



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

Honorable Judy Jeffrey
Director of Education
Iowa Department of Education
Grimes State Office Building
East 14th & Grand Streets
Des Moines, IA 50319-0146

FEB 25 2005

Dear Director Jeffrey:

The purpose of this letter is to respond to the Iowa Department of Education's (IDE) March 31, 2004 submission of its Federal Fiscal Year (FFY) 2002 Annual Performance Report (APR) for the Individuals with Disabilities Education Act (IDEA) Part B funds used during the grant period July 1, 2002 through June 30, 2003. The APR reflects actual accomplishments made by the State during the reporting period, compared to established objectives. The APR for IDEA is designed to provide uniform reporting from States and result in high-quality information across States.

The APR is a significant data source utilized in the Continuous Improvement and Focused Monitoring System (CIFMS) implemented by the Office of Special Education Programs (OSEP), within the U.S. Department of Education. The APR falls within the third component of OSEP's four-part accountability strategy (i.e., supporting States in assessing their performance and compliance, and in planning, implementing, and evaluating improvement strategies) and consolidates the self-assessing and improvement planning functions of the CIFMS into one document. OSEP's Memorandum regarding the submission of Part B APRs directed States to address five cluster areas: General Supervision, Early Childhood Transition, Parent Involvement, Free Appropriate Public Education in the Least Restrictive Environment, and Secondary Transition.

Background

As part of the Continuous Improvement Monitoring Process, Iowa's Self-Assessment was submitted on December 22, 2000. IDE submitted a "plan to plan" on October 15, 2001 that was reviewed by OSEP staff. IDE submitted an Improvement Plan based on comments provided by OSEP staff on September 11, 2002. In its May 22, 2003 letter, OSEP requested that in addition to the other areas of improvement outlined in the Improvement Plan, IDE also provide information regarding how the accountability system for the State transition activities will address issues raised in the Self-Assessment. IDE provided the transition information in an April 21, 2003 Progress Report to address this area of improvement. OSEP informed IDE that, as part of CIFMS, it expected IDE to continue to implement improvement activities and include data that indicated it was maintaining compliance in these identified areas in need of improvement in the State's FFY 2002 APR. Since that time, neither the State nor OSEP has identified areas of noncompliance in any of the cluster areas.

The State's APR should reflect the collection, analysis, and reporting of relevant data, and document data-based determinations regarding performance and compliance in each of the cluster areas (as well as any other areas identified by the State to ensure improvement). OSEP's comments are listed by cluster area.

General Supervision

Timely Identification and Correction of Deficiencies Identified through Monitoring

IDE must: (1) ensure that each educational program for children with disabilities administered within the State meets IDE's standards, including the requirements of Part B (34 CFR §300.600(a)(2)(ii)); and (2) implement proper methods of monitoring to identify and correct noncompliance in a timely manner (within one-year of identification) (20 U.S.C. 1232d). The State provided data and information, on pages 1 through 16 of the APR, demonstrating that IDE's policies and procedures identified noncompliance, ensured timely correction of noncompliance, and encouraged positive program performance. The State included baseline and trend data, indicators, targets, activities, timelines and resources to address each of the following topics in this cluster: (1) effective general supervision; (2) identification and remediation of systemic noncompliance; (3) timely dispute resolution; (4) sufficient qualified personnel; and (5) accurate and timely data collection and reporting. IDE explained on page 3 of the APR that Iowa's continuous improvement monitoring, first implemented in 2002, was organized around the following "enduring concepts": parent and student participation, educational interventions, appropriate services in the least restrictive environment, transition, system supports, and student results.

On pages 3 and 4 of the APR, IDE described the focused monitoring process that was implemented in 2000 and realigned in 2002 with a continuous improvement process that focused on compliance and student results. Special education monitoring activities were integrated into Iowa's general school improvement process in which 20% of Iowa's local school districts, area education agencies (AEAs)¹, and other agencies were reviewed annually. On page 4 of the APR, IDE reported that it conducted 69 school improvement visits during the 2002-2003 school year. Following the on-site comprehensive school improvement visit, data were verified and districts received a summary report informing them of their areas of strength, areas of needed improvement, and areas of noncompliance. On page 5 of the APR, IDE indicated that school districts and AEAs worked together to meet timelines and to address areas of noncompliance.

