

**Compliance Tips for
Indicator 13**

September 2010

Please be advised that meeting federal requirements ensures compliance. Districts and charter schools may set their standards higher. Consult with your Director of Special Education for clarification about your local requirements.

What is Indicator 13?

The Individuals with Disabilities Education Act (IDEA) was reauthorized on December 3, 2004, and its provisions became effective on July 1, 2005. In conjunction with the reauthorization, the U. S. Department of Education, through the Office of Special Education Programs, required states to develop six-year State Performance Plans in December, 2005 around 20 indicators, about which data will be submitted annually (beginning February, 2007) in Annual Performance Reports.

Indicator 13 relates to transition plans for students.

Current Measurement Language for Indicator 13

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)).

Who is the intended audience for the Compliance Tips?

The Compliance Tips are designed to be used primarily by members of the IEP team when developing IEPs for transition aged students.

How are the Compliance Tips organized?

The Compliance Tips follow the National Secondary Transition Technical Assistance Center's (NSTTAC) Indicator 13 Checklist, which is available on their website: <http://www.nsttac.org/>.

The Tips are organized so that they can readily be printed/copied front to back. The front section for questions 1, 3, 4, 5, 6, and 8 lists bulleted Key Points that highlight guidance for practitioners that will assure compliance and facilitate writing appropriate transition plans for students with disabilities that will increase the opportunities for positive postsecondary outcomes. The examples model compliance and lead to best practice. Questions 2 and 7 simply define compliance requirements.

Each question is followed by the IDEA Federal Regulations (IDEA) and the Utah Board of Education Special Education Rules (USBE-SER) citations.

NSTTAC Checklist

1. Is there an appropriate measurable postsecondary goal or goals that covers education or training, employment, and, as needed, independent living?
2. Is (are) the postsecondary goal(s) updated annually?
3. Is there evidence that the measurable postsecondary goal(s) were based on age appropriate transition assessment?
4. Are there transition services in the IEP that will reasonably enable the student to meet his or her postsecondary goal(s)?
5. Do the transition services include courses of study that will reasonably enable the student to meet his or her postsecondary goal(s)?
6. Is (are) there annual IEP goal(s) related to the student's transition services needs?
7. Is there evidence that the student was invited to the IEP Team meeting where transition services were discussed?
8. If appropriate, is there evidence that 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?

What are state and federal requirements for transition plans in the IEP?

Beginning not later than the first IEP to be in effect when the student turns 16 (such as in an IEP meeting conducted when the student is 15 years old), or younger if determined appropriate by the IEP team, and updated annually thereafter the IEP must include: appropriate measurable postsecondary goals, including academic and functional goals, based upon age-appropriate transition assessments related to training or education employment, and, where appropriate, independent living skills; and the transition services, including courses of study, needed to assist the student in reaching the student's post-secondary goals. (IDEA §300.320(b), USBE-SER §VII.B.5(a))

Indicator 13 requirements address compliance for IEPs developed for students who will be 16 during the course of the IEP. IEPs and transition plans developed for students younger than age 16 must meet all compliance requirements; any non-compliance is reported in a separate indicator (Indicator 15).

QUESTION 1

Is there an appropriate measurable postsecondary goal or goals that covers education or training, employment, and, as needed, independent living? (IDEA §300.320(b), USBE-SER §VII.B.5(a)(1))

KEY POINTS:

Postsecondary Goals (PSG) are required in the areas of education/training and employment. The decision as to whether or not to include a PSG in the area of independent living skills rests with the IEP Team and should be based on transition assessment. If no goal is needed for independent living skills, nothing needs to be written in this area, although an N/A is always preferable to leaving something blank.

- PSGs must be appropriate. Based on information about the student, does the goal seem reasonable? Could a student who reads at the 1st grade level achieve a PSG employment goal of being a pediatrician? Could the same student achieve a PSG employment goal of being employed at a hospital in another capacity?
- PSGs must be measurable, meaning that it may be counted as occurring or not occurring. Therefore it is preferable to use the word “will” when describing the PSG. “Wants”, “wishes”, “hopes to”, and other similar words are not measurable and will not be considered as meeting compliance requirements.
- The PSG must focus on what the student will do after exiting the public school system. A Transition Program or an LEA post-high program for 18-21 year old students is part of the public education continuum and still provides a free, appropriate public education (FAPE) to students with disabilities. For those students, the PSG must address what will occur after the student completes that program.
- The PSG must be an actual outcome and not an activity or process. “Seeks”, “pursues”, “continues”, “learns”, and “applies” are words that describe processes, not outcomes. An activity such as “applying” to a college or “seeking” employment is therefore not considered a measurable postsecondary outcome and will not be considered as meeting compliance requirements. Instead, use words such as “attending” college or “obtaining” employment to describe outcomes.
- Best practice is to use active rather than passive voice; e.g., “The student will participate in on-the-job training”, rather than, “Will receive on-the-job-training”. PSGs may be written using third person, e.g. “Student will...” or “Name will...”, or first person, e.g. ‘I will...’
- The use of one word such as “military”, “nurse”, “work”, or “college”, is not a measurable PSG. The outcome must be stated as an end result; “The student will enlist in the Army”.

