
Make the Mark.

Atlanta Public Schools | June 7, 2024

Special Education Services Internal Audit – Report #FY24-05



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June 7, 2024

Connie Brown, CPA, CIA, CRMA
Executive Director, Internal Compliance
Atlanta Public Schools
130 Trinity Avenue
Atlanta, GA 30303-3624

Dear Connie:

Plante Moran has completed consulting services for Atlanta Public Schools ("APS") consisting of an internal audit over Special Education Services, as summarized in our professional services agreement dated June 27, 2022, and statement of work dated February 1, 2024.

We were not engaged to, and did not perform an audit, the objective of which would be the expression of an opinion on APS's internal control environment. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is solely for the information and use of the management and the Atlanta Public Schools Board of Education and is not intended for use by anyone other than these specified parties.

We would like to recognize and thank the management and staff of APS for their cooperation and courtesy extended to us throughout this process.

Sincerely,

A handwritten signature in black ink that reads "Troy A. Snyder".

Troy A. Snyder, CICA
Engagement Partner

Executive Summary



Project Overview & Background

The Atlanta Public Schools (“APS”) Audit Committee approved an internal audit over Special Education Services (“SES”) at the request of the District Superintendent. The Office of Internal Compliance (“OIC”) engaged Plante Moran to perform the internal audit. The internal audit encompassed special education services provided by the Office of Special Education, the Multi-Tiered System of Supports (“MTSS”) department, the Psychological Services department, and included all APS District schools with special education programs.

APS policy indicates that a Student Support Team (“SST”) is available at every school and utilizes the MTSS process as a systematic problem-solving approach to address learning and/or behavior difficulties faced by students. The MTSS process includes three tiers and each tier of instruction includes interventions at differing intensities of frequency, durations, and group size.

1. Tier I is the primary level of prevention which focuses on instruction at the district’s core curriculum and instructional practices.
2. Tier II is the secondary level of prevention which focuses on students identified through screenings as underperforming or at risk for poor learning/behavior outcomes or those who need acceleration/enrichment.
3. Tier III is the tertiary level of prevention of students who have not responded to primary or secondary levels of prevention.

The MTSS process is evidence-based intensive instruction and is continuously adjusted and individualized to address the needs of each student. Plante Moran’s primary focus during the internal audit was of the tertiary level of prevention in addition to Special Education Services, as the identification and referral for an evaluation typically begins at the tertiary level.

In summary, there were a total of 1,916* traditional students identified and referred for an evaluation and a total of 6,323* traditional students with an IEP during the 2022-2023 and 2023-2024 school years. There were a total of 767* students enrolled in the Atlanta Virtual Academy (“AVA”) program that had an IEP during the 2022-2023 and 2023-2024 school years. Additionally, there were a total of 237* children communicated as eligible for transition into APS District by the Babies Can’t Wait (“BCW”) program during the 2022-2023 and 2023-2024 school years.

*Metrics above were sourced from GO-IEP, Cognito, and manual reports. Reports include the following: Referrals Log FY22, Referrals Log FY23, GO-IEP IEP Students Listing, DR-2006 List and Count of AVA SPED Students, LEA Notification Population Listing.

Objective & Scope

Plante Moran evaluated the administration of Special Education Services, with a focus on the following areas during the 2022-2023 and 2023-2024 school years:

1. Identification of students who may require Special Education Services
2. Referral and Evaluation of students to determine qualification for Special Education Services
3. Individualized Education Program (“IEP”) Development
4. SES training for Special Education Lead Teachers and MTSS personnel

Specifically, we assessed District policies, procedures, and practices in alignment with APS Board policy and the Georgia Department of Education regulations through sample-based testing and inquiry. Plante Moran facilitated a focus group discussion with a select group of parents to discuss strengths of the special education program as well gain insights into potential areas of improvement. Plante Moran also held several interviews with Special Education Lead Teachers (“SELT”), Special Education coordinators (i.e. cluster leads), MTSS coordinators, school psychologists, general education teachers, and other personnel as needed throughout the internal audit. The objective of these interviews was to discuss their specific roles/responsibilities and SES procedures at each respective school/cluster and to validate our testing results. Further details regarding the audit objectives tested may be found on pages 7-9 of this report.

