174.

Improvement Activities/Timelines/Resources No Longer Active:

Improvement Activity	Timelines	Resources
Revise Indiana's companion guide to Article 7 (Indiana's special education rules and regulations). **Completed as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2009 (SY 09-10)	The Office of Special Education, Project Personnel Supported by the Office of Special Education, IN-SIG/SPDG, PIRC, IN*SOURCE, ASK
Coordinate and disseminate information related to family, school, community partnership activities and resources in Indiana by creating a state hub for information on effective family, school, and community partnerships through increased collaboration with agencies devoted to education and family support. **Completed as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	The Office of Special Education, Project Personnel Supported by the Office of Special Education, IN-SIG/SPDG, PIRC, IN*SOURCE, ASK
Embed Indiana's standards for family, school, and community partnerships into the training and technical assistance for statewide educational initiatives.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Project Personnel Supported by the Office of Special Education, IN-SIG/SPDG, PIRC, IN*SOURCE, ASK
Indiana Resource Network (IRN), formerly known as INRCIA. Added as of FFY 2008 (SY 08-09) submission of the APR.	Through 2012 (SY 12-13)	The 6 IRNs will assist LEAs and schools in reforming and improving their supports and services

Improvement Activities/Timelines/Resources Ongoing:

Improvement Activity	Timelines	Resources
a. Continue funding for IN*SOURCE and ASK b. Increase number of returned parent surveys c. Notify planning districts of results of parent surveys **Revised as of FFY 2011 (SY 11-12).**	FFY 2005 (SY 05-06) through FFY 2012 (SY 12-13)	IDOE, INSOURCE, ASK, CEL, PIRCs and PRC.
Analyze survey results for trends regarding consistently low-scoring and high-scoring areas of parent involvement. Target for improvement the areas most likely to impact the indicator.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Project Personnel Supported by the Office of Special Education, IN-SIG/State Personnel Development Grant (SPDG), PIRC, IN*SOURCE, ASK
Training and technical assistance to strengthen family, school, and community partnerships will be provided to LEAs as a means to increase student achievement and parental involvement.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Project Personnel Supported by the Office of Special Education, IN-SIG/SPDG, PIRC, IN*SOURCE, ASK
Train parents through Indiana's Academy for Parent Leadership and other parent organizations throughout Indiana to be a part of training and technical assistance to statewide initiatives.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Project Personnel Supported by the Office of Special Education, IN-SIG/SPDG, PIRC, IN*SOURCE, ASK

Improvement Activity	Timelines	Resources
Provide information sessions to increase awareness of statewide initiatives and effective educational practices among families and communities.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Project Personnel Supported by the Office of Special Education, IN-SIG/SPDG, PIRC, IN*SOURCE, ASK

Appendix 8-1

Office of Special Education – Parent Survey (Spring 2008)

This is a survey for parents of students receiving special education services. Your responses will help guide efforts to improve services and results for children and families. For each statement below, please select one response choice by placing an ☒ in the appropriate box for each question. In responding to each statement, think about your experience and your child's experience with special education throughout the past academic year **(2010-2011)**. If you would like to complete the survey online please go to http://surveys.wested.org/s3/inps. ***When prompted for the Survey Security Code, type the number located in the upper right corner of this survey***. Thank you.

Question	Yes	No
1) At the Case Conference Committee meeting, we discussed options concerning services in the Least Restrictive Environment.	❒	❒
2) At the Case Conference Committee meeting, we discussed how my child would participate in statewide assessments (ISTEP, ISTAR).	❒	❒
3) At the Case Conference Committee meeting, we discussed and planned for accommodations and modifications that my child would need (i.e. tests read aloud, preferential seating, scribe, strategies to deal with behavior).	❒	❒
4) Written justification was given for the extent that my child would not receive services in the general classroom.	❒	❒
5) At the Case Conference Committee meeting, we discussed extended school year options.	❒	❒
6) I receive reports about my child's progress toward goals as outlined in his or her Individualized Education Program.	❒	❒
7) The school explains what options I have if an issue cannot be resolved in a Case Conference Committee meeting.	❒	❒
8) The school provides information on agencies that can assist my child in transitions.	❒	❒
9) I was given information about organizations that offer support for parents of students with disabilities.	❒	❒
10) I participate in school sponsored activities.	❒	❒
11) I attend training sessions relating to the needs of children with disabilities and their families.	❒	❒

Question	Strongly Agree	Agree	Disagree	Strongly Disagree
12) I am treated like an equal partner with teachers and other professionals in planning my child's special education needs and goals.	❒	❒	❒	❒
13) When scheduling Case Conference Committee meeting, consideration was given to my availability.	❒	❒	❒	❒
14) Teachers and administrators ensure that I have fully understood the Procedural Safeguards (the rules in federal law that protect the rights of parents).	❒	❒	❒	❒
15) General education personnel make accommodations and modifications as indicated on my child's Individualized	❒	❒	❒	❒

Education Program.				
16) Special education personnel make accommodations and modifications as indicated on my child's Individualized Education Program.	❒	❒	❒	❒
17) All staff understands my child's needs and their role in implementing my child's Individualized Education Program.	❒	❒	❒	❒

Question	Strongly Agree	Agree	Disagree	Strongly Disagree
18) My child receives all the supports and services documented in his or her Individualized Education Program.	❒	❒	❒	❒
19) My child's Individualized Education Program tells how progress towards goals will be measured.	❒	❒	❒	❒
20) My child's evaluation report is written in terms and language I understand.	❒	❒	❒	❒
21) Teachers are available to communicate with me in a variety of ways (i.e. phone, email, notes, etc.).	❒	❒	❒	❒
22) The school shows sensitivity to the needs of my child and other students with disabilities and their families.	❒	❒	❒	❒
23) Written information I receive is understandable.	❒	❒	❒	❒
24) Teachers and administrators respect my cultural heritage.	❒	❒	❒	❒
25) I know who to contact if a special education issue arises.	❒	❒	❒	❒
26) Teachers are knowledgeable about my child's disability.	❒	❒	❒	❒
27) The principal supports appropriate special education services in the school.	❒	❒	❒	❒
28) General education and special education personnel work together to assure that my child's Individualized Education Program is being implemented.	❒	❒	❒	❒
29) The school encourages student involvement in Case Conference Committee meetings.	❒	❒	❒	❒
30) I am knowledgeable about federal and state laws that affect special education.	❒	❒	❒	❒
31) Over the past year, special education services have helped me and/or my family understands how the special education system works.	❒	❒	❒	❒

Child's School:	**Check One:** Child's Primary Exceptionality/Disability: ❒ Autism Spectrum Disorder ❒ Blind or Low Vision ❒ Cognitive Disability ❒ Deaf or Hard of Hearing ❒ Deaf-Blind ❒ Developmental Delay	**Check One:** Child's Race / Ethnicity: ❒ White ❒ Black or African-American ❒ Hispanic or Latino ❒ Asian or Pacific Islander ❒ American Indian or Alaskan Native ❒ Multi-racial
Child's Age in Years:		

Child's Grade: Prekindergarten, Kindergarten, or 1 thru 12:	❒ Emotional Disability ❒ Language or Speech Impairment ❒ Multiple Disabilities ❒ Other Health Impairment ❒ Orthopedic Impairment ❒ Specific Learning Disability ❒ Traumatic Brain Injury	
Comments:		

Indicator 9 of the Part B State Performance Plan (SPP)

Monitoring Priority: Disproportionality

Indicator 9: Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification.
[20 U.S.C. 1416(a)(3)(C)]

Measurement:[50]
Percent = [(# of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification) divided by the (# of districts in the State)] times 100.
Include State's definition of "disproportionate representation."
Based on its review of the 618 data for FFY 2008, describe how the State made its annual determination that the disproportionate representation it identified (consider both over and underrepresentation) of racial and ethnic groups in special education and related services was the result of inappropriate identification as required by §§300.600(d)(3) and 300.602(a), e.g., using monitoring data; reviewing policies, practices and procedures, etc. In determining disproportionate representation, analyze data, for each district, for all racial and ethnic groups in the district, or all racial and ethnic groups in the district that meet a minimum 'n' size set by the State. Report on the percent of districts in which disproportionate representation of racial and ethnic groups in special education and related services is the result of inappropriate identification, even if the determination of inappropriate identification was made after the end of the FFY 2009 reporting period, i.e., after June 30, 2010. If inappropriate identification is identified, report on corrective actions taken.

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
Due to OSEP's in depth analysis of Indiana's disproportionate representation definition and methodology, the state was requested to modify its method of calculating disproportionality to assure racial ethnic neutrality prior to submitting the FFY 2010 (SY 10-11) APR which was due February 1, 2012. The state also updated its narrative description of the monitoring procedures and practices to assure compliance with OSEP Memo 09-02 (see the "Annual determination of disproportionate representation of racial and ethnic groups in special education and related services" and "Verification of correction of noncompliance" sections below.)

Since 1998 the IDOE, Office of Special Education has partnered with the Equity Project at the Center for Evaluation and Education Policy at Indiana University[51] (Equity Project) in order to monitor disproportionality, as part of the monitoring process described in Indicator 15, at both the SEA and LEA, and to develop procedures to assist LEAs in addressing identified issues of disproportionality.

Careful analysis of disproportionality is not a new concept in Indiana; data regarding LEA disproportionality has been shared with LEAs annually since 1999. Representatives of the Equity Project were in attendance at the national panels convened by Westat, and have been in regular contact with the National Center for Culturally Responsive Educational Systems (NCCRESt) in order to ensure that all measures are based on nationally consensually based measures. The Indiana model for monitoring and addressing disproportionality has been highlighted at a number of national conferences, including the NCCRESt national conference in February 2006, the Council for Exceptional Children, and the National Association of School Psychologists.

[50] Per OSEP This Measurement table has been updated with submission of FFY 2008 APR.
[51] See http://ceep.indiana.edu/equity.

On October 21, 2010, OSEP conducted a conference call with the State of Indiana inquiring about its disproportionate representation calculation methodology. On October 26, 2010, as requested, the State submitted written justification to OSEP regarding its method of calculating disproportionality in regards to Indicators 9 and 10. On July 19, 2011, the State received written notification from OSEP indicating, based on their review of Indiana's October 26, 2010 written explanation, the State's method of calculating disproportionate representation, specifically the State's utilization of the risk index, may not be race neutral and requested the State revise its methodology to assure race neutrality. During the month of August 2011, Indiana sought and received technical assistance from DAC to assist the State in developing a race neutral methodology for determining disproportionate representation.

On September 15, 2011, Indiana submitted to OSEP its proposed revision of its method of determining disproportionate representation. On September 30, 2011, the State participated in a teleconference with OSEP to respond to several inquiries, including implementation timelines for the revised methodology. On October 3, 2011, the State submitted a written response regarding OSEPs September 30th questions, as requested by OSEP. On January 5, 2012, the State received written notification from OSEP stating that Indiana's proposed revision of its methodology for calculating disproportionate representation resolved OSEP's concerns with race neutrality.

On January 13, 2012, the SAC reviewed and provided input on Indiana's purposed revisions to its disproportionate representation definition. As directed by OSEP, the State changed its calculation mythology to assure compliance with 34 CRF §300.600(d)(3).

Indiana defines *disproportionate representation (or disproportionality)* of racial and ethnic groups in special education and related services as a risk ratio greater than 2.0 or a risk ratio less than 0.5 in special education and related services, for two consecutive years. Sample "n" size is set at a minimum of 30 students in a given population. A review of policies, procedures and practices is conducted on those LEAs designated as having disproportionate representation to determine if the disproportionality is the result of inappropriate identification.

Previously, Indiana's logic for utilizing the risk index in the manner it did was to add stability to the utilization of a risk ratio to avoid seemingly random fluctuations in the LEAs that exceeded the disproportionality thresholds. The potential instability of risk ratios in low "n" size situations has been noted consistently (see e.g., Bollmer et al., 2007). The State has over time been concerned with the potential instability, and for this data collection elected to raise the minimum "n" size from 10 to 30, which is the same "n" size that is utilized for similar purposes in NCLB.

For more than a decade, the Equity Project has worked with the Office of Special Education and LEAs throughout the state in order to implement local interventions that are designed to reduce the rate of disproportionate representation at the local level. LEAs found to have disproportionate representation were offered the opportunity to engage in a process termed Local Equity Action Development (LEAD) in which they conducted a needs assessment, formed a district team that reviews local data, formulated hypotheses, developed interventions, and engaged in a continuous data feedback process using local data to evaluate the impact of those interventions. During FFY 2006 (SY 06-07), an evaluation conducted by the Equity Project suggested that the LEAD process was highly effective, resulting in decreases in disproportionate representation of up to 20% in some cases. The process additionally received a favorable response from LEA staff in a qualitative evaluation. This process will be adapted for use with LEAs ultimately found to have disproportionate representation due to inappropriate identification.

Racial and ethnic disproportionate representation is determined by using the relative risk ratio to compare the risk of service in special education and related services for each racial/ethnic group (American Indian, Asian/Pacific Islander, African American, Hispanic, White) to the risk for all others, using the risk ratio formula recommended by Westat. To determine "disproportionate representation," both statistical overrepresentation and under-representation are assessed (see exact criteria and format below).

Two data sets are utilized to explore the extent for which disproportionality is prevalent in special education enrollment throughout Indiana schools. The student enrollment demographics and disability data is obtained from the states September ADM enrollment count and December 1st special education child count. As required, the state utilizes data collected on Table 1 (Child Count) of Information Collection 1820-0043 (Report of Children with Disabilities Receiving Special Education under Part B of the IDEA, as amended) for all children with disabilities aged 6 through 21 served under IDEA.

Annual determination of disproportionate representation of racial and ethnic groups in special education and related services

When determining disproportionate representation, Indiana's definition requires an LEA to exceed the established thresholds (2.0 risk ratio for overrepresentation or 0.5 risk ratio for underrepresentation) for two consecutive years; therefore the state utilizes the data from the current FFY reporting period as well as the previous FFY. Determination of disproportionality due to inappropriate identification is a two-step process.

- Step one is the process to determine which LEAs have disproportionate representation based upon Indiana's definition. The LEAs that exceed the risk ratio thresholds for either over-representation or under-representation for two consecutive years are notified of their disproportionality.
- Step two is an analysis to determine if the disproportionality is the result of inappropriate policies, procedures and practices. The LEAs notified in step one are required to review their policies, procedures and practices, and complete the Indiana Special Education Disproportionality Self-Assessment survey for Indicator 9.

The IDOE and its contracted agent review and analyze the LEA's self-assessment surveys. Follow up telephone interviews are conducted with the LEAs to clarify information regarding their self-assessments as needed. Based upon the review of the LEA's data, self-assessment and phone interviews, it is determined if the LEA's disproportionality may or may not be due to inappropriate policies, procedures or practices. If upon review it is determined the appropriate policies, procedures and practices may not be in place, an individual file review is conducted to assure compliance with in 34 CFR §§300.111, 300.201 and 300.301 through 300.311. The file selection is based upon a ten percent random sample (no less than five, no more than ten) of case files of students with disabilities in the same racial ethnic group that has the disproportionality.
If the individual file review indicates student specific instances of noncompliance with the child find, evaluation, and eligibility requirements in 34 CFR §§300.111, 300.201 and 300.301 through 300.311, the LEA is issued a finding of noncompliance and informed it must:

1. Correct each specific instance of noncompliance as soon as possible and in no case later than one year from the date of notification; and,
2. Review and revise their policies, procedures, and practices to assure compliance with 34 CFR §§300.111, 300.201 and 300.301 through 300.311.

Verification of Correction of Noncompliance

Each LEA that was issued a finding of noncompliance for Indicator 9 (or the related requirements of the Indicator) is required to undergo a two-prong process of correction, as described in OSEP Memorandum 09-02.

When there is an instance of noncompliance due to inappropriate identification, the LEA is issued a single finding of noncompliance. The finding includes each individually identified student-specific case of noncompliance as well as inappropriate policies, procedures and practices. Pursuant to OSEP Memo 09-02, the LEA must first correct each individual IEP that is identified as noncompliant due to inappropriate identification. The LEAs that are issued findings are directed to seek assistance from the Indiana Resource Network's technical assistance centers to assist the LEA in correcting the noncompliant IEPs. Individual cases of noncompliance are corrected by the LEAs using various means including, but not limited to, reassessing the student if the assessments were identified as inadequate or reconvening the Case Conference Committee if the proper members were not in attendance. The corrected IEPs will then be verified for correction by the IDOE through individual file reviews.

In addition to correcting each student-specific case of noncompliance, the LEAs are required to review and modify as needed: policies, procedures and practices to assure compliance with the child find, evaluation, and eligibility requirements in 34 CFR §§300.111, 300.201 and 300.301 through 300.311. The updated policies, procedures and practices will then be reviewed and verified for correction by the IDOE. After the policies, procedures and practices are verified and corrected, the LEA is informed of their responsibility to ensure every IEP in the LEA is compliant and meets the requirements of IDEA 2004.

In Indiana, once an LEA has corrected each student-specific case of noncompliance due to inappropriate identification; updated their policies, procedures and practices; and ensured that all IEPs in the LEA are compliant; the IDOE will then select a random sampling of IEPs from the LEA in order to verify systemic correction of the noncompliance. The random sampling will be from all student IEPs in the same racial/ethnic group(s) that was (were) identified in the LEA's notification of noncompliance due to inappropriate identification. If any noncompliant IEPs due to inappropriate identification are found during the random sampling, the LEA failed to correct noncompliance. If the LEA is able to complete each of the aforementioned steps and each step is verified as complete and correct by the IDOE, the LEA will be issued a notification of correction of noncompliance.

Baseline Data for FFY 2005 (SY 05-06):
In FFY 2005 (SY 05-06), the initial statistical analysis suggested that 10 Indiana LEAs had disproportionate representation of racial and ethnic groups in special education and related services, representing 3.41% of the total number of LEAs. The percent of LEAs identified as having a disproportionate number of students due to inappropriate identification at that time was 0%.

In conversations with OSEP, it became apparent that the earlier criteria being using by the Office of Special Education inappropriately mixed definitions of significant disproportionality and disproportionate representation. Thus, we have conducted a re-analysis of state data for FFY 2005 (SY 05-06) and FFY 2006 (SY 06-07) and have preliminarily determined that three of 337 (1%) LEAs present statistical criteria indicating disproportionality of racial and ethnic groups (American Indian, Asian/Pacific Islander, African American, Hispanic and White) in special education and related services.

Upon notification of the preliminary determination of disproportionate representation the three identified LEAs were requested to verify their data. The data verification process determined that two of the three LEAs preliminarily identified as having disproportionate representation, occurred because of a local residential treatment facility whose students were served by the identified LEA. These residential facility students resided outside the LEA prior to being placed into the treatment facility. By removing these "out of district" residential treatment facility students from the data, the two LEAs no longer met the Indiana criteria of disproportionate representation.

The data verification process for the third LEA indicated that the LEA did have disproportionate representation. However, a review of the LEAs policies, procedures and practices determined that the disproportionate representation was not the result of inappropriate identification.

Discussion of Baseline Data:
Annual determination of disproportionate representation due to inappropriate identification.
Once a determination is made that an LEA has disproportionate representation, further analysis must take place to determine whether the determination of disproportionate representation is due to inappropriate identification. Both disproportionate representation and inappropriate identification are determined through the focused monitoring process described in Indicator 15.

First, as described above, an annual analysis of data is conducted to identify LEAs with data that raises concerns about disproportionate representation. Each district identified through the procedure above will receive correspondence from the Office of Special Education requesting data verification. When the data verification substantiates disproportionate representation the LEA will complete a self-assessment process that includes tools developed by NCCRESt.

All responses from LEAs will be reviewed by a joint team of representatives from the Office of Special Education and the Equity Project, as described in Indicator 15, to determine whether data indicating disproportionate representation indicate policies, practices, and procedures that are appropriate for all students, regardless of racial/ethnic category.

The combination of these activities may result in the determination of inappropriate identification practices. Findings of noncompliance are identified in the preliminary report with corresponding required corrective actions and timelines. As described in Indicator 15, completion of corrective actions is tracked through ongoing program reports, provision of technical assistance, and ongoing contact with the Office of Special Education.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	Percent of districts that report disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification will be 0%.
2006 (SY 06-07)	Percent of districts that report disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification will be 0%.
2007 (SY 07-08)	Percent of districts that report disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification will be 0%.
2008 (SY 08-09)	Percent of districts that report disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification will be 0%.
2009 (SY 09-10)	Percent of districts that report disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification will be 0%.
2010 (SY 10-11)	Percent of districts that report disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification will be 0%.
2011 (SY 11-12)	Percent of districts that report disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification will be 0%.
2012 (SY 12-13)	Percent of districts that report disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification will be 0%.

Improvement Activities/Timelines/Resources No Longer Active:

Improvement Activity	Timelines	Resources
LEAs identified with disproportionate representation will complete a self-assessment as part of the monitoring process to determine if disproportionate representation is due to inappropriate identification The process includes tools developed by NCCRESt that have been modified. **Completed as of FFY 2007 (SY 07-08).**	May 2008	Office of Special Education, Equity Project personnel

Improvement Activity	Timelines	Resources
LEA's identified with disproportionate representation due to inappropriate identification will attend an intensive institute on addressing disproportionality to be held in the spring. **Discontinued as of FFY 2008 (SY 08-09); will be covered under the IRN improvement activity.**	FFY 2008 (SY 08-09) through FFY 2010 (SY 10-11)	The CEL, the Equity Project personnel, the NCRRC.
Professional development activities and/or technical assistance will be provided statewide on: • Closing Indiana's opportunity gaps (e.g., academic, social, and behavioral) by creating culturally responsive instructional systems; • Embedding early interventions in the culture of daily practice; • Utilizing Problem Solving Process to enhance the effectiveness of early intervention teams; • Designing individualized education programs (IEP) aligned with the general education curriculum to ensure education benefit; • Ensuring culturally responsive instructional and classroom management practices with all children; • Ensuring culturally responsive communication/interaction with all families; • Differentiated instruction in all classrooms • Effective use of assessment and progress monitoring tools; • Understanding language proficiency and academic achievement issues for English Language Learners (EEL) students; • Continuation and expansion of "Courageous Conversations about Race"; and, • Continuation of training on inclusive education, multilevel instruction, scheduling, and peer supports. **Discontinued as of FFY 2008 (SY 08-09); will be covered under the IRN improvement activity.**	FFY 2007 (SY07-08) through FFY 2010 (SY 10-11)	IDOE, projects supported by IDOE
Revise state guidelines for eligibility determination and service, and provide statewide training on appropriate identification of students with disabilities. **Completed as of FFY 2008 (SY 08-09).**	FFY 2007 (SY07-08) until completed	IDOE, Statewide stakeholders
a. Survey LEAs with overrepresentation to determine preliminary causative factors (e.g. residential facilities located within boundaries, training needs, other factors) b. Continue to support Center for Evaluation and Education Policy (CEEP) technical assistance to LEAs **Discontinued as of FFY 2007 (SY 07-08).**	a. FFY 2006 (SY 06-07) b. FFY 2005 (SY 05-06) through FFY 2010 (SY 10-11)	a. The Office of Special Education, local administrators b. Continue to support CEEP technical assistance to LEAs

Improvement Activity	Timelines	Resources
a. Continue to examine data and survey LEAs to determine self-reported causative factors. b. Development of Improvement Plans to be submitted to IDOE/Office of Special Education c. Strengthen General Education Interventions (GEI) and Response to Interventions (RTI) initiatives **Discontinued as of FFY 2007 (SY 07-08).**	a. FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11) b. FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11) c. FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	a. Continue to examine data and survey LEAs to determine self-reported causative factors. b. Development of Improvement Plans to be submitted to IDOE/Office of Special Education c. Strengthen GEI and RTI initiatives
LEA's identified with significant disproportionality will attend a three day intensive institute on addressing disproportionality to be held in the Spring. (In future years, the intensive institute will also include LEAs with disproportionate representation due to inappropriate identification). **Discontinued FFY 2007 (SY 07-08).**	May, 2008	Office of Special Education, Equity Project personnel, NCRRC

Improvement Activities/Timelines/Resources Ongoing:

Activity	Timelines	Resources
LEAs identified with disproportionate representation due to inappropriate identification will form a district-wide team to address disproportionality issues. With technical assistance from the IDOE and IRN, the team will develop and evaluate a plan for addressing all areas of disproportionate representation due to inappropriate identification. **Modified as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	Office of Special Education, Equity Project personnel, NCRRC
Continue to gather data on disproportionate identification of racial and ethnic groups in special education and disseminate to stakeholders through a variety of formats, including the IDOE website.	FFY 2007 (SY 07-00) through FFY 2012 (SY 12-13)	Office of Special Education, Equity Project personnel
Indiana Resource Network (IRN) **Added as of FFY 2008 (SY 08-09).**	Through 2012 (SY 12-13)	The 6 IRNs will assist LEAs and schools in reforming and improving their supports and services.
Gather data on disproportionality of racial and ethnic groups in special education and disseminate to stakeholders. **Added as of FFY 2011 (SY 11-12).**	FFY 2010 (SY 10-11) through FFY 2012 (SY 12-13)	IDOE, IRN, CEEP

Activity	Timelines	Resources
Define policies and procedures for data collection and reporting. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education and Office of Data and Accountability

Indicator 10 of the Part B State Performance Plan (SPP)

Monitoring Priority: Disproportionality

Indicator 10: Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.
[20 U.S.C. 1416(a)(3)(C)]

Measurement: [52]
Percent = [(# of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification) divided by the (# of districts in the State)] times 100.
Include State's definition of "disproportionate representation."
Based on its review of the 618 data for FFY 2008, describe how the State made its annual determination that the disproportionate representation it identified (consider both over and underrepresentation) of racial and ethnic groups in special education and related services was the result of inappropriate identification as required by §§300.600(d)(3) and 300.602(a), e.g., using monitoring data; reviewing policies, practices and procedures, etc. In determining disproportionate representation, analyze data, for each district, for all racial and ethnic groups in the district, or all racial and ethnic groups in the district that meet a minimum 'n' size set by the State. Report on the percent of districts in which disproportionate representation of racial and ethnic groups in special education and related services is the result of inappropriate identification, even if the determination of inappropriate identification was made after the end of the FFY 2009 reporting period, i.e., after June 30, 2010. If inappropriate identification is identified, report on corrective actions taken.