- The PSG should succinctly state what the student will do and be based on findings from transition assessment conducted with the student.
- PSGs in education/training, employment, and if appropriate, independent living, must have corresponding transition services and annual measurable IEP goals.
- PSGs for education/training and employment must be included regardless of the student's skill level or type and severity of disability. A statement such as "Mike is unable to be employed due to the nature and severity of his disability" does not meet compliance requirements.
- Schools and IEP teams are not responsible for ensuring that students achieve the PSGs; however they are responsible for providing transition services and special education/related services that are designed to facilitate the student's movement toward achieving the PSGs.

An IEP that is compliant will include:

- Measurable postsecondary goals for education/training and employment that indicate what the student will do after leaving the public school system.
- Documentation that postsecondary goals for independent living were considered and developed if needed.

Corrections to bring an IEP into compliance:

- Rewrite postsecondary goals, addressing key points, to ensure that goals are measurable, based on transition assessment(s), and occur after the student has left the public school system.
- Correction may be documented through an IEP addendum.

QUESTION 1

Is there an appropriate measurable postsecondary goal or goals that covers education or training, employment, and, as needed, independent living?

EXAMPLES
PSG: EDUCATION/TRAINING
After graduation, Henry will attend Bridgerland ATC in Brigham City to become a Vet Tech.
After high school, Jackie will participate in on the job training at The Avenues Animal Clinic.
Following exit from the district's 18-21 year old program, Maria will complete vocational training at the Southwest Applied Technology College.
Following high school, Troy will attend a four year college majoring in business management.
Tonya will participate in an in-home or center-based program designed to provide vocational training with medical and therapeutic supports.
Damian will attend a community based employment program after he ages out of school.
PSG: EMPLOYMENT
Carl will work as a manager of a McDonalds.
Max will participate in technologically-supported volunteer work at his church.
Following graduation, Ashley will volunteer in the community with support from the local community center board.
While attending a two-year college I will work part-time at PetSmart. After graduating from a two-year college with my associate's degree, I will work full-time as a vet tech.
Following high school, Paul will work at the local hospital, using job coaching and other supports.
PSG: INDEPENDENT LIVING SKILLS
After graduation, Bill will live at home and participate to the maximum extent possible in his daily routines (e.g. feeding, dressing, bathing, etc.) through the use of technology.
After completion of the 18-21 year old program, Jackie will prepare for each day by dressing and feeding herself with assistance.
Barry will live independently in his own home, direct his own supports, schedule medical and work appointments, pay his own bills, acquire various types of insurance, and access services in his community.
Following Devon's aging out of the school system; he will live semi-independently with a roommate in an assisted living environment and utilize public transportation to access his community.
N/A- Based on TPI assessment data, June has the skills to live independently.
Tad will live in college housing with an assigned roommate.

QUESTION 2

Is (are) the postsecondary goal(s) updated annually? (IDEA §300.320(b), USBE-SER §VII.B.5(a))

Key points:

- PSGs and transition services are required in IEPs for students aged 16 and above.
- IEPs, including transition plans, must be reviewed, and revised as needed, at least annually.
- Parents must be notified when a purpose of the IEP meeting includes the consideration of the student's postsecondary goals and transition services.

An IEP that is compliant will include:

- Postsecondary goals for education/training, employment, and as needed, independent living skills, documented in the student's current IEP.

Note:

- If PSGs are included in the IEP for the first time because the student just turned 16, this section will be reviewed as having met compliance criteria for annual review, even though the previous IEP does not include PSGs.
- If all three PSGs are reviewed as compliant (which could include N/A for the independent living skills PSG), this section will be reviewed as having met compliance criteria.
- If either the education/training or employment PSGs is reviewed as noncompliant, this section will be reviewed as noncompliant.

