

## Interactions Among Program, Placement, and Services in Educational Planning for Students With Disabilities

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### Abstract

Although IDEA and its corresponding federal regulations provide an underlying philosophy and procedures to help design education for students with disabilities, the law remains open to widely varying interpretations. One aspect of IDEA, namely, the relationship among the program, placement, and services for a student with disabilities when planning an appropriate education is discussed here. An analysis of how these three interrelated components can be applied in different sequences highlights drawbacks to some sequence variations. A conceptualization of how program, placement, and services can be approached in an interactive manner, rather than a strict linear one, is offered within a framework that is consistent with IDEA, its corresponding regulations, and educational logic.

The likelihood of planning, providing, and sustaining an appropriate education for a student with a disability is increased when the various pieces of the planning puzzle fit together in ways that are based on sound educational logic. The Individuals With Disabilities Education Act (IDEA) Amendments (1997) and its corresponding regulations (Code of Regulations, 1999) provide a substantial set of procedures, based on an underlying philosophy—to help design educational programs and supports for students with disabilities. Yet, even after 25 years of use, extensive study, and reauthorization, it is still common to find scholars, practitioners, and families interpreting various aspects of the law in different ways. This is evidenced by the steady stream of administrative complaints, mediation, due process hearings, and litigation regarding special education issues where opposing lawyers and dueling “experts” argue over their interpretations of the law. The principles that form the basis of IDEA can be relied upon to assist in making sense of these varying interpretations. These include principles such as (a) zero reject, (b) nondiscriminatory evaluation, (c) appropriate education, (d) least restrictive environment, (e) procedural due process, and (f) parental and student participation (A. Turnbull, Turnbull, Shank, & Leal, 1999).

My primary purpose in this article is to discuss the relationship among a student’s educational program, placement, and services. The relationship among these aspects of educational planning is as important as it can be confusing. My argument is that certain sequence variations are inconsistent with both IDEA and educational logic. Further, I will show that approaching Individual Educational Planning (IEP) in a strict, linear manner poses threats to developing appropriate educational plans for students with disabilities. As an alternative, an interactive conceptualization of program, placement, and services is presented in this article. Nothing in the plain language of IDEA or its regulations precludes such an interactive approach to planning. Quite the contrary, the interactive conceptualization and sequence will be described in ways that show it is highly consistent with IDEA, its corresponding regulations, and sound educational logic. This approach is based on the logic that, in order for services to be educationally relevant, they must be contextually grounded. The following sections describe how the terms, program, placement, and services are used in this article. These descriptions rely on a combination of IDEA requirements and educational logic that extends beyond but is consistent with IDEA (H. Turnbull & Turnbull,

2000). Appendix A provides a listing of some of the legal foundation from IDEA pertaining to this discussion.

## Program

First, within this context, the term *program* is used to refer to the content, or the *what*, of a student's education rather than where it is provided or by whom. Program broadly consists of two major components, learning outcomes and supports. *Learning outcomes* refer to a clear statement of what a student will be expected to learn during the school year.

All learning outcomes are based on individual student needs identified through nondiscriminatory evaluation designed to "gather relevant functional and developmental information" (IDEA, 1997, § 1414 (b)(2)(A)). The evaluation data are used to ascertain a student's present levels of performance, needs, interests, strengths, and learning characteristics in relevant domains. This information is designed to assist teams in selecting appropriate learning outcomes that are reasonably attainable within a year and reflect an appropriate level of difficulty while seeking to establish high standards that provide sufficient challenge for the student.

In part, learning outcomes include the student's annual goals and corresponding short-term objectives or benchmarks. The goals and objectives are meant to reflect individually determined learning priorities based on a student's unique needs arising from a disability and assist in providing access to the general education curriculum (Bateman & Linden, 1998; Hehir, 1997). The IEP team (e.g., parent, student, special educator, general education teacher, local education agency representative) determines the goals and objectives and documents them in an IEP.

Students with disabilities pursue many other learning outcomes in school that are not, and need not, be documented as detailed IEP goals and objectives (Bateman & Linden, 1998, pp. 12, 45). Yet, from an educational perspective, it is important for team members to know the scope of these other learning outcomes (Giangreco & Doyle, 2000). Therefore, the term *program*, as used here, also includes this broader set of additional learning outcomes, extending beyond IEP annual goals, that are targets for instruction during the school year. Typically, these additional learning outcomes come

from the general education curriculum at various levels and may come from other, more specialized sources that extend the scope of the general education curriculum, such as functional life skills that typically are not included in general education curricula.