On pages 7 and 8 of the APR, IDE further described how the focused monitoring process identified systemic issues by analyzing final site visit reports. Data demonstrated that IDE's monitoring process required agencies to develop action plans with timelines to address noncompliance issues. IDE provided detailed data of noncompliance identified through the special education focused monitoring process. On pages 7 through 9 of the APR, the State's analysis of the site-visit report data showed a decline in the number of noncompliance citations identified from the 2001-2002 to 2002-2003 school years. Special education improvement efforts were integrated into the larger school improvement process; therefore, IDE indicated special education issues are addressed in a systemic manner. Also the State

¹ Iowa has 15 AEAs that operate as local education agencies (LEAs) and provide support services to the local districts that provide instructional programs.

reported that there are clearly defined procedures and mechanisms in place to ensure follow-up. However, data were not provided to demonstrate how IDE followed up with each district after the issuance of the site report to ensure that corrective actions were completed within a reasonable period of time, not to exceed one year of identification. IDE has indicated on page 10 of the APR that a database will be created for the next APR reporting period for tracking corrective action plans to citations and the implementation of plans according to identified timelines, and that this tracking database will be completed by June 2004.

From data and information provided by the State in the APR, OSEP could not determine whether IDE is in compliance with the requirement at 20 U.S.C. 1232d that States ensure the timely correction of deficiencies identified through monitoring. In the next APR, the State must submit to OSEP: (1) documentation demonstrating that the State has ensured the correction of noncompliance that it identified through monitoring, within a year of identification, including the results of its corrective action plan tracking database; or (2) a plan that includes strategies, proposed evidence of change, targets and timelines that will ensure timely correction of identified noncompliance, as soon as possible, but no later than one year from the date that OSEP accepts the plan.

Timely Issuance of Due Process and Complaint Decisions

On pages 3 through 12 of the APR, IDE provided data that demonstrated continued successful and innovative dispute resolution, and that it had received few complaints, requests for mediation and requests for due process hearings during the APR reporting period due to the use of alternative forms of dispute resolution, pre-appeal conferences and a Resolution Facilitator process. On page 3 of the APR, IDE noted that numbers of formal complaints and due process hearings have decreased over the past 10 years even though the number of students with IEPs has increased. The September 2003 Government Accountability Office (GAO) Report "Numbers of Formal Disputes are Generally Low and States are Using Mediation and Other Strategies to Resolve Conflicts,"² identifies Iowa as exceeding IDEA requirements by allowing States to request a pre-appeal conference to mediate disputes prior to requesting a hearing. The APR indicated on page 3 that all due process hearing decisions were issued within timelines for 2001-2002 and 2002-2003. OSEP looks forward to receiving data and analysis in the FFY 2003 APR, demonstrating IDE's continued implementation of strategies to ensure performance and compliance regarding the timeliness of due process hearings.

On page 11 of the APR, IDE indicated that for the 2000-2001, 2001-2002, and 2002-2003 reporting periods, the State reported 18 formal written complaints were filed. Of the 18, nine were investigated and all but one was completed within 60 days. IDE indicated on page 11 of the APR that the delay in resolving the one complaint by 18 days was partly because the AEA and school district were closed for winter break, but IDE also acknowledged that although the administrator of the process may have granted an extension, no formal extension was reflected in the record. On page 12 of the APR, IDE indicated that for the FFY 2003 APR reporting period, it is committed to maintaining a system of complaint investigations, mediations, and due process hearings and reviews that are completed in a timely manner. In the FFY 2003 APR, IDE must report on its continued efforts to ensure performance and compliance regarding timely complaint resolutions.

² The report is available at <http://www.gao.gov/new.items/d03897.pdf>.