Please note Plante Moran was not engaged to perform an assessment of the execution of special education services and the quality of education provided to special education students.

Methodology

To evaluate the adequacy of the policies, procedures, and practices in place, Plante Moran performed the following:

1. Assess whether existing policies and procedures related to the identification, referral, evaluation, and placement of students in the Special Education Services (SES) align with related regulatory requirements of the Georgia Department of Education.
2. Evaluate teacher and administrative training related to the identification, referral, evaluation, and placement of students into Special Education Services (SES).
3. Evaluate the procedures for identification of a need for Special Education Services (SES) to confirm that procedures align with District policy.

4. Evaluate whether referral procedures align with District policy and Georgia Department of Education regulations by reviewing a sample of students referred to the special education department for services during the scoping period.
5. Evaluate whether evaluation processes were conducted in accordance with District policy and Georgia Department of Education regulations by reviewing a sample of students referred to the special education department for services during the scoping period, including both students who did receive services and those who did not.
6. Assess whether District policies and procedures related to Individualized Education Programs align with related regulatory requirements of the Georgia Department of Education.
7. Evaluate administrators' rationale and procedures around Individualized Education Programs development for alignment with District policy and Georgia Department of Education regulations. Assess whether IEPs are appropriately supported and regularly updated to reflect current student needs at least annually.

To specifically evaluate concerns related to virtual school students, Babies Can't Wait transitions, class sizes/caseloads, transportation timeframes, and graduation age, Plante Moran additionally tested the following audit objectives:

1. Evaluate the virtual school special education compliance requirements, technology infrastructure, and access for students.
2. Review the timeliness of referral and evaluation of students transitioning from the Babies Can't Wait Program to APS Special Education Services.
3. Examine the class size and caseloads of the Special Education Lead Teachers and Student Support Team to understand the ratio of students to SELT or SST.
4. Evaluate the timeframe in which special education student transportation requests are received, addressed, and resolved to ensure they are timely.
5. Evaluate the average graduation age of students in Special Education Services (SES) and identify any trends between the APS clusters.

Summary of Themes

The table below highlights overarching thematic areas of development that were identified during audit fieldwork.

No.	Area	Theme
1	Compliance with District Policies and State Regulations	Key District policies are aligned with Georgia Department of Education regulations. However, standard operating procedures and documentation requirements outlined in the policy are not consistently applied and adhered to across all schools. For example, our testing showed that policies regarding monthly SST meetings, timeliness of providing meeting notices to parents, and timeliness of completion of evaluations and IEP meetings were not adhered to in each school assessed. A lack of mandated trainings, subjective interpretation of the District policy, and limited staffing resources have resulted in inconsistent application and adherence to APS policies.
2	Retention of Student Records/Documentation	GO-IEP is not consistently utilized as the primary system of record to document information related to identification, referral, evaluation, and IEPs of students within the SES process. As a result, documentation such as Problem Identification Checklist, Response to Intervention plans, parental consent for evaluations, and progress monitoring support could not be provided for several samples tested or were not fully and accurately completed per records retained in GO-IEP.
3	MTSS and Special Education Training	MTSS and SES training materials do not address all key elements of District policies and procedures. SELT attendance to Special Education related training sessions are not mandatory, therefore this results in misunderstandings and misapplication of policies and procedures. Additionally, an absence of cross-departmental trainings may lead to siloed work streams that causes inefficiencies and miscommunication across teams.
4	APS Special Education Policy and Procedures	APS policies and procedures pertaining to MTSS and SES employ ambiguous verbiage that allows for judgment to be applied in certain circumstances. For example, the policy utilizes language such as “adequate,” “periodically,” and “regularly” throughout the document. This may lead to misinterpretation of policies and procedures and cause inconsistent practices amongst individual schools.

