

# **The Individuals with Disabilities Education Act**

*Least Restrictive Environment*

*What does it mean for children with disabilities?*

The National Association of Private Special Education Centers

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# Presenters

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# FEDERAL INTEREST

- IDEA: Sweeping civil rights legislation
- Mandate to serve all children regardless of the severity of disability
- Federal funding ensures compliance with law
- Federal funding has dramatically increased positive outcomes for students

# Process Measures or Outcomes?

*Outcomes are NOT.....*

- Classification rates
- Eligibility Criteria
- % of Racial or Ethnic Minorities
- Placement Data

# Introduction

M. Christopher Tabakin, M.S.

- President and CEO of iHi International
- Vice President of NAPSEC Board of Directors
- Executive Board member of Potential Inc. & Springtime School
- Executive Board member of PA Council for Exceptional Children
- International Council for Exceptional Children member and award winning advocate at the national level

# Profile of Student Populations

- Why is my background important?
- Organizational involvement with continuum of services
- Who are the students that NAPSEC Program serve - a profile
  - Danny
  - Joanna
- 10,000 foot level: DOE speaks, states will listen, but they don't always comprehend

# IDEA Stats – Where Do Children Receive Services?

Of America's 6.4 million students, 13% are classified with a disability, of that 13% only 3% are served outside of the general education environment.

Of the 3%, 1% are parentally placed (parents who can afford this option), leaving 2% that have Individual Education Plans (IEP)/Individual Family Service Plans (IFSP) teams that have determined the **least restrictive environment - most appropriate** - is a **specialized program in a public or private setting**.

Children are placed by the Local Education Agency (LEA) in private specialized programs. Programs receiving federal funds are required to meet all the same requirements as a public school. These programs are monitored at the state and federal level to ensure compliance.

# IDEA Regulations - History

## § 300.110 Program options

The State must ensure that each public agency takes steps to ensure that its children with disabilities have available to them the **variety of educational programs and services available** to nondisabled children in the area served by the agency, including art, music, industrial arts, consumer and homemaking education, and vocational education.

## § 300.115 Continuum of alternative placements

(a) Each public agency must ensure that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.

# § 300.116 Placements

In determining the educational (b) The child's placement—

(1) Is determined at least annually;

(2) Is based on the child's IEP; and

(3) Is as close as possible to the child's home;

(c) Unless the IEP of a child with a disability requires some other arrangement, the child is educated in the school that he or she would attend if nondisabled;

(d) In selecting the LRE, consideration is given to any potential harmful effect on the child or on the quality of services that he or she needs; and

(e) A child with a disability is not removed from education in age appropriate regular classrooms solely because of needed modifications in the general education curriculum. Placement of a child with a disability, including a preschool child with a disability, each public agency must ensure that—

# Placement Decision

Each public agency must ensure that—

(a) The placement decision—

Is made by a group of persons, including the parents, and other persons knowledgeable about the child, the meaning of the evaluation data, and the placement options; and

(2) Is made in conformity with the LRE provisions of this subpart, including §§ 300.114 through 300.118.

# Least Restrictive Environment (LRE) § 300.114

## LRE Requirements

- (a) General.
- (b) (1) Except as provided in § 300.324(d)(2) (regarding children with disabilities in adult prisons), the State must have in effect policies and procedures to ensure that public agencies in the State meet the LRE requirements of this section and §§ 300.115 through 300.120.
- (2) Each public agency must ensure that—
  - (i) To the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities, are educated with children who are nondisabled; and
  - (b) Additional requirement—State funding mechanism—

# Least Restrictive Environment (LRE) State Funding Mechanisms

(1) General.

(i) A State funding mechanism must not result in placements that violate the requirements of paragraph (a) of this section; and

(ii) A State must not use a funding mechanism by which the State distributes funds on the basis of the type of setting in which a child is served that will result in the failure to provide a child with a disability FAPE according to the unique needs of the child, as described in the child's IEP.

(2) Assurance. If the State does not have policies and procedures to ensure compliance with paragraph (b)(1) of this section, the State must provide the Secretary an assurance that the State will revise the funding mechanism as soon as feasible to ensure that the mechanism does not result in placements that violate that paragraph.