Additional learning outcomes as described here are not a requirement of an IEP; therefore, teams have flexibility in how they choose to document them. Explicitly identifying additional learning outcomes can help clarify the breadth and scope of a student's overall educational program, assist in determining a classroom teacher's curricular and instructional responsibilities, help identify areas in need of supports and services, and provide parents with a more complete understanding of their child's educational program.

The second major program component is supports. Unlike learning outcomes through which an observable change in student behavior can be seen, *supports* refer to what will be done to or for a student so that he or she may have access to education, participate in school, and pursue identified learning outcomes. This consists of some of the supplementary aids and services referred to in IDEA (1997) that are generally necessary for a student, regardless of location.

On IEP documents, the terms or phrases used to describe supports vary from state to state (e.g., accommodations, modifications, supports, management needs). Giangreco, Cloninger, and Iverson (1998) have suggested six categories of general supports that may be done to or for a student:

1. *Personal Needs* (e.g., needs to be fed, needs to be catheterized)
2. *Physical Needs* (e.g., needs to be repositioned at least hourly, needs to have leg braces adjusted and checked)
3. *Teaching Others About the Student* (e.g., teach staff and classmates about the student's augmentative communication system and other communicative behaviors, teach staff seizure-management procedures and behavioral or health crisis procedures)
4. *Sensory Needs* (e.g., needs to have teachers use FM unit/auditory trainer, needs to have tactile materials, needs large print materials)
5. *Providing Access and Opportunities* (e.g., environmental modifications, provide access to co-curricular activities, provide access to materials in the student's native language, instructional accommodations to general education activities and materials prepared in advance to facilitate multilevel instruction and curriculum overlapping)
6. *Other General Supports* (e.g., those not clearly addressed in any other category, needs class notes recorded, needs extended time limits to complete task, ensuring collaborative teamwork among general and special educators)

There is wide spread agreement in the professional literature that identifying the components of a student's educational program (i.e., learning outcomes and supports) logically precedes making decisions about services or placement (Bateman & Linden, 1998; Giangreco et al., 1998; H. Turnbull & Turnbull, 2000; Yell, 1998a, 1998b).

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## Placement

In this context, *placement* includes two primary components: the option along the IDEA continuum of placements and the actual location of that option. The *placement option along the IDEA continuum* refers to the type of setting where a student will be educated (e.g., general education class with supports, resource room, special class, special school). Bateman and Linden (1998) stated that "Placement lies at the center of an ideological storm in special education" (p. 13). At one end of the ideological spectrum are proponents of inclusive schooling, who favor a continuum of supports within general education environments. Taylor (1988) argued persuasively that the continuum of placements has inherent limitations and potential pitfalls. At the other end of the spectrum are those who favor the existing continuum of placements described in IDEA. Brantlinger (1997) referred to this latter group as "traditionalists" (p. 430).

The interactive planning conceptualization and sequence proposed in this article renders some the divisiveness of this ideological debate moot by closely adhering to IDEA's least restrictive environment provisions and preferences for regular class placement of students who have disabilities given appropriate supports. The anticipated result of such an approach would be to put increased emphasis on encouraging IEP teams to figure out what types of supports and conditions are needed for students with disabilities to be successfully educated in general education classrooms in the schools they would attend if they did not have disabilities.

The second placement consideration is the *identification of the actual location* (e.g., building, classrooms) where the student will be educated. Adding location to the meaning of placement extends the legalistic definition of placement within IDEA and provides vital information for sound educational planning. Decisions about location, though important, are not a required part of the IDEA process, nor are they necessarily subject to the IDEA's procedural safeguards. When IEP teams

consider a change in placement, typically they are referring exclusively to the placement option along the IDEA continuum (e.g., special class, regular class). Bateman and Linden (1998) stated that change in placement "does not mean a change in locale or building or even level of building. For example, moving a special class across town or going from elementary to middle school is not necessarily a change in placement" (p. 37). Although the IDEA definition of placement does not specifically address location, nothing in the law precludes considering location, which is vital from a logical educational perspective.

Location has an impact on parent involvement, participation in extra-curricular activities, and the establishment of relationships with peers who do not have disabilities. Each of these location-oriented contextual issues is addressed in IDEA and has an increased likelihood of occurrence if the student is educated in the school he or she would attend if not disabled. Further, knowing the actual location of the building and classrooms where a student with a disability will be educated allows those planning appropriate services for students with disabilities to consider a variety of location-specific characteristics of the placement that may have an impact on the need for services.