Sufficient Supply of Qualified Personnel

On pages 13 through 17 of the APR, the State reported that there was no shortage of qualified personnel to meet the educational needs of all children with disabilities. IDE's success in maintaining sufficient numbers of qualified special education administrators, teachers, related services personnel, paraprofessionals, and other providers was attributed to the State's requirement that all teachers, including special education personnel, must have a license as a prerequisite for employment. In Iowa, teachers may be fully certified, but not fully endorsed. Iowa has implemented a plan to decrease the number of Class C endorsements (Class C endorsements are issued to educators who are licensed and have completed a minimum of 50 percent of their endorsement credits) through such supports as: Iowa's Teacher Quality Act, a web-based teacher recruitment site; Teach Iowa, legislation requiring competency-based teacher licensure; and Iowa's participation in the Council of Chief State School Officers-sponsored Center for Teacher Quality. Through its State Improvement Grant (SIG), Iowa supported and coordinated the Multi-categorical Resource-Regents Endorsement Initiative that assists Class C multi-categorical resource teachers to move into full endorsement through tuition support for needed coursework provided by partnering universities, and providing a counselor/ advisor for all participants. OSEP looks forward to IDE's report in the next APR on IDE's continued performance and compliance in this area as a result of its implementation of these strategies.

Data collection

On pages 20 through 22 of the APR, the State identified its efforts to collect accurate and timely data to use in reports and decision-making. Iowa's AEAs, IDE and the Bureau of Children, Family and Community Services used the Information Management System (IMS) to collect, store, manage, and disseminate Part B data. The primary function of this system was to provide AEAs and their districts with data about the service delivery system for special education services. AEA data entry personnel reviewed and entered information from each IEP into the IMS with data verification checks. For the fields required for 618 tables, IMS generated a verification report of incomplete or unusual data that was forwarded to AEA data entry personnel for follow-up with the IEP team. Personnel and discipline data were collected at the AEA level manually and submitted to IDE for aggregation. Data accuracy improved in the child count, least restrictive environment (LRE) and exit tables due to improvements in the IMS and ongoing training provided to IEP teams and AEA personnel. OSEP looks forward to reviewing the results of the implementation of these strategies to improve data accuracy in the next APR.

Early Childhood Transition

The instructions to this cluster ask States to determine whether children eligible for Part B services transitioning from Part C to Part B have an IEP or IFSP in effect by their third birthdays (34 CFR §300.132(b)). On page 24 of the APR, IDE reported consistently high percentages (97% to 99.8%) of children with disabilities receiving Early Intervention services, who were found eligible for Part B over the last five years. Activities included implementation of the Federally-funded General Supervision Enhancement Grant (GSEG) to enhance the data system that gathers data for: (1) the percentage of children, exiting from Part C to Part B, who have an IEP in effect by their third birthdays; (2) transition planning meeting dates; and (3) participants attending transition planning meetings. All AEAs and

school districts had early childhood transition policies and procedures in place to guide implementation. In addition, Part C Administrative Rules that became effective January 15, 2003 enhanced the State's capacity to provide a smooth transition for children exiting Early Access (EA) and entering Part B preschool services. The recently-awarded GSEG details the expansion of the current data system to ensure that interagency and early childhood data are available. State and regional staff analyzed the early childhood transition data to develop improvement strategies and annual State-wide technical assistance plans. OSEP looks forward to data and analysis in the next APR, indicating whether children eligible for Part B services transitioning from Part C to Part B have an IEP or IFSP in effect by their third birthdays (34 CFR §300.132(B)), as well as the results of the implementation of strategies to ensure compliance in this area.

OSEP assumes that any Part C to Part B tracking system that Iowa implements will not involve the disclosure of personally identifiable information from students' education records, or if it will, that such disclosure is consistent with the IDEA and the Family Educational Rights and Privacy Act (FERPA). OSEP has enclosed for your information a copy of its February 11, 2004, letter to Mary Elder, Executive Director, Texas Interagency Council on Early Childhood Intervention, which discusses the limited disclosure of personally identifiable information for purposes of meeting IDEA's child find mandate.

Parent Involvement

On pages 30 through 37 of the APR, IDE reported its progress in reaching its goal that the provision of a free appropriate public education (FAPE) is facilitated by parent involvement. The State's performance indicator addressed families having the support necessary to participate in their children's education through information, resources, and training opportunities. IDE has chartered Parent-Educator Connection (PEC), a program created to foster the development of partnerships between parents of children with disabilities and special educators and to provide services and support to families in each of the AEAs. The PEC collaborates with the Parent Training and Information Center of Iowa and the Iowa Federation of Families for Children's Mental Health to share data regarding the information and support provided to families and educators across the State.