# **Conference Report on IDEA Reauthorization Showing the Intent of Congress**

For Early Intervention the IDEA Conference Report states “Congress recognizes that there may be instances when a child’s individualized family service plan cannot be implemented satisfactorily in the natural environment. The Conferees intend that in these instances, the child’s parents and the other members of the individualized family service plan team will together make this determination and then identify the most appropriate setting in which early intervention services can be provided.

# What is at Stake?

- LRE –States already have additional requirements for Specialized Program Placements
- The pendulum is swinging
- Costs are at stake
- Failure to provide the most appropriate education possible
- A recent article in a California Paper clearly communicated the concerns:  
[http://www.insidebayarea.com/breaking-news/ci\\_28879622/oakland-school-districts-proposes-greater-mainstreaming-special-education](http://www.insidebayarea.com/breaking-news/ci_28879622/oakland-school-districts-proposes-greater-mainstreaming-special-education)

# Quotes and Excerpts from article:

- “District officials said that the proposed change by Superintendent...is an effort to improve all students' ability to be ready for college and to more fully comply with state and federal laws that require all students with special needs be put in the “least restrictive environment possible.”
- “But special education teachers and students disagree. “The full push toward an all-inclusive classroom is really a push to downgrade special education,” said Mark Airgood, a special education teacher at Edna Brewer Middle school. Airgood said he thinks the district's plan to integrate more special education students into general education classes represents a step backward.”
- “I think it's a very cynical sentiment. You're taking away real services with smaller classrooms in the name of inclusion”
- “Oakland Unified spokesman Troy Flint said that the district fully intends to provide appropriate support for students in integrated classrooms and that the move toward integration would actually cost the district more money”

- “A lot of critics misunderstand our intent. It's not a sink-or-swim model where we take these kids with special needs and toss them into the deep end,’ Flint said. “This is about helping kids thrive and challenging kids and allowing them to fulfill their potential.”
- “From a parent standpoint, I understand ... my child will be in a bigger classroom, they’ll drown in there, they won’t get the attention they need, all of those things come up,” Rosenbaum said. “If you don’t give any support to the teacher or a teacher's aide, then it is a dump and pray situation, close your eyes and hope that this works.”
- “The devil is in the details,” Rosenbaum added. For parents of special needs students in Oakland Unified, the concern seems to be that the decision may not be fully thought out.
- “Mylishia Anderson, 19, a recent graduate of Oakland High School, said she has benefited from small, specialized classes, and she doesn't think the program should be changed.”

# What is at stake...

- Failure to effectively utilize tax-payer money - an outcome report conducted and independently verified shows that when necessary, nonpublic program educate students for about 70% of the cost of educating that child in a public program
- The goal...Get the students back to the public system when they can be successful, and/or prepare them to enter adulthood successfully.
- Prepare for life after school and employment.
- Costs associated with serving an individual over a lifetime are much higher when outcomes are not successful in school.

# NAPSEC Outcomes Summary – 2013-2014

## PLANS: 1,817 TRANSFER STUDENTS

Male: 72% (1,306)

Female: 28% (511)

Race/Ethnicity: 51% (934) White

32% (589) Black

14% (248) Hispanic

2% (41) Asian

<1% (5) American Indian/Alaskan Native and Hawaiian/Other Pacific Islander

**Length of Stay:** 94% (1704) enrolled < 1-5 years

**School Level:** 51% (924) High School

20% (365) Middle School

12% (227) Elementary

17% (301) Preschool

## Exiting Students by Type of Disability/Specialized Program:

17% (300) Preschool

20% (371) Developmental

53% (965) Emotional/Behavioral

8% (136) Medical

2% (45) Learning

## TRANSFER STUDENTS: RESULTS

55% (996) plan to enter/return to In-district programs

19% (343) plan to enter/return to In-district Regular Education

# Plans: 977 Graduates/Aged-out Students

## GRADUATES/AGED-OUT STUDENTS - RESULTS

- **88%** plan to enter a Mainstream, Vocational Rehabilitation, or Community-Based Activity
- **31%** (307) to 4-Year/2-Year College or Trade/Technical School
- **14%** (132) to Competitive Employment or Military
- **22%** (210) to Vocational Rehab or Supported/Sheltered Employment
- **21%** (208) to Community-Based Programs
- **3%** (35) to Other Post School Activities
- **9%** (85) with No Immediate Post school Plans