Detailed Audit Results



Approach

Plante Moran conducted a comprehensive evaluation of the district's policies and procedures related to identification, referral, evaluation, and IEPs for Special Education Services. This assessment focused on their completeness, clarity, and compliance with applicable federal and state regulations. Additionally, Plante Moran evaluated the documentation of these processes to ensure alignment with the district's policies and established procedures. Our testing included inquiry and sample-based testing to assess the following audit objectives:

No.	Audit Objective Descriptions
Identification, Referral, and Evaluation	
1a	Verify the policy or procedure addresses key regulations defined by the Georgia Department of Education.
1b	Verify that key regulations defined by the Georgia Department of Education are included in District policy.
3a	Verify that formal documentation was obtained for the identification of learning and/or behavior problems.
3b	As part of the SST Plan, verify that intensive interventions are implemented for a minimum of 12 weeks, unless instructional strategies indicate a shorter period of time.
3c	Verify progress monitoring from the interventions occurs weekly during the SST process and changes are implemented to the student's SST plan based on the effectiveness or ineffectiveness of the interventions.
3d	Verify the SST meets at least once a month for the duration of the interventions.
4a	Verify the student referral included documentation of scientific, research or evidence based academic and/or behavioral interventions.
4b	Verify APS utilized a Response to Intervention (RTI)/Multi-Tiered System of Supports (MTSS)/SST process for referral for a special education evaluation.
4c	Verify that SST team members include a general education teacher, MTSS interventionist, SELT, parent/guardian, school psychologist, and any other employee that may evaluate the student.
4d	Verify that parental consent was obtained to move forward with an evaluation.
5a	Verify that a full and individual initial evaluation was performed prior to the initial provision of special education and related services.

5b	Verify that the initial evaluation was completed within 60 calendar days of receiving written parental/guardian consent.
5c	Verify that the evaluation is comprehensive and provides sufficient data to determine whether the student is a student with a disability.
5d	Verify that the evaluation documents how the disability affects the student's academic and/or behavioral performance in school.
5e	If eligible, verify that the evaluation provides appropriate information for developing an IEP.
5f	Verify that initial eligibility meetings are held within 70 days of receiving written parental/guardian consent.
Teacher Training	
2a	Verify the employee training material related to the identification, referral, evaluation, and placement of students addresses key attributes defined by the District policy.
2b	Verify that the required special education employees attended the training.
Individualized Education Program	
6a	Verify the policy or procedure addresses key attributes defined by the Georgia Department of Education.
6b	Verify that key regulations defined by the Georgia Department of Education are included in District policy.
7a	Verify that IEP development and implementation date occurs within 30 days of establishing eligibility via an initial evaluation or re-evaluation.
7b	Verify that a draft IEP was shared with the parents prior to the IEP meeting.
7c	Verify that adequate notice is provided to parents prior to IEP meetings.
7d	Verify that the IEP Team includes the parent/guardian, not less than one of the student's general education teachers, not less than one of the student's special education teachers or providers, and a district representative.
7e	Verify that the district representative included in the IEP Team is qualified to provide or supervise the provision of specifically designed instruction to meeting the unique needs of the child, knows about the general education curriculum and knows about the availability of resources in the district.
7f	Verify that IEPs are reviewed and updated at least once per year.
7g	Verify that IEPs are in effect at the beginning of the school year.

7h	Verify that annual goals are clear, understandable, and positively stated.
7i	Verify that annual goals can be accomplished within one year.

Our testing of the additional audit objectives included inquiry, sample-based, and full population testing to assess the following:

No.	Audit Objective Descriptions
Atlanta Virtual Academy Technology Infrastructure & Access	
1	Verify that the technology infrastructure of the virtual learning platform and the process to provide/revoke access to students is adequate and up to industry standards for similarly sized public school districts through inquiry.
Babies Can't Wait Transition	
2a	Verify that the initial evaluation was completed within 60 calendar days of receiving written parental/guardian consent.
2b	Verify that the eligibility meeting was held within 60 calendar days of receiving written parental/guardian consent.
2c	Verify that the initial IEP meeting was held on or before the child's 3rd birthday.
2d	Verify that the initial IEP was in effect by the child's 3rd birthday.
Class Size and Caseload	
3.1	Verify that caseloads per Case Manager do not exceed maximums noted in the Georgia DOE - Rule 160-4-7-.14 Personnel, Facilities and Caseloads through full population testing.
3.2a	Verify class sizes do not exceed maximum class sizes stated in accordance Georgia DOE - Rule 160-4-7-.14 Personnel, Facilities and Caseloads.
Transportation Requests Timeframe	
4a	Verify the transportation department addressed the transportation request within 8-10 business days and routed the special education student within 8-10 business days.
Graduation Age & Cluster Trends	
5	Evaluate the average rate of graduation and average age of special education graduates to identify any trends between clusters through full population testing.