Corrections to bring an IEP into compliance:

- Correct the PSGs.
 - Employment and education/training, and as needed independent living skills.
 - Ensure that PSGs follow examples listed above.
 - Correction may be documented through an IEP addendum.
- Meet IEP timelines as required by IDEA and State rules.
 - Each LEA must ensure that the IEP team: reviews the student's IEP periodically, but not less than annually, to determine whether the annual goals for the student are being achieved; and revises the IEP, as appropriate, to address any lack of expected progress toward the annual goals in the IEP and in the general education curriculum, if appropriate; the results of any reevaluation; information about the student provided to, or by, the parents; the student's anticipated need; or other matters.
(IDEA §300.324, USBE-SER §III.I.4)

QUESTION 3

Is there evidence that the measurable postsecondary goal(s) were based on age-appropriate transition assessment? (IDEA §300.320(b), USBE-SER §VII.B.5(a)(1))

The Division on Career Development and Transition (DCDT) of the Council for Exceptional Children defines transition assessment as an"ongoing process of collecting data on the individual's needs, preferences, and interests as they relate to the demand of current and future working, educational, living, and personal and social environments. Assessment data serve as the common thread in the transition process and form the basis for defining goals and services to be included in the Individualized Education Plan. " (Sitlington, Neubert, Leconte, 1997).

A thorough transition assessment will include evaluating and/or reporting the student's:

- Interests
- Preferences
- Cognitive development and academic achievement performance
- Adaptive behavior
- Interpersonal relationship skills
- Emotional development and mental health
- Employability and community skills
- Community participation

"Age-appropriate" means a student's chronological age, rather than developmental age.

KEY POINTS:

- Transition assessment leads to the development of measurable postsecondary goals, courses of study, transition services, annual goals, agency linkages, and the Summary of Performance (SOP). It is to be the foundation of the entire IEP.
- The PSGs should (each year) be based on current transition assessment results.
- The student's strengths, interests, and preferences must be considered. For some students, this information may be obtained through situational assessment and/or observation. It is not sufficient to interview only the parent(s).
- As with all assessment, transition assessment documentation should include the name of the assessment(s), the date of the administration, who administered it, and a summary of the assessment results.
- Transition assessment could include aptitude, academic achievement, behavior, skills, and personality evaluations, as well as interest and preference inventories. Transition assessment can include a review of existing assessments, including

state, district and/or school wide assessment and documented classroom progress data as well as assessment completed by related service providers. These assessments may provide information about student strengths, preferences, and needs and may lead to the identification of needed transition services.

- Transition assessment must be comprehensive and more than a single “snapshot”. As with any assessment, the selection of transition assessments administered should be based on the following questions:
 - What do we need to know about the student?
 - Where can we get the information?
 - Who should be administering the assessment?
 - How will we use the information?
 - How should the information be organized?
 - When do we begin and what do we do?

- Transition assessment data can be gathered through a combination of methods, including computer or web-based assessments; paper and pencil tests; structured student and family interviews; observational school, community or work-based assessments (situational or environmental); and curriculum-based assessments. They can be formal or informal and may be administered by special and general educators, parents, employers, etc., or student self-assessments.

- The IEP team may access additional assessment information and resources through the Counseling Office or Career Center in your school, the local Department of Workforce Services (DWS) office or Vocational Rehabilitation (VR). With parent or adult student permission and assistance, the IEP team may be able to access information about the student’s participation in outside activities such as 4-H, Scouts, church, or volunteer activities.

- *NOTE: When the assessment is specific and individualized to a student AND impacts a student’s eligibility for special education and related services or changes those services, it is an evaluation under IDEA and requires parental consent.*

QUESTION 3

Is there evidence that the measurable postsecondary goal(s) were based on age-appropriate transition assessment?

Assessment should be the foundational data used to develop the postsecondary goals, transition services, course of study, and annual goals. An analysis of transition assessment data could identify potential gaps between a student's current skill level and the skill/knowledge required to attain the PSGs. A process should be evident (e.g. data obtained over time and not just from one "snapshot", or a comprehensive assessment is conducted).

The USOE model Individualized Transition Plan form includes a section for transition assessment ("How were the student's preferences and interests considered?"), with space to enter the name of the transition assessment or interest inventory. The results or a summary of the results of the transition assessment(s) should be attached to this form or included elsewhere in the special education file; the form should be accordingly marked. Results of the transition assessment process should also be included in the Present Levels of Academic and Functional Performance (PLAAFP) statements in the IEP.