**45%** plan to enter 4-Year/2-Year College, Trade/Technical School or Competitive Employment/Military

# **NAPSEC Cost Studies**

## **ASAH - NJ State Private Special Education Association**

For years, it had wrongly been assumed that the cost of serving students with disabilities in approved private schools is greater than the cost of serving similar student in self-contained public school programs. The assumption was based on published tuition rates. However, as the cost study reveals, these tuition rates cannot be compared. This is because private school tuition rates include all costs, whereas public school tuition rates exclude cost association with pension, social security and health benefits on retirement, as well as facilities construction and associated debt service. These “hidden” costs are **paid by the state and/or county** tax dollars – not local school districts. Public schools, therefore, report tuition rates that are lower than the full actual cost to taxpayers.

# MAAPS

## Massachusetts Association of Approved Private Schools

This report compares the structure of special education costs in public schools, collaboratives and C766 schools, where there are substantial differences regarding the severity of student disability, staff to student ratios, the length of the school year and staff compensation. The cost comparison also includes all costs to the state taxpayer, who subsidize school districts and collaboratives by hundreds of millions a year for teacher retirement pensions and school building construction. The cost comparison demonstrates that C766 school costs are 35% lower than that of public schools and collaboratives, after the differences in staff compensation, length of the school year and hidden costs to taxpayers are considered.

- 1. Public school and educational collaboratives administrators erroneously claim that they can serve students at less cost than a C766 school can. This assertion is not based in fact and does not consider hidden costs to the taxpayer, differences in the severity of student disability, staff to student ratios and the length of the school year.
- 2. It would cost public school districts \$80,000 per pupil, or \$20,000 a year more, to provide the same level of services of a typical C766 day school at a cost of \$59,000.
- 3. The only way in which a student could be served at less total cost by a public school or collaborative is by providing less service to the student.
- 4. Public school and collaborative salaries are generally 44% higher than C766 school salaries.

**THE INDIVIDUAL WITH DISABILITIES  
EDUCATION ACT (IDEA)**

**FREE APPROPRIATE PUBLIC EDUCATION (FAPE)**

**THE LEAST RESTRICTIVE  
ENVIRONMENT (LRE)**

**THE INDIVIDUALIZED  
EDUCATION PROGRAM (IEP)**

## Purpose of Presentation:

Our mutual understanding that federal special education law has a rich history that gives all children access to education and elicits desired outcomes that can be expected from education:

Secretary Duncan stated recently that the path to get to this point includes:

- Increasing graduation rates;
- Decreasing dropout rates;
- Getting students ready for higher education

The IDEA is a well-written law. The natural tensions created by the often competing concepts of LRE and FAPE have their resolution at the child level, by the individuals who know the child best.

This resolution happens at the multi-disciplinary conference, and are written in the IEP. The law, then, is child-focused, with the selection of services and the location where they are provided, decided at the local level.

FAPE and LRE are appropriately defined at the federal level. The federal government wrote IDEA to standardize across the states the right of all students to public education.

# The Role of the Federal Government

- Naturally takes a backseat to state and local involvement. This is congruent with the following financial stakes:
- On average, the distribution of education funding is as follows:
- Federal contribution: 10%
- State contribution: 40%
- Local contribution: 50%
- For a 10% contribution, the federal government has purchased a seat at the table, but their role is limited.

# Why are FAPE and LRE competing concepts?

We are always viewing one concept relative to the other in order to comply with IDEA. Both principles must be duly considered at the child level.

## FREE APPROPRIATE PUBLIC EDUCATION (P.L. 108-446, Section 602(10))

“The term ‘free, appropriate public education’ means special education and related services that:

1. Have been provided at public expense, under public supervision, direction, and without charge;
2. Meet the standards of the state educational association;
3. Include an appropriate preschool, elementary school, or secondary school education in the state;
4. And, are provided in conformity with the individualized education program required under Section 614(3)

# The Court Weighs In

The **two fundamental requirements** of IDEA are FAPE and LRE.