Summary of Findings and Recommendations

Our observations below are based on corroborative inquiry with APS personnel, inspection of sample documentation, and in some cases, full population testing through our use of data analytics. In response to our observations, recommendations are included for the district's consideration on how to resolve gaps where internal controls were not in place, internal controls were not designed effectively, or opportunities exist to reduce risk to the district.

Each recommendation was rated high, moderate, or low based on priority in terms of impact on the process, internal controls, or efficiency of operations.

1. **High priority** indicates that the finding requires immediate attention, and the recommendation may have a significant impact on risk mitigation.
2. **Moderation priority** indicates that the finding should be addressed timely, and the recommendation may have a meaningful impact on risk mitigation.
3. **Low priority** indicates that the finding should be addressed as time and resources permit, and the recommendation may have a low impact on risk mitigation.

The following table summarizes the findings identified through the audit.

Category	High Priority	Moderate Priority	Low Priority	Total Findings
Compliance	4	-	-	4
Record Retention	1	-	-	1
Training	-	2	-	2
Policies and Procedures	-	-	1	1
Total Findings	5	2	1	8

The table below summarizes the findings and related recommendations identified through the audit:

No.	Observation	Recommendation	Priority
Compliance:			
1	District and State policies and procedures were not followed in documenting the identification and referral of students into the Special Education program via reporting. Specifically, Responses to Intervention Reports, Initial Referral Checklists, and Problem Identification Checklists were not completed for some students. In addition, the use of these documents is not standardized across the district.	<ol style="list-style-type: none"> 1. Mandate the use of standard forms (such as the Problem Identification Checklist, Response to Intervention Plan, Initial Referral Checklist, etc.) for every school across the district. 2. Develop Standard Operating Procedures (SOPs) and training that explains when, level of detail, and how to complete the forms in alignment with District policy so that all schools are consistently utilizing and retaining standardized documentation in GO-IEP. 	High
<p>Management Response #1:</p> <p><u>Training:</u> The MTSS team will standardize the required forms and develop SOPs for processes. The teams will include the forms and SOPs in the beginning of year training for MTSS contacts.</p> <p><u>Monitoring:</u> MTSS Coordinators (5) will sample 3-5 cases per month for required files. A record of these reviews will be centrally maintained and reviewed by Student Services Leadership.</p> <p>Implementation Date: August 1, 2024 and on-going</p> <p>Responsible for Implementing Recommendation: Student Services Leadership to include Assistant Superintendent Student Services and Executive Director of Special Education</p>			

No.	Observation	Recommendation	Priority
2	Interventions are not being monitored as part of the SST plan in alignment with District policy. Weekly progress monitoring for interventions and monthly SST intervention meetings were not documented for students.	<ol style="list-style-type: none"> 1. Provide training to ensure all MTSS/SST faculty understand the District policy around intervention progress monitoring, including document retention requirements in GO-IEP. 2. All evidence of MTSS/SST intervention progress monitoring and meetings for Special Education student referrals should be documented in GO-IEP. 	High
<p>Management Response #2: We are currently soliciting for a progress monitoring tool for reading, math, and behavior at tier 2, 3, and for special education goals. We are planning for this tool to be on the August board meeting agenda. If approved, we will complete integration and training in August and implementation starting in September. This tool will allow for standardization across support structures and provide us with quick, normed, and sensitive to growth data to make the best real-time instructional decision to close achievement gaps.</p> <p><u>Training:</u> All MTSS Contacts and Special Education Case Managers will be trained on the expectations of progress monitoring in August and the tool in September.</p> <p><u>Monitoring:</u> MTSS and Special Ed Coordinators will sample 3-5 cases per month for required files. A record of these reviews will be centrally maintained and reviewed by Student Services Leadership.</p> <p>Implementation Date: August, September, and on-going</p> <p>Responsible for Implementing Recommendation: Student Services Leadership including MTSS and Special Ed Coordinators</p>			