An IEP that is compliant will include:

- Current assessment that provides information about the student's strengths, needs, preferences, and interests regarding postsecondary goals. (Although it is acceptable for the IEP to describe future transition assessments, there must be evidence that transition assessment was completed and considered prior to development of the current IEP.)
- At least one specific current transition assessment listed for each post-secondary goal area. Best practice is to have multiple transition assessments administered over time and/or a review of existing assessments (e.g., adaptive behavior scales scores, CRT/UAA scores, RtI progress monitoring) and how student skills/challenges identified through those assessments may impact selection and achievement of post-secondary goals.
- Documentation that the results of transition assessment are used in the development of the transition IEP—postsecondary goals, transition services, course of study, and annual goals. It can be inferred that information from the transition assessment informed the development of the IEP, but it is best practice to include an actual summary. This summary may be an IEP attachment or included in the PLAAFP statement.
- Documentation that the student's strengths, interests, and preferences were considered. Documentation of a parent interview with no information from the student, will not meet compliance. Information may be gathered via situational,

task, or environmental assessment for students with more significant support needs.

- Documentation of age-appropriate sources of information.

Corrections to bring an IEP into compliance:

- Document current age-appropriate transition assessments by including the assessment in the IEP file, attaching the assessment results to the IEP, or summarizing the assessment results in the IEP (may be included in the PLAAFP statement).
- Correction may be documented through an IEP addendum.

QUESTION 3

Is there evidence that the measurable postsecondary goal(s) were based on age-appropriate transition assessment?

EXAMPLES
Included as part of PLAAFP Statements
<p>Independent Living Skills Postsecondary Goal Worksheet and informal interview, 11/02/09, conducted by case manager. Chris identified that he would like to work as a chef. Chris has helped on jobs involving cooking with his uncle, met with the school guidance counselor on 12/7/09 to review the community college application process, has his driving permit, passed the Foods Service/Culinary Arts class with a B (with instructional and testing accommodations), and regularly does chores at home (parent report). A review of MAPs benchmark assessment data on 11/5/09 (reading comprehension at the 6.5 grade level, writing skills at the 6.9 grade level) indicates that his current reading and writing skills will make it difficult for him to be successful in college without additional supports. Therefore, the case manager will help Chris identify needed supports and resources. The case manager will also help Chris explore additional paths to pursue his interests.</p>
<p>Brittany began OJE (On the Job Education/Experience) classes in fall 2009, where she takes transition assessments regularly. She has completed transition reading and math assessments that evaluate her skills in the areas of employment and daily living. These assessments indicate that she can prepare her own microwave meals, perform basic hygiene tasks independently, write checks with verbal prompts and determine change when purchasing items totaling less than \$5.00. She needs to improve skills in budgeting, understanding job application forms, and planning for long term activities. The SIB-R assessment indicates a Broad Independence age of 8.6 years, Personal Living Skills at 9.4 years, and Community Living Skills at 6.10 years. Her OJE tryouts have helped her to discover a passion for animals and possible career as a vet tech; currently, there is a gap between her academic skill level (reading comprehension at .3.0 grade level, math calculation at 4.7 grade level) and the vet tech requirements (high school diploma or GED).</p>
Assessment results summary
<p>Michael completed the Transition Planning Inventory on 2/9/10 to assess his entry level work skills and behaviors.</p> <p>Michael's Vocational Trainer completed daily evaluations at community worksites and a Comprehensive Work Experience and Study Student Training Evaluation in Fall semester 09, which assessed his progress within their volunteer program. To evaluate his community and independent living skills, the job coach completed situational assessments for all community activities. School staff completed progress reports at the completion of each class in which Michael was enrolled. The assessment process also included a review of records (Vineland Adaptive Behavior Scale-II, WISC-III, and state and school tests), parent interview, and student interview. The results of all assessments, reports, and interviews were used to determine Michael's transition progress and remaining needs.</p> <p>Assessment results indicate that Michael is able to access the community</p>

independently, performs well on job sites with close supervision, functions below grade level academically, and has appropriate social and communication skills.

- Transition Planning Inventory, Case Manager, updated 9/09
- The Brigance Transition Skills Inventory, Transition Class Teacher, 1/16/10
- Informal inventory, Joe Smith, 12/10/09
- Review of Ansell-Casey Life Skills assessments, Dan Dunn, 2/1/10

Assessments indicate that Erin has adequate and age appropriate independent living, career awareness, employment-related, and community skills. Erin is interested in a job where she can work with her hands and work with tools. She indicated that she likes working by herself and building things. Cars are her primary interest. She will attend training at Salt Lake Community College for Auto Tech or enroll in Job Corps. Her CTE and UBSCT scores indicate that writing is an area of need, but her other academic skills are at grade level. She identified that she would like to live by herself in an apartment or dormitory. She reports no interpersonal problems on these assessments. She is taking a Driver Education class in school in preparation for earning her driver license.