Landmark case (*Daniel R.R. v. State Board of Education*): determined that students with disabilities have a right to be included in both academic and extracurricular programs of general education. But, the Court states, IDEA does not contemplate an **all or nothing education system** in which children with disabilities attend either regular or special education. **Rather the Act and its regulations require schools to offer a continuum of services. The appropriate mix will vary from child-to-child and, it may be hoped, from school year to school year, as the child develops.**

*Florence County v. Shannon Carter*, U.S. Court of Appeals: “Under the Act, mainstreaming is a policy to be pursued to so long as it is consistent with the Act’s **primary goal of providing disabled students with an appropriate education**. Where necessary for educational reasons, mainstreaming assumes a **subordinate role** in formulating an education program.

*Mark Hartmann v. Loudon County*, U.S. Court of Appeals: The Court found that **mainstreaming or inclusion is secondary to the need to provide a free appropriate education** from which the child receives educational benefit. This reflects a **Congressional judgment that receipt of such social benefits is ultimately a goal subordinate to the requirement that disabled children receive educational benefit**.

- “..the IDEA’s mainstreaming provision establishes a presumption, not an inflexible federal mandate. Under its terms, disabled children are to be educated with children who are not handicapped only ‘to the maximum extent appropriate.’ (20 U.S.C. Sec. 1412(5)(B)). Section 1412(5)(B) explicitly states that **mainstreaming is not appropriate** ‘when the nature and severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.’” 20 U.S.C. Sec. 1412(5)(B).
- Later court decisions added decision-making distinctions by indicating that a satisfactory IEP must provide “significant learning” and “meaningful benefit.” (*N.R. v. Kingwood Township*).

- Highlights:
- Not “all-or-nothing”
- Appropriate services will vary from child-to-child
- Primary goal is to provide an appropriate education
- Mainstreaming assumes a subordinate role
- Mainstreaming or inclusion is secondary to the need to provide FAPE
- Mainstreaming is a goal subordinate to the requirement that disabled children receive educational benefit
- Mainstreaming is not appropriate when the nature and severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily

- It is at the local level, with the individuals who are most familiar with the child that the philosophical tensions of FAPE and LRE are resolved. And that is as it should be.
- Those who would unduly influence, through policy and guidance, some resolution of these competing principles provide a disservice to the child and to all of those who are in the environment that can best meet the needs of the child. Any focus other than the basic tenets of **both** FAPE and LRE does harm, creating faulty implementation and unintended consequences. A pendulum swing in policy negates the dynamic and fluid responses provided at the local level.

U.S. Department of Health & Human Services  
U.S. Department of Education

POLICY STATEMENT ON INCLUSION OF CHILDREN WITH  
DISABILITIES IN EARLY CHILDHOOD PROGRAMS

# IDEA

- IDEA, Part C Infants and Toddlers requires appropriate early intervention services are made available to eligible infants/toddlers with disabilities in “natural environments”.
- IDEA, Part B eligible children ages 3-21 requires special education and related services be provided to the maximum extent appropriate, in the least restrictive environment (LRE), which includes a continuum of placement options and supplementary services.

# IDEA & LRE



- IDEA requires that the first placement option considered for an eligible child with a disability is the regular classroom the child would attend if he or she did not have a disability.



- For 3-5 Local Educational Agencies (LEA's) must ensure that a free appropriate public education (FAPE) is provided in the LRE regardless of whether they operate a general ed. program.



- FAPE is defined as an educational program individualized to a specific child, designed to meet that child's unique needs and results in educational benefit.
- The goal is to have children with disabilities move along the continuum and transition based on their needs, not the "place."

# OSEP/HSS Policy Statement

- Department's position is ALL young children should have access to high quality programs.
- “Meaningful inclusion” is beneficial to children with and without disabilities.
- Meaningful inclusion in “high quality programs” can support children with disabilities in reaching their potential.
- Documented research and efficacy studies supporting inclusion.

\*It should be clearly noted, the word “inclusion” does not exist in IDEA, rather the law requires FAPE in the LRE!



