November 2011

Paperwork in Special Education: Survey Findings

by Eileen Ahearn, Ph.D.

INTRODUCTION

In 2002, Project Forum conducted a survey on special education forms and a policy forum on the issue of paperwork in special education.[1] Some recommendations that resulted from those activities were included in the 2004 reauthorization of IDEA. With a new reauthorization pending, the topic has again aroused interest. This document presents the findings from a survey of states on current observations and beliefs in areas related to the perceived burden of paperwork[2] on special education. It was completed as part of the Cooperative Agreement between Project Forum at the National Association of State Directors of Special Education (NASDSE) and the U.S. Department of Education's Office of Special Education Programs (OSEP).

BACKGROUND AND METHODOLOGY

The purpose of the 2002 policy forum was to develop recommendations for reducing unnecessary paperwork in special education while maintaining accountability, procedural safeguards and parental involvement. Studies of the implementation of the Individuals with Disabilities Education Act (IDEA) at that time revealed the complexity of the paperwork issue. For example, the Study of Personnel Needs in Special Education (SPeNSE) found significant variation across the country in the amount of paperwork that teachers report and in the perception by teachers of the problem it poses to them.

The survey about forms used in state special education programs that was conducted in preparation for the 2002 policy forum revealed that almost all states had at least some forms on their websites and 23 states reported that one or more forms were mandated for local education agency (LEA) use. There was wide variation among states in the content, format and prescribed usage for these forms.

There have been significant changes in the years since the 2002 forum in data gathering at the federal level (e.g., ED*Facts*),[3] and in technology advances that have facilitated

---

[1] Copies of these documents are available at http://www.projectforum.org/index.cfm.
[2] Respondents were advised of the following definition: The term *paperwork* refers to all aspects of recording and reporting as well as the time involved to meet those requirements at state and local levels regardless of the medium used, (e.g., paper, computer, etc.).
[3] See http://www2.ed.gov/about/inits/ed/edfacts/index.html for information on this federal initiative.

improvements in information gathering and dissemination. To document the changes, Project Forum conducted a survey of state directors of special education during the months of July-September, 2011 using Zarca Interactive© (an online survey management program). A total of 39 responses were received—36 from states and three from non-state jurisdictions, all hereafter referred to as states. Data were analyzed using Zarca and the survey findings are reported in the remaining sections of this document.

FINDINGS

The survey included 13 items covering four main topics:

- paperwork related to the IEP;
- model forms issued after the 2004 reauthorization;
- effects of technology advances on reducing the amount of paperwork; and
- the sources of current paperwork.

Respondents were also asked to add any other comments about paperwork reduction issues.

Paperwork Related to the IEP

IEP Forms

A total of 18 states indicated that they have a state-mandated IEP form. Of those 18 states, 10 use computer-based forms while eight do not. A follow-up item asked states with computer-based forms if their IEP form is part of a comprehensive computer-based special education student management system. All but one of the states with computer-based forms responded in the affirmative (nine states). These results suggest that, although the number of states that are using electronic forms is small, they usually include the IEP form as part of a computer-based special education management system. Although not all states have adopted computer-based IEPs or computer-based management systems at the state level, individual districts within states that do not have a required statewide system may use electronic systems at the local level.

All but one of the nine states that indicated use of a statewide computer-based management system provided short descriptions of their programs as follows:

- *Hawaii* developed its own electronic system that is used by all employees and contractors who serve students with disabilities.
- *Alabama*, *Delaware* and *South Carolina* indicated that they use systems purchased from vendors that are customized for their state.
- *The Bureau of Indian Education (*BIE) also worked with a vendor to develop its system that is used by all BIE-funded schools.
- *Louisiana* used a vendor to develop its Special Education Reporting (SER) System that all teachers and related service providers use to enter IEP information. Access to information depends on an individual's approved level of access.
- Two states provided links to the systems they acquired from the vendor "Infinite Campus." They are: *Montana* (http://www.opi.mt.gov/Reports&Data/AIM/index.html) and *Kentucky* (http://www.education.ky.gov/KDE/Instructional+Resources/Exceptional+Children/Student+Information+System-Special+Education).

Model Forms

As required by the 2004 reauthorization of the IDEA, OSEP published and widely disseminated model forms that the law required to be "consistent with the requirements of Part B of the IDEA" and "sufficient to meet those requirements."[4] Survey respondents were asked whether they adopted one or more of the three forms that were developed. Those who indicated they did not adopt any were asked if they used the OSEP forms as part of the process of revising their state forms to comply with IDEA 2004.

Survey results revealed that the forms were used in some way by almost all of the responding states:

- A total of 18 states indicated that they adopted one or more of the forms.
- Of those states that did not adopt a form, 17 replied that they used the model forms in the revision of their own forms.
- Only three states indicated that they neither adopted nor used the forms.[5]

Advances in Technology that Reduced Paperwork

A wide variety of responses were made to the item that asked for examples of advances in technology that allowed states to reduce their paperwork. First, most states identified at least one area of operation that has been assisted by advances in technology. Examples are:

- Improvements in managing IEPs was specifically mentioned by 16 respondents as due to better technology availability.
- Increased ability to access student-level data supports educators to provide direct help for students.
- Websites eliminate the need to send out paper copies and allow the provision of information in a form that can be easily disseminated.
- Technology allows all forms to be paperless except those that need a parental signature.
- Computerization has provided significant progress in the monitoring system.
- Electronic communication has reduced the need to make paper copies and facilitates sharing at a much higher level.
- Other online areas of improvement mentioned by one or more states included more efficient grant applications, approval processes, amendments, student assessments and data reporting.
- One respondent stated that technology has not only reduced paperwork, but also reduced the staffing level needed for the general supervision system.