IDE reported a new focus for PEC based on an analysis of data, identification of needs across the State, and discussions with stakeholders. IDE provided extensive information and resources to families regarding the transition of children with disabilities from Part C to Part B. IDE provided information to families on transition to post-secondary activities/environments. IDE identified baseline data, targets, timelines, activities, strategies and an explanation for slippage or progress. OSEP looks forward to reviewing the results of the implementation of these strategies in the next APR.

Free Appropriate Public Education in the Least Restrictive Environment

Disproportionality

On pages 40 and 41 and in Attachment 2 of the APR, the State reported baseline and trend data by race/ethnicity that compared the percentage of children with disabilities receiving special education in specific educational settings to the State's general student population. In Iowa, children with disabilities receiving special education services under IDEA have an

“eligible individual” designation, rather than a disability category designation; therefore, data reported are for all children with disabilities.

The State reported that both the over-representation of American Indian children and the under-representation of Asian children in special education declined. Hispanic children were under-represented in the least restrictive educational setting (removed from the regular classroom less than 20% of the school day), and there was a continued increase in the percentage of Black children who were disproportionately placed into special education and into more restrictive educational settings. Keeping in mind that in 1999-2000, Black students comprised 3.63% of pre-kindergarten -12 enrollment and in 2002-2003, they accounted for 4.04% of pre-kindergarten -12 students, there has been an increase of Black students with disabilities with IEPs every year: in 1999-2000, 5.81% had IEPs and in 2002-2003, 6.78% had IEPs. While the percentages for other minorities held steady or increased slightly with the overall increase in student population, more Black students were placed into special education. In addition, Black students were over-represented in two educational environment categories: outside regular class 21-60% and outside regular class >60%. Comparing data from 1999-2000 to data from 2002-2003, greater percentages of Black students have been placed into more restrictive settings: 5.04% to 6.53% for outside regular class 21-60%, and 11.35% to 12.01% for outside regular class >60%.

In addressing evidence of disproportionate representation, IDE and the Office for Civil Rights funded the development of a document by Daniel Reschly, *Disproportionate Minority Representation in General and Special Education: Patterns, Issues, and Alternatives (1997)*. In response to the recommendations presented by Dr. Reschly, IDE developed and implemented State standards for problem-solving processes in order to enhance the quality of pre-referral interventions. IDE provided technical assistance to AEAs to develop non-categorical classification criteria focusing on multiple sources of data related to student needs and progress. In 2002-2003, IDE designed the Instructional Decision-Making Model to create a seamless system of educational services for all children that provides early identification and intervention in the general education setting. IDE also conducted a review of assessment practices to identify possible bias and eliminated the use of norm-referenced cognitive tests that have been associated with biased outcomes for students from minority groups.

Page 40 of the APR contained a numerical goal for the percentage of children with disabilities receiving special education, by race/ethnicity, to make it comparable to the percentage of children, by race/ethnicity, in the State’s general student enrollment. Also, in each particular educational setting, IDE established a goal that the percentage of children, by race/ethnicity, be comparable to the percentage of children, by race/ethnicity, in the State’s general student enrollment. The proposed use of numerical goals based upon race raises serious concerns under Federal civil rights laws and the United States Constitution and is not an appropriate way to address the potential compliance problems that significant disproportionality may indicate. Any proposed use of numerical goals/targets based upon race, even where the numerical goal is based upon comparable numbers in the general population, raises the same legal concerns.

Under 34 CFR §300.755, it is appropriate to look at policies, procedures and practices in the referral, evaluation and identification process to determine if they are educationally appropriate, consistent with the requirements of Part B and race neutral. On pages 43 and 44

of the APR, IDE reported that it will continue to implement strategies to address disproportionality, including reviewing and modifying its policies, procedures and practices by, for example, examining data from local school districts on disproportionality, sponsoring parent training initiatives to provide information about IDEA to parents from diverse backgrounds, expanding the use of positive behavioral interventions, and expanding the implementation of the instructional decision-making model in the AEAs. OSEP looks forward to a report in the next APR of IDE's continued efforts to address disproportionality of Black students with disabilities in Iowa.