Overview of the SP) Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
Due to OSEP's in depth analysis of Indiana's disproportionate representation definition and methodology, the State was requested to modify its method of calculating disproportionality to assure racial ethnic neutrality prior to submitting the FFY 2010 (SY 10-11) APR which was due February 1, 2012. The state also updated its narrative description of the monitoring procedures and practices to assure compliance with OSEP Memo 09-02 (see the "Annual determination of disproportionate representation of racial and ethnic groups in special education and related services" and "Verification of correction of noncompliance" sections below.)

Since 1998 the IDOE Office of Special Education has partnered with the Equity Project [53] in order to monitor disproportionality, as part of the monitoring process described in Indicator 15, at both the SEA and LEA, and to develop procedures to assist LEAs in addressing identified issues of disproportionality.

Careful analysis of disproportionality is not a new concept in Indiana; data regarding LEA disproportionality has been shared with LEAs annually since 1999. Representatives of the Equity Project were in attendance at the national panels convened by Westat, and have been in regular contact with NCCRESt in order to ensure that all measures are based on nationally consensually based measures. The Indiana model for monitoring and addressing disproportionality has been highlighted at a number of national conferences, including the NCCRESt national conference in February 2006, the Council for Exceptional Children, and the National Association of School Psychologists.

On October 21, 2010, OSEP conducted a conference call with the State of Indiana inquiring about its disproportionate representation calculation methodology. On October 26, 2010, as requested, the State submitted written justification to OSEP regarding its method of calculating disproportionality in regards to

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Indicators 9 and 10. On July 19, 2011, the State received written notification from OSEP indicating, based on their review of Indiana's October 26, 2010 written explanation, the State's method of calculating disproportionate representation, specifically the states utilization of the risk index may not be race neutral and requested the State to revise its methodology to assure race neutrality. During the month of August 2011, Indiana sought and received technical assistance from the DAC to assist the state in developing a race neutral methodology for determining disproportionate representation.

On September 15, 2011, Indiana submitted to OSEP its proposed revision of its method of determining disproportionate representation. On September 30, 2011, the State participated in a teleconference with OSEP to respond to several inquiries, including implementation timelines for the revised methodology. On October 3, 2011, as requested, the State submitted a written response regarding OSEP's September 30th questions. On January 5, 2012, the State received written notification from OSEP stating that Indiana's proposed revision of its methodology for calculating disproportionate representation resolved OSEP's concerns with race neutrality.

On January 13, 2012, the Indiana SAC reviewed and provided input on Indiana's purposed revisions to its disproportionate representation definition. As directed by OSEP, the state changed its calculation mythology to assure compliance with 34 CRF §300.600(d)(3).

Indiana defines *disproportionate representation (or disproportionality)* of racial and ethnic groups in specific disability categories as a risk ratio greater than 2.0 or a risk ratio less than 0.5 in special education and related services for two consecutive years. Sample "n" size is set at a minimum of 30 students in a given population. A review of policies, procedures and practices is conducted on those LEAs designated as having disproportionate representation to determine if the disproportionality is the result of inappropriate identification.

Previously, Indiana's logic for utilizing the risk index in the manner it did was to add stability to the utilization of a risk ratio to avoid seemingly random fluctuations in the LEAs that exceeded the disproportionality thresholds. The potential instability of risk ratios in low "n" size situations has been noted consistently (see e.g., Bollmer et al., 2007). The State has over time been concerned with the potential instability, and for this data collection elected to raise the minimum "n" size from 10 to 30, which is the same "n" size that is utilized for similar purposes in NCLB.

For more than a decade, the Equity Project has worked with the Office of Special Education and LEAs throughout the state in order to implement local interventions that are designed to reduce the rate of disproportionate representation at the local level. LEAs found to have disproportionate representation were offered the opportunity to engage in a process termed LEAD in which they conducted a needs assessment, formed a district team that reviews local data, formulated hypotheses, developed interventions, and engaged in a continuous data feedback process using local data to evaluate the impact of those interventions. During FFY 2006 (SY 06-07), an evaluation conducted by the Equity Project suggested that the LEAD process was highly effective, resulting in decreases in disproportionate representation of up to 20% in some cases. The process additionally received a favorable response from LEA staff in a qualitative evaluation. This process will be adapted for use with LEAs ultimately found to have disproportionate representation due to inappropriate identification.

Racial and ethnic disproportionate representation is determined by using the relative risk ratio to compare the risk of service in special education and related services for each racial/ethnic group (American Indian, Asian/Pacific Islander, African American, Hispanic, White) to the risk for all others, using the risk ratio formula recommended by Westat. To determine "disproportionate representation," both statistical overrepresentation and under-representation are assessed (see exact criteria and format below).

Two data sets are utilized to explore the extent for which disproportionality is prevalent in special education enrollment throughout Indiana schools. The student enrollment demographics and disability data is obtained from the states September ADM enrollment count and December 1st special education child count. As

required, the state utilizes data collected on Table 1 (Child Count) of Information Collection 1820-0043 (Report of Children with Disabilities Receiving Special Education under Part B of the IDEA, as amended) for all children with disabilities aged 6 through 21 served under IDEA.

Annual determination of disproportionate representation of racial and ethnic groups in special education and related services

When determining disproportionate representation, Indiana's definition requires an LEA to exceed the established thresholds (2.0 risk ratio for overrepresentation or 0.5 risk ratio for underrepresentation) for two consecutive years; therefore the State utilizes the data from the current FFY reporting period as well as the previous FFY. Determination of disproportionality due to inappropriate identification is a two-step process.

Step one is the process to determine which LEAs have disproportionate representation based upon Indiana's definition. The LEAs that exceed the risk ratio thresholds for either over-representation or under-representation for two consecutive years are notified of their disproportionality.

Step two is an analysis to determine if the disproportionality is the result of inappropriate policies, procedures and practices. The LEAs notified in step one are required to review their policies, procedures and practices, and complete the Indiana Special Education Disproportionality Self-Assessment survey for Indicator 10.

The IDOE and its contracted agent review and analyze the LEAs self-assessment surveys. Follow up telephone interviews are conducted with the LEAs to clarify information regarding their self-assessments as needed. Based upon the review of the LEA's data, self-assessment and phone interviews, it is determined if the LEA's disproportionality may or may not be due to inappropriate policies, procedures or practices. If upon review it is determined the appropriate policies, procedures and practices may not be in place, an individual file review is conducted to assure compliance with in 34 CFR §§300.111, 300.201 and 300.301 through 300.311. The file selection is based upon a ten percent random sample (no less than five, no more than ten) of case files of students with disabilities in the same racial ethnic group that has the disproportionality.

If the individual file review indicates student specific instances of noncompliance with the child find, evaluation, and eligibility requirements in 34 CFR §§300.111, 300.201 and 300.301 through 300.311, the LEA is issued a finding of noncompliance and informed it must:

1. Correct each specific instance of noncompliance as soon as possible and in no case later than one year from the date of notification; and,
2. Review and revise their policies, procedures, and practices to assure compliance with 34 CFR §§300.111, 300.201 and 300.301 through 300.311.

Verification of Correction of Noncompliance

Each LEA issued a finding of noncompliance for Indicator 10 (or the related requirements of the Indicator) is required to undergo a two-prong process of correction, as described in OSEP Memorandum 09-02.

When there is an instance of noncompliance due to inappropriate identification, the LEA is issued a single finding of noncompliance. The finding includes each individually identified student-specific case of noncompliance as well as inappropriate policies, procedures and practices. Pursuant to OSEP Memo 09-02, the LEA must first correct each individual IEP that is identified as noncompliant due to inappropriate identification. The LEAs that are issued findings are directed to seek assistance from the Indiana Resource Network's technical assistance centers to assist the LEA in correcting the noncompliant IEPs. Individual cases of noncompliance are corrected by the LEAs using various means including, but not limited to, reassessing the student if the assessments were identified as inadequate or reconvening the Case Conference Committee if the proper members were not in attendance. The corrected IEPs will then be verified for correction by the IDOE through individual file reviews.

In addition to correcting each student-specific case of noncompliance, the LEAs are required to review and modify as needed: policies, procedures and practices to assure compliance with the child find, evaluation, and eligibility requirements in 34 CFR §§300.111, 300.201 and 300.301 through 300.311. The updated policies, procedures and practices will then be reviewed and verified for correction by the IDOE. After the policies, procedures and practices are verified corrected, the LEA is informed of their responsibility to ensure every IEP in the LEA is compliant and meets the requirements of IDEA.

In Indiana, once an LEA has corrected each student-specific case of noncompliance due to inappropriate identification; updated their policies, procedures and practices; and ensured that all IEPs in the LEA are compliant: the IDOE will then select a random sampling of IEPs from the LEA in order to verify systemic correction of the noncompliance. The random sampling will be from all student IEPs in the same racial/ethnic group(s) that was (were) identified in the LEA's notification of noncompliance due to inappropriate identification. If any noncompliant IEPs due to inappropriate identification are found during the random sampling, the LEA failed to correct noncompliance. If the LEA is able to complete each of the aforementioned steps and each step is verified as complete and correct by the IDOE, the LEA will be issued a notification of correction of noncompliance.

Baseline Data for FFY 2005 (SY 05-06):
In FFY 2005 (SY 05-06), the initial statistical analysis suggested that 10 Indiana LEAs had disproportionate representation of racial and ethnic groups in specific disability categories, representing 3.41% of the total number of LEAs. The percent of LEAs identified as having a disproportionate number of students due to inappropriate identification at that time was 0%.

In conversations with the OSEP, it became apparent that the earlier criteria being used by the Office of Special Education inappropriately mixed definitions of significant disproportionality and disproportionate representation. Thus, we have conducted a re-analysis of FFY 2005 (SY 05-06) and FFY 2006 (SY 06-07), utilizing the current disproportionate representation definition and have determined that 14 of 337 (4.15%) LEAs present statistical criteria indicating disproportionality. Upon completion of the data verification process, letters were sent of each of the 14 identified LEAs informing them of the disproportionate representation of racial and ethnic groups in specific disability categories and that the assessment process must be conducted to determine if the disproportionate representation is the result of inappropriate identification. Seven of the 14 assessments which include a review of the LEAs policies, procedures and practices have been completed and reviewed by the Office of Special Education and the Equity Project. Based upon this review of the seven completed to date, the Office of Special Education has determined that all seven of the LEA's disproportionate representation, is the result of inappropriate identification.

The remaining seven LEAs are currently undergoing the assessment process to determine if their disproportionate representation of racial and ethnic groups in specific disability categories is the result of inappropriate identification. The assessment, review and determination process for the last seven identified LEAs will be completed in May 2008.

Discussion of Baseline Data:
Determination of disproportionate representation due to inappropriate identification of racial and ethnic groups in specific disability categories
Once a determination is made that an LEA has disproportionate representation, further analysis must take place to determine whether the determination of disproportionate representation is due to inappropriate identification. Both disproportionate representation and inappropriate identification are determined through the focused monitoring process described in Indicator 15.

First, as described above, an annual analysis of data is conducted to identify LEAs with data that raises concerns about disproportionate representation. Each district identified through the procedure above will receive correspondence from the Office of Special Education requesting data verification. When the data verification substantiates disproportionate representation the LEA will complete a self-assessment process that includes tools developed by NCCRESt.

All responses from LEAs will be reviewed by a joint team of representatives from the Office of Special Education and the Equity Project, as described in Indicator 15 to determine whether data indicating disproportionate representation indicate policies, practices, and procedures that are appropriate for all students, regardless of racial/ethnic category or specific disability category.

The combination of these activities may result in the determination of inappropriate identification practices. Findings of noncompliance are identified in the preliminary report with corresponding required corrective actions and timelines. As described in Indicator 15, completion of corrective actions is tracked through ongoing program reports, provision of technical assistance, and ongoing contact with the Office of Special Education.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	Percent of districts that report disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification will be 0%.
2006 (SY 06-07)	Percent of districts that report disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification will be 0%.
2007 (SY 07- 08)	Percent of districts that report disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification will be 0%.
2008 (SY 08- 09)	Percent of districts that report disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification will be 0%.
2009 (SY 09- 10)	Percent of districts that report disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification will be 0%.
2010 (SY 10- 11)	Percent of districts that report disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification will be 0%.
2011 (SY 11- 12)	Percent of districts that report disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification will be 0%.
2012 (SY 12- 13)	Percent of districts that report disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification will be 0%.

Improvement Activities/Timelines/Resources No Longer Active:

Improvement Activity	Timelines	Resources
LEAs identified with disproportionate representation will complete a self-assessment as part of the monitoring process to determine if disproportionate representation is due to inappropriate identification The process includes tools developed by NCCRESt that have been modified. **Completed in FFY 2007 (SY 07-08).**	May, 2008	Office of Special Education, Equity Project personnel

LEA's identified with disproportionate representation due to inappropriate identification will attend an intensive institute on addressing disproportionality to be held in the spring. **Discontinued as of FFY 2008 (SY 08-09), will be covered under the IRN improvement activity.**	FFY 2008 (SY 08-09) through FFY 2010 (SY 10-11)	The CEL, the Equity Project personnel, the NCRRC.
Professional development activities and/or technical assistance will be provided statewide on: • Closing Indiana's opportunity gaps (e.g., academic, social, and behavioral) by creating culturally responsive instructional systems; • Embedding early interventions in the culture of daily practice; • Utilizing Problem Solving Process to enhance the effectiveness of early intervention teams; • Designing individualized education programs (IEP) aligned with the general education curriculum to ensure education benefit; • Ensuring culturally responsive instructional and classroom management practices with all children; • Ensuring culturally responsive communication/interaction with all families; • Differentiated instruction in all classrooms • Effective use of assessment and progress monitoring tools; • Understanding language proficiency and academic achievement issues for English Language Learners (EEL) students; • Continuation and expansion of "Courageous Conversations about Race"; and, • Continuation of training on inclusive education, multilevel instruction, scheduling, and peer supports. **Discontinued as of FFY 2008 (SY 08-09; will be covered under the IRN improvement activity.**	FFY 2007 (SY07-08) through FFY 2010 (SY 10-11)	IDOE, projects supported by IDOE
Revise state guidelines for eligibility determination and service, and provide statewide training on appropriate identification of students with disabilities. **Completed as of FFY 2008 (SY 08-09).**	FFY 2007 (SY07-08) until completed	IDOE, Statewide stakeholders
a. Survey LEAs with overrepresentation to determine preliminary causative factors (e.g. residential facilities located within boundaries, training needs, other factors) b. b. Continue to support Center for Evaluation and Education Policy (CEEP) technical assistance to LEAs **Discontinued in FFY 2007 (SY 07-08).**	a. FFY 2006 (SY 06-07) b. FFY 2005 (SY 05-06) through FFY 2010 (SY 10-11)	a. The Office of Special Education, local administrators b. The Office of Special Education c. The Office of Special Education, IU/CEEP, local LEAs

a. Continue to examine data and survey LEAs to determine self-reported causative factors. b. Development of Improvement Plans to be submitted to IDOE/Office of Special Education c. Strengthen General Education Intervention (GEI) and Response to Intervention (RTI) initiatives **Discontinued in FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	a. The Office of Special Education, local administrators b. The Office of Special Education, local administrators, psych service staff c. The Office of Special Education, Indiana Principal Leadership Academy, local administrators
LEA's identified with significant disproportionality will attend a three day intensive institute on addressing disproportionality to be held in the Spring. (In future years, the intensive institute will also include LEAs with disproportionate representation due to inappropriate identification). **Discontinued FFY 2007 (SY 07-08).**	May, 2008	The Office of Special Education and Equity Project personnel; NCRRC
Coordinate activities with the Positive Behavior Support (PBS) initiative, a systems approach to effective school- wide management that provides a comprehensive continuum of supports. **Discontinued FFY 2007 (SY 07-08).**	FFY 2008 (SY 08-09) through FFY 2010 (SY 10-11)	The IDOE
A statewide "Closing the Opportunity Gap" institute will be held each Summer or Fall each year. Attendance will be open to all LEAs in the state, but will be required for any LEA with significant discrepancy or at-risk of significant discrepancy. **Discontinued FFY 2007 (SY 07-08).**	FFY 2008 (SY 08-09) through FFY 2010 (SY 10-11)	The Office of Special Education and Equity Project personnel; NCRRC

Improvement Activities/Timelines/Resources Ongoing:

Improvement Activity	Timelines	Resources
LEAs identified with disproportionate representation due to inappropriate identification will form a district-wide team to address disproportionality issues. With technical assistance from the IDOE and IRN, the team will develop and evaluate a plan for addressing all areas of disproportionate representation due to inappropriate identification. **Modified as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	Office of Special Education, Equity Project personnel, NCRRC
Continue to gather data on disproportionate identification of racial and ethnic groups in special education and disseminate to stakeholders through a variety of formats, including the IDOE website.	FFY 2007 (SY 07-00) through FFY 2010 (SY 10-11)	Office of Special Education, Equity Project personnel
Indiana Resource Network (IRN), formerly known as INRCIA. **Added as of FFY 2008 (SY 08-09).**	Through 2010 (SY 10-11)	The 6 IRNs will assist LEAs and schools in reforming and improving their supports and services

Define policies and procedures for data collection and reporting. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education and Office of Data and Accountability
Track monthly compliance for LEAs with uncorrected Findings. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education specialists
Distribute a Monitoring Workbook to LEAs found out of compliance containing an in-depth analysis of areas of noncompliance. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education, LEAs
Gather data on disproportionality of racial and ethnic groups in special education and disseminate to stakeholders. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE, IRN, CEEP

Indicator 11 of the Part B State Performance Plan

Monitoring Priority: Effective General Supervision Part B / Child Find

Indicator 11:[54] Percent of children who were evaluated within 60 days of receiving parental consent for initial evaluation or, if the State establishes a timeframe within which the evaluation must be conducted, within that timeframe.
(20 U.S.C. 1416(a)(3)(B))

Measurement:
a. # of children for whom parental consent to evaluate was received.
b. # of children whose evaluations were completed within 60 days (or State-established timeline).
Account for children included in a but not included in b. Indicate the range of days beyond the timeline when the evaluation was completed and any reasons for the delays.
Percent = [(b) divided by (a)] times 100.

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
The timely referral and evaluation of students is imperative to the provision of FAPE. Current Indiana special education regulations (Article 7) require that LEAs complete the initial evaluation for special education eligibility within 60 instructional days, beginning at the point that informed written parental consent is received by the LEA and ending on the date on which the case conference committee (CCC) meets to determine whether the student is eligible to receive special education services.

In recent years, however, there has been considerable debate in Indiana regarding the efficiency of the 60 day timeline for initial evaluation. Following the reauthorization of IDEA, Indiana began a process of rewriting Article 7, and statewide discussions have included consideration of this timeline and have been of utmost importance to constituents across the state irrespective of the region, population density, or role individuals hold. The strand was discussed in one session in October of 2005 with local directors of special education and their building-level administrators and then in a separate session in February 2006 with family members. It is also a topic that has been discussed by numerous members of the Indiana Association of School Psychologists. Those who support shortening the timeline argue that allowing 60 days permits a third of the school year to pass before decisions are actually made regarding special education services. Conversely though, proponents of maintaining the current 60 day timeline argue that because LEAs presently have difficulty meeting the timeline as is, reducing the number of days for conducting the initial evaluation and providing an Evaluation Report to the parents hinders the school's ability to adequately evaluate whether the student is one with a true disability or whether the observed difficulties are attributable to the manner or type of instruction being provided to the student.

The revised Article 7 was passed and became law in Indiana on August 13, 2008. The law now states that the initial educational evaluation must be conducted and the Case Conference Committee convened within 50 instructional days of the date the written parental consent is received by licensed personnel[55].

Considering the basis of a student's difficulty is an integral component to the introduction and implementation of an Integrated and Focused System (IFS) to support student success[56] for building-based teams. Indiana established a state team in May 2007 in order to develop the framework necessary for

[54] Per OSEP guidance updates were made to both definition and measurement for this Indicator. Former definition was Percent of children with parental consent to evaluate, who were evaluated within 60 days (or State established timeline).
[55] This paragraph was added to communicate revision of Article 7 on February 2, 2009.
[56] Commonly referred to as Response to Intervention (RtI) and called IFS in Indiana.

statewide support of an IFS. The team developed a mission statement and guiding principles necessary for the process to be implemented with fidelity. In December 2007, the team was expanded to include representatives from various statewide agencies and organizations, including the IDOE Office of Special Education, the Indiana State Teachers Association (ISTA), the Indiana Education Association, and a parent information and training center (IN*SOURCE[57]). This statewide team continues to refine and explore processes to ensure that the educational needs of all students are met. In those discussions, too, the issue of educational evaluation timelines has been explored. It is in large part due to these varied discussions that the revisions to this Indicator have evolved.

Compliance with evaluation timelines has been monitored in a variety of ways. Prior to FFY 2004 (SY 04-05), the data for this indicator was collected using a manual data submission process at the local level. This process was inconsistent and tedious. Beginning in FFY 2005 (SY 05-06), a more formal and automated system was enacted, thus providing for a more detailed and accurate collection of data through 618 data collection project titled the CODA Project[58]. An analysis of the initial data collected during FFY 2005 (SY 05-06) was discussed with representatives of various Centers within the IDOE, the SAC, the Indiana Council of Administrators of Special Education (ICASE), IN*SOURCE central office staff, and other constituents in the state. The purpose of these discussions was to help ascertain realistic and acceptable targets for this indicator, while maintaining a focus on a goal of 100% compliance with the evaluation timeline. From these discussions it was acknowledged by those involved that there are some circumstances, such as an extended illness of the student, where it is not possible to meet the stipulated timeline; however, these should be rare occurrences. Key concepts brought forth from these discussions included the need to track the number of referrals that were found ineligible as well as the range of days any referrals violated the prescribed timeline. The State Advisory Council voted in December 2007 to modify the initial evaluation timeline and amend the timeline if a student was involved in an IFS process. The timeline in those instances was recommended to be 20 instructional days. This language is subject to approval by the SBE and to public hearings and input. At this time, it seems fairly certain that the 60 instructional day timeline will be modified once the new regulations are promulgated, a process anticipated to conclude by August 2008.

