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Executive Summary

This report contains an analysis and evaluation of the current and prospective Individual Education Plan compliance for New Hanover County, NC. Methods of analysis include monthly and annual audits as well as categorization of interviews and observations. Results of the data analyzed show that only 8% of the IEP's audited were in compliance in 2006. This is due to a lack of understanding the new software, a lack of awareness of the components required by the IEP, and time available to complete the IEP proficiently.

The report finds that although there has been an increase of compliant IEP's, there is still a large gap. Recommendations discussed include:

- Amending the internal structure of the new software, Goalview
- Conducting informal IEP file audits
- Holding teachers accountable for their work by mandating training for those out of compliance
- Obtaining a wireless router to complete paperwork while conducting their meetings

Overview

New Hanover County has been battling the compliance issue for years. As a result, they implemented a database, Goalview, to assist with writing and completing Individualized Education Plans (IEP's). If the teachers fill out all the components, then the end result will be a complete IEP. Mandatory training was implemented for all the teachers to learn how to navigate the new software. The county then had continual "refresher" trainings throughout the year. This past year they have not only maintained the continual training but have incorporated compliance issues with each section so the teachers will have a better awareness of their responsibilities.

The matter of completing IEP's properly is related directly to federal funding. If the IEP does not include all the components that Individuals with Disabilities Education Act (2004) require, then the federal government can and will reduce the funding for the school or district. This affects not only the direct services that Special Education students receive but also the related services such as Visually Impaired, Occupational Therapy, Physical Therapy, Speech, and Adapted PE.

The sponsors include Central Office personnel: the Director and Assistant Director of Special Education for the county and Special Education liaisons. The stakeholders include the local school administration and the teachers. After completing a random county wide audit of the Special Education records, Central Office personnel found that the teachers were still not addressing all of the required components. This could be due to high teacher turnover, human error, time constraints, or the way the database is formatted.

They have offered ongoing training throughout the year for all Special Education teachers, but the teachers do not attend on a regular basis. Also, when the teachers attend training it removes them from the classroom, and many teachers are unaware when the trainings are offered. Many of the teachers also feel that they are completing the IEP's properly. The central office personnel feel that the database could be internally revamped to increase the compliance to 100%. The local administration and the teachers feel that they are addressing all of the components of the IEP and that there are no compliance issues.

When central office does an audit, the local schools (e.g. Principal and Department Chair) are not given the results of the audit. As a consequence, the teachers are not held accountable for their work.

Gap Analysis

A random sample of IEPs were compiled from every school in New Hanover County for an audit. A team comprised of teachers, liaisons, and the Special Education Director conducted an internal audit to assess whether there was an improvement in the area of IEP compliance. The results showed that although the county had improved with the compliance, they were still not at 100%. Only 8% of the audited IEP files were in compliance. The county would like to have 100% compliance by 2010. Having this compliance correlates with the mission of New Hanover County's Special Education Department: *it is the Mission of New Hanover County Schools Special Education and Related Services to provide a high Quality education that prepares all students to be productive and contributing citizens of a global society.* The schools need full funding in order to give students an optimal education. If schools are losing funding due to incomplete IEP's, then the students will be the ones who suffer due to the lack of services.

The fields required to be addressed according to IDEA are consent, initial evaluations, reevaluations, IEP services, and special factors. The following data was gathered from the internal audit.

| # of Records Reviewed | # of Records in Compliance |
|-----------------------|-------------------------------|
| 77 | 10 |
| | |
| Area | % Compliant |
| Consent | 86% |
| Initial evaluations | 73% |
| Re-evaluation | 77% |
| IEP Services | 19% |

The audit team usually does an overall assessment of the compliance areas, but does not take the case manager into consideration. Therefore, the case manager is not held accountable for their paperwork. The Principal of the school and the Department Chair are not notified when one of the employees is not completing the paperwork properly. In order to increase the compliance of the IEPs the case manager needs to be held accountable for their paperwork.