The physical characteristics of a school building (e.g., barrier-free status, climate control for a student who cannot regulate body temperature), the configuration and characteristics of classmates (e.g., class size, the number of other students with disabilities, classroom space), and staffing characteristics (e.g., number of general education staff to serve the classroom, availability of school health services, training and experience of staff members) all have potential impact on the type, extent, and nature of services that a student needs to have access to, and participate in, an individually appropriate education. For example, if a student with a severe orthopedic disability is placed in a barrier-free building, he or she is likely to require less support from a physical therapist to identify ways to overcome physical barriers than would be necessary in an older, less accessible building. A classroom assistant who has a full year of successful experience feeding a child with severe oral-motor difficulties is likely to need less training and monitoring from an occupational therapist than would an assistant who is new to the student and has no previous experience. A student who is blind and has been successfully negotiating his or her middle school for the last 3

years without specialized supports may need services from an orientation and mobility specialist during his or her first semester in high school because the environment is different, larger, more complex, and requires more transitions throughout the school day. These examples demonstrate that knowing about the characteristics of the location where the student will be educated provides fundamental contextual information that can have a substantial impact on determining what services are necessary to enable a student with disabilities to receive an appropriate education.

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## Services

*Services* refer to primarily related services that “are required to assist a child with a disability to benefit from special education” (Code of Federal Regulations, 1999, § 300.24). Related services providers include speech–language pathologists, audiologists, occupational therapists, physical therapists, orientation and mobility specialists, school psychologists, social workers, and rehabilitation counselors, among others. These services extend beyond those associated with a particular placement option. For example, if a student with a disability is being placed in the regular education kindergarten she would attend if she did not have disabilities, the IEP team could already know that the kindergarten was staffed by a teacher who has both general and special education certification, a full-time paraprofessional, and a special educator whose work is shared across the six K-2 classes in the building. Knowing this placement-specific staffing information is critical to making relevant related-services decisions.

In addition, related services can refer to non-specialized personnel (e.g., paraprofessionals who must work under the direction and supervision of a qualified professional) whose responsibilities extend beyond those covered by the existing personnel associated with particular placements. For example, some school districts routinely assign paraprofessionals to primary grade classes to assist classroom teachers. Some states, through their regulations, assign a minimum number of special education paraprofessionals to work under the direction of a special educator based on the continuum placement option. For example, in one state, an option along the continuum is for a special educator to serve a maximum of 12 students with disabilities and have a minimum of one paraprofessional for every 3 stu-

dents. Knowing this type of information has an impact on whether additional paraprofessional services, beyond those associated with the placement, may be needed.

Services potentially provided to students may or may not be required to ensure that a student with a disability receives an appropriate education. Some students identified as requiring special education can pursue their education and receive educational benefit through a combination of services provided by general and special educators, without the need for additional specialized or nonspecialized related services. For others, the provision of related services is essential to their pursuit of an appropriate education; without such services they would not be able to have access to education or receive sufficient educational benefit. The IDEA requires that these service decisions be individually determined. Such decisions will be influenced by the student’s identified program (i.e., learning outcomes, supports) and placement (i.e., option along the continuum, location).

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## Sequence Variations

Information from IDEA provides substantial guidance for educational planning but leaves a tremendous amount of room for interpretation. Used in conjunction with the underlying principles upon which IDEA is based and sound educational logic, the language of the law provides valued flexibility to tailor educational planning and service provision in unique and effective ways to address the myriad of variations that exist in the field. There is little doubt that the law, like many laws pertaining to education and social policy, was purposely written with sufficient latitude to allow for the best aspects of this flexibility to be put to use on behalf of students with disabilities. The law becomes a potential obstacle when its latitude is not filled with the best the field has to offer and it slides into a sea of bureaucracy and red tape or is viewed in a disconnected manner. That is why it is advisable to view IDEA in its totality and holistically, rather than in a segmented or myopic fashion.

There are six planning sequence variations that can be used with program, placement, and services. Four of the six variations, those beginning the sequence with either placement or services, clearly are problematic based on both IDEA and sound educational practice. The fifth variation, though commonly used in the field, embodies less blatant, but

nonetheless significant threats to the development and provision of an appropriate education for students with disabilities when applied in a strict linear fashion.