In FFY 2005 (SY 05-06), the data for this indicator was collected through the Office of Special Education using software maintained by the CODA Project. For special education purposes, each LEA in Indiana is either a single district planning district (an LEA) or is part of a special education planning district. All special education planning districts must use the CODA Project to submit child count data for state and federal funding purposes or have a means to convert the data collection system into a format useable by the CODA Project. For purposes of this indicator, collected data provides insight on the overall number of referrals processed and includes the following categories.

a. The subset of students who were found to be ineligible for services.
b. The number of referrals out of compliance with the timelines by the range of:
    i. one to five instructional days,
    ii. six to 10 instructional days,
    iii. 11 to 15 instructional days, and
    iv. over 16 instructional days.
c. The number of referrals which met the 60 instructional day timeline.

Baseline Data for FFY 2004 (2004-2005):
The formula for this indicator is [(b) + (c)] ÷ a x 100.

7,890+ 20,545 ÷ 33,448 x 100 = 85.0%

[57] IN*SOURCE is Indiana's resource center for families with special needs http://www.insource.org/.
[58] The CODA Project is Indiana's data collection system for special education funding. For more details on the CODA Project, please see: http://www.thecodaproject.org/.

Due to miscommunication and misinformation between the Office of Special Education and OSEP, baseline data was not collected in FFY 2004 (SY 04-05). Indiana's baseline and target data is therefore based on data collected in FFY 2005 (SY 05-06) and is portrayed in the following table.

FFY 2005 (SY 05-06)

Total Number of Referrals	33,448	(a) 33,448
Total Number of Referrals: Student Found Ineligible Within Required Timeline	7,890	(b) 7,890
Total Number of Referrals: Student Found Eligible Within Required Timeline	20,545	(c) 20,545
Compliance With Required Timeline	28,435	85.0%
Range of Days		
Total Number of Referrals: Student Found Eligible; Non-Compliance With Required Timeline	3,187	
Total Number of Referrals: Student Found Ineligible; Non-Compliance With Required Timeline	1,848	
Completed, but in Non-Compliance	5,035 (15.1%)	
Total Number of Referrals Out Of Compliance by: 1-5 Instructional Days	1,689	
6-10 Instructional Days	1,058	
11-15 Instructional Days	738	
More Than 16 Instructional Days	2,702	
	6,187	

There were 111 LEAs who incorrectly included the *Referrals Not Yet Completed by Data Collection Point Timeline* into the corresponding *Total Number Of Referrals Out Of Compliance [specified] Instructional Days,* thus duplicating the data by 446 referrals. In addition, there were 63 LEAs who reported inaccurately, thus skewing the data reported. With these numbers as reported, there are 1,152 too many students (evaluations) distributed across the number of days out of compliance and 22 students "too few" in the number of evaluations brought forward. Therefore, corrective action must be taken in order to ensure the accuracy of the data.

Discussion of Baseline Data:
The Office of Special Education recognizes the need for this indicator to be set at 100% compliance yet realistically there will be instances when conducting the evaluation within the 60 instructional day timeline will not be achievable. Those occurrences should be rare and must have quantifiable documentation supporting the reasons for noncompliance. It is anticipated that LEA-specific reasons will be collected via the annually required file review for LEAs not achieving 100% compliance with the indicator. For FFY 2005 (SY 05-06), there were 11 LEAs in 100% compliance and an additional 26 with at least 95% compliance (11.3% ≥ 95% compliance). For FFY 2006 (SY 06-07), there were 25 LEAs in 100% compliance and an additional 59 with at least 95% compliance (28.3% ≥ 95% compliance). This demonstrates that gains are being made. Nonetheless, the Office of Special Education realizes that a 15% gain in the compliance rate must be achieved in an expeditious manner and has set forth a plan to bring all LEAs into compliance in the five year plan.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	(Baseline Year) 100% of all referrals processed within the prescribed state timeline.

2006 (SY 06-07)	100% of all referrals processed within the prescribed state timeline.
2007 (SY 07-08)	100% of all referrals processed within the prescribed state timeline.
2008 (SY 08-09)	100% of all referrals processed within the prescribed state timeline.
2009 (SY 09-10)	100% of all referrals processed within the prescribed state timeline.
2010 (SY 10-11)	100% of all referrals processed within the prescribed state timeline.
2011 (SY 11-12)	100% of all referrals processed within the prescribed state timeline.
2012 (SY 1213	100% of all referrals processed within the prescribed state timeline.

Improvement Activities/Timelines/Resources:
In the previously approved SPP, the FFY 2005 (SY 05-06) data served as Indiana's baseline data submission. The SPP stated that if an LEA was out of compliance, it would be required to conduct a self-assessment/file review to determine potential causes for the failure to conduct evaluations in a timely fashion. In FFY 2006 (SY 06-07), there were 62 LEAs (20.9%) who were identified to be out of compliance with this indicator. Any LEA with less than 85% compliance in meeting the 60-instructional day timeline was required to conduct a file review and provide a narrative summary of the reasons for non-compliance. Furthermore, any LEA who was out of compliance for a second consecutive year was given the additional requirement of completing a self-assessment and developing a local action plan to address noted issues revealed in the assessment process.

Improvement Activities and Resources Ongoing:
Improvement activities for LEAs not meeting compliance on this indicator will be based upon the LEA valuation and action plan developed pursuant to the requirements of Indicator 15.

Improvement Activity	Timelines	Resources
LEAs identified as not meeting the required timeline for completing educational assessments will be required to develop a corrective action plan for ensuring compliance.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education and other grant activities sponsored by the Office of Special Education.
As part of the Indiana Resource Network (IRN), the Effective Evaluation Resource Center will assist LEAs and schools in reforming and improving their supports and services. **Added as of FFY 2008 (SY 08-09) submission of the APR.**	Through 2012 (SY 12-13)	Effective Evaluation Resource Center
Define policies and procedures for data collection and reporting. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	Office of Special Education and Office of Data and Accountability
Track monthly compliance for LEAs with uncorrected Findings. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	Office of Special Education specialists

Distribute a Monitoring Workbook to LEAs found out of compliance containing an in-depth analysis of areas of noncompliance. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education, LEAs

Indicator 12 of the Part B State Performance Plan (SPP)

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Indicator 12: Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an individualized education program (IEP) developed and implemented by their third birthdays. [20 U.S.C. 1416(a)(3)(B)]

Measurement[59]:
a. # of children who have been served in Part C and referred to Part B (LEA notified pursuant to 637(a)(9)(A)) for Part B eligibility determination.
b. # of those referred determined to be NOT eligible and whose eligibility was determined prior to their third birthdays.
c. # of those found eligible who have an IEP developed and implemented by their third birthdays.
d. # of children for whom parent refusal to provide consent caused delays in evaluation or initial services.
e. # of children who were referred to Part C less than 90 days before their third birthdays.

Account for children included in a but not included in b, c, d or e. Indicate the range of days beyond the third birthday when eligibility was determined and the IEP developed and the reasons for the delays.
Percent = [(c) ÷ (a - b - d - e)] × 100.

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
There are important activities and timelines to be met during the transition process. Successful transitions begin with people thinking about the future, planning ahead, and working together. Early intervention providers under Part C (First Steps providers) and LEAs under Part B that serve young children with disabilities continue to address issues to ensure 100% of the children receive special education services by their third birthday. The transition data collected in the APR for FFY 2004 (SY 04-05) through the CODA Project[60] shows that 84% of children referred from Part C to Part B had an IEP implemented by their third birthday. There were 3% of children that did not receive FAPE because of failure on the part of the school to implement the IEP by third birthday. IDOE Office of Special Education and First Steps are working together to assure 100% implementation by the third birthday for this area of compliance.

The research from two national transition projects [Sequenced Transition to Education in the Public Schools (STEPS) by Beth Rous and Bridging Early Services Transition by Sharon Rosenkoetter] funded by ED shows that transition must be viewed in a more focused way than as a series of events in a child's life. The evidence suggests that collaboration is essential and that collaborative, formalized policies and procedures are vital to the success of the transition process. An effective transition system includes a state and local team that addresses administration, staff, family preparation and child preparation components (Rosenkoetter et al., 1994; Rous et al., 1994, Wolery, 1989). To address Indiana's transition challenges, the Office of Special Education and the Bureau of Child Development Services in the Division of Disability and Rehabilitation Services, Part C (First Steps) jointly funded the Indiana Transition Initiative for Young Children and Families (Transition Initiative) in 1999. The State Transition Team that provides leadership on transition is composed of parents and parent organizations, representatives from the Office of Special Education, First Steps, Indiana Head Start Partnership Office, the Indiana Head Start Association, the Indiana Association for Child Care Resource and Referral, Riley Child Development Center, Indiana State Department of Health, Prime Time and Education of Homeless Children and Youth in the IDOE to address issues that relate to or have an impact on

[59] Per OSEP there were updates made to Measurement table with submission of FFY 2008 APR.
[60] The CODA Project is Indiana's data collection system for special education funding. For more details on the CODA Project, please see: http://www.thecodaproject.org/.

transition of young children. There is a state transition coordinator and regional staff to assist in building a focused transition team in interested communities. The goal is to develop local comprehensive transition systems that assist families make smooth and effective transitions. The Transition Initiative actively assists community teams in twenty-two counties. It offers assistance with facilitation, training, local interagency agreements to create stability in local transition practices, action plans, and transition resources. The initiative has a web site to present updated transition information and serve as a resource to communities.[61]

During FFY 2005 (SY 05-06), a major component of the transition initiative was to review local interagency agreements between schools, First Steps, and Head Start to identify weaknesses and provide technical assistance on writing or re-writing local interagency agreements.

The Office of Special Education and First Steps continue to work closely together to improve transitions from one program to another. The two agencies have a signed state level interagency agreement along with Head Start to clarify roles and responsibilities. Uniform First Steps transition forms have been developed and transition products have been created. The two agencies share transition data to verify data and identify inconsistencies.

The Office of Special Education and First Steps wrote and widely disseminated a joint memorandum to provide guidance to First Steps service coordinators and LEA representative to clearly identify roles and responsibilities at the transition meeting during FFY 2005 (SY 05-06). This memorandum is also on each agency's web site.

The Office of Special Education distributes transition data to early childhood administrators representing LEAs at the annual Early Childhood Administrators' Spring and Fall conferences. Areas of non-compliance are discussed and the participants share ways to improve non-compliance.

Baseline Data for FFY 2004 (SY 04-05):

a. The number of children served in Part C and referred to Part B for eligibility determination.
   FFY 2004 (SY 04-05) = 3,202

b. The number of those referred determined to be NOT eligible and whose eligibilities were determined prior to their third birthday and whose eligibilities were determined prior to their third birthday.
   FFY 2004 (SY 04-05) = 314 not eligible

   Note: During FFY 2004 (SY 04-05), there was no way to determine whether the case conference date occurred prior to the third birthday for ineligible children. The CODA Project was updated to collect the new information on December 1, 2006 in FFY 2006 (SY 06-07).

c. The number of those children referred from Part C and eligible for Part B.
   FFY 2004 (SY 04-05) = 2,888
   The number who have an IEP developed and implemented by their third birthday.
   FFY 2004 (SY 04-05) = 2,424 (84%)

   Percent = [(c) ÷ a - b) × 100]

The number and percentages listed in "c" does not give an accurate picture. The Office of Special Education monitors the reasons for any delay beyond the third birthday, as indicated in the charts below. There were 3% of IEPs that were delayed for LEA failure reasons.

Number of Late IEPs and Reason for Delay:

Total	Parent missed	Referral less than	Moved	Illness	Late First Steps	Late School

[61] http://www.indianatransition.org

Late IEP	appointments	two months from third BD			Referral	Other
464	234	48	7	15	67	93

Percent of children with Late IEPs and Reasons for Delay:

Total Part B eligible	Parent missed appointments %	Referral less than two months from third BD %	Moved %	Illness %	Late First Steps Referral %	Late School Other %
2,888	8%	2%	.2%	.5%	2%	3%

In FFY 2004 (SY 04-05), the CODA Project did not contain the fields needed to collect range of day data. The data collection system will be revised to collect the new information on December 1, 2006.

In the October 2005 correspondence from the ED responding to Indiana's submission of the FFY 2003 (SY 03-04) APR, the ED required the State to report data regarding attendance at transition conferences in FFY 2004 (SY 04-05). Data collected by the CODA Project on December 1, 2004 indicates that for 2,465 children, the First Steps service coordinator notified/invited a school representative to the First Steps Transition Conference. There were 2,420 (98%) LEAs that reported attending the First Steps transition conferences when notified/invited.

The FFY 2005 (SY 05-06) APR incorporates the new data element from OSEP in the APR measurement criteria to include "the number of children for whom a parent's refusal to provide consent caused delays in the child's evaluation or initial services."

Discussion of Baseline Data:
The FFY 2004 (SY 04-05) transition data collected through the CODA Project reports that 84% of children referred from Part C to Part B had an IEP in place by their third birthday. Only 3% of eligible children did not have an IEP in place by their third birthday due to school failure to implement. When the LEAs reported children in this category, they were required to do a file review when an IEP was not implemented in a timely manner in the CIFMS. A corresponding plan of corrective action, including timelines, to remediate the situation was required. The LEAs were also required to complete an individual file review search for any child where the reason for late implementation was due to parent missed appointments in order to determine whether a systemic issue exists.

In the 2005 correspondence from ED responding to Indiana's submission of the FFY 2004 (SY 04-05) APR, the ED requested that Indiana submit information to ensure that the data submitted is accurate. This concern arose when Indiana reported data from the CIMFS process on the number of LEAs that did not have a school representative present when invited to the transition conference. As part of the CIMFS process, the LEAs were required to do a file reviews to determine why the school representative was not in attendance. Some LEAs then reported that upon further review, a school representative was present, but the data was entered incorrectly. The LEAs explained that the local CODA Project staff reported the school representative absent when there was documentation in the child's record that the school representative was present. It is expected that this individual record review was informative for administrators and data entry personnel to better ensure the accuracy of the data that is reported. Improved data accuracy will be reflected on the December 1, 2006 Child Count.

There were 2% of children that did not have services in place because it was reported that the First Steps service coordinator did not meet transition timelines for conducting the transition conference. The Office of Special Education and First Steps worked together this year to analyze the data reported through the CODA Project. The Office of Special Education shared the data with First Steps, who then identified the service coordinator when there was a problem with evidence of a transition conference. First Steps utilized this data to request written documentation from service coordinators verifying transition meeting minutes and

written notification to the school representative. This review enabled First Steps to identify systemic transition conference issues with individual service coordinators and the process provided First Steps and the Office of Special Education an opportunity to verify the accuracy of the data that the LEAs reported. The Office of Special Education distributed discrepancies to preschool coordinators at their Fall Early Childhood Administrators' Conference and provided updated reporting forms and training on accurate data reporting in order to improve the accuracy of the data on the December 1, 2006 Child Count.

Family Transition Survey
In January 2005, First Steps mailed surveys to 400 families requesting information regarding the transition process from Part C to Part B. In order to develop a list of families to send the transition survey, First Steps pulled data for all children who had turned three years old in the last 12 months. Based on the child identification number and then matching names and addresses, the names from previous survey recipients were eliminated. The remaining children were given a computer generated randomized number. Numbers 1-400 were then selected as the new pool of survey recipients.

There were 100 surveys out of 400 surveys that were returned (25% response rate). There were 81 parents that responded to the question "Did services begin for your child by third birthday?" There were 33 parents that indicated yes (41%). Of the 48 parents (59%) that responded no, there were 36 parents (75%) that reported their children had a Summer birthday, and services began at the beginning the new school year (no timeline violation). There were 11 parents (23%) that indicated services were delayed for some other reason including parent choice, initial placement not working out, move-in from another state. Three respondents (3.7%) indicated the delay was because of the school system problems such as transportation arrangements and delayed evaluations. This is consistent with the 3% of children reported in the CODA Project in the data reported earlier.

There were 93 parents (94.9%) out of a total of 98 parents that responded, "overall, their child's transition experience was positive." The transition survey documents that transition procedures were in place and working for 95% of parents that returned their transition survey.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	100% of children referred by Part C prior to age 3, who are found eligible for Part B, have an IEP developed and implemented by their third birthdays.
2006 (SY 06-07)	100% of children referred by Part C prior to age 3, who are found eligible for Part B, have an IEP developed and implemented by their third birthdays.
2007 (SY 07-08)	100% of children referred by Part C prior to age 3, who are found eligible for Part B, have an IEP developed and implemented by their third birthdays.
2008 (SY 08-09)	100% of children referred by Part C prior to age 3, who are found eligible for Part B, have an IEP developed and implemented by their third birthdays.
2009 (SY 09-10)	100% of children referred by Part C prior to age 3, who are found eligible for Part B, have an IEP developed and implemented by their third birthdays.
2010 (SY 10-11)	100% of children referred by Part C prior to age 3, who are found eligible for Part B, have an IEP developed and implemented by their third birthdays.
2011 (SY 11-12)	100% of children referred by Part C prior to age 3, who are found eligible for Part B, have an IEP developed and implemented by their third birthdays.
2012 (SY 12-13)	100% of children referred by Part C prior to age 3, who are found eligible for Part B, have an IEP developed and implemented by their third birthdays.

Improvement Activities/Timelines/Resources No Longer Active:

Improvement Activities	Timelines	Resources
Collect and report the number of ineligible children whose eligibilities were determined prior to third birthday and the range of days beyond third birthday. **Completed as of FFY 2006 (SY 06-07).**	FFY 2005 (SY 05-06) through FFY 2006 (SY 06-07)	The Office of Special Education and the CODA Project
Collect data that identifies the date that early childhood services were initiated. The date that services were initiated will be compared to the child's date of birth to determine that the IEP was implemented by the child's third birthday. Data will be collected on December 1, 2008. [Added in SPP for FFY 2006 (SY 06-07) submission.] **Completed as of FFY 2008 (SY 08-09).**	FFY 2008 (SY 08-09)	The Office of Special Education and the IDOE Information Technology Division
Continuous Improvement Focused Monitoring System. **Completed as of FFY 2006 (SY 06-07).**	FFY 2005 (SY 05-06) through FFY 2006 (SY 06-07)	CIMFS Performance Indicator on Effective Transition
Implement improved general supervision of transition and accountability with the recalibrated Continuous Improvement and Focused Monitoring System described in Indicator 15. [Added in SPP for FFY 2006 (06-07) submission.] **Discontinued as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	Office of Special Education monitoring team, Transition Initiative, the IDOE Information Technology Division, the Office of Special Education due process team, and LEAs
The Office of Special Education will issue a memorandum informing LEAs that the requirement to provide a FAPE by the child's third birthday has not changed for children served in Part C and referred to Part B. However, the way the Office of Special Education verifies whether an IEP is implemented by a child's third birthday will be determined by whether services began by the child's third birthday rather than the date of the CCC meeting where the parent signed consent for the IEP. The LEA will be informed of the new data field in the CODA Project. **Completed as of FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08)	The Office of Special Education and the IDOE Information Technology Division
Develop and widely distribute a transition DVD to help prepare families exiting First Steps and seeking services from Head Start or Special Education from Part B for transition. The DVD will provide consistent transition information for providers. **Completed as of FFY 2006 (SY 06-07).**	FFY 2005 (SY 05-06) through FFY 2006 (SY 06-07)	The Office of Special Education, with financial support from the Indiana State Improvement Grant and provider and family input.

State Transition Team members from the Transition Initiative will provide information and training in each First Steps Cluster to transition partners on local teams and others involved in transition to share resources and provide transition information. [Revised in SPP for FFY 2006 (SY 05-06) submission.] **Completed as of FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08)	Members of the State Transition Team from the Office of Special Education, First Steps, Head Start, Prime Time and Education of Homeless Children and Youth in IDOE, Indiana State Department of Health, and Child Care Resource and Referral.
The State Transition Coordinator for the Transition Initiative and regional staff will assist local transition teams with team development, provide training to improve transition experiences, and provide resources and information on best practices. The State Transition Coordinator for the Transition Initiative will provide technical assistance to LEAs that report reasons for delay due to lack of timely information from First Steps service coordinators. [Added in SPP for FFY 2006 (06-07 submission.] **Completed as of FFY 2008 (SY 08-09).**	FFY 2006 (SY 06-07) through FFY 2010 (SY 10-11)	State Transition Coordinator for the Transition Initiative, the State Transition Team, and the Office of Special Education. The State Transition Coordinator and the Office of Special Education.
The State Transition Coordinator and regional staff for the Transition Initiative will facilitate development of local MOAs. Local MOAs will be posted on the Transition Initiative web site. Local MOAs provide a framework for collaboration in implementing a comprehensive, coordinated service system for young children and their families. The MOAs include joint planning and identify roles and responsibilities for transition. **Completed as of FFY 2006 (SY 06-07).**	FFY 2005 (SY 05-06) through FFY 2006 (SY 06-07)	Transition Initiative
Update the state level MOA to provide a framework for collaboration in implementing a comprehensive, coordinated service system for young children and their families. Include joint planning roles and responsibilities for transition in the MOA. The signed State MOA will be publicized through participating agency web sites and the transition initiative web site. **Completed as of FFY 2006 (SY 06-07).**	FFY 2005 (05-06) through FFY 2006 (SY 06-07)	The MOA team that represents the signatory agencies.
Utilize Indiana's Transition Initiative as a vehicle to assist communities in creating a comprehensive community-wide system ensuring positive and effective transition experiences for young children and their families. [Revised in SPP for FFY 2006 (SY 06-07) submission.] **Completed as of FFY 2008 (SY 08-09).**	FFY 2005 (05-06) through FFY 2010 (10-11)	The Office of Special Education, members of the State Transition Team, the State Transition Coordinator, regional transition staff, and local transition teams.

Improvement Activities/Timelines/Resources Ongoing:

Improvement Activities	Timelines	Resources
Provide timely feedback on LEA submitted data through statistical reports and follow-up to correct incomplete or inaccurate data. **Added in as of FFY 2006 (06-07).**	FFY 2006 (SY 06-07) through FFY 2012 (SY 12-13)	The Office of Special Education and IDOE Information Technology Division
The Office of Special Education Early Childhood Coordinator will provide state-wide updates on LEA progress in meeting requirements for Indicator 12 to early childhood administrators at their annual Spring conference. Early childhood administrators representing LEAs that achieve 100% compliance on implementing IEPs by third birthday will receive a certificate of recognition. A state-wide data showing LEAs with LEAs that did not achieve compliance shall be distributed. Early childhood administrators shall discuss noncompliance and share strategies that work to correct noncompliance. **Modified as of FFY 2008 (SY 08-09).**	FFY 2005 (SY 05-06) through FFY 2012 (SY 12-13)	The Office of Special Education Early Childhood Coordinator and Early Childhood Administrators.
Utilize the evidenced-based research and resources from the National Early Childhood Transition Center (NECTC) and the NCRRC **.** **Added in as of FFY 2006 (06-07).**	FFY 2006 (SY 06-07) through FFY 2012 (SY 12-13)	NECTC, NCRRC, and the Office of Special Education.
The IDOE and First Steps will share transition data from each system to inform, verify, and correct inconsistencies. The information will be utilized to reconcile differences and inform local agencies of discrepancies in order to improve communication and data accuracy.	FFY 2005 (SY 05-06) through FFY 2012 (SY 12-13)	The Office of Special Education and First Steps.
Indiana Resource Network (IRN. **Added as of FFY 2008 (SY 08-09).**	FFY 2008 (SY 08-09) through FFY 2012 (SY 12-13)	The 6 IRNs will assist LEAs and schools in reforming and improving their supports and services
As part of the Indiana Resource Network (IRN), the Effective Evaluation Resource Center will assist LEAs and schools in reforming and improving their supports and services. **Added as of FFY 2008 (SY 08-09).**	Through 2012 (SY 12-13)	Effective Evaluation Resource Center
Define policies and procedures for data collection and reporting **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	Office of Special Education and Office of Data and Accountability
Track monthly compliance for LEAs with uncorrected Findings **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	Office of Special Education specialists

Distribute a Monitoring Workbook to LEAs found out of compliance containing an in-depth analysis of areas of noncompliance. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education, LEAs

Indicator 13 of the Part B State Performance Plan (SPP)

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Indicator 13: [62] Percent of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority. (20 U.S.C. 1416(a)(3)(B))

Measurement: Percent = [(# of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority) divided by the (# of youth with an IEP age 14 and above)] times 100.