# OSEP/HSS Definition of INCLUSION

“Inclusion” in early childhood programs refers to including children with disabilities in early childhood programs, together with their peers without disabilities; holding high expectations and intentionally promoting participation in all learning and social activities, facilitated by individualized accommodations; and using evidence-based services and supports to foster their development, friendships with peers, and sense of belonging. This applies to all young children with disabilities from those with the mildest to those with the most significant.



# OSEP/HHS Guidance Document

Premise based on “inclusion” agenda:

- Children with disabilities face significant barriers to accessing “inclusive” settings
- “Too many” preschool children with disabilities are only offered the option of receiving special education in “separate settings”
- “Inclusive settings” are not necessarily as expensive as “separate settings
- “Inclusive settings” have better outcomes for children
- “Meaningful inclusion” can support children with disabilities in reaching their full potential

# Feds to States

- There is a “lag” in inclusive opportunities
- Review and modify resource allocations
- Develop policies to facilitate “high quality inclusion”
- Develop fiscal incentives to support inclusion
- Ensure State Certifications, Credentials and Workforce Preparation Programs have a strong focus on “inclusion”
- Affirm laws and research that form the foundation for inclusion

IDEA clearly states provision of FAPE in the LRE

# OSEP & HHS Guidance and Response\*

1) State leaders should prioritize, invest in and set the vision for “inclusion”, and establish expectations and resources.

\*State leaders should be ensuring that IDEA is implemented, the “Least Restrictive Continuum” is available for all children, and children are being placed according to their individual needs.



# OSEP & HHS Guidance and Response\*

2) State policies should ensure high-quality inclusion.

\*State policies should promote high quality programs and services for all children in all learning environments.

3) States should set goals and track data based on their vision statement on inclusion, including establishing a baseline identifying the number of inclusive high-quality early childhood slots available and benchmarks that track progress in reaching the State's goals.

\*States should track data ensuring children with disabilities are being served in accordance with their individual needs established by their IEP.

# OSEP & HSS Guidance and Response\*

4) States should review and modify resource allocations.

5) States should strengthen accountability and Build Incentive structures

The guidance document states: “States can incentivize high quality inclusive early learning models, through, for example publically recognizing programs that are implementing high-quality inclusive programs, using tiered reimbursement in their quality rating and improvement systems, providing differentials per child with a disability included in a general early childhood program, ...

# IDEA – LRE - FUNDING REQUIREMENTS

## **LRE Section 300.114 LRE Requirements.**

(a) General. (1) Except as provided in Section 300.324(d)(2) (regarding children with disabilities in adult prisons), the State must have in effect policies and procedures to ensure that public agencies in the State meet the LRE requirements of this section and Subsection 300.115 through 300.120.

(2) Each public agency must ensure that-

(i) To the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities, are educated with children who are nondisabled; and

(ii) Special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only if the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.

(b) Additional requirement-State Funding Mechanism-

# LRE - FUNDING MECHANISM

(b)Additional requirement –State funding mechanism-

(1)General. (1) A State funding mechanism must not result in placements that violate the requirements of LRE.

(ii)A State must not use a funding mechanism by which the State distributes funds on the basis of the type of setting in which a child is served that will result in the failure to provide a child with a disability FAPE according to the unique needs of the child, as described in the child's IEP.

(2)Assurance. If the State does not have policies and procedures to ensure compliance with paragraph (b)(1) of this section, the State must provide the Secretary an assurance that the State will revise the funding mechanism as soon as feasible to ensure that the mechanism does not result in placements that violate that paragraph.

# **Congress Strengthened State Funding Formula Provisions**

Congress is concerned that some States continue to use funding mechanisms that provide financial incentives for, and disincentives against, certain placements. It is the intent of changes to Section 612(a)(5)(B) to prevent State funding mechanisms from affecting appropriate placement decisions for students with disabilities. State funding mechanisms are in place to ensure funding is available to support the requirements of this provision, not to provide an incentive or disincentive for placement. The new provisions in this section were added to prohibit States from maintaining funding mechanisms that support placement decisions based on a place.