No.	Observation	Recommendation	Priority
3	<p>APS policy and State regulations require parental consent to perform an evaluation. Some evaluations were performed without retention of written parental consent. In addition, documentation did not verify that SST teams included all necessary team members. Documentation also did not verify that all IEP team members attended the IEP meetings or include documentation of parent agreement to excuse the missing team members.</p>	<ol style="list-style-type: none"> 1. Case Managers should upload and retain parental consent for evaluation in GO-IEP in accordance with District policy. 2. Provide training on District policy around required documentation of SST team members and IEP team members required to attend IEP meetings, including documentation of parent agreement to excuse attendees. 	High
<p>Management Response #3:</p> <p><u>Training:</u> All Special Ed Lead and School Psychologists will be trained on the expectation for parental consent for evaluation, required IEP team members, and required documentation.</p> <p><u>Monitoring:</u> Special Ed Coordinators (5+) will sample 3-5 cases per month for required files. A record of these reviews will be centrally maintained and reviewed by Student Services Leadership.</p> <p>Implementation Date: August 1, 2024 and on-going</p> <p>Responsible for Implementing Recommendation: Executive Director of Special Education and Director Psychological Services</p>			

No.	Observation	Recommendation	Priority
4	Completion of required milestones throughout the evaluation and IEP process are not completed in compliance with District policies and State regulations.	<ol style="list-style-type: none"> 1. Utilize GO-IEP to monitor the flow of documents to ensure all milestones during the identification, referral, evaluation, and IEP process are completed timely and in compliance with district policies and State regulations. 2. Provide training to all faculty involved in milestone completion to ensure District policies and timeline expectations are understood. 3. Develop a formal process to document and retain documentation evidence that can substantiate the reasons why timeline milestones were not met, such as due to parental delays, parental agreement to waive 10-day meeting notices, lack of student attendance, etc. 	High

Management Response #4:

Develop: Process to document late evaluations in GO-IEP.

Training: All Special Education Lead Teachers, School Psychologists, Speech Language Therapists, Occupational Therapy will be re-trained on timelines and documentation.

Monitoring: Special Ed Coordinators (5+) will sample 3-5 cases per month for required files. A record of these reviews will be centrally maintained and reviewed by Student Services Leadership.

Implementation Date: July 29, 2024 and on-going

Responsible for Implementing Recommendation: Special Education Executive Director and Director Psychological Services

No.	Observation	Recommendation	Priority
Record Retention:			
5	APS transitioned into a new record keeping system, GO-IEP in 2023. There is documentation that was not transferred from the predecessor system to GO-IEP. Additionally, GO-IEP is not utilized as the primary form of document retention across all schools, and it is not being updated appropriately.	<ol style="list-style-type: none"> 1. Provide training during pre-planning at the beginning each school year on how to properly utilize GO-IEP effectively to retain Special Education Services related documentation and input/update data appropriately and timely in accordance with District policy. 2. Develop a formal standard procedure that includes an audit trail to substantiate that parents are provided with a draft IEP prior to the IEP meeting. 	High
<p>Management Response #5:</p> <p><u>Training:</u> Special Education Lead Teachers and Case Managers will attend required training on the expectations of the use of GO-IEP for all special education processes and documentation. This required training will include what must be recorded in the IC Contact Log and GO-IEP.</p> <p><u>Monitoring:</u> Coordinators will sample 3-5 cases per month for required files. A record of these reviews will be centrally maintained and reviewed by Student Services.</p> <p>Implementation Date: August 1, 2024 and on-going</p> <p>Responsible for Implementing Recommendation: Special Education Leadership to include Executive Director and Director</p>			