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
For this indicator, regarding transition plan components for students with disabilities, Indiana state rule requires transition plans beginning at age 14, or prior to the 9th grade, or earlier if determined appropriate by the case conference committee. As a component of the CIFMS, the IDOE Office of Special Education requires each LEA to review 5% of student records (with a minimum of five records reviewed and a maximum of 25 records reviewed) at each building that students with disabilities/IEPs at the indicated age receive services.

Although Indiana's CIFMS process is moving toward a web-based information system, this particular indicator still will require a local and individual file review. Indiana has had, in the past, a similar indicator based upon a file review of the necessary components as delineated in Article 7, based on IDEA, prior to the 2005 reauthorization.

Baseline Data for FFY 2005 (SY 05-06):
Baseline data is based on the review of 3,095 files representing 308 LEAs in the state. Each LEA was required to review files of students with disabilities aged 14 through 21. Using the total number of students within this category, per LEA 5% of those eligible files were to be reviewed for the required components. If the 5% per LEA exceeded 25 files, the LEA was only required to review a maximum of 25 files. However, if the 5% per LEA resulted in less than five files to be reviewed, 100% of all eligible student files required review. In FFY 2005 (SY 05-06), there were six LEAs required to review 100% of eligible files due to the small number of students aged between 14 and 21. Of the files reviewed, 88% contained all the required components.

Discussion of Baseline Data:
Reflective of Indiana's rule that students age 14 and older, or prior to the 9th grade, are required to have a Transition IEP with the required components in place, these students were also included in the file review that formed the FFY 2005 (SY 05-06) baseline data.

[62] Per OSEP guidance, with submission of FFY 2008 APR the definition and Measurment table for the Indicator were updated.

During the file review for this indicator, a number of local special education directors contacted the Office of Special Education with concern regarding the language used in this indicator as compared to the language used in Article 7. The general consensus was that while certain files met the standard in Article 7 as it stood prior to the re-write to meet IDEA 2004, the components did not meet the exact language of this indicator. Therefore, local special education directors did not feel that they could count files as compliant with the new language, thus setting a higher standard for compliance. Several directors also reported that according to the standard for "measurable goals,' some goals within Transition IEPs were not measurable and therefore did not meet the standard and therefore those files were considered as not in compliance. Directors indicated that staff would be directed to re-convene the case conference committees for those individual students and create a compliant IEP document.

Due to the re-authorization of IDEA, Indiana is in the process of revising Article 7. Through the stake-holder process, with preliminary language in place, it is expected that Article 7 will continue to go beyond IDEA in requiring transition plans for students starting at age 14 or the 9th grade, whichever occurs first. The stakeholder group – the, The State Advisory Council on the Education of Children and Youth with Disabilities (the State Advisory Council) consists of a majority of members (other than the mandated agency representatives) that are parents of students with disabilities. The participants on the council have recommended retaining the age/grade at which transition planning starts at age 14 or 9th grade, whichever occurs first. Also, the revision of Article 7 will contain the requirement of a Summary of Performance (SOP).

Reestablishment of Baseline data for the FFY 2009 (SY 09-10) posting of the SPP:

Baseline Data for FFY 2009 (SY 09-10)		Percent
Numerator (number of 100% compliant Transition IEPs):	2218	80.2%
Denominator (total number of Transition IEPs reviewed):	2765	

For FFY 2009 (SY 09-10), Indiana contracted with WestEd to perform its review of each LEAs sample of IEPs as detailed above. Indiana, after experiencing several years of improvement on the Indicator, moved to an outside entity performing the analysis rather than each LEA completing a self-assessment of noncompliance in order to increase the rigorousness of the assessment and hold Indiana's LEAs to a more difficult standard of compliant and effective IEPs that drive student outcomes and achievement.

Results of the compliance analysis by WestEd, including subsequent data verification, indicates that 80.2% of statewide IEPs were compliant with the requirements of the Indicator, including the additional requirements added for the FFY 2009 (SY 09-10) submission of the APR. The results represent Indiana's new baseline for the Indicator.

FFY	Measurable and Rigorous Target (Revised)
2005 (SY 05-06)	Baseline year
2006 (SY 06-07)	100% of IEPs for students with disabilities **aged 14** and above include coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals.
2007 (SY 07-08)	100% of IEPs for students with disabilities **aged 14** and above include coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals.
2008 (SY 08-09)	100% of IEPs for students with disabilities **aged 14** and above include coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals.
2009 (SY 09-10)	100% of IEPs for students with disabilities **aged 14** and above include coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals.
2010 (SY 10-11)	100% of IEPs for students with disabilities **aged 14** and above include coordinated, measurable, annual IEP goals and transition services that will reasonably enable the

FFY	Measurable and Rigorous Target (Revised)
	student to meet the post-secondary goals.
2011 (SY 11-12)	100% of IEPs for students with disabilities **aged 14** and above include coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals.
2012 (SY 12-13)	100% of IEPs for students with disabilities **aged 14** and above include coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals.

Improvement Activities/Timelines/Resources No Longer Active:

Activity	Timeline	Resources
Continue semi-annual publication of INDEPENDENCE, a magazine consisting of a collection of articles of interest to students with disabilities at the secondary level. **Discontinued as of FFY 2008 (SY 08-09).**	FFY 2005 (SY 05-06) through FFY 2010 (SY 10-11)	The Office of Special Education, other resource documents.
Revise Article 7 to reflect the new requirement for the Summary of Performance (SOP). **Revision**: Recommend that Article 7 be revised to include the following: A. An SOP be added, and that the SOP be completed when: (1) A student graduates from high school with a regular diploma; (2) A student leaves high school with a certificate of completion; or (3) A student exceeds the age eligibility for special education and related services. B. Transition IEPs are developed and are in effect for students entering into 9th grade or turning 14 years of age, whichever occurs first, or earlier if determined appropriate by the CCC. (Revised during FFY 2006 [SY 06-07]) **Completed as of FFY 2008 (SY 08-09).**	FFY 2008 (SY 08-09)	The Office of Special Education, The State Advisory Council, stakeholders, Indiana State Board of Education.
Provide training to stakeholders on the Transition IEP decision flow chart and components. (New during FFY 2006 [SY 06-07]) **Completed as of FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08)	The Office of Special Education and contractors, local special education planning districts, LEA administration, stakeholders.

Complete multi-year review of all LEA results of file reviews to determine specific LEAs that lapse below 100% standard in any reviewed years. Hold meetings with individual LEA administration and special education planning district directors to identify and remediate problem. **h) Revision**: Monitoring verification visits to: A. conduct individual file reviews; and B. discuss, with the administration and special education planning district directors, the LEA planned outcomes in regard to graduation rates (Indicator 1), drop-out rates (Indicator 2), Transition IEP components and implementation (Indicator 13), and, Post School Outcomes (Indicator 14). **Revised as of FFY 2006 (SY 06-07).** **Completed as of FFY 2008 (SY 08-09).**	FFY 2008 (SY 08-09)	The Office of Special Education, local special education planning districts, LEA administration.
Complete the Indiana Employability Skills Assessment & Reporting Initiative. (New during FFY 2006 [SY 06-07]) **Completed as of FFY 2008 (SY 08-09).**	FFY 2009 (SY 09-10)	The Office of Special Education, local special education planning districts, LEA administration, stakeholders.
Conduct a school to adult life transition conference during the Fall of 2008. **Added as of FFY 2006 (SY 06-07).** **Completed as of FFY 2008 (SY 08-09).**	FFY 2008 (SY 08-09)	The Office of Special Education staff and contractors, local special education planning districts, stakeholders.
Modify the Electronic IEP tool to include all of the Transition IEP components. **Completed as of FFY 2010 (SY 10-11).**	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education staff and contractors, local special education planning districts, LEA administration, stakeholders.
School corporations not meeting standard complete file review utilizing Putting the Pieces Together – Section: Transition 14+. **Revision**: All LEAs complete 5% file review utilizing the "Indiana Transition Requirements Checklist" and submit results utilizing the "Indiana Checklist Tally". **Revised as of FFY 2006 (SY 06-07)** **Discontinued as of FFY 2011 (SY 11-12).**	FFY 2005 (SY 05-06) through FFY 2012 (SY 12-13)	The Office of Special Education, Information Resources and Monitoring **Revision**: Add "Statewide transition school to adult life stakeholder group".
Implement an electronic data collection system for each of the discrete elements of the "Indiana Transition Requirements Checklist" and "Tally" to enable a deeper data analysis. **Added as of FFY 2006 (SY 06-07)** **Discontinued as of FFY 2011 (SY 11-12).**	FFY 2008 (SY 08-09)	IDOE Information Technology Division

Improvement Activities/Timelines/Resources Ongoing:

Activity	Timeline	Resources

The transition school to work Interagency Coordinating Council, (known as the "290 Committee") address statewide issues as they relate to transition. **Added as of FFY 2006 (SY 06-07)**	FFY 2006 (SY 06-07) through FFY 2012 (SY 12-13)	Family Advocates, the IDOE, Vocational Rehabilitation Services, Mental Health and Addictions, Developmental Disabilities, Workforce Development, Corrections, Social Security, Indiana and Ball State Universities, Indiana State Improvement Grant, Community Rehabilitation Provider, Special Education and postsecondary follow-up consultant (See Indicator 14).
IN-SIG grant: Continue to work with school based transition personnel and other stakeholders to refine guidelines for CCCs in the development of the transition components of the IEP. g) Revision: Using the Indiana State Improvement Grant (or the State Personnel Development Grant – if funded) as a conduit, provide statewide, stakeholder training and technical assistance in the area of school to adult life transition. **Revised as of FFY 2006 (SY 06-07).**	FFY 2005 (SY 05-06) through FFY 2012 (SY 12-13)	The Office of Special Education, agencies, schools, and organizations involved in IN-SIG.
Indiana Resource Network (IRN) **Added as of FFY 2008 (SY 08-09).**	Through FFY 2012 (SY 12-13)	The 6 IRNs will assist LEAs and schools in reforming and improving their supports and services
Support best practice transition methods and services that increase secondary and postsecondary outcomes by sponsoring and supporting the Statewide Transition Forum Conference, hosted by the Indiana Resource Network's Secondary Transition Resource Center. **Added as of FFY 2010 (SY 10-11).**	FFY 2010 (SY 10-11) through FFY 2012 (SY 12-13)	IDPE, IRN, Secondary Transition Resource Center
National Secondary Transition Technical Assistance Center (NSTTAC) Intensive Technical Assistance Plan **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE, NSTTAC
Distribute a Monitoring Workbook to LEAs found out of compliance containing an in-depth analysis of areas of noncompliance. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education, LEAs

Indicator 14 of the Part B State Performance Plan (SPP)

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Indicator 14: [63] Percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and were:

A. Enrolled in higher education within one year of leaving high school.
B. Enrolled in higher education or competitively employed within one year of leaving high school.
C. Enrolled in higher education or in some other postsecondary education or training program; or competitively employed or in some other employment within one year of leaving high school.

(20 U.S.C. 1416(a)(3)(B))

Measurement:
A. Percent enrolled in higher education = [(# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education within one year of leaving high school) divided by the (# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)] times 100.
B. Percent enrolled in higher education or competitively employed within one year of leaving high school = [(# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education or competitively employed within one year of leaving high school) divided by the (# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)] times 100.
C. Percent enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment = [(# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment) divided by the (# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)] times 100.

Overview of the State Performance Plan Development:
The requirements for collecting and reporting Indicator 14 of IDEA have been revised. The new collection is significantly different from previous collections. Due to the change in collection, the States are to develop new baseline data, targets and improvement activities for the FFY 2009 (SY 09-10) submission of the SPP and APR.

Indicator 14 of the SPP was developed in coordination with Indiana's stakeholder group, the SAC. The SAC is an organization comprised of parents of students with disabilities, teachers of students with disabilities, local superintendents, special education teachers and administrators, state school representatives, representatives from institutes for higher education, nonpublic school representatives, vocational rehabilitation and transition services representatives, charter school representatives, Part C representatives, the State's McKinney-Vento state coordinator and representatives from each State of Indiana agency that directly deals with the education and/or advancement of individuals with disabilities.

As required, both the SPP and APR have been posted to the IDOE website in order to broadly disseminate the information for this indicator to the public. The SPP and APR have also been posted to the Learning Connection, an educational portal used by LEA personnel, students and parents.

Overview of Issue/Description of System or Process:
Definitions, as compiled by the National Post-Secondary Outcomes Center:

[63] OSEP guidance the definition and measurement of this Indicator was updated with submission of FFY 2008 Annual Performance Report.

- Competitive employment means that youth have worked for pay at or above the minimum wage in a setting with others who are nondisabled for a period of 20 hours a week for at least 90 days at any time in the year since leaving high school. This includes military employment.
- Higher Education means youth have been enrolled on a full- or part-time basis in a community college (2-year program), or college/university (4- or more year program) for at least one complete term, at any time in the year since leaving high school.
- Some Other Employment means youth have worked for pay or been self-employed for a period of at least 90 days at any time in the year since leaving high school. This includes working in a family business (e.g., farm, store, fishing, ranching, catering services, etc.).
- Other postsecondary education or training means youth enrolled on a full- or part-time basis for at least one complete term at any time in the year since leaving high school in an education or training program (e.g., Job Corps, adult education, workforce development program, or vocational technical school which is less than a 2-year program).
- Respondents are youth or their designated family member who answer the survey or interview questions.
- Leavers are youth who left school by graduating with a regular or modified diploma, aging out, left school early (i.e., dropped out), or who were expected to return and did not.

For Indicator 14 for FFY 2009 (SY 09-10) Indiana conducted a multi-stage survey of youth who are no longer attending an Indiana high school and who were eligible for special education under an IEP at the time of departure for one of the reasons defined above.

In order to conduct the post-graduate survey, Indiana established a competitive Request for Proposal to establish a vendor to conduct the survey. CEEP at Indiana University was selected through the RFP process to conduct the survey.

In accordance with federal mandates, CEEP worked collaboratively with the IDOE staff to develop a survey to examine the effectiveness of Indiana's special education services in enabling IEP students' success after they had exited the pre-K-12 educational system and fulfill the requirements of the Indicator. Each question was adapted from federal guidelines with the goal of determining the employment and/or educational status of former IEP students, as per 20 U.S.C. 1416(a)(3)(B), regardless of whether they had received a diploma. CEEP developed questions and protocols for the survey using information and data collection protocols developed by the National Post-School Outcomes Center.

Concurrent to the development of the survey, IDOE staff requested that all Indiana LEAs forward contact information on former IEP high school students to CEEP staff. Contact information requested included the student's first and last name, home address, telephone number and e-mail address. As the survey's target population was former high school students, there was a fairly high probability that a significant portion of contact information would be inaccurate and with some degree of sample bias. However, the contact information proved to be accurate. Of more than 10,000 surveys mailed, only 25 surveys were returned as undeliverable.

The post-secondary survey was administered in two distinct phases. The first phase was via mail and the second via telephone. In the first phase, a paper copy of the survey was mailed by CEEP to the last known address of the entire population of 10,280 students with disabilities that exited high school. Surveys were mailed to each Indiana LEA between July 29, 2010 and August 26, 2010. Recipients were invited to fill out the paper copy of the survey and return it via regular postage, or to fill out an online version of the survey. Due to delays in the receipt of student contact information from LEAs, the mailing was issued in multiple waves according to when the contact information was received. The results of the web and hard copy surveys were compiled by CEEP staff, who entered responses into a central database. Data entry was cross-checked to guarantee accuracy. A total of 657 responses were received (617 by mail and 40 online) and validated during the first phase.

During the second phase, remaining students (those who had not responded to the first phase survey) were contact through the phone survey. The original project design called for a "census" approach in order to gather information from the largest possible number of former students. However, due to the low response rate to the mail survey it was decided to interview of all former students who had not replied to the mailing.

An initial attempt and up to five additional attempts were made to complete a contact with former students. Sample records were classified as exhausted after the sixth attempt to contact the former student. Successful contact with former students occurred in two scenarios; contact with the specified individual or contact with a household member when the specified individual was not available and would not be available during the duration of the study. In cases of contact with household members when the individual would be available in the future, additional attempts were scheduled to reach the former at an agreeable time.

Successful contacts with the former students results in one of three possible outcomes:

- Initial refusal to being interview;
- Interview initiated but not completed – individual refused to complete during the time frame of the project;
- Completed Interview with individual.

Successful contacts with other household members resulted in three possible outcomes:

- Initial refusal to begin interview;
- Interview initiated but not completed – respondent refused to complete during the time frame of the project;
- Completed interview with household member.

Unsuccessful contacts were classified as "live sample – further action" and "dead sample – no further action." Live samples were eligible for additional attempts if the maximum of six attempts was not yet met. Live sample dispositions included callbacks, no answers, answering machines and busy signals. Dead sample dispositions were not eligible for additional attempts. Dead sample dispositions include operator intercepts for disconnected numbers, fax numbers and if the former student was no longer available at the number with no replacement or updated phone number.

Telephone surveys were conducted in a controlled environment in order to ensure consistency of questionnaire administration among all respondents. Operational control employed were:

- Professional, experienced market research interviewers;
- CATI (Computer-Assisted Telephone Interviewing) questionnaire administration;
- CATI sample administration.

The CATI sample administration managed scheduling of attempts so that second and subsequent attempts on each sample record were made during different "day parts" and on different days of the week. "Day parts" were classified as "Day Time" (9:00 a.m. to 5:00 p.m.) and "Weekend/Evening" (Saturday, noon to 5:00 p.m.; Sunday, 5:00 p.m. to 9:00 p.m.; weekday evenings, 5:00 p.m. to 9:00 p.m.). All times were based on the respondent's local time. Field status reports were prepared each day to summarize interviewing activity on a daily and cumulative basis.

Data from all survey methods (mailing, phone and online) were compiled and aggregated to a single master data file. A data file of close-ended responses for each respondent was prepared in a mutually agreed upon format (dbf, flat ascii, Excell, SPSS). Text responses to any open-ended questions were coded, edited and formatted in an Excel file with one record per respondent. Survey results were tabulated on a question-by-question basis with up to 18 cross-tabulations per banner. Both un-weighted and weightier tabulation banners were provided. The weighted banner was created using the most recent U.S. Census population counts for each of Indiana's 92 counties. Tabulated tables were annotated with results of statistical testing between sub-sets of specified sample segments and with mean scores and standard deviations for rating

questions. Responses were weighted, as appropriate, by geographic classification to recalculate the proportional distribution of special education students graduating in each region and county of the State. However, only regional classifications (defined as northern, southern and central Indiana) possess substantial validity – county level data carries a much higher risk of sample bias due to smaller sample sizes and the response rate.

A total of 1,200 telephone interviews were completed from a pre-identified list of respondents assembled by CEEP staff. These interviews are set as a benchmark for future surveys.

Sample Statistics:

Sample Records	Number	Percent
Useable records (disconnect/wrong number/fax	4,590	
Useable records	4,689	100%
Total separate telephone numbers dialed	9,279	
Respondents Not Screened		
Initial refusal	782	16.7
No contact made/No contact with eligible respondent (no answer/answering machine/busy/callback/more than 10 attempts.	2,426	51.7%
Communication barrier/language barrier	131	2.8%
Respondents Screened		
Respondents not qualified (still in high school)	150	3.2%
Respondents qualified but not interviewed (respondent did not complete entire interview)	0	0%
Respondent qualified and interview complete	1,200	25.6%
Total Dialings	31,576	
Total dialing of useable number	24,625	
5.25	5.25	
Maximum attempts per useable number	10	

- Screening interviews were completed with 1,350 respondents resulting in 1,200 respondents qualified to complete a survey and 150 respondents not qualified (still in high school).
- The ratio of initial refusals to completed screening interviews 782/1350) was .58:1 which is well below the average random digit dialing ration of 2.5:1 and the 1:1 ratio generally seen for pre-identified sample files.

Margin of Error:
Statistical accuracy of survey findings based on 1,200 pre-identified but randomly interviewed sample is approximately plus or minus three percentage points at the 95% confidence level. This means that if the survey was replicated 100 times, the results of this survey will fall within plus or minus three percentage points of the average results in 95 out of 100 times.

Respondent Selection and Sample Control:

- Participants were asked for by name listed on the sample file.
- Participants were screened to be out of high school.
- The sample file was randomly sorted to ensure youth from a mix of school corporations were interviewed.

Baseline Data for FFY 2009 (SY 09-10):

Baseline Data, Post Secondary Follow-up Survey Results, Measurements	Total
A. Percent enrolled in higher education (638 leavers / 1,857 leavers)	34.3%

B. Percent enrolled in higher education or competitively employed within one year of leaving high school (912 leavers / 1,857 leavers)	49.1%
C. Percent enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment (1,598 leavers / 1,857 leavers)	86.1%
Post-Secondary Follow-up Supplemental Data Table	**Total**
1. Enrolled in higher education within one-year of leaving high school;	638
2. Competitively employed within one year of leaving high school (but not enrolled in higher education or competitively employed);	274
3. Enrolled in some other postsecondary education or training program within one year of leaving high school (but not enrolled in higher education or competitively employed:	359
4. In some other employment within one year of leaving high school (but not enrolled in higher education, some other postsecondary education or training program, or competitively employed).	327

Discussion of Baseline Data for FFY 2009 (SY 09-10):
Measurement A as described by 20 U.S.C. 1416(a)(3)(B) asks for the percentage of youth enrolled in a 2- or 4-year college. 718 respondents indicated they were enrolled in such a school, while 13 responses in the "other" category also indicated this type of enrollment, for a total of 731 or 39% of the 1,857 responses. Measurement A also specifies that students should be enrolled for at least one full term. Of the 718 responses, 638 were enrolled for at least one full term.

Measurement B of 20 U.S.C. 1416(a)(3)(B) asks for the number of youth enrolled in higher education (as described in Measurement A) or competitively employed. Competitive employment includes pay at or above the minimum wage for 20 hours a week or more for at least 90 days during the year since leaving high school. Military employment and other settings with others who are nondisabled are included. Family business, self-employment, and employment in jail or in a sheltered workshop are excluded.

843 respondents reported that they were competitively employed; of "other" responses, another 484 were added (289 in a company, business, industry or factory; 3 in the military; 16 mechanics/technicians/electricians; 133 in food service; 27 in landscaping; and 16 in automotive services) for a total of 1,333 or 72% of the 1,857 respondents. Of those, 822 were paid at or above minimum wage and worked for 20 hours per week or more for at least 90 days. When compared and added to Measurement A, 912, or 49.1% were competitively employed or were enrolled in higher education.

Measurement C computes the percentage of leaving students who were enrolled in higher education or some other postsecondary education or training program or competitively employed or held some other employment during the year after leaving high school. Any "yes" response to Question 2 was included as the type of education specified. Likewise, any "yes" response to Question 5 was considered as holding employment of some form. Of the 1,857 total respondents, 1,598 or 86% indicated "yes" to either Question 2 or Question 5 or both This figure excludes respondents that were neither employed nor in school, job training, college or other education program.

Conversely, 259, or 14% of all respondents, replied that they had neither been employed nor in school, job training, college or other educational program.

Problems and Areas for Improvement:
Two key problems materialized during the implementation of the survey. First, school corporations were very slow to respond to IDOE and CEEP requests for contact information. School corporations were provided with multiple notifications and a template in which to enter and return the data, but a large proportion of

school corporations failed to respond in the time allotted. In addition, many school corporations did not use the template provided and failed to provide requested information (failure to provide area codes for phone numbers and zip codes for mailing addresses was a particular problem). Further, some school corporations provided contact information for more than former IEP students, but instead gave information for current K-12 IEP students or even contact information for the entire student body. The delays and failure to provide accurate information and in the format requested prevented the original schedule from being met and forced a considerable diversion of staff time at CEEP and increased the size of the sample both for the mailing and the phone survey, with attendant costs. However, IDOE is currently developing a comprehensive database of all contact information for all IEP students, so that in future years the school corporations will not be involved in the data collection process. If the database is not yet ready by the time of the second year of the survey, some form of professional development or incentives or sanctions for school corporations should be considered.