# OSEP & HHS Guidance and Response\* (cont.)

- States should ensure certifications, credentials and workforce preparation programs have a strong focus on inclusion, and that personnel policies facilitate inclusion. OSEP readily identifies this as a barrier wherein there is an identified “lack of expertise in the early childhood workforce”.

\*States should ensure certification, licensure requirements and workforce preparation prior to recommending all children for inclusion.

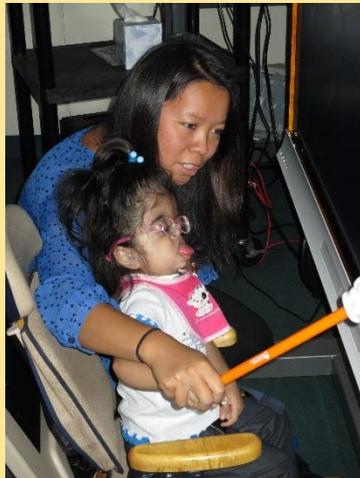


# OSEP & HHS Guidance and Response\*(cont.)



Local educational agencies should “prioritize inclusive placements using the IEP/IFSP process”.

\*Local educational agencies are charged with identifying children with disabilities, developing an Individual Education Plan, and ensuring that services are rendered in accordance with their individual needs in the Least Restrictive Environment.



## Quote from *Washington Post* Article

“I have a tough time learning the material in the larger classes...but if a special education student is flunking most of her final exams, doesn’t that suggest she needs a change?”

# PROGRAMS & SERVICES 3-5

Compensatory education is not a mandate.

## Public and Private Program Options:

Nursery School - Child Day Care

HEAD START -UNIVERSAL PRE-KINDERGARTEN

Integrated Classes - Special Classes



A child with an Autism Spectrum Disorder who has no verbal communication learning the sign for “more” from a teacher assistant.

# Supplementary Services

- Assistive Technology
- Audiology
- Counseling
- Health Services
- Medical Services (evaluation or diagnostic)
- Nursing Services
- Nutrition Services
- Occupational Therapy
- Physical Therapy
- Psychological Services
- Sign Language
- Social Work Services
- Special Education
- Speech Language Pathology Services
- Transportation to Access Services
- Vision Services



In a recent *Washington Post* Article on the Montgomery County Special Education Review – “the school system’s ratio of students to psychologists is **1 to 1,451**...harms students waiting to be evaluated to see whether they need special education services and those already in special education”

# New York State

- FAPE (Free Appropriate Public Education) special instruction, related services “integrated” classes and special classes provided in concert with the continuum of options (Least Restrictive Environment) has been implemented for the past 20 years.
- However, due to the new federal guidance on “inclusion” NYSED is now reviewing the number of children in “separate specialized” settings, current funding mechanisms and holding regional forums to implement the guidance.

# Private Specialized Programs

- Our mission - to provide quality programs and services to enable each child reach his/her potential.
- Our goal - to have children transition into their local educational agency/district.

Preschooler's with a disability are “publically” placed through their Individual Family Service Plan (IFSP) and provided a Free Appropriate Education (FAPE) in the Least Restrictive Environment (LRE) – most appropriate environment – as is required by IDEA.

Programs and supplementary services are based on the child's individual needs - not the place/setting where child is served.

# Continuum of Options

At Alternatives for Children, programs and services are based on their IEP/IFSP and children move along the continuum as needed. We offer:

- Child day care for children 6 weeks to 5 years - licensed by Office of Children and Family Services
- Nursery School - part-time
- Early Head Start & Head Start – children 6 weeks to 5 years meeting income eligibility
- Universal Pre Kindergarten - part-time or full-time
- Special Class in “Integrated Setting” - 50% disabled / 50% nondisabled classes
- Special Classes - smaller classes / higher student / staff ratio