Existing data suggest that the sequence in which professionals consider a student's program, placement, and services may interfere with developing an appropriately individualized program in the least restrictive environment. For example, evidence suggests that many professionals make decisions about the type and frequency of related services in isolation and that these decisions frequently are made prior to knowing the educational program components (e.g., annual goals, extent of participation in the general education curriculum, supports), thus making the educational relevance and necessity of such services unknown (Giangreco, Edelman, & Dennis, 1991). In some instances, professionals have reported recommending the placement of students in a special education school so they could gain access to related services, also prior to knowing the educational program components. Both of these scenarios violate IDEA procedures and reflect questionable logic because they are potentially based on presumed disability characteristics rather than individually determined educational needs.

The following are ineffective planning sequences:

1. Placement–Program–Services
2. Placement–Services–Program

*Problems With Sequences 1 and 2:* Such scenarios clearly violate IDEA. In any scenario where placement precedes program and services (in either order), consideration is not given to the individual learning needs of students because they are not known prior to the placement decision. When placement decisions are made first, too often they have been based on categorical labels assigned to students, which automatically lead to unnecessarily restrictive educational settings without due consideration of less restrictive options (e.g., all students with multiple disabilities go to the special education school or regional special education classroom). A team cannot determine the least restrictive environment in which to pursue a student's education if they do not first know the components of the student's individualized educational program and extent of participation in the general education curriculum.

3. Services–Placement–Program
4. Services–Program–Placement

*Problems With Sequences 3 and 4:* In any scenario where the determination for services (e.g., related services) precedes program and placement (in either order), it is impossible to ensure that the services are educationally relevant and necessary. If services are determined first, they cannot be referenced to participation in the educational program or access to the identified educational placement. This renders such services parallel rather than educationally related services. Furthermore, when services are determined first, there is a danger that students with disabilities will be placed in unduly restrictive educational placements so that they can gain access to a congregated set of professionals (e.g., therapists). Such an approach may put the needs and convenience of professionals above the needs of students and families to access their local schools, thus ignoring the fact that nearly all services are portable. Students do not go to school to receive specialized services; rather, they are provided with individually determined specialized services so that they can attend and participate in schooling.

The fifth planning sequence variation, program–services–placement is also problematic for many of the same reasons presented for Sequences 1 through 4, though it may have a surface appearance of validity. The Code of Federal Regulations (1999) stated that "The child's placement is based on the IEP" (§ 300.552). In part, the IEP includes program and service components as defined in this article (e.g., annual goals, related services). Therefore, it is quite understandable that IDEA commonly has been interpreted in a manner that suggests the appropriate sequence of activities is somewhat linear, starting with the student's program first (e.g., annual goals), services second (e.g., related services), and placement last (Bateman & Linden, 1998, p. 33). Yell (1998b) supported this interpretation by stating, "In determining a student's special education, therefore, questions of what educational services are required must precede questions of where they should be provided" (p. 73).

Yet IDEA does not explicitly require a strict linear sequence. The language of IDEA regarding placement (e.g., "Each child's IEP forms the basis for the placement decision") is not necessarily the equivalent of a strict linear sequence, of program and services followed by placement. Bateman and

Linden (1998) stated: “In many instances the lines between the IEP process . . . and the placement decision are substantially blurred with no detrimental effects” (p. 33). The interactive conceptualization presented in this article suggests that IEP services be contextually grounded. It provides a way for teams to think about interactive aspects of IEP planning and actively plan IEP services within the existing legal parameters of IDEA to develop appropriate education for students with disabilities. Interactive educational planning could be conducted as follows:

1. Determine the Student’s Educational Program
  - a. Learning Outcomes: What a student will learn (e.g., annual goals; short-term objectives; additional learning outcomes, such as those from the general education curriculum)
  - b. Supports: What will be done to or for the student (e.g., personal needs, physical needs, sensory needs; see categories of general supports, pp. 342–343)
2. Initial Proposed Placement Considerations
  - a. Placement is reviewed at least annually
  - b. Placement is congruent with the student’s educational program
  - c. Placement follows least restrictive environment requirements (e.g., regular class with necessary supports is the first option considered; close to home)
  - d. Placement considers the type of placement (e.g., regular class)
  - e. Placement considers characteristics of the specific location (e.g., building characteristics; student and staff characteristics)
  - f. Determine the nature and extent of the general and special education services associated with the placement
3. Determine Services Needed to Support the Initial Proposed Placement
  - a. Determine whether there is a need for non-specialized support services (e.g., additional paraprofessional support services)
  - b. Determine whether there is a need for any specialized related services (e.g., speech–language pathology; physical therapy; occupational therapy; school psychological services).
4. Consider the Interactions between the Placement and Services
  - a. Consider how the placement and services may interact with each other
  - b. If necessary, recycle through Steps 2 and 3 if

the team decides it is appropriate to consider other placement options and corresponding services