The second difficulty during the survey administration was the low response rate to the mailed survey. For the mailed survey, the response rate was approximately 6%. While this is not a particularly low response rate for an unsolicited mailing, the response rate would likely have been far higher had the survey included pre-paid postage. IDOE should evaluate the costs of providing pre-paid postage in order to increase the response rate in future years. The number of disconnected or otherwise inaccurate telephone numbers also reduced the response rate for the phone survey. While the nature of the target population creates inherent challenges to data quality, the results of the survey likely has some degree of sample bias.

Upon analysis of the data and as required by OSEP and in conjunction with its State Advisory Panel and stakeholders, Indiana has set the targets for this Indicator as follows:

FFY	Measurable and Rigorous Target
FFY 2010 SY (10-11)	The percentage of students enrolled in higher education and had an IEP in effect upon leaving school will be ≥ 34.8%.
	The percentage of students enrolled in higher education or competitively employed within one year of leaving high school and had an IEP in effect upon leaving school will be ≥ 49.1%.
	The percentage of students enrolled in higher education, in some other postsecondary education or training program or competitively employed or in some other employment and had an IEP in effect upon leaving school will be ≥ 86.6%.
FFY 2011 SY (11-12)	The percentage of students enrolled in higher education that had an IEP in effect upon leaving school will be ≥ 35.3%.
	The percentage of students enrolled in higher education or competitively employed within one year of leaving high school and had an IEP in effect upon leaving school will be ≥ 49.6%.
	The percentage of students enrolled in higher education, in some other postsecondary education or training program or competitively employed or in some other employment and had an IEP in effect upon leaving school will be ≥ 87.1%.
FFY 2012 SY (12-13)	The percentage of students enrolled in higher education that had an IEP in effect upon leaving school will be ≥ 35.8%
	The percentage of students enrolled in higher education or competitively employed within one year of leaving high school and had an IEP in effect upon leaving school will be ≥ 51.1%.
	The percentage of students enrolled in higher education, in some other postsecondary education or training program or competitively employed or in some other employment and had an IEP in effect upon leaving school will be ≥ 87.6%.

Improvement Activities/Timelines/Resources Ongoing:

Activity	Timeline	Resources
Work with Indiana Resource Center for Families with Special Needs (IN*SOURCE) to produce the college and postsecondary resource directory annually.	FFY 2009 (SY 09-10) through FFY 2012 (SY 12-13)	IN*SOURCE, The Office of Special Education, Colleges and Postsecondary schools.
Work with the Indiana Resource Network (IRN) to plan and hold a post-secondary transition and post-secondary conference annually.	FFY 2009 (SY 09-10) through FFY 2012 (SY 12-13)	IRN, the Office of Special Education
The transition school to work Interagency Coordinating Council, (known as the "290 Committee") address statewide issues as they relate to transition. **Added as of FFY 2011 (SY 11-12)**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	Family Advocates, the IDOE, Vocational Rehabilitation Services, Mental Health and Addictions, Developmental Disabilities, Workforce Development, Corrections, Social Security, Indiana and Ball State Universities, Indiana State Improvement Grant, Community Rehabilitation Provider, Special Education and postsecondary follow-up consultant.
Indiana Resource Network (IRN) **Added as of FFY 2011 (SY 11-12).**	Through FFY 2012 (SY 12-13)	Indiana Secondary Transition Resource
National Secondary Transition Technical Assistance Center (NSTTAC) Intensive Technical Assistance Plan **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2014 (SY 13-14)	IDOE, NSTTAC
National Post-Secondary Outcomes (NPSO) Intensive Technical Assistance Plan **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2014 (SY 13-14)	IDOE, NPSO
Modify the Electronic IEP tool to include rule of completion requirements regarding Indicator 14 survey responses **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12)	IDOE, LEAs

Indicator 15 of the Part B State Performance Plan (SPP)

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 15: General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.
[20 U.S.C. 1416 (a)(3)(B)]

Measurement:
Percent of noncompliance corrected within one year of identification:
a. # of findings of noncompliance.
b. # of corrections completed as soon as possible but in no case later than one year from identification.
Percent = [(b) divided by (a)] times 100.
For any noncompliance not corrected within one year of identification, describe what actions, including technical assistance and enforcement actions that the State has taken.

Overview of Issue/Description of System or Process:
UnderIDEA, the United States Secretary of Education is given the responsibility of monitoring states, and requiring states to monitor LEAs, using quantifiable indicators in three different priority areas.[64] In these three priority areas, there are 20 indicators. States are required to monitor the status of LEAs on 20 indicators. In Indiana, this system of general supervision is carried out by the CIFMS, within the IDOE and the Office of Special Education on an annual basis. The 20 indicators are separated into two subgroups, performance and compliance. Eleven of the indicators are performance, or results-related, indicators and consist of such examples as parent involvement and graduation rates. Performance indicators are measured against established benchmarks, and LEAs are expected to improve performance if they are below target performance level. The target levels change annually so the reader is referred to the specific indicator within this report for the precise target performance level. ED indicators that are results-related are:

a. Indicator #1, Percent of youth with IEPs in the State graduating with a regular diploma.
b. Indicator #2, Percent of youth with IEPs in the State dropping out of high school.
c. Indicator #3, Participation and performance of children with disabilities on statewide assessments:
    i. Percent of districts that have a disability subgroup that meets the State's minimum "n" size meeting the State's adequate yearly progress (AYP) objectives for progress for disability subgroup.
    ii. Participation rate for children with IEPs in a regular assessment with no accommodations; regular assessment with accommodations; alternate assessment against grade level standards; alternate assessment against alternate achievement standards.
    iii. Proficiency rate for children with IEPs against grade level standards and alternate achievement standards.
d. Indicator #4, Rates of suspension and expulsion:
    i. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than 10 days in a school year; and
    ii. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of greater than 10 days in a school year of children with disabilities by race and ethnicity[65].
e. Indicator #5, Percent of children with IEPs aged 6 through 21:
    i. Removed from regular class less than 21% of the day;
    ii. Removed from regular class greater than 60% of the day; or
    iii. Served in public or private separate schools, residential placements, or homebound or hospital placements.

[64] The three priority areas are LRE, General Supervision, and Disproportionality. For details, see 20 USCS 1416(a)(3).
[65] For FFY 2006 (SY 06-07) this sub indicator is not required to be monitored.

f. Indicator #6, Percent of preschool children with IEPs who received special education and related services in settings with typically developing peers (i.e., early childhood settings, home, and part-time early childhood/part-time early childhood special education settings)[66].
g. Indicator #7, Percent of preschool children with IEPs who demonstrate improved:
    i. Positive social-emotional skills (including social relationships);
    ii. Acquisition and use of knowledge and skills (including early language/communication and early literacy); and
    iii. Use of appropriate behaviors to meet their needs.
h. Indicator #8, Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities.
i. Indicator #14, Percent of youth who had IEPs, are no longer in secondary school and who have been competitively employed, enrolled in some type of postsecondary school, or both, within one year of leaving high school.
j. Indicator #18, Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements.
k. Indicator #19, Percent of mediations held that resulted in mediation agreements.

In addition to the 11 performance indicators, there are also nine compliance indicators on which SEAs and LEAs are required to make annual full compliance, three of which are SEA specific. These indicators require 100% compliance and include:

a. Indicator #9, Target = 0%. Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification.
b. Indicator #10, Target = 0%. Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.
c. Indicator #11, Target = 100%. Percent of children with parental consent to evaluate, who were evaluated within 60 days (or State established timeline).
d. Indicator #12, Target = 100%. Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays.
e. Indicator #13, Target = 100%. Percent of youth aged 16[67] and above with an IEP that includes coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals.
f. Indicator #15, Target = 100%. General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.
g. Indicator #16, Target = 100%. Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint[68].
h. Indicator #17, Target = 100%. Percent of fully adjudicated due process hearing requests that were fully adjudicated within the 45-day timeline or a timeline that is properly extended by the hearing officer at the request of either party [68]
i. Indicator #20, Target = 100%. State reported data [618 and SPP and APR] are timely and accurate[68].

The IDOE is required to collect and analyze the data from each LEA on an annual basis for each of these indicators. The Office of Special Education is the division charged with this responsibility for the IDOE and does indeed collect the data on the indicators annually. In previous years, the Office of Special Education

[66] For FFY 2006 (SY 06-07) this sub indicator is not required to be monitored.
[67] For Indiana, transition requirements begin at age 14 unless the case conference committee determines a need to begin earlier.
[68] This indicator is SEA specific in that the data is collected and organized by the Office of Special Education.

monitoring process has been called into question by OSEP due to discrepancies in the reporting and questions of the authenticity of some of the data.

In August 2006, the OSEP within ED conducted an onsite verification visit with the IDOE. A significant portion of this verification visit consisted of focused attention on Indiana's system for ensuring timely correction, within 12 months, by LEAs for issues of noncompliance within the nine compliance indicators. In a letter dated November 22, 2006, from Alexa Posny, then Director of OSEP, it was stated that "[t]he State has not met its responsibility to ensure that noncompliance is corrected within one year of its identification . . ." and subsequently, it was mandated that the IDOE take appropriate steps to ensure correction of issues of noncompliance in the future.

Due in part to the August 2006 OSEP verification visit and in part to the IDOE's commitment to ongoing consideration and betterment of its general monitoring process, a wide array of changes and improvements have been made in the IDOE, specifically in the Office of Special Education. These changes have taken considerable time to achieve but, in the long run, are believed to be in the best interest of the constituents of the state of Indiana. The Office of Special Education acknowledges that innumerable aspects of the general monitoring process must be reconstructed and reorganized in order to provide the most efficient and meaningful education for all Indiana children with specialized learning needs. Additionally, the Office of Special Education acknowledges that at this time, it has yet to achieve a level of full-correction and compliance with OSEP's expectations for this indicator. However, with its ongoing internal improvement activities, the IDOE is confident that within a reasonable amount of time, it will not only be in compliance with federal mandates, but will also have thoughtfully and affirmatively developed an efficient system of general supervision that fully address the OSEP requirements.

During FFY 2006 (SY 06-07), due to a substantial shift of staff and personnel within the Office of Special Education, the IDOE Assistant Superintendent for the Office of Special Education carefully considered and examined the General Supervision indicator expectation; resulting in significant and deliberate changes to the overall CIFMS process. In an analysis of the General Supervision process to this point, it was determined that there was an inadequate means of ensuring LEA correction of noncompliance. The feedback loop between the Office of Special Education and each LEA was ineffective and more resources (i.e., personnel) were needed to ensure that all of the required activities be completed. During the reporting year and into the Fall and Winter of the 2007-2008 school year, Indiana placed priority on the CIFMS system being reinvented. Expending the personnel resources to change the system meant that other activities (e.g., official notification letters of noncompliance) were left undone.

As the new CIFMS team members learned new responsibilities by attending nationally sponsored conferences, utilizing the resources from the various ED sponsored technical assistance centers, and analyzing the existing data sources and reported outcomes for the indicators, they became familiar with the scope and intent of the ED monitoring expectations. One of these expectations is to analyze LEA data and provide feedback. The data from FFY 2005 (SY 05-06) for each LEA will be combined with the current reporting year [FFY 2006 (SY 06-07)] and the various hierarchy levels of monitoring explained later in this indicator will encompass both years of data. The Office of Special Education will be sending letters to each LEA regarding their performance on the 20 ED indicators in February 2008. This letter will serve as the notification to each LEA that they have 12 months to correct any deficiencies with regard to the nine compliance indicators according to the improved and updated CIFMS process. Each LEA will also be required to describe how a local analysis of the data was conducted and what steps, if any, will be taken to ensure that all data submitted to the IDOE is not only timely, but accurate. The Office of Special Education will be reporting on the progress made by each LEA in the FFY 2007 (SY 07-08) APR.

Basis and groundwork for the change in the Office of Special Education CIFMS process is borrowed in part from the IDOE Title I monitoring process, carried out by the Division of Compensatory Education Services and Indiana's PROBE process. In response to a 2005 legislative directive to perform a comprehensive review of executive branch agencies, the Indiana Office of Management and Budget (OMB) developed an 18-question survey instrument called the PROBE, an acronym for Program Results: an Outcome-Based Evaluation. This

tool seeks to ascertain the effectiveness of Indiana state programs to achieve results, while considering the efficiencies in which services are delivered. Many of the questions were duplicated from the federal OMB's Program Assessment Rating Tool (PART). Some of the questions carried forth within the CIFMS from the PART include:

- Is the program free of design flaws or other obstacles that would limit its effectiveness or efficiency?
- Is the program effectively designed and targeted, so that resources will reach intended beneficiaries and/or address the program's purpose?
- Have specific long-term, results-based performance measures that are linked to the program purpose been established?
- Does the program have ambitious targets and timeframes for its long-term measures that reasonably compare with peer group activities?
- Have the program's purpose, goals and measures been communicated throughout the organization and across program partners?
- Has the agency or department responsible for this program taken meaningful steps or developed a plan to address any deficiencies indicated by the questions above?
- Does the agency regularly collect timely and credible performance information, including information from key partners, and use it to manage the program and improve performance?
- Are managers, key personnel and program partners held accountable for cost, schedule, efficiency and performance results?
- Does the program collaborate and coordinate effectively with related programs?
- Has the program demonstrated adequate progress in achieving its long-term performance goals?
- Does the program demonstrate improved efficiencies or cost effectiveness in achieving program goals each year?
- Is input regularly sought, gathered and reviewed to address any deficiencies in customer service or address any changes in programmatic circumstances?

These 12 questions have been amended or modified to be included as part of the revised CIFMS. A complete description of the revised CIFMS follows under the description of improvement activities for this indicator.

Every LEA in the state is expected to fully meet the ED compliance standards for the six compliance indicators and must do so on an annual basis. Every LEA, regardless of performance on the compliance indicators, must complete an annual desk audit, which is submitted to the Office of Special Education and is then analyzed for achievement toward the targeted performance goals (per the Office of Special Education state-directed aims) for the remaining 11 performance indicators. In previous years, any LEA not meeting the standard set for a given indicator was required to conduct a local review on that indicator and report to the IDOE reasons for the noncompliance. These reasons were then required to be accompanied by an Action Plan, which specified how the LEA would seek to achieve compliance for the next FFY reporting period. The strategies were reviewed and accepted/approved by the IDOE or revisions were required. In most cases, corrective action was required within a six month period of time, but in no case less than a 12 month timeframe. As stated previously, this process is being amended and improved and will be discussed in more detail later in this report.[69]

Baseline Data for FFY 2004 (SY 04-05):

a. Findings of noncompliance were identified through the CIFMS in 73 special education planning districts.

[69]The local directors of special education and their administrators who assist them will be fully informed of this revised monitoring process at the Spring ICASE meeting in Indianapolis on February 22, 2008. All will be informed that this revised process begins immediately and that an expedient turn-around in responses will be necessary. The attendees will also be informed that the revised process may be modified depending on the feedback received from ED.

b. Corrections were completed as soon as possible, with Improvement Action Plans that included timelines for compliance that did not exceed 12 months.
c. Not all findings of noncompliance were corrected in less than one year.

Discussion of Baseline Data:

Since the FFY 1999 (SY 99-00), Indiana's CIFMS process has been modeled after the OSEP monitoring process. The primary focus of the system is on the data that is collected and reviewed, and by collecting this data on an annual basis, the CIFMS process helps to ensure continuous improvement throughout the state for all LEAs and across all of the measured indicators. Over 15,000 data sets are reviewed annually through the CIFMS process.

A number of broad issues impact and present challenges to the success of the CIFMS process. One overarching concern is that in regards to noncompliance, certain goals, particularly when 100% compliance is required, are incredibly difficult, if not impossible to achieve. For example, in large LEAs, where there are a large number of students served, having only one instance of failure to implement an IEP by the third birthday for a student transiting from Part C to Part B puts the LEA at a level below 100% and therefore, out of compliance with the federal requirement. This one point of noncompliance may not be indicative of a systemic failing system but instead be one isolated event best dealt with on an individual basis.

Another issue, impacting not only Indiana but all states, is that of personnel shortages. An incapability to hire and retain employees is a concern that can take more than 12 months to correct. An example of this is when additional evaluation personnel are needed but must be trained and employed in order to meet evaluation timelines. Sometimes these issues may be corrected in one LEA only to reappear in another as personnel move from one position to another within any given region of the state.

A final factor regarding this indicator relates to Indiana's data collection process. Indiana received an ED grant intended to provide the resources necessary to streamline the LEA data collection process. Currently there is one data collection process for general education (which includes students with disabilities since they are a part of the general student body) and a separate data collection system for special education funding. This separate collection process for special education funding is conducted by the CODA Project[70]. While there are many activities taking place at the IDOE to align and merge these data systems, much work remains before the process is complete. Until that occurs, some of the data received by the IDOE is duplicative and not necessarily in the precise disaggregation necessary for monitoring the 20 ED indicators. Progress is beginning in this regard and more detail about the process is provided in Indicator 20 of this same report. For purposes of this indicator, suffice it to say that the data collected is analyzed in a cautionary mode because it still remains that some data is not yet entirely accurate. In instances of inaccurate data, LEAs are required to provide the Office of Special Education with a detailed explanation of why the data is inaccurate and what the actual disaggregated view should be for the indicator. With this information, the IDOE intends to move closer to aligning the disaggregated data needs of the state with what the ED needs as a result of the CIFMS process.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	100% of non-compliance corrected within one year.
2006 (SY 06-07)	100% of non-compliance corrected within one year.
2007 (SY 07-08)	100% of non-compliance corrected within one year.
2008 (SY 08-09)	100% of non-compliance corrected within one year.
2009	100% of non-compliance corrected within one year.

[70]The CODA Project is Indiana's data collection system for special education funding. For more details on the CODA Project, please see: http://www.thecodaproject.org/.

(SY 09-10)	
2010 (SY 10-11)	100% of non-compliance corrected within one year.
2011 (SY 11-12)	100% of non-compliance corrected within one year.
2012 (SY 12-13)	100% of non-compliance corrected within one year.

As a byproduct of the reevaluation and modification to Indiana's CIFMS process, the improvement activities, timelines, and resources for this indicator have been completely revised, as follows. This revised monitoring process, set to commence during the FFY 2007 (SY 07-08), is a multi-step process based on research from Leithwood & Jantzi (2006), Kopac (1991), and Cardno (2006) along with insight from Sengi (1990). It is the Office of Special Education's assertion that this recalibration of the CIFMS plan will lead to a more cohesive and sustainable process for the LEAs noted to be in noncompliance than was previously afforded. Through these intensified, collaborative, and focused efforts jointly enacted by LEA and IDOE staff full compliance is not only more likely on this indicator, but also on each of the 20 indicators mandated by the ED. Modeled after the IDOE Title I monitoring process, Office of Special Education staff members will be assigned to specific and individual LEAs. Each staff member will serve as the LEA's primary contact, to whom questions and communication will be directed. Having an ongoing and consistent relationship between the Office of Special Education primary staff contact member and the LEA is advantageous because it ensures a higher sense of reliability and a higher sense of collaboration between the state and local levels. Additionally consistency across the IDOE will be provided by pairing the Division of Compensatory Education staff members with the Office of Special Education staff members. All LEAs will be informed of the contact information for the Office of Special Education staff member to whom they have been assigned and that all responses must flow through that staff member to ensure consistency and continuity of the revised CIFMS process.

Overview of Hierarchies

Level: 1 Office of Special Education / LEA Review of Data for All 20 Indicators

The CIFMS process is multifaceted and begins first with the IDOE collection of data for each LEA in the state on each of the indicators. Once the data is collected, Office of Special Education staff members will analyze the data for their individual LEAs, providing a first level review for any discrepancies or inadequacies. This *Level 1* collection and analysis will occur for every LEA, on each of the indicators. The Office of Special Education staff will determine whether the LEA has achieved the specified target for the indicator and denote that in an internal data base designed for tracking each LEA on each of the indicators. This first level of review will occur prior to June 1 for any given year. LEAs will be informed via a written letter to the superintendent of the LEA of the findings of the Office of Special Education *Level 1* review.

Level 2: LEA Desk Audit / Verification of Data

If an LEA is found to be out of compliance on any compliance indicator, or to have failed to meet a target on a performance indicator, that LEA will then move from *Level* 1 to *Level* 2 of the CIFMS process. Additionally at any time an Office of Special Education staff member flags an LEA's data as questionable, disputable, or suspicious, the LEA may be moved into *Level 2* of the CIFMS process. *Level 2* requires a desk audit be completed by the LEA, consisting of a local review of the data submitted to the IDOE for any of the indicators for which there is an issue or concern.

This required desk audit will at a minimum necessitate an evaluation by the LEA of possible issues regarding:

- specific buildings,
- class or course schedules, or
- service provider caseloads that may be preventing the LEA from achieving compliance within any given indicator.

In addition the LEA must specify in writing how it intends to bring any data reporting inadequacies for any of the indicator(s) into full compliance within the next 12 month time frame.
The LEA *Level 2* response requires a reflective analysis of the 12 questions that have been brought forth and modified from the state-approved PROBE. This is a district-wide reflective analysis that will necessitate review of any and all other state or federal mandated plans that the LEA has developed. Through the local analysis of those plans and the 12 questions from the PROBE the *LEA Level 2* response will provide the Office of Special Education with a written introspective review of where various plans overlap and how the LEA might collaboratively address any issues that are potentially causing lack of compliance with the cited indicators.

If an LEA found to be out of compliance with any one of the nine compliance indicators is already scheduled for an On-Site Monitoring Visit by the Division of Compensatory Education through its Title I monitoring, the Office of Special Education staff member working with that LEA will become necessarily involved in the already planned On-Site Visit. This collaborative approach to monitoring will permit a more meaningful and holistic view of the LEA with a consideration of both Title I and CIFMS indicators. This collaborative monitoring visit will be in addition to the *Level 2* report required from the LEA. Each LEA scheduled for a collaborative monitoring visit will receive written notification from their respective Office of Special Education assigned staff member no later than September 1 of each year.

LEAs required to conduct a *Level 2* review must return the findings of its review to its Office of Special Education assigned staff member by October 1 of the year that the failure to achieve the target for the indicator(s) was identified. As part of the analysis, the LEA is required to provide an aggregate description of how the analysis took place, who was involved in the analysis, and what the district-wide implications are for the findings brought forth during the analysis. The LEA *Level 2* response must provide insight for the 20 indicators overall (how one may be impacting or influencing another) and not for each individual indicator. Additionally, the LEA is required to describe any past or immediate-future applicable professional development or training activities (i.e., within the next three months) that have relevance to the LEA *Level 2* response. The Office of Special Education staff member responsible for the LEA will review the LEA response and provide input or feedback as warranted. Whenever possible, suggestions will be provided to help ensure an Integrated and Focused System to support student success (IFS) is in place and other research-based best practices are implemented. The LEA will also be provided with research and information regarding applicable IDOE grant projects and activities in the feedback given by the IDOE, which will be given to the LEA no later than 15 days after the receipt of the LEA *Level 2* response. This feedback may require that additional information be submitted by the LEA, clarification on anything provided to the IDOE, and/or notification that a verification review consultation must be scheduled within the next 15 calendar days.

Level 3: LEA Valuation Nine/Five
At *Level 3,* the CIFMS process requires a mandatory, individually tailored LEA valuation to be completed by any LEA who is found to be out of compliance with <u>any one of the nine ED compliance indicators</u> and/or failure to achieve the specified target level with any five of the 11 ED performance indicators. Local educational agencies are notified of this requirement via a written letter to the superintendent of the LEA that specifies the exact indicators that have not achieved the required target level.