Graduation and Drop-out Rates

On pages 46 and 47 of the APR, IDE presented information regarding the graduation and drop-out rates for youth with disabilities. Data showed an 11% decrease in drop-outs among students with disabilities, from 36% in 1997-1998 to 25% in 2002-2003. The percentage of students with disabilities graduating with a regular high school diploma increased from 61% in 1997-1998 to 69% in 2002-2003, with a high of 74% during the 2001-2002 school year. Data presented in IDE's Annual Condition of Education Report for 2003 demonstrated an increase in overall graduation rates and a decrease in drop-out rates among all students. There was no disaggregation of data for students with disabilities, so the comparison between the two types of data was not possible. During Comprehensive Improvement Visits conducted at the district level during 2000-2002, a self-assessment instrument was utilized to collect information on each student who dropped out of school. The self-assessment form directed districts to collect demographic data, and respond to questions regarding attendance policies, other factors that contributed to students' decisions to drop out and the resources districts need to reduce the number of students who dropped out of school.

The identification of needed resources led to the development of the Iowa Behavioral Alliance in January 2003. This drop-out prevention advisory group focused on prevention programs with special emphasis on the needs of students with significant social, emotional or behavior needs. Using information gathered from an e-mail survey that asked districts to identify local programs that were effective in reducing drop-out rates, the group developed criteria for a drop-out prevention program. In addition to developing uniform definitions for calculating graduation and drop-out rates, Iowa proposed that Project EASIER, the web-based database that tracks individual student data across Iowa, be used to collect drop-out and graduation rate data that can be disaggregated for students with and without disabilities.

In the next APR, OSEP looks forward to reviewing the results of the implementation of these strategies to ensure accurate data collection of graduation and drop-out data and establishment of a method for disaggregating data to report graduation and drop-out rates for children with disabilities that is comparable to the graduation and drop-out rates for nondisabled children.

Suspensions and Expulsions

On pages 51 through 53 of the APR, IDE discussed the State's efforts to reduce school suspensions and expulsions. It was not possible to compare the suspension and expulsion data for students with and without disabilities, since these data were not collected for students without disabilities. Since the large increase in suspensions and expulsions of students with disabilities in 2000-2001, the number of single suspensions and expulsions has steadily declined to nearly the 1999-2000 level. However, the number of students with disabilities subject to multiple suspensions has declined only slightly. IDE provided State-wide training

on functional behavioral assessments and behavioral intervention plans. In 2002, IDE supported 13 schools in the implementation of school-wide positive behavioral supports. Eight more sites were added in 2003. IDE developed Success4, an initiative funded by capacity-building grants that supported schools through technical assistance and products in the areas of behavioral, social, and emotional development. The State reported that through the work of Project EASIER, a common definition of suspension and expulsion was created and as a result of data collection on comparisons in suspension and expulsion rates for disabled and nondisabled children comparisons between students with and without disabilities would be possible by the FFY 2003 APR.

The APR included activities and strategies for reviewing policies, procedures, and practices to promote the reduction of suspension/expulsion rates in targeted AEAs with high suspension rates, including providing more accurate and comparable data for decision making, conducting monitoring activities on suspension/expulsion, training on the use of behavioral interventions and building capacity in schools and AEAs to address challenging student behavior through the Iowa Behavioral Alliance. In the next APR, IDE should provide more information on the results of the implementation of these strategies, including the additional data comparing suspension and expulsion rates for disabled and nondisabled children.

On page 51 of the APR, IDE reported that it has not identified any AEA with significant discrepancies in the rate of long-term suspensions and expulsions. The instructions to the FFY 2002 APR directed States to describe the method the State used to determine possible discrepancies, what constitutes a discrepancy, the number of agencies with significant discrepancies, and, if significant discrepancies exist, a description of those discrepancies and how the State plans to address them. In the next APR, the State must include all the information required by the instructions, including a description of what constitutes a discrepancy.

Participation and Performance on State-wide Assessments

On page 55 and 56 of the APR, the State reported high participation rates of children with disabilities in State-wide reading and math assessments. Participation rates for the reading assessment ranged from 95.55% for 11th graders to 99.46% for 4th graders. Participation rates for children with disabilities in the State's math assessment ranged from 95.45% for 11th graders and 99.28% for 4th graders.