5. Finalize Placement and Services
  - a. Compare the advantages and disadvantages of placement/service options if more than one has been considered by the team.
  - b. Finalize a team decision about placement and services that meets the student’s need to receive a free appropriate education

The IDEA provides numerous implicit suggestions that the IEP team should be knowledgeable about both a student’s educational program and the characteristics of his or her placement in order to make reasonable decisions about what services are needed for the student to receive an appropriate education. A default starting point is even suggested in the IDEA by directing IEP teams to consider regular class placement in the school the child would attend if he or she did not have disabilities, with appropriate aids and services to facilitate such placement, as the first placement option considered for each student with a disability. By having the IEP team consider program, placement, and services as interrelated components, they can gain synergistic value when they are appropriately connected to each other in an integrated fashion.

Even though putting program first is logical and desirable, planning services prior to placement, in a strict linear manner, ignores that fact that characteristics of the placement are likely to have a substantial impact on the nature and extent of the services needed for a student with a disability to receive an appropriate education. The IDEA implies that it is essential to know the characteristics of the proposed educational placement prior to identifying specialized services because those services are predicated on knowing the characteristics of the program and placement, including the people in that placement (personal communications H. Rutherford Turnbull, III, February 10 and March 30, 1999). For example, IDEA requires the IEP team to consider, “program modifications or supports for school personnel that will be provided for the child” (Code, 1999, § 300.346). How will the team be able to determine what supports school personnel will need if they do not know who the personnel are? In requiring the involvement of the regular education teacher “if the child is, or may be, participating in the regular education environment”

(IDEA, 1997, § 1414 (d)(3)(C)), the Code of Federal Regulations (1999) states:

The regular education teacher of the child, as a member of the IEP Team, shall, to the extent appropriate, participate in the development of the IEP of the child, including the determination of appropriate positive behavioral interventions and strategies and the determination of supplementary aids and services, program modifications, and support for school personnel (§ 300.346).

This statement again points out the interactive nature of program, placement, and services while highlighting that one must know the characteristics of the placement, including the people in the placement, to determine appropriately individualized, contextually referenced services.

Similarly, the IDEA states that related services are to be provided “as may be required to assist a child with a disability to benefit from special education” (§ 602[22]). Although the need for related services clearly is dependent upon the components of a student’s educational program, they also can be highly dependent on the nature of the placement, including the characteristics of the personnel. For example, knowing that a school has a full-time registered nurse or a guidance counselor trained in positive behavior supports, or classroom teachers with experience working with students who have disabilities, may influence whether there is a need to assign additional support service personnel. Knowing about things such as the physical characteristics of the school building and classroom, class size, general education staffing ratio, number of other students with special needs, and the experience and skills of school staff can have a significant influence on the need for support services.

The IDEA (1997) also states “in the case of a child whose behavior impedes his or her learning or that of others, consider, when appropriate, strategies, including positive behavioral interventions, strategies, and supports to address that behavior” (§ 1414 (d)(1)(B)(i)). The literature regarding positive behavior supports consistently supports ecological assessment and intervention (Carr, Horner, & Turnbull, 1999; Horner & Carr, 1997; Koegel, Koegel, & Dunlap, 1996). In other words, any reputable positive behavior intervention, strategy, or support requires that teams have knowledge of, and consider, a variety of contextual/ecological characteristics and factors. Therefore, to meet this provision of IDEA and sound educational practices, one must know the proposed placement characteristics before relevant service recommendations can be made.

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### **A Preferred Sequence: Program, Interactive Initial Placement and Services, Final Placement, and Services**

As described in the previous sections, both IDEA and sound educational practice point to the sequence of (a) program, (b) interactive initial proposed placement and services, and (c) final placement and services as a logical planning sequence to design appropriate education for students with disabilities (see p. 342). Although IDEA states that placement, in part, be based on the IEP, it is not specifically stated that placement must occur after all services decisions have been made. The latitude in the law’s language leaves open the possibility that placement decisions, which take into account the IEP, can occur within the IEP planning process in an interactive fashion in an effort to best meet student needs and then be finalized. This approach is consistent with least to most restrictive concept of the least restrictive environment principle.