Any LEA scheduled for a collaborative monitoring visit with Title I or an onsite monitoring visit from the Office of Special Education during the given FFY may be excluded from the valuation process required at *Level 3*. The LEA may opt, however, to complete the valuation process as part of its preparations for the upcoming collaborative monitoring visit. The Self-Assessment Tool to be used by the LEA for the *Level 3* valuation will consist of no more than 25 questions and will include relevant and explorative questions relating to the noted (cited) indicators. The overarching guiding questions the IDOE staff member will use to create the Self-Assessment the LEA will use for the *Level 3* valuation are provided in Appendix 15-1 and may be adjusted depending on the size of the LEA, the number of indicators cited for suspected noncompliance, and the degree or level of suspected noncompliance for each indicator. The reason for the term 'suspected noncompliance' is that it is at *Level 3* where the LEA must determine the accuracy of the district's alignment with all measures for the given indicator(s). It could be that an LEA does have a higher than average level of disproportionality;

however the LEA's *Level 3* valuation may find that it is not because of inappropriate identification processes used.

The Self-Assessment Tool used for the *Level 3* valuation will be individually tailored by Office of Special Education staff to meet each LEA's specific needs. The Office of Special Education staff member responsible will base the questions in the valuation process on the LEA *Level 2* response, any previously submitted corrective action activities (if applicable), and any additional relevant issues deemed applicable by the IDOE. To aid the LEA in taking a holistic view, the Office of Special Education staff member will cluster questions and indicators following the guidance used in the B15 worksheet, designed by the National Center for Special Education Accountability Monitoring (NCSEAM) and supported by the ED, whenever possible. Another factor brought forth in this determination is a report from the fiscal team within the Office of Special Education that describes any excess carryover, late expenditures, or late reporting noted in the annual applications and reports.

Local educational agencies required to complete a *Level 3* valuation will be encouraged to complete the process with a collaborative team that includes constituents such as service providers, administrators, and family members. The *Level 3* valuation is intended to guide a determination regarding the LEA's level of compliance with the given indicator(s) and whether any actual findings of noncompliance are systemic in nature or limited to one (or a few) buildings or programs within the LEA. The *Level 3* valuation includes a requirement that the LEA submit a summary or report to the Office of Special Education that is holistic in nature and scope and looks at the LEA staff, curriculum, and programs in comparison to the level of compliance for the applicable indicator(s).

The *Level 3* valuation is due to the IDOE no later than November 1 of the applicable year. The Office of Special Education staff member assigned to work with the LEA will review the LEA response and provide input or feedback as warranted. This feedback will be given to the LEA no later than 15 days after the receipt of the LEA's completed *Level 3* valuation and may require additional information to be submitted by the LEA, clarification on anything provided to the IDOE, and/or notification that a verification review consultation must be scheduled within the next 15 calendar days. It is at this level that an official Findings Letter is sent to the superintendent (based on the information provided within the *Level 3* valuation report).

In instances where egregious violations are noted or the submitted documentation from the LEA portrays little effort put forth to ensure full compliance, an on-site verification visit by the IDOE would be scheduled. On-site verification visits are an option for the IDOE in the event a *Level 3* valuation report does not meet the requirements for personnel participation, does not fully describe the data analysis process used or how hypothesis for noncompliance were developed, and other issues noted by the Office of Special Education staff member during the review of the LEA *Level 3* valuation.

Any LEA found to be in noncompliance with a given indicator for any two consecutive or any two out of three consecutive years will automatically be required to complete a *Level 3* valuation even if the LEA is scheduled for a collaborative Title I and Office of Special Education Monitoring Visit during the given FFY. Depending on the level of noncompliance such notation could also trigger the scheduling of an On-Site Verification Visit by the IDOE in any LEA not already scheduled for a collaborative On-Site Monitoring Visit during the current monitoring cycle.

Level 4: LEA Corrective Action Plan
Level 4 within the revised CIFMS process consists of the development, collaborative IDOE/LEA analysis, implementation and collaborative IDOE/LEA review of progress on an LEA *Level 4* Corrective Action Plan. A *Level 4* Corrective Action Plan must include goals and strategies in order to be valuable. Ownership into each LEA plan is a vital component and LEAs will be required to include in each planning team (at a minimum) one service provider and one administrator from each building where issues of noncompliance are noted (as determined by the LEA during the *Level 2* response). During the Office of Special Education review of the *Level 2* and *Level 3* responses from the LEA, the LEA must provide a summary that explains how the LEA determined reasons for the non-compliance and describe potential solutions for bringing the district into

compliance with the cited indicator(s). At *Level 4* (which may occur simultaneously with *Level 2* and/or *Level 3* if an is not contesting the citation of noncompliance), the LEA develops local goals, strategies, and a time table for achieving full compliance on the indicators found to be non-compliant. This information is to be incorporated by each LEA into the self-developed corrective action plan.

The Office of Special Education staff member assigned to work with the LEA will encourage the LEA to establish a realistic timeline for the development of the *Level 4* corrective action plan to ensure that a reasonable number of goals are written and that the plan contains a meaningful evaluation component. Because issues of noncompliance must be corrected as quickly as possible (and in no case within more than a 12 month period), the timeline for the goals' implementations must be a priority for the LEA planning team. Each plan developed and submitted to the IDOE must provide a timeline for reporting to the IDOE on the progress being made by the LEA toward compliance for each indicator cited for noncompliance. The *Level 4* corrective action plan is due to the IDOE by December 15 of the applicable year. The Office of Special Education staff member assigned to work with the LEA will review the LEA report and provide input or feedback as warranted. This feedback will be given to the LEA no later than 15 days from the receipt of the LEA *Level 4* corrective action plan and may require additional information to be submitted by the LEA, clarification on anything provided to the IDOE, and/or notification that a verification review consultation must be scheduled within the next 15 calendar days.

Having the appropriate team members as part of the planning team and affording the team time to thoroughly review the results of the assessment is vital to making solid determinations of causations and factors contributing to the issue(s) of noncompliance. Integrating action plans with other plans (such as Title I and Performance Based Accreditation) will be required to ensure a seamless LEA system-wide process of addressing inadequacies and ensuring implementation of the plan with fidelity as well as community buy-in. The Office of Special Education will work with respective Centers and Divisions within the IDOE to ensure that LEA plans are coordinated. Multi-Center IDOE teams will be formed to aid in the review and oversight of each LEA *Level 4* corrective action plan.

Any LEA cited for a third instance of noncompliance with a given indicator will be mandated to involve the assigned IDOE staff member in the LEA *Level 4* corrective action plan, including the data analysis, goal setting, determining an effective evaluation component, and development of timeline for implementation.

Any LEA cited for a fourth instance of noncompliance with a given indicator may be subject to a delay in federal funding and possible requirement of fiscal obligations or reallocations to ensure compliance.

Public Reporting

The Office of Special Education will work with the NCRRC in March and April 2008 to develop target levels of substantial compliance for the 20 ED indicators. These targets will be used to identify each LEA for each of the indicators. Public reporting of the results will be posted on the IDOE website[71]. Each LEA will have the capability to review the level of compliance achieved on each of the ED indicators by logging into the administrative account for ISTAR[72]. Through the use of the ISTAR Dashboard LEAs will be able to view and even drill down into the data that the LEA has submitted for the required ED indicators. The Office of Special Education will work with a representative subset of the State Advisory Council on Children and Youth with Disabilities (the SAC) to confirm the criteria for achieving substantial compliance on the 20 ED indicators and weighting the indicators for designating LEA determinations.

Sanctions

[71] See http://www.doe.in.gov/achievement/individualized-learning/monitoring.

[72] ISTAR is the state's alternate assessment system for students who have significant cognitive disabilities and it also encompasses the state's optional electronic individualized education program. For more information, see http://www.doe.in.gov/achievement/assessment/istar

Sanctions for noncompliance are built into each level. At *Level 1* the failure of the LEA to respond within the required timeline will trigger a written notification to the superintendent of the LEA and automatically move the LEA into *Level 3* with all data being presumed accurate and useable for public reporting purposes.

At *Level 2* the failure of the LEA to respond within the required timeline will trigger a written notification to the Superintendent and automatically move the LEA into *Level 4* with the Office of Special Education staff assisting in the development of the *Level 4* Corrective Action Plan.

At *Level 3* the failure of the LEA to respond within the required timeline will trigger a written notification to the Superintendent and result in a scheduled onsite monitoring visit from the Office of Special Education (unless the LEA is already scheduled for a collaborative onsite monitoring visit with Title I during the given fiscal year).

At *Level 4* the failure of the LEA to respond within the required timeline will trigger a written notification to the Superintendent of a designated delay in federal dollar distributions to the LEA.

CIFMS Sequence of Events

Task / Process	Primary Responsibility Of…	Accomplished By…
Collection Of Overall Data For Each Of The 20 ED Indicators For Each Lea In The State	Office of Special Education Staff	May 1 Of Each Year
Level 1 Review Of Data For Each Indicator	Office of Special Education Staff	June 1 Of Each Year
Level 1 Reporting To Each LEA	Office of Special Education Staff	August 1 Of Each Year
Comparison Of LEAs For On-Site Monitoring Visits From Title I[73]	IDOE Staff	August 30 Of Each Year
Notification To All LEAs Who Will Receive A Collaborative On-Site Monitoring Visit This Calendar Year	IDOE Staff	September 1 Of Each Year
LEA Level 2 Desk Audit	LEA Staff	Completed & Returned To The IDOE No Later Than October 1 Of Each Year
Analysis & Report Of Review Of LEA Level 2 Desk Audit Findings	Office of Special Education Staff	Within 15 Calendar Days Of Receipt Of LEA Level 2 Desk Audit Analysis
Possible Verification Review Consultation With LEA (If Desk Audit Warrants)	Office of Special Education & LEA Staff	Within 30 Calendar Days Of Receipt Of LEA Level 2 Desk Audit Analysis
Prepare & Distribute Individually Tailored Level 3 LEA Valuation	Office of Special Education Staff	Within 15 Calendar Days Of Finalizing Review Of LEA Level 2 Desk Audit Analysis
Completion Of Level 3 LEA Valuation	LEA District-Wide Team	Completed & Returned To The IDOE No Later Than November 1 Of Each Year
Analysis & Report Of Review Of Level 3 LEA Valuation Findings	Office of Special Education Staff	Within 15 Calendar Days Of Receipt Of LEA Level 3 Valuation Findings
Possible Verification Review Consultation With LEA (If Valuation Warrants)	Office of Special Education & LEA Staff	Within 30 Calendar Days Of Receipt Of LEA Level 3 Valuation or Sooner if Warranted
Possible On-Site Verification Visit With LEA (If Valuation Warrants)	Office of Special Education & LEA Staff	Within 30 Calendar Days Of Receipt Of LEA Level 3 Valuation or Sooner if Warranted

[73] Any LEA On-Site Collaborative Monitoring Visit will follow the timeline and schedule established by the IDOE Division of Compensatory Education (Title I) staff.

Task / Process	Primary Responsibility Of…	Accomplished By…
Level 4 Corrective Action Plan	LEA District-Wide Team	Ongoing As Analyses Are Occurring; Completed & Returned To IDOE By December 15 Of Each Year
Analysis & Report Of Review Of Level 4 LEA Corrective Action Plan	Office of Special Education Staff	Within 15 Calendar Days Of Receipt Of Level 4 LEA Corrective Action Plan
IDOE Involvement In LEA Level 4 Corrective Action Plan Development (If Necessary)	Office of Special Education Staff	Within 30 Calendar Days Of Receipt Of Level 4 LEA Corrective Action Plan
Report Of Progress On Level 4 LEA Corrective Action Plan	LEA Staff	Ongoing Per Timeline Established In The IDOE Approved Level 4 LEA Corrective Action Plan
LEA Notification to Public of the IDOE Findings & Corrective Action Plan	LEA Superintendent or Designee	No Later Than April 1 of Applicable Year
Notification Of Mandatory Allocation Of Fiscal Resources To Aid In LEA Compliance	Office of Special Education Staff	By March 30 Of The Applicable Calendar Year When Warranted

Improvement Activities/Timelines/Resources No Longer Active:

Improvement Activity	Timelines	Resources
a. Continue with annual schedule for CIFMS for all LEAs. b. Division of Exceptional Learner (Office of Special Education) staff monitor CIFMS corrective actions, complaint corrective actions, and IHO orders. c. Monitoring results for all LEAs will be posted on the website. d. Determination of LEA compliance/performance. **Revised as of FFY 2007 (SY 07-08) submission of the APR.** **Discontinued as of FFY 2008 (SY 08-09) submission of the APR.**	FFY 2005 (SY 05-06) through FFY 2006 (SY 05-06)	a. The Office of Special Education, local directors, stakeholders, SAC b. The Office of Special Education c. The Office of Special Education d. The Office of Special Education & LEAs
a. All year one activities. b. Technical assistance for LEAs. c. Monitoring results for all school corporations will be posted on the Office of Special Education website. d. Determination of LEA compliance/performance. **Discontinued as of FFY 2008 (SY 08-09) submission of the APR.**	FFY 2006 (SY 06-07) through FFY 2010 (SY 10-11)	a. The Office of Special Education, local directors, stakeholders, SAC b. The Office of Special Education c. The Office of Special Education d. The Office of Special Education & LEAs

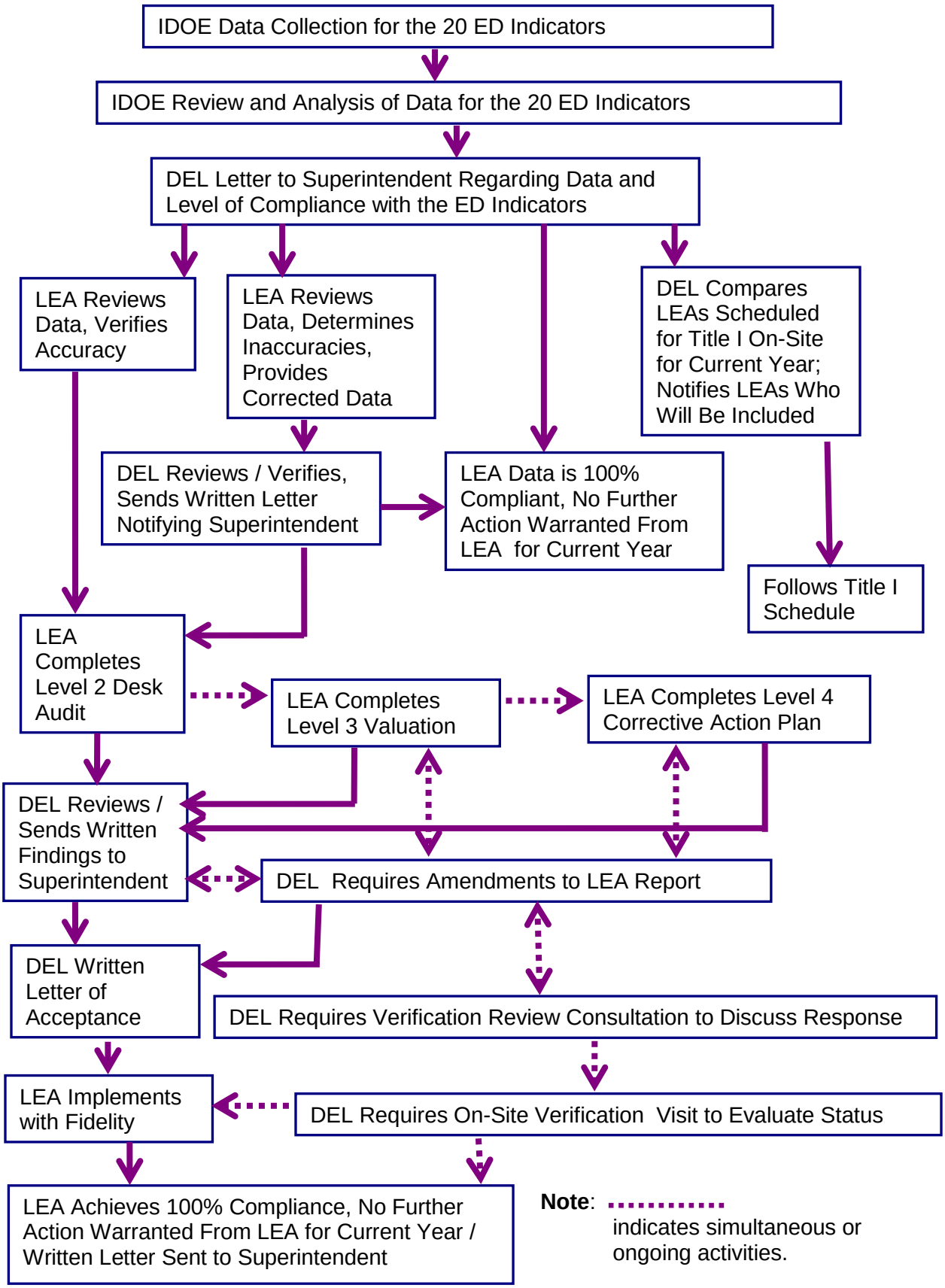
State Special education regulations (Article 7) will be promulgated to reflect IDEA and final regulations. **Completed as of FFY 2008 (SY 08-09).**	FFY 2005 (SY 05-06) through FFY 2008 (SY 08-09)	The Office of Special Education, SAC, Special Committees, and local directors, State Board of Education, State Attorney General's Office, Governor's Office
Reorganize and restructure the Office of Special Education special education monitoring system. **Completed as of FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08)	The IDOE and projects supported by the IDOE
Assign and maintain ongoing one-on-one state provided technical assistance with individual LEAs. **Completed as of FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	The IDOE and projects supported by the IDOE
a. Develop LEA Determination Stakeholder Committee. b. Establish timeline for LEA determinations. c. Create scenarios for determinations. **Completed as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08)	a. The IDOE and projects supported by the IDOE b. The IDOE c. The IDOE and special committees
Make LEA Determinations on an annual basis **Completed as of FFY 2008 (SY 08-09) submission of the APR.**	FFY 2007 (SY 07-08)	The IDOE and projects supported by the IDOE
a. Utilize new monitoring system. b. Develop internal verification process for data checks. c. Institute ongoing IDOE verification process. **Completed as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08)	a. The IDOE and projects supported by the IDOE b. The IDOE c. The IDOE
Multiple Title Office of Special Education collaborative meetings to plan "Indiana Districts In Improvement – Year 1 and Year 3" 2 day workshop. **Completed as of FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08)	The IDOE
Collaboration with Title I, the Office of Special Education, and the Center for English Language Learners (ELL) to sponsor workshop for "Indiana Districts In Improvement – Year 1 and Year 3". NOTE: As a result of these efforts, schools are using "One Plan" for their action plan. **Completed as of FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08)	The IDOE personnel and statewide stakeholder groups
a. Align state discretionary grants with SPP improvement activities b. Assign articulated technical assistance (TA) responsibilities to IDOE grant recipients. **Completed as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	a. The IDOE and projects supported by the IDOE b. The IDOE and projects supported by the IDOE

Align Indiana state improvement grant with the six foundational pieces that establish the framework for the integrated and focused system of supports (IFSS). **Completed as of FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08)	The IDOE and projects supported by the IDOE
The Office of Special Education will hire more staff members to accommodate capacity needs of revised monitoring system. **Discontinued as for FFY 2011 (SY11-12).**	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The IDOE
The Office of Special Education will collaborate with other states in the NCRRC who have demonstrated successful achievement of IDEA required activities (e.g., visiting Illinois to observe LEA Determinations Stakeholder process). **Discontinued as for FFY 2011 (SY11-12).**	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The IDOE and projects supported by the IDOE, the staff of Illinois State Board of Education, the staff of the NCRRC
Coordinate and plan regular TA conference call with OSEP contacts and federally funded TA centers. **Discontinued as for FFY 2011 (SY11-12).**	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The IDOE, The NCRRC staff, OSEP staff
Coordinate and plan regular TA conference calls with LEA contacts and federally funded TA centers on a variety of topics. **Discontinued as for FFY 2011 (SY11-12).**	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The IDOE and projects supported by the IDOE

Improvement Activities/Timelines/Resources Ongoing:

Improvement Activity	Timelines	Resources
Utilize available technical assistance from federally funded TA centers, including the NCRRC ~~and DAC~~, by both attending TA coordinated conferences and by hosting TA center personnel for focused, one-on-one assistance. **Revised as of FFY 2011 (SY 11-12)**	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The IDOE and projects supported by the IDOE, NCRRC staff, ~~DAC staff~~
Ensure quality LEA interventions and improvement in student outcomes by providing and supporting an external evaluator for the IRN efforts towards technical assistance, professional development and correction of noncompliance. **Added as of FFY 2010 (SY 10-11).**	FFY 2010 (SY 10-11) through FFY 2012 (SY 12-13)	Indiana has a current contract in place for an external evaluator who has designed an electronic system that will all the IDOE to ensure that the interventions and technical assistance being provided by the IRN target correction of noncompliance within one year.
Distribute a Monitoring Workbook to LEAs found out of compliance containing an in-depth analysis of areas of noncompliance. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education, LEAs

Gather data on disproportionality of racial and ethnic groups in special education and disseminate to stakeholders. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE, IRN, CEEP
Define policies and procedures for data collection and reporting. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education and Office of Data and Accountability
Track monthly compliance for LEAs with uncorrected Findings. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education specialists


IDOE Data Collection for the 20 ED Indicators
IDOE Review and Analysis of Data for the 20 ED Indicators
DEL Letter to Superintendent Regarding Data and Level of Compliance with the ED Indicators
LEA Reviews Data, Verifies Accuracy
LEA Reviews Data, Determines Inaccuracies, Provides Corrected Data
DEL Compares LEAs Scheduled for Title I On-Site for Current Year; Notifies LEAs Who Will Be Included
DEL Reviews / Verifies, Sends Written Letter Notifying Superintendent
LEA Data is 100% Compliant, No Further Action Warranted From LEA for Current Year
Follows Title I Schedule
LEA Completes Level 2 Desk Audit
LEA Completes Level 3 Valuation
LEA Completes Level 4 Corrective Action Plan
DEL Reviews / Sends Written Findings to Superintendent
DEL Requires Amendments to LEA Report
DEL Written Letter of Acceptance
DEL Requires Verification Review Consultation to Discuss Response
LEA Implements with Fidelity
DEL Requires On-Site Verification Visit to Evaluate Status
LEA Achieves 100% Compliance, No Further Action Warranted From LEA for Current Year / Written Letter Sent to Superintendent
Note: indicates simultaneous or ongoing activities.

References

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APPENDIX 15 - 1

This addendum consists of three resource charts.

a) "Monitoring Priority". Each of the indicators listed, including the monitoring priority.
b) "Thought Provoking Questions". The chart "clusters" indicators. As the questions are reviewed by the LEA, all of the indicators in a particular cluster are to be included in the analysis. Evidence of analysis is to be incorporated into the school improvement plan.
c) "Example – Targeted Questions". As the "Thought Provoking Questions" are being reviewed, the LEA is to look specifically at the Indicator(s) that were out of compliance. These targeted questions are to be considered as the school improvement plan is developed as part of the "clustered" indicators.

MONITORING PRIORITY	INDICATORS WITH THIS PRIORITY
Free and Appropriate Education in the Least Restrictive Environment	**Compliance Indicator 1:** Percent of youth with IEPs graduating from high school with a regular diploma compared to percent of all youth in the State graduating with a regular diploma. **Compliance Indicator 2:** Percent of youth with IEPs dropping out of high school compared to the percent of all youth in the State dropping out of high school. **Compliance Indicator 3:** Participation and performance of children with disabilities on statewide assessments: A. Percent of districts that have a disability subgroup that meets the State's minimum "n" size meeting the State's AYP objectives for progress for disability subgroup. B. Participation rate for children with IEPs in a regular assessment with no accommodations; regular assessment with accommodations; alternate assessment against grade level standards; alternate assessment against alternate achievement standards. C. Proficiency rate for children with IEPs against grade level standards and alternate achievement standards. **Compliance Indicator 4:** Rates of suspension and expulsion: A. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than 10 days in a school year; and B. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of greater than 10 days in a school year of children with disabilities by race and ethnicity. **Compliance Indicator 5:** Percent of children with IEPs aged 6 through 21: A. Removed from regular class less than 21% of the day;[74] B. Removed from regular class greater than 60% of the day; or C. Served in public or private separate schools, residential placements, or homebound or hospital placements. **Compliance Indicator 6:** Percent of preschool children with IEPs who received special education and related services in settings with typically developing peers (i.e., early childhood settings, home, and part-time early childhood/part-time early childhood special education settings). **Performance Indicator 7:** Percent of preschool children with IEPs who demonstrate improved: A. Positive social-emotional skills (including social relationships); B. Acquisition and use of knowledge and skills (including early language/communication and early literacy); and C. Use of appropriate behaviors to meet their needs.