QUESTION 4

Are there transition services in the IEP that will reasonably enable the student to meet his or her postsecondary goal(s?) (IDEA §300.320(b), USBE-SER §VII.B.5(a)(2))

KEY POINTS:

- Transition services are a “coordinated set of activities” leading toward the measurable postsecondary goals. They are the activities/strategies/steps/actions that the community of adults, including special/general education teachers, counselors, school club advisors, outside agencies, parents, community members, etc., provides to help the student achieve his/her postsecondary goals.
- Do not confuse the Transition Services with the Special Education and Related Services identified on the IEP. The section of the IEP outlining “services needed to advance toward annual goals and to be involved and progress in the general curriculum” identifies ONLY the special education and related services that will be provided.
- If an agency representative agrees to provide transition services, the services and how they will be provided must be documented in the IEP. (IDEA §300.324, USBE-SER §VII.B.8) It would be appropriate to include this information in the IEP section titled “Program modifications or supports for school personnel and/or supplementary aids and services to student or on behalf of student in regular education programs”.
- Related services include physical and occupational therapy, psychological services, transportation etc. (USBE-SER §I.E.34) and must be linked to the PSGs. Continued need for these services and supports must be considered when discussing transition services and, if needed, should be part of the student’s transition plan. If the student will continue to need these service and supports after leaving the school system, a representative of any agency that might be providing or paying for the services must be invited to the IEP meeting with the consent of the parent or adult student.
- Transition services must be specific and individualized for the student, based on the unique needs for this student with disabilities that must be addressed to help him/her reach the PSGs. These needs should be addressed in the IEP as measureable annual IEP goals that are directly related to the student’s PSGs.
- Transition services in the areas of Education/Instruction, Career/Employment, Community Experiences, and Adult Living/Independent Living must be considered in each student’s IEP and either marked as “IEP goal” followed by the goal number, or “considered/not needed”. The team must also consider whether an outside agency might be providing or paying for these services and

the form marked accordingly. If agency involvement is needed, list the agency; if it is not needed, mark “considered, not needed”.

Please note that the USOE model Individualized Transition Plan forms have embedded the IDEA transition services of Instruction, Related Services, Community Experiences, Employment and Other Post-School Adult Living Objectives, and if appropriate, acquisition of Daily Living Skills and Provision of a Functional Vocational Evaluation in the areas listed on the form: Education/Instruction; Career/Employment; Community Experiences; and Adult Living/Independent Living.

- A school may provide the active facilitation of linkages and referral to an adult agency; however, it may not commit another agency to providing services without the involvement and approval of that agency.

An IEP that is compliant will include:

- Documentation that all transition service areas were considered and either addressed through an annual IEP goal or identified as “not needed”.
- Documentation that the transition services are a “coordinated set of activities” leading toward the measurable postsecondary goals. Evidence may be found in annual measurable IEP goals, accommodations, course of study, or other supplementary aids/services. Examples include:
 - An annual IEP goal to improve reading skills as preparation for postsecondary community college education.
 - Accommodations, e.g. use of a personal organizer or other assistive technology, to help a student follow a routine or communicate with others, leading to improved employment outcomes for the student.
 - CTE Health Science classes listed in the course of study for a student who intends to enroll in a nursing program.
 - Speech/language services to improve communication skills for a student with an indentified speech/language deficit who identified retail sales as a PSG for employment.
- Transition services that are individualized for the specific student.

Corrections to bring an IEP into compliance:

- Documentation that all transition services were considered.
- Documentation of “coordinated set of activities”, including annual IEP goals where appropriate, leading toward the measurable postsecondary goals.
- Correction may be documented through an IEP addendum.

QUESTION 4

Are there transition services in the IEP that will reasonably enable the student to meet his or her postsecondary goal(s?)

Definitions of Transition Services

Education/Instruction includes the services and instruction provided by general and special educators and related service providers that are typically a part of the teaching and learning process. This is usually provided in schools through academic instruction in general or special education classes, and could include career and technical education or advanced placement courses, linkages (application, financial aid, etc.) to higher education, and/or instruction to learn or improve a particular skill. Instruction may also occur in other settings, including work and other community settings.

Agency/community supports may include such agencies as: Vocational Rehabilitation; Disability Resource Centers; or counseling services.

Career/Employment includes activities/strategies that focus on the development of work-related behaviors, job seeking and keeping skills, career exploration, skill training, apprenticeship training, and employment. Services could be provided by the school in the form of classes which address career and job awareness and exploration or through community vocational training experiences. A functional vocational evaluation should be considered when determining appropriate transition services for a specific student.

Agency/community supports may include such agencies as: Vocational Rehabilitation; or Department of Workforce Services.

Community Experiences includes accessing community services/activities such as transportation, local library, recreation center, church, bank, stores, volunteer opportunities, etc., and/or job shadows.