On pages 54 through 63 of the APR, IDE included data regarding the State's goal to increase performance results of children with disabilities on large-scale assessments. For children with disabilities participating in the district-wide reading assessment during the 2002-2003 school year, 31.04% performed at the proficient level for grade four, 20.47% percent for grade eight and 24.81% for grade 11. For the alternate assessment, the proficiency level was 89.72% for grade four, 87.86% for grade eight, and 77.27% for grade 11. The December 2003 Progress Report stated that for the 2003-2004 school year, more students with disabilities participated in the standard, rather than the alternate, assessment, and that the number of students scoring "proficient" on the alternate assessment increased. IDE believes the increase in students with disabilities participating in the regular assessment and the increase in proficiency in the alternate assessment are due to technical assistance and consultation provided by AEA training teams to teachers on participation guidelines during the first year of implementation of the substantially modified alternate assessment process.

IDE's Reading First plan addressed improved reading achievement for all K-3 children including children with disabilities. IDE built capacity and supported schools through the State-wide Reading Team (SWRT) made up of State consultants, AEA special education and educational services consultants, school administrators and literacy specialists. Ongoing training and technical assistance was provided to increase reading achievement through structured school improvement by engaging in continuous data-based decision-making and quality professional development focused on research-based strategies.

At the same time, IDE was researching and identifying scientifically-based practices to increase math achievement for all children as they review the current math program, Every Student Counts. Using the portfolio format, the alternate math assessment was based on alternate achievement standards. Proficiency rates for the regular math assessment were 37.31% for grade four, 23.78% for grade eight, and 32.77% for grade 11. Alternate assessment performance was reported at 89.67% proficient for grade four, 84.80% for grade eight, and 83.62% for grade 11. IDE worked with the University of Kentucky during the development and early implementation phases to support schools with an informational website and on-going training sessions. In the next APR, OSEP looks forward to reviewing the results of the continued implementation of strategies and their effectiveness in increasing the participation and performance rates of children with disabilities on State-wide assessments.

Least Restrictive Environment

On pages 64 through 66 of the APR, IDE reported data related to providing FAPE in the LRE. Although Iowa's LRE data for children outside of the regular class less than 21% of the day was at the national average, the trend moved downward from the 1993-1994 school year. The percentage of children ages three through five with disabilities served in less restrictive environments (early childhood setting, home, part-time special education settings, and reverse integration settings) increased since 1999-2000. The monitoring process revealed that there was inconsistent recording of LRE data. To address the problem, IDE studied the continuum of programs across the State, redefined LRE codes, and conducted on-going staff development and technical assistance to AEA and district data entry personnel. The web-based IEP, which was field tested in 2003-2004, automatically and accurately calculates LRE percentages. OSEP looks forward to reviewing the results of the implementation of these strategies in the next APR.

Early Language/Communication, Pre-reading, and Social-Emotional Skills of Preschool Children

On pages 67 through 70 of the APR, IDE reported that it did not establish baseline data to determine the early language/communication, pre-reading, and social-emotional skills, of preschool children with disabilities receiving special education and related services. IDE indicated that kindergarten teachers completed a Kindergarten Perception Survey at the beginning of the school year. This assessment of entry-level skills, motor, communication, cognitive, social/emotional and self-management was subjectively rated; therefore, Iowa did not have a consistent measure for determining language/communication, pre-reading, and social-emotional skills. Data were provided by the percentage of children meeting skills for each category. Data collected were not individualized and could not be disaggregated by disability.

Every Child Reads Birth to Kindergarten (ECR-BK) was a State-wide collaborative effort, piloted in one geographic region of the State, supported by the State Improvement Grant to expand the capacity of early care and education providers to promote language, reading, and writing resulting in enhanced literacy development prior to kindergarten. Participants in this State-wide collaborative effort concluded that additional measures were necessary to assess social-emotional skills and personal story-telling skills. IDE provided targets to develop a data-gathering system to measure the progress of preschool children with disabilities receiving special education services in language/communication, pre-reading, and social-emotional skills. In addition, an early childhood assessment work group developed guiding principles and recommendations for the development of an assessment system that would assist decision-making regarding the selection of a more reliable assessment.