| What IS happening? | What SHOULD be happening | Gap | |
|------------------------------|-------------------------------|-------------------------|--|
| Teachers are not addressing | Teachers should understand | Lack of understanding | |
| all the required components | all the required components | the IEP or the software | |
| of the IEP | and address them properly in | headings | |
| | the IEP | | |
| Teachers do not attend | Teachers should attend IEP | No teacher | |
| trainings when needed | training when they do not | accountability | |
| | understand parts of the IEP | | |
| Teachers are working on | Teachers should complete the | Time | |
| their paperwork at intervals | whole IEP so they do not skip | | |
| due to lack of time | or miss a section | | |

Performance Analysis

Organizational systems

The decisions regarding Goalview and IEP compliance are made by the Director of Special Education, but the decisions are influenced by a team including the Assistant Director and the liaisons. The information is then passed to the administrators, Goalview managers, Department Chairs, and Teachers via e-mail and through interdepartmental memos.

The trainings and all Goalview related issues are written into the budget for the year. Due to high personnel turnover within the Special Education Department, Goalview trainings are offered on a regular basis for new staff. Therefore, they are a permanent part of the Special Education staff development budget. New staff is required to attend an all day overview of Goalview. Throughout the school year additional trainings are held for teachers.

The clients are the students and parents. If an IEP is not written properly, then the students will not receive the maximum service for their educational success. Due to reduced funds, the county may not have the financial backing to provide the optimal education.

The following chart demonstrates the hierarchy within the Special Education Department.



Management Systems

Due to the bureaucratic nature of school systems, there are no set management techniques. Most of the local administrators rely on the Department Chairs to monitor the paperwork since they do not have an understanding of all the laws and regulations that drive an IEP. But due to the Department Chairs duties such as teaching classes, scheduling, managing their own caseload, etc., they do not have the time to review the paperwork of all the other teachers. The schools tend to leave the monitoring of student records to the individual teachers.

Physical and Technical Systems

All teachers have access to computers with network connections in their rooms, but the work environment can be very distracting due to interruptions from students and other teachers. These interruptions can cause a person to become distracted and overlook important components that are required to be addressed. Also, many times the teachers planning periods are filled with additional duties such as hall duty, lunch duty, or parent conferences. This does not leave the additional time to complete all the required paperwork for Special Education students.

Human and Social Systems

The Director and Assistant Director for Special Education have quarterly meetings with the Goalview managers in the county to gather input from the teachers about the program. Many suggestions have been made by teachers such as expanding drop down menus which they have been able to fix. Each school has its own culture that operates under the large umbrella of Special Education services. Due to schools operating independently from Central Office, a monitoring system needs to be implemented.

Interventions

In order to meet the goal of 100% compliance by 2010, the county needs to continue the training for teachers that is already in place which not only addresses the technical side of the software but also components that are required to be addressed in the IEP.

The audit team should reconvene to look at and compile a list of changes they would like to see within the software program. The team also has to look at the headings of each section to make sure they are clear and concise so that all teachers understand what is required. Many of the questions also need to be reworded or taken out completely. For example, one question stated "*Is assistive technology considered for this child?*" with a choice of Yes or No, the answer is always YES so the question needs to be reworded to avoid further confusion. Another intervention should require certain fields to be addressed before an IEP can be finalized. If these fields are not addressed then a warning message should pop up that states the IEP could not be finalize due to missing fields (and list the fields missing). When the software was purchased, the company offered to adjust the program as needed to support to the county

The central office team conducts internal audits every year to asses whether the compliance gap is closing. When the internal audits are completed, the casemanagers with out of compliance IEPs need to be sent to the appropriate training, which is offered throughout the school year. This needs to be mandatory for the case manager. A memo should be sent to the principal, Department Chair, and the teacher who is to attend the training.

Goalview is an online database that was implemented not only for the compliance issue but to assist with the time factor for teachers. Currently schools do not utilize Goalview during meetings. The teachers take written notes during a meeting then fill in the blanks at a later time in Goalview. An intervention for teachers would be to access Goalview during the IEP meeting so that they can take notes in the database while the meeting is in progress. This will free up time after the meeting. This would mean that the schools would have to checkout a laptop to the Special Education Department and set up a wireless router so the teachers could access the Internet.