Agency/community supports may include such agencies as: community volunteer agencies; Independent Living Centers; or local transportation agency.

Adult Living/Independent Living includes activities important to adult living such as managing a budget, renting a home, completing tax forms, registering to vote, accessing medical services, and self-advocacy, etc.

Agency/community supports may include such agencies as: community volunteer agencies; Independent Living Centers; or the local transportation agency.

Note:

Please note that the USOE model Individualized Transition Plan prompts for the required areas to consider when developing transition services. One way to assure that all areas are considered by the staffing team is described below (e.g., when addressing the Postsecondary Education/Training Goal, always consider instruction and related services.) Although each area for transition services could be considered under each of

the postsecondary goals, following this format would assure that the IEP team does consider each area.

- Education/Training: always consider Instruction and Related Services.
- Employment: always consider Career/Employment (including a Functional Vocational Evaluation when appropriate) and Community Experiences; may consider Education/Training and Adult Living/Independent Living.
- Independent Living (as needed): always consider Education/Training, Community Experiences, and Adult Living/Independent Living

QUESTION 5

Do the transition services include courses of study that will reasonably enable the student to meet his or her postsecondary goal(s)? (IDEA §300.320(b), USBE-SER §VII.B.5(a)(2))

KEY POINTS:

- A course of study that meets compliance requirements must include a multi-year description of coursework and other school experiences from the student's current IEP to the anticipated exit year, be specific and individualized to the student taking into account the student's preferences and interests, and link to the postsecondary goals.
- "Other school experiences" may include activities such as: job shadowing; work experience; participation in school clubs or activities; drivers education; or career counseling.
- A course of study that exemplifies best practice should, in addition to being multiyear, specific, individualized, and linked to the PSGs, stand up to the "Stranger Test" – is this clear and transferable to another school; e.g., can another school build a class schedule based solely on this information? Would another school understand the other school experiences as listed in the courses of study?
- The course of study describes the classes and other school activities needed by this particular student to align with the identified postsecondary goals. The description may be an individualized list of courses and activities and/or a narrative focusing on specific skills/knowledge to be learned in a class or activity.
- It is acceptable to include "all classes to satisfy all requirements for an XXX High School Diploma" as long as the course of study also meets the requirements stated above. Specific elective courses and other school experiences that are aligned with the postsecondary goals must be included.
- If the district provides an individualized four year plan for each student, then that plan could be acceptable if it provides a clear description of all course needs (not just required courses) leading to identified postsecondary goals and includes courses from the current year to the student's anticipated exit year.
- A list of classes that the student has completed and credits earned will not meet courses of study requirements.

An IEP that is compliant will include:

- A list of courses and other school activities designed to meet the individual student's needs.
- A long-term view of courses needed (from current IEP to when the student will exit the school system).
- Enough information that another LEA implementing the IEP would be able to determine a class schedule that would meet the student's needs.

Corrections to bring an IEP into compliance:

- Ensure that the course of study:
 - Includes a multi-year description of coursework from the student's current IEP through the anticipated exit year;
 - Is specific and individualized and takes into account the student's preferences and interests; and
 - Links to the postsecondary goals.
- Correction may be documented through an IEP addendum.

QUESTION 6

Is (are) there annual IEP goal(s) related to the student's postsecondary goals/transition services needs? (IDEA §300.43, USBE-SER §VII.B.2(a)(1))

KEY POINTS:

- Annual IEP goals must be measurable, i.e., must contain observable target behavior, conditions, and criteria.
- Annual goals should indicate the need for specialized instruction.
- Annual goals state what the student will do or learn within the next year that will move the student toward achieving his/her postsecondary goals (PSG) and that link to the student's transition services. Be cautious that the goal does not inadvertently communicate a false reality; e.g., "In order to be successful in college, the student will read at a 4.0 grade level".
- The linkage between the annual goals and the PSG/transition services must be direct, specific, and genuine. If someone were to pick up the IEP and go directly to the annual goals, he/she should be able to predict the broad PSG/transition services needs with a high degree of accuracy, e.g. will attend college, will be employed in sales.
- It is not enough to simply state that a linkage exists, e.g. "The student will use fractions with at least 85% on accuracy on 5 of 5 trials" for a student who intends to live independently. The linkage must be direct, specific, and genuine, e.g. "The student will multiply and divide fractions (i.e. $\frac{1}{4}$, $\frac{1}{3}$, $\frac{1}{2}$, $\frac{2}{3}$, $\frac{3}{4}$) to halve and double recipes 5 of 5 trials in cooking class".
- Adding the words "for life" or "for work" after a goal is not enough to demonstrate linkage. Writing an annual goal that genuinely links to the PSGs requires a thorough understanding of the skills, knowledge, and admission/job requirements for the specific PSG.
- Annual goals should link to a Utah State Core Curriculum standard, but a Core standard is not, by itself, an annual goal.
- Academic goals most readily link to the PSG in education/training, and may link to the PSG in career/employment.
- Behavioral (including social skills) or communication goals can readily link to any of the PSGs.
- Related service goals must link to the PSG and transition services. For example, if the IEP team identifies that a student needs orientation and mobility services to access the school campus, they should also consider whether the student

needs the same services to access the community, including work sites and college campuses.