[74] At the time of the release of this package, revised forms for collection of 618 State reported data had not yet been approved. Indicators will be revised as needed to align with language in the 2005-2006 State reported data collections.

MONITORING PRIORITY	INDICATORS WITH THIS PRIORITY
	Performance Indicator 8: Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities.
Disproportionality	**Performance Indicator 9:** Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification. **Performance Indicator 10:** Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.
Monitoring Priority: Effective General Supervision Part B/ Child Find	**Performance Indicator 11:** Percent of children with parental consent to evaluate, who were evaluated within 60 days (or State established timeline).
Monitoring Priority: Effective General Supervision Part B/ Effective Transition	**Compliance Indicator 12:** Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays. **Performance Indicator 13:** Percent of youth aged 14 and above with an IEP that includes coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals. **Performance Indicator 14:** Percent of youth who had IEPs, are no longer in secondary school and who have been competitively employed, enrolled in some type of postsecondary school, or both, within one year of leaving high school.
Monitoring Priority: Effective General Supervision Part B/ General Supervision	**Performance Indicator 15:** General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification. **Performance Indicator 16:** Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint. **Performance Indicator 17:** Percent of fully adjudicated due process hearing requests that were fully adjudicated within the 45-day timeline or a timeline that is properly extended by the hearing officer at the request of either party. **Performance Indicator 18:** Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements. **Performance Indicator 19:** Percent of mediations held that resulted in mediation agreements. **Performance Indicator 20:** State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

ANALYSIS: THOUGHT PROVOKING QUESTIONS	
Q1: Describe the characteristics of your local SPP indicator *data collection*:	
For **each** cluster of Indicators, LEA to complete a analysis using the following: a. Who is responsible for designing data collection in your state and/or local school or district for each of the indicators? b. What are the information sources and how is the information collected for each of the indicators? c. Who is responsible for collecting the data? d. Who is responsible for analyzing the data? e. How good are the data in terms of reliability? Validity? Response rate?	
Indicator(s)	Data to be Analyzed
1, 2, 13, 14	Example: Grad rate/dropout rate/Indiana Transition IEP checklist/ Indiana Post-School Follow-Up System (INPSFS)

3, 7	
4	
5, 6	
8	
9, 10	
11	
12	

Q2:	As you reviewed your school or district's data collection (sufficient and quality/accuracy) do you need to look for more? Did questions about data collection emerge for which you want to seek answers? If so, list your questions as they pertain to each cluster of indicators
Q3:	Describe your school or district's performance on each cluster of indicators. Highlight areas that need improvement which could include consideration of instruction/intervention, assessment/progress monitoring, data based problem solving, LEA leadership, family involvement, and cultural responsivity.
Q4:	As you reviewed your school or district's performance (trends and patterns), what questions emerge about performance you want to seek answers? List your questions as they pertain to each cluster of indicators.
Q5:	As you reviewed your school or district's performance, describe actions now necessary to address issues (instruction/intervention, assessment/progress monitoring, data based problem solving, LEA leadership, family involvement, and cultural responsivity). Incorporate the following categories into your improvement activities: Provide training/professional development; Improve data collection; Improve systems administration and monitoring; Improve collaboration/ coordination; Program development; Clarify/examine/develop policies and procedures; Provide technical assistance; Evaluation.

Example – Targeted Questions	
Indicator	Questions
6	1. The LEA reviews current placement patterns to determine whether a continuum of placement options were available and utilized or were most children with IEPs served in settings designed for children with disabilities. 2. The LEA routinely analyzes student placement and service data to determine patterns, issues, or areas of potential need for staff development and revision of routine practices. 3. The LEA has a process in place to monitor whether CCC placement decisions were based on child need rather than program availability. 4. The LEA provides training to CCC participants and teachers on presenting the continuum of placement options to incoming parents. 5. The LEA establishes an LRE Improvement Plan as part of the school improvement plan when data reveals a lack of opportunity for participation in early childhood programs with typical peers. The plan includes strategies to increase participation of children with IEPs in early childhood programs (e.g., contracting with community preschools/child care centers, placement in Head Start, reverse integration public school classroom including at least 50% nondisabled children, public school operated preschool programs). The plan addresses access to a developmentally appropriate curriculum and instruction that is aligned to the Foundations for Young Children to the Indiana Academic Standards for Young Children from Birth to Age 5.
7	1. The LEA has a monitoring process in place to compare STNs in the Educational Information System (EIS) with those listed on the December 1 child count (and subsequent student entry in the CODA Project data system) to ensure all preschool-age children with disabilities are assessed at entry, annually, and at exit. Documentation exists that every child with a disability was assessed via the ISTAR assessment within the first quarter of entry or no later than sixty instructional days after initiation of services. 2. The assessment system is designed so teachers and parents will receive benefit from collecting and providing the data. 3. When progress data identifies children in the "not improved" category (did not gain or use

	new skills), the LEA reviews who these children are to determine the efficacy of the services in meeting the needs of all students. 4. On-going professional development is available to support teachers in the administration, scoring, interpretation of the ISTAR assessment, and using the ISTAR to inform instruction.
12	1. The LEA routinely monitors whether children referred from Part C who are eligible for Part B are evaluated and receiving services by their third birthday. a. The monitoring system includes a process for checking a sample of records for accuracy and completeness. There are safeguards to minimize data entry errors. b. The monitoring system includes review of evaluation and initiation of services timelines in files of (1) the children from Part C that were <u>eligible</u> and receiving services <u>after</u> their third birthday and (2) for the children found <u>ineligible after</u> their third birthday to identify any policies, procedures, or routine practices that when applied to individual students with disabilities results in a violation of the requirement. c. The monitoring system includes a review of files for children that failed to receive a FAPE by their third birthday due to parent delays and missed appointments. The LEA verifies the presence of documentation of valid reasons for delays or was the evaluation scheduled too close to the third birthday that <u>any</u> parent delay caused the timeline to be exceeded. 2. The LEA has written procedures for ensuring that parents are informed of the evaluation timelines and involved in scheduling of a case conference committee meeting to discuss the results of an evaluation. 3. The LEA has an established plan to allocate sufficient time for members of the multidisciplinary assessment team to adequately participate in an assigned assessment (no backlogs). 4. The LEA monitors LEA personnel attendance at First Steps transition conferences. When there is a repetitive issue of lack of attendance due to untimely notification by First Steps service coordinators (10 day prior written notification), the LEA communicates with the First Steps System Point of Entry to resolve the issue in a timely manner. The LEA participates on an interagency transition team to facilitate effective transitions of children between and among agencies. 5. The LEA provides training to CCC participants and local CODA Project staff to ensure uniform compliance with transition requirements and ensure that accurate data is provided to the local CODA Project staff. 6. Potential problems in meeting the required timelines for providing FAPE to preschool children with disabilities by their third birthday are identified, confronted, and resolved in a timely manner. 7. The LEA reviews the referral sources for three and four year old children that were referred to the LEA after the child's third birthday. When there were significant increases in the number of children from one year to the next that had not received services from First Steps, the local First Steps Council and System Point of Entry were notified.

APPENDIX 15 – 2

IDEA INDICATORS	Preliminary Title I Counterparts
Compliance Indicator 1: Percent of youth with IEPs graduating from high school with a regular diploma compared to percent of all youth in the State graduating with a regular diploma.	Evidence of outcome data
Compliance Indicator 2: Percent of youth with IEPs dropping out of high school compared to the percent of all youth in the State dropping out of high school.	Evidence of outcome data
Compliance Indicator 3: Participation and performance of children with disabilities on statewide assessments: A. Percent of districts that have a disability subgroup that meets the State's minimum "n" size meeting the State's AYP objectives for progress for disability subgroup. B. Participation rate for children with IEPs in a regular assessment with no accommodations; regular assessment with accommodations; alternate assessment against grade level standards; alternate assessment against alternate achievement standards. C. Proficiency rate for children with IEPs against grade level standards and alternate achievement standards.	Policies and practices concerning core academic subjects that have the greatest likelihood that all groups of students will meet the proficient level on the Indiana Statewide Testing for Educational Progress-Plus (ISTEP +)
Compliance Indicator 4: Rates of suspension and expulsion: A. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of children with disabilities for greater than 10 days in a school year; and B. Percent of districts identified by the State as having a significant discrepancy in the rates of suspensions and expulsions of greater than 10 days in a school year of children with disabilities by race and ethnicity.	Show evidence that LEA provides guidance to schools about the evaluation of the school wide programs
Compliance Indicator 5: Percent of children with IEPs aged 6 through 21: A. Removed from regular class less than 21% of the day; B. Removed from regular class greater than 60% of the day; or C. Served in public or private separate schools, residential placements, or homebound or hospital placements.	Show evidence that LEA provides technical assistance and support to schools developing school wide programs in the areas of needs assessment, comprehensive planning, implementation, and evaluation
Compliance Indicator 6: Percent of preschool children with IEPs who received special education and related services in settings with typically developing peers (i.e., early childhood settings, home, and part-time early childhood/part-time	Evidence of outcome data

APPENDIX 15 – 2

IDEA INDICATORS	Preliminary Title I Counterparts
early childhood special education settings).	
Performance Indicator 7: Percent of preschool children with IEPs who demonstrate improved: A. Positive social-emotional skills (including social relationships); B. Acquisition and use of knowledge and skills (including early language/communication and early literacy); and C. Use of appropriate behaviors to meet their needs.	Evidence of outcome data
Performance Indicator 8: Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities.	Build the schools' and parents' capacity for strong parental involvement by: □ Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children □ Providing materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate to foster parental involvement □ Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, etc., conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children □ Educate educators, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school □ Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand □ Other reasonable support for parental involvement activities under section 1118 as parents may request
Performance Indicator 9: Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification.	Annual measurable objectives for continuous and substantial progress by each group of students to meet proficient levels of achievement on the ISTEP+ (by 2013-2014)

APPENDIX 15 – 2

IDEA INDICATORS	Preliminary Title I Counterparts
Performance Indicator 10: Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.	Show evidence that the progress of participating students is reviewed on an ongoing basis; and if necessary, revisions made to the TAS program
Performance Indicator 11: Percent of children with parental consent to evaluate, who were evaluated within 60 days (or State established timeline).	Evidence of outcome data
Compliance Indicator 12: Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays.	Plans for assisting preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or a state-run preschool program
Performance Indicator 13: Percent of youth aged 14 and above with an IEP that includes coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals.	Show SES student progress reports a. Does the report provide specific information about student progress and ensure that students are improving their academic achievement and that instructional goals are being met? b. Is the report written in a format that parents understand? c. Are the reports distributed in a timely manner to parents and LEA/school staff? d. Are the reports developed in accordance to the LEA-provider contract? As applicable, show evidence of coordination with social and health services to meet the needs of students at risk of dropping out of school and other participating students, including prenatal health care and nutrition services related to the health of the parent and child.
Performance Indicator 14: Percent of youth who had IEPs, are no longer in secondary school and who have been competitively employed, enrolled in some type of postsecondary school, or both, within one year of leaving high school.	Evidence of outcome data
Performance Indicator 15: General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.	Show evidence that LEA monitors the implementation of school improvement plans Show evidence that LEA provides technical assistance and support to schools developing school wide programs in the areas of needs assessment, comprehensive planning, implementation, and evaluation. Implementation of school wide reform strategies that: □ Provide opportunities for all children to meet proficient and advanced levels of student academic achievement □ Use effective methods and instructional strategies

APPENDIX 15 – 2

IDEA INDICATORS	Preliminary Title I Counterparts
	that are based on scientifically based research that strengthens the core academic program □ Increases the amount of learning time □ Includes strategies for serving underserved populations □ Includes strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting state standards □ Address how the school will determine if those needs of the children have been met □ Are consistent with and are designed to implement state and local improvement plans, if any.
Performance Indicator 16: Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.	Show evidence that the LEA has a complaint procedure policy
Performance Indicator 17: Percent of fully adjudicated due process hearing requests that were fully adjudicated within the 45-day timeline or a timeline that is properly extended by the hearing officer at the request of either party.	Evidence of outcome data
Performance Indicator 18: Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements.	Evidence of outcome data
Performance Indicator 19: Percent of mediations held that resulted in mediation agreements.	Evidence of outcome data
Performance Indicator 20: State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.	Compliance with school ranking and serving requirements: Provide documentation as to the procedures used to verify rank order.

Indicator 16 of the Part B State Performance Plan (SPP)

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 16:[75] Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint, or because the parent (or individual or organization) and the public agency agree to extend the time to engage in mediation or other alternative means of dispute resolution, if available in the State.
(20 U.S.C. 1416(a)(3)(B))

Measurement: Percent = [(1.1(b) + 1.1(c)) divided by 1.1] times 100.

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
Indiana's special education rules and regulations stipulate that any written complaint meeting the requirements of 511 IAC 7-30-2(a) is accepted by the IDOE Office of Legal Affairs as a complaint. Upon receipt, the complaint is entered into the Office of Special Education's closely monitored database, and assigned to a complaint investigator by the Due Process Coordinator. A notification letter is sent to the superintendent, complainant, and the local special education director, indicating the complaint issues and establishing the timelines. The complaint investigator has 30 days to conduct the investigation and issue a written report including the issues, findings of fact, conclusions of law, and corrective action for each violation if necessary. The complainant and the LEA have 15 calendar days to respond with a request for reconsideration if they disagree with the findings of the complaint report. If a request for reconsideration is received, Indiana's director of special education has 15 calendar days to issue the reconsideration results. The entire process from the OLA's receipt of a complaint to issuance of the reconsideration results (if requested) should not exceed 60 calendar days, unless an extension has been granted for exceptional circumstances.

If the LEA is found in violation of Article 7 or IDEA, documentation indicating compliance with the corrective action ordered must be received by the OLA no later than the date specified in the report. At that time, a compliance letter is sent to all parties and the file is closed. If no corrective action is required and no request for reconsideration is received then a closure letter is sent to all parties closing the file. A summary of the complaint report (minus any personally identifiable information) is made available for viewing on the OLA's website[76].

Baseline Data for FFY 2004 (SY 04-05):
In FFY 2004 (SY 04-05), 100 % of signed written complaints with reports issued were resolved within appropriate timelines.

[(93 + 11) ÷ 104] = 100%

Discussion of Baseline Data:
In FFY 2004 (SY 04-05), there were 104 complaints filed that were investigated and had issued reports. Of these 104, 93 complaint investigation reports were issued within the 30 day timeline. Eleven of the remaining complaint investigation reports exceeded 30 days due to exceptional circumstances and were granted an extension of time.

FFY	Measurable and Rigorous Target
2005	Percent of signed written complaints with reports issued that were resolved within 30-

[75] Per OSEP, the Indicator 16 definition was updated with submission of FFY 2008 APR.
[76] http://www.doe.in.gov/improvement/legal

FFY	Measurable and Rigorous Target
(SY 05-06)	day timeline, including a timeline extended for exceptional circumstances with respect to a particular complaint will be 100%.
2006[77] (SY 06-07)	Percent of signed written complaints with reports issued that were resolved within 60-day timeline, including a timeline extended for exceptional circumstances with respect to a particular complaint will be 100%.
2007 (SY 07-08)	Percent of signed written complaints with reports issued that were resolved within 60-day timeline, including a timeline extended for exceptional circumstances with respect to a particular complaint will be 100%.
2008 (SY 08-09)	Percent of signed written complaints with reports issued that were resolved within 60-day timeline, including a timeline extended for exceptional circumstances with respect to a particular complaint will be 100%.
2009 (SY 09-10)	Percent of signed written complaints with reports issued that were resolved within 60-day timeline, including a timeline extended for exceptional circumstances with respect to a particular complaint will be 100%.
2010 (SY 10-11)	Percent of signed written complaints with reports issued that were resolved within 60-day timeline, including a timeline extended for exceptional circumstances with respect to a particular complaint will be 100%.
2011 (SY 11-12)	Percent of signed written complaints with reports issued that were resolved within 60-day timeline, including a timeline extended for exceptional circumstances with respect to a particular complaint will be 100%.
2012 (SY 12-13)	Percent of signed written complaints with reports issued that were resolved within 60-day timeline, including a timeline extended for exceptional circumstances with respect to a particular complaint will be 100%.

Improvement Activities/Timelines/Resources No Longer Active

Improvement Activity	Timelines	Resources
a. Utilize due process database to ensure that all complaint reports are investigated and a written report issued within the 30 day timeline. b. Schools will be accountable for completing the corrective action by the deadline included in the report. c. Assistant director of due process will notify the monitoring team of discrepancies in the database. d. Conduct periodic Complaint Investigation trainings for complaint investigators. e. Closing letter will be issued no later than 24-hours after receipt of corrective action or 15 days after the written report is issued (if no corrective action). f. Criteria for requested extensions will be documented for; Complaint report timeline, and Corrective action timeline. **Discontinued as of FFY 2007 (SY 07-08).**	FFY 2005 (SY 05-06)[78] Will be a major focus the first year of the improvement plan, but will then be an ongoing process with monthly reviews.	Access to database system, The Office of Special Education

[77] The measurable target was changed to reflect Indicator 16's 60-day timeline measurable target. Indiana has a two-tiered complaint process as described in the Overview of Issue/Description of System or Process.
[78] The improvement activities for FFY 2005 (SY 05-06) are from the original submission of the SPP in FFY 2005 (SY 05-06).

a. Will continue year 1 activities of the improvement plan, b. Complaint investigation trainings will address systemic issues. **Discontinued as of FFY 2007 (SY 07-08).**	FFY 2006 (06-07)[79] Ongoing through 2011	Access to database, The Office of Special Education, Complaint investigation trainings-agendas
Utilize due process database to ensure that all complaints are investigated and a written report issued within 30 calendar day timeline, and ultimately the 60 day timeline if a reconsideration is requested. The database should be reviewed and revised annually. **Discontinued as of FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08)[80]	The Office of Special Education, Due Process Team, CADRE[81]
The Due Process Team will meet twice a month for continuous monitoring of complaints. **Discontinued as of FFY 2007 (SY 07-08).**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	Due Process Team

Improvement Activities/Timelines/Resources Ongoing:

Improvement Activity	Timelines	Resources
Develop and utilize a tracking system to track the status of complaints and automatically alert due process staff to approaching deadlines.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process Team, CADRE[82]
Review and revise complaint procedures. Provide ongoing technical assistance and training to complaint investigators.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process Team, CADRE

[79] The improvement activities for FFY 2006 (SY 06-07) are from the original submission of the SPP in FFY 2005 (SY 05-06).
[80] Because of Office of Special Education's change of staff in both monitoring and due process areas, the improvement activities have been changed to better reflect the goals of each area. The changes will affect FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11).
[81] Consortium for Appropriate Dispute Resolution for Special Education at http://www.directionservice.org/cadre/
[82] Consortium for Appropriate Dispute Resolution for Special Education at http://www.directionservice.org/cadre/

Indicator 17 of the Part B State Performance Plan (SPP)

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 17:[83] Percent of adjudicated due process hearing requests that were adjudicated within the 45-day timeline or a timeline that is properly extended by the hearing officer at the request of either party or in the case of an expedited hearing, within the required timelines.
(20 U.S.C. 1416(a)(3)(B))

Measurement: Percent = [(3.2(a) + 3.2(b)) divided by 3.2] times 100.

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
After receiving a due process hearing request, the OLA appoints an Independent Hearing Officer (IHO) who notifies all parties of the request and conducts a pre-hearing conference to discuss the request with the public agency and the parent. IHOs are appointed on a rotating basis, and will recuse themselves if there is a conflict of interest with either the parent or the public agency. If the matter is not dismissed, or is otherwise not resolved, the IHO conducts the hearing and submits a written decision and the formal record to the OLA at the conclusions of the hearing. Both parties may have legal representation present during the hearing process. The due process hearing timeline begins on the date a request for a due process hearing is received by the IDOE. Due process hearings shall be conducted, a final decision reached, and a copy of written decision mailed to all parties within 45 calendar days after the determination that the matter has not been resolved through a resolution session or mediation. An IHO may grant extensions of time beyond the 45 calendar day timeline at the request of either party. Any extension of time granted by the IHO shall be in writing and sent to all parties and included in the formal record of the proceedings.

Baseline Data for FFY 2004 (SY 04-05):
Of due process hearing requests that were fully adjudicated, 92% were rendered within the required timelines in FFY 2004 (SY 04-05).

11 ÷ 12 x 100 = **92%**

Discussion of Baseline Data:
In FFY 2004 (SY 04-05), there were 12 fully adjudicated hearing requests, including decisions. All hearing requests had extended timelines, and the IHOs issued written decisions in 11 of the hearing requests before the timelines expired. The extended timeline for the 12th hearing request elapsed before a written decision was issued. Therefore, 92% of the requested hearings resulted in written decisions before the documented timelines expired.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	Percent of due process hearing requests fully adjudicated within the 45-day timeline, including a timeline that is properly extended by the hearing officer at the request of either party will be 100%.
2006 (SY 06-07)	Percent of due process hearing requests fully adjudicated within the 45-day timeline, including a timeline that is properly extended by the hearing officer at the request of either party will be 100%.
2007 (SY 07-08)	Percent of due process hearing requests fully adjudicated within the 45-day timeline, including a timeline that is properly extended by the hearing officer at the request of either

[83] Per OSEP's the definition for this Indicator was updated with submission of the FFY 2008 APR.

FFY	Measurable and Rigorous Target
	party will be 100%.
2008 (SY 08-09)	Percent of due process hearing requests fully adjudicated within the 45-day timeline, including a timeline that is properly extended by the hearing officer at the request of either party will be 100%.
2009 (SY 09-10)	Percent of due process hearing requests fully adjudicated within the 45-day timeline, including a timeline that is properly extended by the hearing officer at the request of either party will be 100%.
2010 (SY 10-11)	Percent of due process hearing requests fully adjudicated within the 45-day timeline, including a timeline that is properly extended by the hearing officer at the request of either party will be 100%.
2011 (SY 11-12)	Percent of due process hearing requests fully adjudicated within the 45-day timeline, including a timeline that is properly extended by the hearing officer at the request of either party will be 100%.
2012 (SY 12-13)	Percent of due process hearing requests fully adjudicated within the 45-day timeline, including a timeline that is properly extended by the hearing officer at the request of either party will be 100%.

Improvement Activities/Timelines/Resources No Longer Active:

Activity	Timelines	Resources
a. Due Process Coordinator will monitor each hearing request to verify timelines. b. IHO training will emphasize timelines. c. The Office of Special Education will remove any IHOs not meeting timelines. d. Annual report to Indiana's State Advisory Council on the Education of Children with Disabilities (State Advisory Council) IHO timelines. e. The following data will be collected from IHOs: ▪ Timelines and any requested extensions; and ▪ Documentation of resolution options. **Discontinued as of FFY 2007 (SY 07-08).**	FFY 2005 (SY 05-06)[84]	a. The Office of Special Education b. The Office of Special Education, IHOs c. The Office of Special Education d. The Office of Special Education, State Advisory Council **e.** The Office of Special Education
a. Due Process Coordinator will monitor each hearing request to verify timelines. b. IHO training will emphasize timelines. c. The Office of Special Education will remove any IHOs not meeting timelines. d. Annual report to Indiana's State Advisory Council IHO timelines. **Discontinued as of FFY 2007 (SY 07-08).**	FFY 2006 (SY 06-07)[85]	a. The Office of Special Education b. The Office of Special Education, IHOs c. The Office of Special Education d. The Office of Special Education, State Advisory Council

[84] The improvement activities for FFY 2005 (SY 05-06) are from the original submission of the SPP in FFY 2005 (SY 05-06).
[85] The improvement activities for FFY 2006 (SY 006-07) are from the original submission of the SPP in FFY 2005 (SY 05-06).