No.	Observation	Recommendation	Priority
Training:			
6	Training for MTSS and special education department faculty does not address several key components of the District policy, such as items related to the SST process, S.M.A.R.T goal development, and comprehensive evaluations.	<ol style="list-style-type: none"> 1. Conduct a thorough review of the existing training related to the identification, referral, evaluation, and placement of students in special education. 2. Update training materials to include all key components of the District's special education policy, in alignment with the Georgia Department of Education regulations. 	Moderate
Management Response #6: We will review the existing training materials and make sure the 7 areas noted are included prior to the August 2024 training. Implementation Date: July 29, 2024 Responsible for Implementing Recommendation: Special Education Executive Director and Director			
7	Attending training sessions related to the identification, referral, evaluation, and placement of students in the Special Education program is not required per District policy. Additionally, there is an absence of cross-functional training between the MTSS, Special Education, and Psychology Services departments.	<ol style="list-style-type: none"> 1. Revise District policy to enact mandatory attendance to training sessions related to identification, referral, evaluation, and placement in the Special Education program for all relevant staff (including SELTs, MTSS, and other faculty). Consider whether additional days during pre-planning prior to the start of the school year focused on training would help the District achieve this objective. 2. Establish cross-functional training sessions that involve collaboration amongst the Special Education, MTSS, and Psychology departments to create better cohesive services when transitioning students from one step of the referral and eligibility determination process to the next. 	Moderate

No.	Observation	Recommendation	Priority
		<ol style="list-style-type: none"> 3. Ensure that faculty starting mid-year receive the same level of onboarding and training as those who begin at the start of the school year. 4. Consider whether providing Special Education related trainings to general education teachers and other non-Special Education related faculty would be valuable for District-wide alignment of goals and objectives. 5. Consider other methods for providing training and support to special education department staff, such as mentorship programs across all schools. Some schools communicated that they have a mentorship program, while other schools do not. 	
<p>Management Response #7: Required training for cross-functional teams will be conducted at the beginning of the year. Required training will also be held for MTSS Contacts, Special Education Lead Teachers, and new SELTs training monthly. SELTs and their evaluators will receive a monthly to-do list and coordinating reports with an optional meeting/training session each month on the 7 topics outlined by the Audit.</p> <p>Implementation Date: August 1, 2024 and on-going</p> <p>Responsible for Implementing Recommendation: Special Education Executive Director and Director</p>			

No.	Observation	Recommendation	Priority
Policies and Procedures:			
8	Certain District policies and procedures pertaining to special education identification, referral, evaluation, and IEP development employ language that lacks precision, which may lead to misinterpretation of policy.	<ol style="list-style-type: none"> 1. Conduct a thorough review of the existing policies and procedures related to student identification, referral, evaluation, and placement. 2. Clarify any ambiguous language, eliminate inconsistencies, and ensure that critical information and timelines are clearly articulated. 3. For items that need to be tailored to student specific needs, provide practical guidelines for SELTs and MTSS personnel to utilize, such as a range of timelines for intensive interventions for specific subject matters. 4. For any exceptions to the guidance outlined in the APS policy, thoroughly document the reasoning why the exception was established within each standard document. 	Low
<p>Management Response #8: The 4 identified policy and procedure areas for revision will be considered to bring clarity to work in our schools in alignment with best practices and allowing for flexibility of individual needs of the students.</p> <p>Implementation Date: December 30, 2024</p> <p>Responsible for Implementing Recommendation: Student Services Executive Director Special Education and Director Special Education</p>			

Appendix



Appendix 1: Background Narrative

Atlanta Public Schools Special Education Services Internal Audit Process Narrative

Identification for a Referral

There are multiple avenues a student can be identified for a referral for an evaluation to determine the student's need and eligibility for Special Education services, as outlined below.