15:1:2 Integrated Class

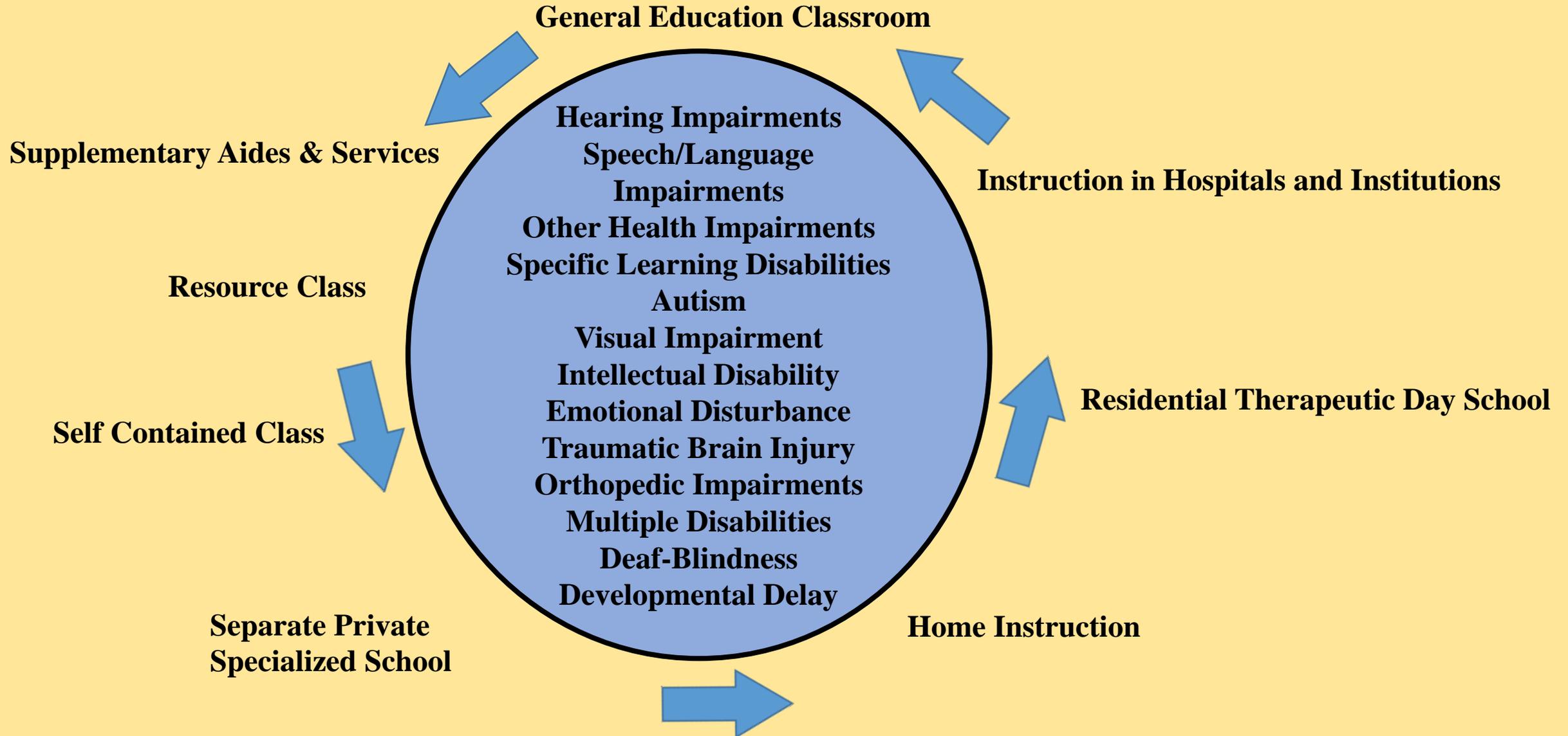
6:1:1 Self Contained Class



# Private Specialized Programs & IDEA...

- How we are funded
- Privately operated, publicly regulated
- Compliance with state and Federal Law
- Procedural safeguards
- Effectiveness and outcomes
- Cost benefit analysis
- Staff specially trained to work with population served
- Can expand and contract to meet community needs
- Serve the entire range of severe disabilities
- Emphasis on public private partnerships

# Continuum of Placement Options



# The Continuum of Placement Options

- Each point on the continuum supports and enhances the other and each is critical in addressing the full array of disabilities/needs that exist
- NAPSEC schools are devoted to timely movement on the continuum
- NAPSEC schools are innovators in progressive options that address individual education/therapeutic needs

# NAPSEC

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