- At least one annual IEP goal must show direct, specific, and genuine linkage to each PSGs. Best practice is that each annual goal directly, specifically, and genuinely links to the PSGs and is supported by a specific transition service.

An IEP that is compliant will include:

- Annual IEP goals that are measurable, i.e., contain observable target behavior, conditions, and criteria.
- At least one annual IEP goal that directly links to each PSG.
- Goals that are individualized based on the specific student's needs.

Corrections to bring an IEP into compliance:

- Rewrite goals to meet criteria for "measurable".
- Ensure that goals are individualized to meet the specific student's needs.
- Correction may be documented through an IEP addendum.

QUESTION 6

Is (are) there annual IEP goal(s) related to the student's PSGs/transition services needs?

EXAMPLES
ANNUAL GOAL: EDUCATION/TRAINING
Paul will improve his reading comprehension by answering literal and inferential questions after reading a non-fiction passage at the 8th grade level with 85% accuracy. (PSG: auto mechanics training in community college)
Hal will write using conventional grammar, usage, sentence structure, punctuation, capitalization, and spelling with 80% accuracy based on the district grade level rubric. (PSG: 4 year college)
Frankie will practice self-advocacy skills by discussing his learning characteristics and needed accommodations and modifications with all his general education teachers, without prompting based on weekly teacher report. (PSG: on the job training)
ANNUAL GOAL: EMPLOYMENT
Gina will improve her ability to follow through with tasks, to be measured by the following objectives: a. Use a planner to track projects and manage her work load 90% of the time b. Complete activities/projects assigned to her 95% of the time (PSG: employment at WalMart)
Kyle will improve his reading comprehension skills from 7.2 grade level to an 8.0 grade level as measured on standardized assessment. (PSG: employment as a welder)
Susan will complete two step picture directions using a picture chart 95% of the time. (PSG: community based employment in food service)
ANNUAL GOAL: INDEPENDENT LIVING SKILLS
Donell will improve his emotional regulation, coping, and problem solving skills by demonstrating the following objectives: a. Following classroom and school rules 95% of the time without a prompt and 100% with a prompt. b. Naming personal difficulties and 1-2 ways to appropriately cope with each of these difficulties 8 out of 10 times. (PSG: living in a college dorm)
Juan will state his first and last name and phone number with 100% accuracy to 5 different people in 5 different settings. (PSG: participate in community activities)
Samantha will respond to questions and make choices, as indicated below, using alternative communication methods. a. When given a choice between two objects, Samantha will indicate her preference using eye gaze 90% of the time as measured by progress monitoring. b. When given a choice between two activities, Samantha will indicate her preference using eye gaze 75% of the time as measured by progress monitoring. (PSG: supported living setting)

QUESTION 7

Is there evidence that the student was invited to the IEP Team meeting where transition services were discussed? (IDEA §300.43, USBE-SER §VII.B.4)

Students must be invited to the IEP meeting if a purpose of the meeting will be the consideration of postsecondary goals for the student and the transition services needed to assist the student in reaching those goals. (If the student is invited, but does not attend the meeting, the LEA must take other steps to ensure that the student's preferences and interests were considered.)

An IEP that is compliant will include:

- Documentation in the IEP file that the student was invited to participate in his/her IEP meeting prior to the day of the meeting.
- Acceptable documentation includes:
 - Notice of Meeting addressed specifically to student (may be co-addressed with parents); or
 - The student included on the list of who will be invited to the meeting on the Notice of Meeting; or
 - Copy of a separate invitation to the student that contains all required elements (IDEA §300.322, USBE-SER §III.H.); or
 - Documentation of verbal invitation, e.g., phone log, that contains all required elements (IDEA §300.322, USBE-SER §III.H.)
- A student's signature of attendance on the participants' page of the IEP will not meet this compliance requirement. There must be documentation of an invitation that specifically names the student and is dated prior to the date of the meeting.