1. The primary method is through Tier I instruction by the general education teacher(s), which can be through traditional in-person classroom settings or through virtual online settings, if the student is enrolled in the Atlanta Virtual Academy (AVA) program. Depending on the severity of the learning and/or behavioral concerns, the student may firstly begin Tier II or Tier III interventions of the Multi-Tiered System of Supports (MTSS) process prior to, or simultaneously in conjunction with, a referral for an evaluation.
2. A secondary method may be performed by the Student Support Team (SST) through Tier II / III interventions if it is deemed that the child is not showing any progress of improvements from the interventions.
3. A third avenue may be through a parental request for an evaluation. If a parent believes their children requires special education services, then the parents have the right to request a referral for an evaluation, which APS must provide, based on Georgia Department of Education regulations.
4. A fourth method is through the Babies Can't Wait (BCW) program, in which children can begin their transition planning to APS between 27-33 months of age. Typically, a BCW coordinator will notify a Special Education Coordinator of the APS preschool program through an online notification listing, which then begins the standard referral for evaluation process.

Typically, formal documentation to identify learning and/or behavioral problems must be produced to substantiate the need for a referral. This may include the following:

1. Problem Identification Checklist from general education teachers
2. Analyzed work samples from general education teachers, if applicable

3. Response to Intervention (RTI) plan documentation from the SST
4. RTI progress monitoring data from the SST
5. Developmental History form from a parent
6. Previous psychological evaluation reports, if applicable

Referral for an Evaluation

Once formal documentation to identify learning and/or behavioral problems is obtained by the SELT, a referral meeting is held with the parent, MTSS interventionist, general education teacher, SELT, and school psychologist. The purpose of a referral meeting is to discuss concerns of the student's academic and social/emotional well-being, explain the referral and evaluation process, review their parental rights, and determine next steps. To proceed, the parent must obtain a completed and passed hearing and vision screening for the student and sign the Parent Consent for Evaluation form. Without these two items, the school psychologist cannot move forward with the evaluation. The SELT has the responsibility to collect these forms from the parent, complete the Initial Referral Checklist, and attach the Initial Referral Routing form along with all supporting documentation of learning/behavioral concerns to the school psychologist. This packet of student information is known as the "referral packet".

Evaluation to Determine Eligibility

Once the referral packet is obtained by the school psychologist, they may begin their evaluation of the student, which may include psychological and/or speech and language type evaluations depending on the student's areas of concerns. The psychologist has a 60 calendar day timeline to complete the evaluations from the date the school received the signed parent consent form, with the exclusion of school breaks and other allowable exceptions. The types of tests performed during the evaluation period is discussed with the parent(s) during the initial referral meeting, however the psychologist has full autonomy to assess the student on concerns not initially identified, if he/she has reason to believe there may be other reasons causing the student's learning impairments. Each evaluation is completely individualized and comprehensive to the student.

Each psychologist's approach and methodology to evaluate a student is varied and will be dependent greatly on the student's strengths, weaknesses, concerns of the parent and teachers, medical diagnosis of disabilities, age, etc. Psychologists may begin their evaluation with an observation of the student during regular classroom, lunchroom, and/or recess settings, if deemed appropriate. After observations are

completed, they will conduct formal, standardized tests in a one-on-one setting. These standardized tests may include, but are not limited to the following:

1. Wechsler Intelligence Scale for Children, Fifth Edition (WISC-V)
2. Wechsler Preschool and Primary Scales of Intelligence – Fourth Edition (WPPSI-IV)
3. Wechsler Individual Achievement Test – Fourth Edition (WIAT-4)
4. Developmental Profile, Fourth Edition (DP-4)
5. Beery-Buktenica Developmental Test of Visual-Motor Integration – Sixth Edition (VMI-6)
6. Integration Sixth Edition (VMI)
7. Kaufman Test of Educational Achievement-Third Edition (KTEA-3)
8. Behavior Assessment System for Children, Third Edition (BASC-3)
9. Behavior Rating Inventory of Executive Function Second Edition (BRIEF 2)
10. Piers-Harris Children’s Self-Concept Scale, Second Edition (PIERS-2)

Once standard testing is completed, the psychologist reviews all of the information collected and provided previously through the referral packet and develops a comprehensive report. The report summarizes the following:

1. Reason for referral
2. Background information of the student, such as developmental and medical history
3. List of standardized tests administered
4. General observations and impressions
5. Summary results of each standard test performed as well as interpretations of such results
6. Psychologist’s determination of whether the student should be considered for special education eligibility
7. Recommendations to aid the student’s academic achievement and social/emotional well-being for teachers and parents to consider