The proposed planning sequence moves from generic to specialized, as supported by the requirements of the regulations to consider the supplemental aids and services required to facilitate placement in the regular classroom in the school students would attend if they did not have disabilities, prior to considering more restrictive options. This again suggests that one must at least first consider the characteristics of possible placement in regular class with supports prior to determining services.

Even though this sequence seems more logical, making sense of it is not quite as neat and linear as it appears on paper. Rather, there is an interactive relationship between program, placement, and services, with each component having an impact on the others. Teams are encouraged to consider these interactions when planning the IEP. By doing so, they stand the best chance of ensuring that the education of students with disabilities will be both appropriate and effective.

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### **Implications for Practice**

When teams are required to make complex decisions that involve consideration of numerous variables, as in the case of IEP planning, it is vital for members to have a shared understanding regarding the principles and corresponding procedures that will guide their work. When team members do not have a shared understanding, the likelihood of conflict increases as does the potential that the plan-

ning for the student's educational program will be disjointed and ultimately ineffective. Either of these scenarios detracts from our collective mission to provide appropriate and quality education for students with disabilities. Although in this article I have offered a way to think about the interactions among program, placement, and services, IEP teams also must consider the practical implications of the proposed conceptualization. First, this approach has implications for the design and use of IEP forms. Schools may improve their planning by ensuring that their IEP forms and corresponding directions for completion are compatible with both the federal requirements of the IEP and a process that makes sense to the IEP team. It is recommended that the order in which items are on an IEP form match an educationally logical planning sequence.

Second, this approach has implications for the manner in which related services providers contribute their input to the IEP planning process in terms of both assessment and recommendations for service provision. In many situations, related services evaluations are conducted in a parallel fashion, with recommendations based on discipline-specific assessments rather than referenced to the educational program and placement. Therefore, for related services recommendations to be educationally relevant and necessary, service providers must become aware of educational program and placement characteristics as well as the potential involvement of other service providers in an effort to make appropriately coordinated decisions (Giangreco, 1996).

Third, the plans made during the IEP planning process have implications for service provision, interaction among team members, and other implementation aspects of the educational program. Although IEPs sometimes get filed away, resulting in their potential left unrealized, by using this approach, teams have the opportunity to ensure that planning is highly relevant and that it is applied in ways that help students learn.

Finally, the planning sequence proposed in this article can increase the likelihood that students with disabilities will have opportunities to be educated with peers who do not have disabilities (as intended by IDEA) and will have the necessary supportive services to access and participate in their individually determined educational program. This can have a significant impact on families, students, and school staff as they build a shared understanding of student needs, shared expectations, and responsibilities.

## References

- Bateman, B., & Linden, M. A. (1998). *Better IEPs: How to develop legally correct and educationally useful programs* (3rd ed.). Longmont, CO: Sopris West.
- Brantlinger, E. (1997). Using ideology: Cases of nonrecognition of the politics of research and practice in special education. *Review of Educational Research, 67*, 425-459.
- Carr, E. G., Horner, R. H., & Turnbull, A. P. (1999). *Positive behavior support for people with developmental disabilities: A research synthesis*. Washington, DC: American Association on Mental Retardation.
- Code of Federal Regulations. (1999). 34 CFR §§ 300.1-300.754.
- Giangreco, M. F. (1996). *Vermont interdependent services team approach: A guide to coordinating educational support services*. Baltimore: Brookes.
- Giangreco, M. F., Cloninger, C. J., & Iverson, V. S. (1998). *Choosing outcomes and accommodations for children: A guide to educational planning for students with disabilities* (2nd ed.). Baltimore: Brookes.
- Giangreco, M. F., & Doyle, M. B. (2000). Curricular and instructional considerations for teaching students with disabilities in general education classrooms. In S. Wade (Ed.), *Inclusive education: A casebook of readings for prospective and practicing teachers* (pp. 51-69). Hillsdale, NJ: Erlbaum.
- Giangreco, M. F., Edelman, S., & Dennis, R. (1991). Common professional practices that interfere with the integrated delivery of related services. *Remedial and Special Education, 12*(2), 16-24.
- Hehir, T. (1997, November 13). *Keynote address*. Presented at the International Dyslexia Association Annual Conference, Minneapolis.
- Horner, R., & Carr, E. G. (1997). Behavioral support for students with severe disabilities: Functional assessment and comprehensive intervention. *Journal of Special Education, 31*, 84-104.
- Individuals With Disabilities Education Act 20 USC § 1414 (b)(2)(A). (1997)
- Individuals With Disabilities Education Act Amendments of 1997, Pub. L. No. 105-17, §§ 1400 et seq., 111 Stat. 37 (1997).
- Koegel, L. K., Koegel, R. L., & Dunlap, G. (1996). *Positive behavioral support: Including people with difficult behaviors in the community*. Baltimore: Brookes.
- Taylor, S. J. (1988). Caught in the continuum: A