Under the Government Performance and Results Act of 1993, 31 U.S.C. 1116, the effectiveness of the IDEA section 619 program is being measured based on the extent to which early language/communication, pre-reading, and social-emotional skills of preschool children with disabilities receiving special education and related services are improving. In the FFY 2003 APR, Iowa must either submit documentation of data (whether collected through sampling, monitoring, individual IEP review, or other methods), targets for improved performance and strategies to achieve those targets for this area, or a plan to collect the data for the FFY 2004 APR, including a detailed timeline of the activities necessary to implement that plan.

Secondary Transition

The instructions to this cluster ask States to provide information on whether the percentage of youth with disabilities participating in post-school activities is comparable to that of nondisabled children. On pages 72 through 74 of the APR, IDE reported on its accountability system for transition activities and its improvement efforts in documenting the secondary transition process. IDE reported that since 1994 Iowa has not had a system of collecting data and analysis of transition outcome data. However, IDE reported that progress was made in establishing a State-wide accountability system. Existing data sources such as Division of Vocational Rehabilitation Services databases, Iowa Regents Freshman Report, Iowa Workforce Development databases, and comprehensive school improvement data were identified and aligned with system indicators. Additionally, the State indicated that it will collect data regarding: the percent of its post-secondary children with disabilities working greater than or equal to 25 hours a week and earning at least minimum wage; percent enrolled in any type of post-secondary education; and parents' expectations for their children with disabilities for post-secondary experiences, living away from home, and having a paid job.

On pages 75 through 78 of the APR, the State discussed the goal of improving the documentation of the secondary transition process. The 2000 Iowa Self-Assessment indicated that documentation of secondary transition services within IEPs varied considerably. IDE reported in the APR that once the State-wide accountability system is in place, data would be available to systematically review the implementation and documentation. IDE also reported progress in this area with the introduction of a State-wide IEP form. The new form provides space to document student preferences and interests and courses of study. Training materials were developed and included clarification of procedures for planning secondary transition.

Data were provided that demonstrated an increase in the percentage of IEPs that document the six critical parts of transition planning during the reporting period 2002-2003. The State provided baseline and trend data, targets, an explanation for slippage and progress, projected targets, future activities, timelines, and projected resources to address this goal.

The development of an accountability system for State transition activities has been an on-going area of improvement in the State's Improvement Plan. OSEP looks forward to reviewing information in the next APR that includes data related to post-secondary outcomes for children with disabilities, and activities to achieve those targets, including resulting data on performance indicators. OSEP looks forward to reviewing the results of the implementation of strategies to improve the implementation and documentation of the secondary transition process.

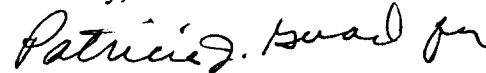
Conclusion

The timeline for the State's submission of its FFY 2003 Part B APR is extended to 60 days from the date of this letter. As noted above, IDE must include in its FFY 2003 APR:

1. documentation that it ensured correction of noncompliance identified through monitoring within a reasonable period of time, not to exceed one year of identification, including the results of the corrective action plan tracking database, or a plan to ensure correction of this noncompliance including strategies, proposed evidence of change, targets, and timelines, as soon as possible, but not later than one year from the date OSEP accepts the plan;
2. data demonstrating that complaints are resolved within the 60-day timeline, or if extensions are granted, within extended timelines;
3. the information required by 34 CFR §300.146, including what constitutes a discrepancy; and
4. data (whether collected through sampling, monitoring, individual IEP review, or other methods), targets for improved performance and strategies regarding the effectiveness of the IDEA section 619 program based on the extent to which early language/communication, pre-reading, and social-emotional skills of preschool children with disabilities receiving special education and related services are improving, or a plan to collect the data for the FFY 2004 APR, including a detailed timeline of the activities necessary to implement that plan.

OSEP recognizes that the APR and its related activities represent only a portion of the work in your State. We look forward to collaborating with Iowa as you continue to improve results for students with disabilities and their families. If you have questions, please contact Kimberly Mitchell at (202) 245-7453.

Sincerely,

A handwritten signature in cursive script, appearing to read "Stephanie Smith Lee".

Stephanie Smith Lee

Director

Office of Special Education Programs

cc: Lana Michelson