While the psychologist provides a recommendation of whether the student should be considered for special education eligibility, it is ultimately a team decision to conclude on during the eligibility meeting. Per APS policies, the initial eligibility meeting must be held within 70 calendar days of receiving written parental consent, excluding school breaks and other allowable exceptions. Eligibility meeting attendees may include the parent(s), SELT, school psychologist or personnel responsible for evaluating the student, general education teacher, and Local

Education Agency (LEA) representative or designee. The purpose of the eligibility meeting is to review the results of the student's evaluation and make a team determination of whether the student qualifies and has a need for special education services. If the team decides to proceed, an Individualized Education Program (IEP) meeting must be held within 30 calendar days from the date of establishing eligibility.

Re-evaluations must take place every 3 years for all students within the Special Education program, unless requested otherwise by a parent or SST member.

Developing and Implementing Individualized Education Programs

An Individualized Education Program (IEP) is a written plan that serves as the framework to provide specialized instruction and other related services to ensure the student receives a Free Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE). The IEP is based on the unique educational needs of the student and is not necessarily based on his/her specific area of disability.

Prior to the IEP meeting, it is the Case Manager's responsibility to draft a copy of the proposed IEP collaboratively with other members of the IEP team prior to submitting the draft to the SELT for review. IEP team members must include the following:

1. A parent or guardian
2. At least one of the student's general education teachers
3. At least one of the student's special education teachers or providers
4. A district representative

Once the draft IEP is reviewed and approved by the SELT, the Case Manager provides a copy of the draft as well as a notification of meeting form to the parents. The notification of meeting form should be provided at least 10 calendar days in advance of the meeting date, unless the parents agreed to meet within a shorter timeframe.

The purpose of the IEP meeting is to review the proposed program, which includes the student's present levels of academic achievement and functional performance, results of the student's district or statewide assessments, his/her educational strengths and weaknesses, parental concerns, parental rights, and how the disability impacts the student's participation in general education curriculum. Additionally, the IEP outlines measurable annual goals that describe what the student can be reasonably expected to accomplish in one school year. The IEP also

includes how progress towards the annual goals will be measured and documented. The parent must provide written consent prior to the provision of special education services.

Once written parent consent is provided, the IEP can be implemented. Once implemented, progress monitoring data is reviewed weekly and documentation of progress monitoring is the responsibility of the Case Manager. Progress monitoring reports are sent to the parents every 9 weeks. If the student is not showing signs of improvement, then the IEP team considers adjusting the specific instructions of the current IEP.

All students within the Special Education program must have an IEP in effect at the beginning of the school year, excluding the school year the initial IEP was implemented. Annual IEP reviews are conducted before the expiration date of the current IEP, however the IEP may be reviewed at any time upon parent or district request. All student records and data related to special education services should be stored within GO-IEP as the primary system of record.

Appendix 2: Selected Schools

The below APS schools were selected for inclusion in the special education internal audit sample testing.

School Name			
1	Atlanta Classical Academy	15	Jackson Elementary School
2	Atlanta Virtual Academy	16	Martin Luther King, Jr. Middle School
3	Bolton Academy	17	Maynard Jackson High School
4	Booker T Washington High School	18	Michael R. Hollis Innovation Academy
5	Boyd Elementary School	19	Midtown High School
6	Bunche Middle School	20	Morris Brandon Elementary School
7	Continental Colony Elementary School	21	North Atlanta High School
8	Deerwood Academy	22	Perkerson Elementary School
9	Dobbs Elementary School	23	Peyton Forest Elementary School
10	Douglass High School	24	South Atlanta High School
11	Dunbar Elementary School	25	Springdale Park Elementary School
12	Fickett Elementary School	26	Sylvan Hills Middle School
13	Fred A. Toomer Elementary School	27	Tuskegee Airmen Global Academy
14	Howard Middle School	28	Young Middle School

Interviews were held with Special Education coordinators (i.e. cluster leads), Special Education Lead Teachers (SELTs), school psychologists, MTSS Coordinators, individual educators (such as general education teachers), and other personnel as needed at the above schools.

Thank you.



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