Corrections to bring an IEP into compliance:

- Non-compliance in the reviewed IEP is not correctable, e.g. the student cannot be invited to a meeting that has already occurred.
- To document compliance with this requirement, the LEA must:
 - Change its policies, procedures and/or practices that contributed to or resulted in non-compliance, e.g. document that the teacher received professional development on notice of meeting requirements, and
 - Correctly implement the requirement, e.g. show documentation from another file that the teacher has invited a student to an IEP meeting.

QUESTION 8

If appropriate, is there evidence that 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? (IDEA §300.321, USBE-SER §VII.B.4(c) §§)

KEY POINTS:

- The LEA must have written consent from the parent or an adult student (student is 18 or older), legal guardianship has not been awarded to another person) before inviting an agency representative to attend any IEP meeting. This written consent must be obtained each and every time an outside agency representative is invited to attend an IEP meeting.
- An adult agency representative is only required to be invited to the IEP meeting when that agency is likely to provide and/or pay for transition services during the current IEP. Agencies that may be involved include, but are not limited to: Vocational Rehabilitation (VR); Division of Services for People with Disabilities (DSPD); Department of Work Force Services (DWS); community mental health agencies; or college disability resource centers.
- Evidence that this area is compliant will be determined by reviewing the student's IEP file for both written consent, signed by the parent or adult student, and the agency invitation. There are no specific requirements as to what the agency invitation must include; it could be an email, documentation of a phone call, or a letter.
- If consent is obtained, the list of who will be invited to the meeting on the Notice of Meeting should include the name and agency of the agency representative invited.
- If outside agency representatives attend a meeting at the invitation of the parents, that should be documented somewhere on the IEP. For example, it could be noted after the agency representative's signature on the IEP, "attended per parent invitation".
- Compliance requirements around parental consent do not apply to linkages conducted through activities such as Agency Fairs, parent/student evening programs, or in-class presentations as long as the LEA does not disclose personally identifiable information about the student's disability during the activity.
- Linkages can be effectively facilitated outside of the IEP meeting. Work with your local agency partners to establish relationships and to develop strategies.

- If the need for agency involvement is determined during an IEP meeting, include a statement to that effect in the transition plan. This may be noted in the section “Program modifications or supports for school personnel and/or supplementary aids and services to student or on behalf of student in regular education programs”.
- The USOE model Individualized Transition Plan form has a specific prompt in Section 2: Transition Services regarding inviting adult agencies. There is also a space to document that the need for agency involvement was considered. If agency involvement is needed, list the agency; if it is not needed, mark “considered, not needed”.

An IEP that is compliant will include:

- Documentation that agency involvement was considered.
- If agency involvement was needed:
 - Written consent to invite an agency representative is in the file;
 - Evidence the agency was invited is in the file; and
 - Written consent is dated prior to the agency invitation.

Corrections to bring an IEP into compliance:

- Non-compliance in the reviewed IEP is not correctable, e.g. consent may not be obtained after the agency representative was invited to the IEP meeting.
- To document compliance with this requirement, the LEA must:
 - Change its policies, procedures and/or practices that contributed to or resulted in non-compliance, e.g. document that the teacher received professional development on consent and transition requirements, and
 - Correctly implement the requirement, e.g. show documentation from another file that the teacher has considered needed agency involvement, obtained written consent, and invited the agency representative to the IEP meeting.

Summary

“Transition is not just a fad. It is not a program or a project that has a beginning and an end. It is a vision and a goal that is linked to a greater effort to advance a democratic and civilized society. Like the idea of a “democracy” it embodies ideals and goals that are continually reached for; though possibly never perfectly achieved. An investment in effective transition services for youth demonstrates this nation’s commitment to the full participation of all its citizens and residents in the work and progress of the nation.”

Carol A. Kochhar-Bryant in *Pathways to Successful Transition for Youth with Disabilities*

Transition planning is a multi-year process that involves students, families, educators, and, frequently, representatives of community agencies and, when implemented with fidelity, facilitates the student’s movement from school to adulthood. The Individuals with Disability Education Act of 2004 (IDEA) has an increased emphasis on the importance of transition planning for students with disabilities although the details of how to accomplish the development of transition plans are unspecified.

This document is an attempt to guide IEP teams in the development of transition plans that not only meet compliance requirements as outlined in Indicator 13 of the State Performance Plan/Annual Performance Report, but that also address the needs and goals of individual students. The framework for this guide is the Indicator 13 checklist developed by the National Secondary Transition Technical Assistance Center (NSTTAC) and approved by the Office of Special Education Programs (OSEP). Following the process and ensuring that each item is documented in the IEP will lead to a transition plan that not only meets compliance requirements, but also addresses the preferences, strengths and interests of the individual student.