Feasibility

| Interventions | Strength of | Organ. Change | Barriers to implementation | Finances | Programming |
|---------------|----------------|------------------|----------------------------|----------|-------------|
| | support | impact | | | |
| Change the | 1 | 1 | 1 | 1 | 2 |
| internal | | | | | |
| design of the | | | | | |
| software, | | | | | |
| Goalview | | | | | |
| Internal | 1 | 1 | 1 | 1 | 1 |
| audits | | | | | |
| Mandatory | 1 | 1 | 1 | 1 | 1 |
| training for | | | | | |
| out of | | | | | |
| compliance | | | | | |
| IEPs | | | | | |
| Wireless | 1 | 1 | 1 | 2 | 1 |
| router | | | | | |

1 = Low 2=Moderate 3=High

The risks associated with the interventions are relatively low with the exception of the programming and the finances. Goalview may not have the ability to implement some of the changes into the software due to the internal make-up. For example, one of the changes the team has previously asked for is spell check integrated into Goalview, but the software will not support this change.

The other moderate risk is associated with the cost of the wireless router. All other finances (e.g. Training, staff, time) are written into the Special Education budget annually. The additional cost of the wireless router is minimal ranging from \$60-\$100.

All other risks are low. The county already implements training for the Goalview. The liaisons are available to audit the IEP files and have the authority to mandate teachers to attend training if they are not meeting the requirements. Once the audit is completed and the memos have been sent out, the liaisons are able to access the staff development sign in and automatically sign the teachers up for the appropriate trainings.

Evaluation Plan

Activities

Outputs

Outcomes

Impact



Formative Evaluation

Formative evaluation will be conducted by auditing a small random sample of files monthly. The audits will be conducted by the Special Education liaisons and Special Education Department Chair. Central office will also conduct annual audits. Also, the Department Chair will conduct monthly meetings with the teachers to ascertain whether or not they need more time to complete their paperwork and to go over any complications they may be having with the software. When problems arise teachers will be sent to trainings as a result of an audit, they will complete a survey at the end of the training, for feedback purposes.

Summative Evaluation

The team will conduct a summative evaluation at the end of the 2009-10 school year to compare the percent of compliant IEP's to the previous years.

Data Collection

Description of Data Collection Methods and Instruments

Data will be collected through audits, interviews, observations, and surveys. <u>Audits</u>

Monthly audits will take place at the local school. These are informal audits to hold teaches accountable for their work. Annual audits will take place at Central Office to assess improvement in IEP compliance.

<u>Surveys</u>

Based on the audits, some teachers may have to attend trainings. Surveys will be given to the teacher at the end of each the trainings. These surveys assess the training and ask for suggestions and improvements.

Interviews

Interview will take place throughout the school year to gain teacher input on interventions. The teachers will feel they are a part of the solution.

Observations

The Department Chair will conduct unannounced observations of teacher instruction. Observation will also be conducted during the IEP meetings.

Types of Data to be Collected

Quantitative data will be taken via IEP file audits, of the total files audited a percent will be tallied of the all that are out of compliance. Qualitative data will come from the surveys, observation, interviews, and audits

Techniques to Ensure Validity and Reliability

Validity will be ensured by having the files audited by Central Office personnel. Each case manager will have one file randomly audited monthly. This will ensure that no one person is being targeted. The findings will be reviewed with the Performance Technologist, Department Chair, and Director of Special Education.

Data Analysis Plan

Description of Analysis Methods

Qualitative data will be analyzed annually through the Central Office audit. This data will be the number of files audited and the number of files out of compliance. The quantitative data will be transcribed to a document and given to the Performance Technologist (PT) to code and categorize. This will enable the PT to look at the various issues and interventions that are being implemented.

Report Findings

The findings of the formative evaluations will be reported in narrative form to the Director of Special Education, Principals, and Department Heads. All raw data will

remain at Central Office with the Director of Special Education. The summative evaluation report will also go to Department of Public Instruction.