Improvement Activities/Timelines/Resources Ongoing:

Activity	Timelines	Resources
Refine and utilize the due process database to ensure that necessary elements are included in the system and utilize the database to track the status of due process hearings.	FFY 2007 (SY 07-08) [86] through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process Team
Develop and utilize a tracking system to ensure that IHOs are provided with timely reminders when a case is at risk of failing to meet required timeline.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process Team
Conduct training sessions, at least annually, for IHOs. Information will be presented to the IHOs with respect to due process procedures and timelines.	FFY 2007 (SY 07-08) through FFY 2012 (12-13)	The Office of Special Education, Due Process Team, IDOE Office of Legal Affairs, IHOs
Monitor IHOs' caseloads and timelines and provide IHOs prompt and appropriate technical assistance and/or professional discipline for failure to document appropriate timelines. This includes removing IHOs from rotation if they are in danger of missing timelines. **Revised as of FFY 2010 (SY 10-11).**	FFY 2007 (SY 07-08) through FFY 2012 (12-13)	The Office of Special Education, Due Process Team

[86] Because of Office of Special Education's change of staff in both monitoring and due process areas, the improvement activities have been changed to better reflect the goals of each area. The changes will affect FFY 2007 through FFY 2010.

Indicator 18 of the Part B State Performance Plan (SPP)

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 18: Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements.
[20 U.S.C. 1416(a)(3(B)]

Measurement: Percent = (3.1(a) divided by 3.1) times 100.

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
The resolution session is a new requirement under IDEA and became effective on July 1, 2005. Pursuant to 34 CFR §300.510, within 15 days of receiving notice of the parent's due process hearing request, and prior to the initiation of a due process hearing, the LEA must convene a meeting with the parent and the relevant members of the CCC to allow the parent to discuss the facts that form the basis of the hearing request and provide the LEA with an opportunity to resolve the issues. The meeting may be waived by mutual written consent of the LEA and the parent or by agreement to mediate, but mediation may not delay the timelines. If the matter is not resolved to the satisfaction of the parent within 30 days of the receipt of the due process hearing request, the due process hearing may occur, and the 45-day timeline for the due process hearing begins.

When the OLA receives a due process hearing request, it is assigned to an IHO. The IHO contacts the parties and sets a hearing date and advises the parties that they must report progress to the IHO about the resolution session. The IHO will report to the OLA the resolution session information. A member from the Due Process Team will enter data into the OLA database system and track the progress of resolution sessions and resolution session settlement agreements.

Baseline Data for FFY 2005 (SY 05-06):

3	Hearing Requests Total	**66**
3.1	Resolution Sessions	**43**
3.2(a)	Settlement Agreements	**13**
3.2	Hearings Fully Adjudicated	**10**

Percent = 3.1(a) divided by (3.1) times 100. (13 ÷ 43) x 100 = **30.2%**

Discussion of Baseline Data:
Because the resolution session is a new requirement under IDEA, there has been a learning curve with respect to the concept of resolution sessions with the parties involved in the due process hearing, the IHO, and the Office of Special Education. Parties are still acclimating themselves with the concepts and the best way to conduct and prepare for this meeting.

For FFY 2005 (SY 05-06), out of 43 resolution session 13 resulted in settlement agreements. Therefore, 30.2% of hearing requests that went to resolution sessions were resolved through resolution session settlement agreements.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	Not Applicable (Baseline Year)
2006	Percent of hearing requests that went to resolution sessions that were resolved through

FFY	Measurable and Rigorous Target
(SY 06-07)	resolution session settlement agreements will be 30.4%.
2007 (SY 07-08)	Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements will be 30.6%.
2008 (SY 08-09)	Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements will be 30.8%.
2009 (SY 09-10)	Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements will be 31%.
2010 (SY 10-11)	Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements will be 31.2%.
2011 (SY 11-12)	Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements will be 31.4%.
2012 (SY 12-13)	Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements will be 31.6%.

Improvement Activities/Timelines/Resources No Longer Active:

Improvement Activity	Timelines	Resources
a. Continue discussion about resolution sessions/requirements with IHOs during annual training. b. IHOs adhere to timelines when submitting data the Office of Special Education. c. ICASE will remind LEAs that information pertaining to resolution session can be obtained via the Office of Special Education website. **Discontinued as of FFY 2007 (SY 07-08).**	FFY 2006 (SY 06-07)[87] Annually	Office of Special Education, Due Process Team

Improvement Activities/Timelines/Resources Ongoing:

Improvement Activity	Timelines	Resources
Refine and utilize the due process database to ensure that necessary elements are included in the system with respect to resolution sessions. For each due process request, the resolution process and the results of that process will be monitored.	FFY 2007 (SY 07-08) [88] through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process Team
IHOs will be trained and updated, at least annually, about resolution process and the procedures for monitoring the process.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process Team, IDOE Office of Legal Affairs
The Office of Special Education will work with parent organizations and LEAs to develop awareness of the option to resolve disputes through a resolution session.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process Team, IHOs, IDOE's Legal Division, IN*SOURCE, ASK, ICASE

[87] The improvement activities for FFY 2006 (SY 06-07) are from the original submission of the SPP in FFY 2005 (SY 05-06).
[88] Because of the Office of Special Education's change of staff in both monitoring and due process areas, the improvement activities have been changed to better reflect the goals of each area. The changes will affect FFY 2007 through FFY 2010.

Indicator 19 of the Part B State Performance Plan (SPP)

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 19: Percent of mediations held that resulted in mediation agreements.
z[20 U.S.C. 1416(a)(3)(B)]

Measurement: Percent = [(2.1(a)(i) + 2.1(b)(i)) divided by 2.1] times 100.

Overview of the SPP Development:
See Overview of State Performance Plan Development on pages 1 through 3

Overview of Issue/Description of System or Process:
The IDOE provides mediation services at no cost to parents and LEAs at any time there is a disagreement. Mediation is not limited to due process hearing requests. Mediation is a voluntary process and both the parent and the LEA must agree to go to mediation. Upon receipt of a request for mediation, the OLA assigns the mediation to a trained mediator from the rotation list. The mediator contacts the involved parties and schedules the mediation session in a timely manner. If the process is successful in reaching agreement, the written mediation agreement must be signed by both parties and is legally binding.

Baseline Data for FFY 2004 (SY 04-05):
Out of 23 mediations that resulted in agreements divided by 35 (the number of requests that went to mediation) documents that 66% of the mediations held resulted in mediation agreements.

Discussion of Baseline Data:
Of the total 45 mediation requests, 10 were either not held or are pending. From the remaining 35 mediation requests, 23 went to mediation.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	Percent of mediation requests that go to mediation will result in agreements 52.2% of the time.
2006 (SY 06-07)	Percent of mediation requests that go to mediation will result in agreements 52.4% of the time.
2007 (SY 07-08)	Percent of mediation requests that go to mediation will result in agreements 52.6% of the time.
2008 (SY 08-09)	Percent of mediation requests that go to mediation will result in agreements 52.8% of the time.
2009 (SY 09-10)	Percent of mediation requests that go to mediation will result in agreements 53.0% of the time.
2010 (SY 10-11)	Percent of mediation requests that go to mediation will result in agreements 53.2% of the time.
2011 (SY 11-12)	Percent of mediation requests that go to mediation will result in agreements 53.4% of the time.
2012 (SY 12-13)	Percent of mediation requests that go to mediation will result in agreements 53.6% of the time.

Improvement Activities/Timelines/Resources No Longer Active:

Improvement Activity	Timelines	Resources
a. Review whether additional mediators are needed and recruit additional mediators if need increases b. Mediators will be surveyed for suggestions to improve process. c. Mediators will network to learn/show effective techniques. d. Conference with experienced practitioners demonstrating positive mediation techniques. e. The Office of Special Education will conduct study of mediators and incorporate results into improvement plan. **Discontinued as of FFY 2007 (SY 07-08).**	FFY 2005 (SY 05-06)[89]	a. The Office of Special Education b. The Office of Special Education, Mediators c. Mediators d. The Office of Special Education, Mediators, IN*SOURCE, ICASE
a. Review whether additional mediators are needed and recruit additional mediators if need increases. b. Mediators will be surveyed for suggestions to improve process. c. Mediators will network to learn/show effective techniques. d. Conference with experienced practitioners demonstrating positive mediation techniques. e. The Office of Special Education will conduct study of mediators and incorporate results into improvement plan. **Discontinued as of FFY 2007 (SY 07-08).**	FFY 2006 (SY 06-07)[90]	a. The Office of Special Education b. The Office of Special Education, Mediators c. Mediators d. The Office of Special Education, Mediators, IN*SOURCE, ICASE e. The Office of Special Education

Improvement Activities/Timelines/Resources Ongoing:

Activity	Timelines	Resources
Review whether additional mediators are needed and recruit additional mediators if need increases.	FFY 2007 (SY 07-08) [91] through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process Team
Mediators will be surveyed for suggestions to improve process.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process Team, Mediators
Conduct training sessions, at least annually, for mediators in the following areas: ▪ Special education rules and regulations; ▪ Mediation procedures and practices; ▪ Mediation techniques; and ▪ Areas of special interest and hot topics.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process, Team, Mediators, IDOE Office of Legal Affairs

[89] The improvement activities for FFY 2005 (SY 05-06) are from the original submission of the SPP in FFY 2005 (SY 05-06).
[90] The improvement activities for FFY 2006 (SY 05-06) are from the original submission of the SPP in FFY 2005 (SY 05-06).
[91] Because of Office of Special Education's change of staff in both monitoring and due process areas, the improvement activities have been changed to better reflect the goals of each area. The changes will affect FFY 2007 through FFY 2010.

Develop a plan to increase public awareness to parents and LEAs to explain and encourage the use of mediation. In addition, design and complete a mediation document to disseminate to LEAs and parents regarding the availability of mediation services as well as other dispute resolution methods available in Indiana.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process Team, Mediators, IN*SOURCE, ASK, ICASE
Develop and utilize a database to track progress in mediations, including the mediation dates, results, withdrawals, and timelines.	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education, Due Process Team

Indicator 20 of the Part B State Performance Plan (SPP)

Monitoring Priority: Effective General Supervision Part B / General Supervision

Indicator 20: State reported data [618 and State Performance Plan and Annual Performance Report (APR)] are timely and accurate.
[20 U.S.C. 1416(a)(3)(B)]

Measurement: [92]
State reported data, including 618 data, State Performance Plan, and Annual Performance Reports, are:

a. Submitted on or before due dates (February 1 for child count, including race and ethnicity; placement; November 1 for exiting, discipline, personnel and dispute resolution; and February 1 for Annual Performance Reports and assessment); and
b. Accurate, including covering the correct year and following the correct measurement.

States are required to use the "Indicator 20 Scoring Rubric" for reporting data for this indicator (see Attachment B).

Overview of the SPP Development:
See Overview of State Performance Plan Development.

Overview of Issue/Description of System or Process:
In the late 1980s, the IDOE and specifically the Office of Special Education became aware of the need to computerize and automate the special education data collection, child count, reporting, and accountability required by ED. The Office of Special Education consulted with several sources, including other state departments of education and Westat for technical assistance in developing a statewide system that would provide accurate data in real-time for LEAs that could be aggregated for statewide data collection and reporting purposes.

The result was Indiana's CODA Project[93]. The Director of the CODA Project works under the direction of the Assistant Director for Special Education Funding within the Office of Special Education, and assures that the data collected statewide can be aggregated at the state level for state and federal reporting purposes. The fields of information within the software used by the CODA Project includes over 100 data fields, most of which are required for state and local data collection and reporting purposes. Some fields are LEA designated (optional) fields that include features such as transportation routes and emergency contact persons for the students entered into the system.

Each state-required entry field within the integrated electronic management system (IEM) software must be completed in order for the data to be included in the CODA Project data collection[94]. The data is collected at varying times each school year throughout the state and LEAs are informed of those dates to ensure all files are updated in time for the data to be harvested. For state funding purposes, those collection dates are October 1, December 1 and April 1. By ignoring incomplete data sets (those for which all state-required fields have not been completed) a check and balance system of assurance exist; resulting in data and child count information that is collected in a timely as well as accurate manner.

For purposes of the CIFMS, the CODA Project data is "triangulated" with other data sources including the IDOE Programs and Services (DOE-PS) database, the STN database, and the ISTAR[95] database. The data is further confirmed when inquiries are made regarding complaints, hearings, community

[92] Per OSEP the measurement for this Indicator was updated with submission of FFY 2008 submission of Annual Performance Report.
[93] The CODA Project is Indiana's data collection system for special education funding. For more details on the CODA Project, please see: http://www.thecodaproject.org/.
[94] For a complete listing of the codes available, see http://www.thecodaproject.org/data-entry-codes.html.
[95] ISTAR is the state of Indiana's alternate assessment for students with significant cognitive disabilities and has a built in component that is used for evaluating all preschool-aged pupils in the state.

supported/residential applications, or use of the Office of Special Education sponsored electronic IEP contained within the ISTAR database.

The five employees of the CODA Project have divided the special education planning districts amongst them to ensure that each site has a contact person. It is this CODA Project contact person who assists the special education planning district (which may be responsible for the special education data submission of several LEAs) in downloading and installing the IEM software and training local personnel on the use and reporting requirements for IEM.

Baseline Data for FFY 2004 (SY 04-05):
The baseline for Indicator 20 is accurate data and timely data submission. The IDOE target is 100% accurate data submitted timely 100% of the time. To date there are only six LEAs who are not using the IEM software and these sites therefore submit a manual count that is added into the state pool of data for reporting purposes. In rare instances where the submission requirements are not met in a timely and accurate manner, software submittal processes are reviewed and modified to assure full compliance is achieved. However, because state and federal funding is contingent upon receipt of the timely as well as accurate (valid) count from each LEA, receiving the data in a timely and accurate manner has not been an issue for the Office of Special Education.

The charts which follow are federally required reports for this indicator. Each SEA must submit these reports annually. An SEA receives a score or rating of 1 for "YES or OK" or a 0 for "NO".

SPP/APR Data - Indicator 20				
APR Indicator	**Valid and Reliable**	**Correct Calculation**	**Followed Instructions**	**Total**
1	1		1	2
2	1		1	2
3A	1	1	1	3
3B	1	1	1	3
3C	1	1	1	3
4A	1	1	1	3
5	1	1	1	3
7	1	1	1	3
8	1	1	1	3
9	1	1	1	3
10	1	1	1	3
11	1	1	1	3
12	1	1	1	3
13	1	1	1	3
14	1	1	1	3
15	1	1	1	3
16	1	1	1	3
17	1	1	1	3
18	1	1	1	3
19	1	1	1	3
			Subtotal	58
APR Score Calculation		**Timely Submission Points** - If the FFY2006 APR was submitted on-time, place the number 5 in the cell on the right.		5
		Grand Total - (Sum of subtotal and Timely Submission Points) =		63

618 Data - Indicator 20					
Table	**Timely**	**Complete Data**	**Passed Edit Check**	**Responded to Data Note Requests**	**Total**
Table 1 - Child Count Due Date: 2/1/07	1	1	1	1	4
Table 2 - Personnel Due Date: 11/1/07	1	1	1	1	4
Table 3 - Ed. Environments Due Date: 2/1/07	1	1	1	1	4
Table 4 - Exiting Due Date: 11/1/07	1	1	1	1	4
Table 5 - Discipline Due Date: 11/1/07	1	1	1	1	4
Table 6 - State Assessment Due Date: 2/1/07	1	1	1	1	4
Table 7 - Dispute Resolution Due Date: 11/1/07	1	1	1	1	4
				Subtotal	28
618 Score Calculation			**Grand Total** (Subtotal X 2) =		56

Indicator #20 Calculation	
A. APR Grand Total	63
B. 618 Grand Total	56
C. APR Grand Total (A) + 618 Grand Total (B) =	119
Total N/A in APR	0
Total N/A in 618	0
Base	**119**
D. Subtotal (C divided by Base*) =	1.000
E. Indicator Score (Subtotal D x 100) =	100.0

*Note any cell marked as N/A will decrease the denominator by 1 for APR and 2 for 618

Discussion of Baseline Data:
Over the last few years, the Office of Special Education has encountered one difficulty with the CODA Project data but has since taken steps to correct the problem. It pertained to the collection of data for students enrolled in early childhood programs, and specifically the program codes used to designate placement settings for this group of students. At the 2005 Data Managers Meeting in Washington, DC, ED indicated that the regulations and accompanying new placement setting codes for early childhood students were "on the fast track" for approval. Because any change to the IEM software would necessitate months of work, Indiana made the decision to implement the new placement settings prior to the 2005 December 1 Child Count activities. Because the federal changes did not take place in the timeframe anticipated, Indiana had to cross walk the old definitions with the new definitions for FFY 2005 (SY 05-06). That issue has since been rectified and Indiana has a process in place that aligns the early childhood school settings with the school-aged general education setting definitions.

Overall, the data submitted for fiscal allocations via the CODA Project is accurate and timely thus making achievement of this indicator fortuitous for the state as well as each LEA. As Indiana moves forward with advancements in technology and toward a real time data collection system (as opposed to one where the data must be harvested from each LEA on a prescribed schedule), there are many challenges and obstacles to overcome. To assist in the establishment of a technologically sound (and more importantly, secure) data management system, Indiana has received a ED grant to supplement the process. The ultimate goal is to streamline the data collection process for LEAs within the next five to 10 fiscal years. Indiana has a team of professionals working on this endeavor but there are decisions and challenges to overcome prior to moving forward.

Currently there is one data collection process for general education called the IDOE Programs and Services data base (the DOE-PS) which also includes students with disabilities since they are a part of the general student body and a separate data collection system for special education funding (the CODA Project). The DOE-PS is based on the STN system and requires each LEA to upload or send a data set to the IDOE on a regularly prescribed basis. Data includes such information as date of enrollment, drop out, or death of a student; whether the student receives a free or reduced lunch or breakfast, or assistance for textbook rental fees. Several fields of information in the DOE-PS are mirrored in the IEM system (e.g., date of enrollment or death of a student) but the IEM system also contains more detailed fields that are unique and specific for special education (e.g., the date of referral for special education or the date of the most recent educational evaluation). There are many activities taking place at IDOE to align and merge these data systems, but much work is still needed. Some of the data received by the IDOE is duplicative and not necessarily in the precise format which lends itself to the disaggregation necessary for monitoring each of the 20 ED indicators. This necessitates a cautionary analysis of the data collected for many of the ED indicators. Because the IDOE recognizes that the data for a given indicator is not entirely accurate, we afford each LEA the opportunity to verify the data. This creates an extra layer of work that is tedious and time consuming for all involved. In those instances where the data is flagged by the Office of Special Education staff for potential inaccuracies, LEAs are required to review the data and provide a detailed explanation of whether they believe the data to be accurate and if not, why the data is inaccurate and what the actual data should be for the indicator as well as what corrective action will be taken to ensure the inaccurate reporting does not recur. This extra step creates an obstruction for reporting on all 20 ED indicators in an expeditious and accurate manner as well as in the precise configuration necessary for fully reporting on each indicator.

Some changes are being made to the data collection efforts in Indiana. The IDOE Senior Management Team, in implementing the IDOE Strategic Plan, is using *Project Charters* to identify the action areas that reflect the priorities of the Department. Per guidelines established by the IDOE, each Project Charter must provide for the following components: the project sponsor (a member of the IDOE Senior Management Team); the project manager; a description of the current status of the issue or activity; the desired results; initial detractors; core team members; program measures, including resources/inputs, activities and outputs; outcomes, including short term results (changes in learning, knowledge, attitude, skills, understanding), intermediate results (changes in behavior, practice or decisions) and long term results (change in condition);

the customer; and, the communication plan. For purposes of the CIFMS there are two Project Charters of note: The Indiana One Plan and the Indiana Technology Plan.

PROJECT CHARTER: The IDOE'One Plan'
Because of various IDOE and federal requirements, LEAs submit multiple plans (anywhere from 17 to 40, depending upon the depth of the expected plan) to various divisions within the IDOE. This myriad of plans are not aligned with the elements of the IDOE balanced score card, have inconsistent submission dates, and are duplicative of component expectations (i.e., family involvement, data fields, and student achievement goals). The One Plan will consist of a core that will contain elements addressing multiple state and federal requirements to bridge relevant IDOE Divisions and programs. The One Plan will have schedules that would be developed to address those requirements outside the scope of the core to allow for additional unique or specific requirements. Monitoring would then address each of the core and tertiary components, and technical assistance would be based upon the results of monitoring across the applicable IDOE Divisions. The CIFMS would integrate with the One Plan to permit LEAs the flexibility of completing one, unified plan to address all required IDOE components, including any applicable ED indicators.

PROJECT CHARTER: The IDOE Technology Initiative
The Indiana One Plan must be supported through technology to ensure adequate management of the data across Divisions within the IDOE. Currently, data might be available at a school building, at an LEA, or at a state level utilizing various data sources and databases, which need to be better connected and fully integrated. To help facilitate this, the IDOE is exploring the technology currently available and determining where gaps or needs might best be filled. This analysis is looking at the IDOE-PS database, the ISTAR web-based data system, the Indiana Accountability System for Academic Progress (ASAP) website, and the smartDESKTOP[96].

Indiana was recently awarded $5.2 million in federal funding to support the design and implementation of *Project P-20*[97], a statewide longitudinal data system that will enhance the state's ability to manage, analyze and use education data to drive student achievement. Indiana plans to link data at all levels: from pre-kindergarten to higher education and beyond. Like many states, Indiana is largely "data rich" but limited with respect to reporting and analytical tools. *Project P-20* will integrate multiple data sources into a single centralized data repository. The result will be broader access to data, leading to a fuller understanding of student academic achievement and the success rates of state and local educational programs. Local educational agencies will be better positioned to use data in reviewing and revising local policies and practices. Parents will have increased access to information regarding the performance of the students and schools in their communities. Furthermore, state policymakers will have better information to evaluate ongoing efforts to meet the goals set forth by the federal NCLB and the state's own accountability system.

FFY	Measurable and Rigorous Target
2005 (SY 05-06)	100% accurate and timely data submission 100% of the time.
2006 (SY 06-07)	100% accurate and timely data submission 100% of the time.
2007 (SY 07-08)	100% accurate and timely data submission 100% of the time.
2008 (SY 08-09)	100% accurate and timely data submission 100% of the time.
2009 (SY 09-10)	100% accurate and timely data submission 100% of the time.
2010 (SY 10-11)	100% accurate and timely data submission 100% of the time.

[96] For details see http://ideanet.doe.state.in.us/reed/newsr/2007/10-October/smartDESKTOP.html.
[97] For details see http://ideanet.doe.state.in.us/reed/newsr/2007/07-July/datasystem.html.

FFY	Measurable and Rigorous Target
2011 (SY 11-12)	100% accurate and timely data submission 100% of the time.
2012 (SY 12-13)	100% accurate and timely data submission 100% of the time.

Improvement Activities/Timelines/Resources No Longer Active:

Improvement Activity	Timelines	Resources
The IDOE statewide assessment systems [ISTAR and the Indiana Statewide Testing of Educational Performance (ISTEP)] will be continuously monitored for improvement in process, data management, and use for improved instruction. As other IDOE initiatives are implemented, the data within those systems will be compared and analyzed as well. **Completed as of FFY 2010 (SY 10-11).**	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education and other grant activities sponsored by the Office of Special Education.
Technical assistance efforts, including stakeholder partnerships and grant initiatives, will be reviewed annually to determine efficacy and determine whether additional initiatives should be added or whether a current initiative should be changed or eliminated. **Completed as of FFY 2010 (SY 10-11).**	FFY 2007 (SY 07-08) through FFY 2012 (SY 12-13)	The Office of Special Education and other grant activities sponsored by the Office of Special Education.
A subgroup of the State Advisory Council will work with the Office of Special Education to set criteria for cut scores on the various indicators (to denote when substantial compliance is achieved). **Completed as of FFY 2008 (SY 08-09).**	FFY 2007 (SY 07-08) through FFY 2010 (SY 10-11)	The Office of Special Education staff, members of the State Advisory Council, and staff from the NCRRC.

Improvement Activities/Timelines/Resources Ongoing:

Improvement Activity	Timelines	Status
Implement and support the data verification and submission components of the Indiana Individualized Educational Program (IIEP), Indiana's electronic IEP development tool to ensure data accuracy and assist LEAs in identifying areas of noncompliance. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education, LEAs, Indiana IEP Resource Center
Define policies and procedures for data collection and reporting. **Added as of FFY 2011 (SY 11-12).**	FFY 2011 (SY 11-12) through FFY 2012 (SY 12-13)	IDOE Office of Special Education and Office of Data and Accountability