critical analysis of the principle of least restrictive environment. *Journal of the Association for Persons with Severe Handicaps*, 13, 41–53.

Turnbull, A. P., Turnbull, H. R., Shank, M., & Leal, D. (1999). *Exceptional lives: Special education in today's schools* (2nd ed.). Upper Saddle River, NJ: Prentice-Hall.

Turnbull, H. R., & Turnbull, A. P. (2000). *Free appropriate education: The law and children with disabilities* (6th ed.). Denver: Love.

Yell, M. (1998a). *The law and special education*. Upper Saddle River, NJ: Merrill and imprint of Prentice Hall.

Yell, M. (1998b). The legal basis of inclusion. *Educational Leadership*, 56(2), 70–73.

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## Appendix A

### IDEA Information About Placement Code of Federal Regulations 34, Sec. 300.552

Placements in determining the educational placement of a child with a disability, including a preschool child with a disability, each public agency shall ensure that—

- (a) The placement decision—
  - (1) 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 least restrictive environment provisions of this subpart, including Secs. 300.550–300.554
- (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 least restrictive environment, 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 curriculum. (Authority: 20 U.S.C. 1412(a)(5))

### Notice of Interpretation Extent to Which Child Will Participate With Nondisabled Children

Section 300.347(a)(4) requires that each child's IEP include "An explanation of the extent, if any, to which the child will not participate with nondisabled children in the regular class and in [extracurricular and other nonacademic] activities." This is consistent with the least restrictive environment provisions at Secs. 300.550–300.553, which include requirements that

1. each child with a disability be educated with nondisabled children to the maximum extent appropriate (Sec. 300.550(b)(1));
2. each child with a disability be removed from the regular educational environment only when the nature or severity of the child's disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily (Sec. 300.550(b)(1)); and
3. to the maximum extent appropriate to the child's needs, each child with a disability participates with nondisabled children in nonacademic and extracurricular services and activities (Sec. 300.553).

All services and educational placements under Part B must be individually determined in light of each child's unique abilities and needs, to reasonably promote the child's educational success. Placing children with disabilities in this manner should enable each disabled child to meet high expectations in the future.

Although Part B requires that a child with a disability not be removed from the regular educational environment if the child's education can be achieved satisfactorily in regular classes with the use of supplementary aids and services, Part B's least restrictive environment principle is intended to ensure that a child with a disability is served in a setting where the child can be educated successfully. Even though IDEA does not mandate regular class placement for every disabled student, IDEA presumes that the first placement option considered for each disabled student by the student's placement team, which must include the parent, is the school the child would attend if not disabled, with appropriate supplementary aids and services to facilitate such placement. Thus, before a disabled child can be placed outside of the regular educational environment, the full range of supplementary aids and services that if provided would facilitate the student's placement in the regular classroom setting must be considered. Following that consideration, if a determination is made that a particular disabled student cannot be educated satisfactorily in the regular educational environment, even with the provision of appropriate supplementary aids and services, that student then could be placed in a setting other than the regular classroom. Later, if it becomes apparent that the child's IEP can be carried out in a less restrictive setting, with the provision of appropriate supplementary aids and services, if needed, Part B would require that the child's placement be changed from the more restrictive setting to a less restrictive setting. In all cases, placement decisions must be individually determined on the basis of each child's abilities and needs, and not solely on factors such as category of disability, significance of disability, availability of special education and related services, configuration of the service delivery system, availability of space, or administrative convenience. Rather, each student's IEP forms the basis for the placement decision.

Further, a student need not fail in the regular classroom before another placement can be considered. Conversely, IDEA does not require that a student demonstrate achievement of a specific performance level as a prerequisite for placement into a regular classroom. [[Page 12472]]