Yet a few states replied that they had not seen significant improvements from the addition of, or transition to, increased use of technology. The points these respondents made were:

- Increased paperwork is not the result of technology or the lack thereof. It is the process itself. The amount of time required for meeting all processing requirements remains the same.
- Reduction in state staffing levels has mitigated the advantages from electronic conversion of many tasks.

---

[4] The forms that were developed are available at http://idea.ed.gov/static/modelForms.
[5] Note: The remaining one of the 39 total responding states did not reply to this item.

- Some electronic changes, such as the growth of email, have increased the work volume in areas such as requests for information.

Primary Sources of Current Paperwork

Responses to the item that asked about aspects of record-keeping, information collection and reporting that require state or local staff to complete a substantial amount of paperwork were consistently critical on two main points: duplication and the SPP/APR process.[6] Comments in those two areas and additional observations on this item follow.

Duplication:

Most states made some reference to duplicative reporting requirements as a substantial source of additional paperwork. Specific examples included:

- required duplication for maintaining hard copy and digital records;
- duplication of data reporting for ED*Facts* and OSEP;
- increased amount of time required to complete paperwork caused by increased volume due to electronic availability; and
- misalignment between reporting for IDEA and other programs, especially Elementary and Secondary Education Act (ESEA) programs.

SPP/APR-Related Paperwork

- Data collection for many of the indicators requires considerable work by LEA staff as well as state staff with questionable return of useful information.
- Many parents do not have access to technology so parent surveys pose paperwork complications.
- Data collected for many of the indicators seem to have no use for anything except filling a reporting requirement.
- Most of the SPP/APR data collection is time consuming and costly and not seen as useful by SEA staff in furthering better outcomes for students with disabilities.
- The SPP process is too lengthy and places excessive paperwork demands on districts that go beyond IDEA requirements.

Other Sources of Paperwork

Respondents described the following sources of additional paperwork:

- electronic systems that are not aligned and do not interface with one another;
- excessive number of IEP-related forms;
- required tracking of CEIS[7] services;
- meeting documentation requirements for procedural safeguards;

---

[6] The 2004 reauthorization of IDEA requires that each state develop a State Performance Plan (SPP) that will guide evaluation of IDEA implementation and that each state submit an Annual Performance Report (APR) related to that plan.
[7] CEIS refers to Coordinated Early Intervening Services that are services provided with IDEA funds to students in kindergarten through grade 12 (with a particular emphasis on students in kindergarten through grade three) who are not currently identified as needing special education or related services, but who need additional academic and behavioral supports to succeed in a general education environment.

- constant data collection changes that are labor intensive and that increase workload requirements for the state record systems;
- data collection under the Elementary and Secondary Education Act (ESEA) that is not aligned with IDEA;
- new and frequent changes in software systems that are stressful and costly;
- monitoring of mediation agreements and resolution sessions;
- record-keeping for RTI; [8]
- Medicaid billing for eligible IDEA services; and
- data collection for the second level of correction required by OSEP Memo #09-02. [9]

The Single Most Time Consuming Reporting Requirement

More than half of the responding states referred to the SPP/APR process or specific parts of it in response to this item. Other areas cited as the most time consuming sources of paperwork were as follows:

- paperwork associated with special education from the pre-referral stage, through evaluation and the development of the IEP;
- disproportionality indicators that do not align with ESEA;
- discipline requirements under IDEA;
- reporting maintenance of effort for special education from other state agencies;
- the suspension-expulsion data collection;
- tracking and monitoring districts that have underrepresentation of minorities in special education;
- the annual December count of students with disabilities because many districts now close for longer periods at that time of year;
- the special education cost report; and
- the lack of alignment between special education assessment data reporting and state assessment reporting requirements.

How the Most Time Consuming Reporting Requirements Could be Lessened

As mentioned above, most respondents referred to the SPP/APR process as the most time consuming aspect of their reporting requirements. Suggestions for lessening that amount of time and improving efficiency included making the report shorter, especially by eliminating some indicators, and changing to a biennial reporting process. Other suggestions included:

- providing additional resources to support training for LEAs in all areas of reporting;
- establishing a clear and concise notification process to be used for other state agencies concerning their responsibility for maintenance of effort for special education; and
- ensuring better alignment of reporting between OSEP and the Office of Elementary and Secondary Education (OESE).

---

[8] RTI (Response to Intervention) is the practice of providing high quality instruction/intervention matched to student needs and using learning rate over time and level of performance to make important educational decisions.
[9] This memo delineates the state requirements for the correction of noncompliance reported in the APR.

Reducing Paperwork Without Undermining Children's Rights

This item asked respondents to suggest what type of paperwork reduction efforts could be undertaken without undermining the rights of children with disabilities to receive a free appropriate public education. Many suggested shortening the SPP/APR including one response that suggested that most of the SPP/APR indicators could be eliminated to allow the redirection of resources to improving the provision of a free appropriate public education. Other specific suggestions included:

- Distribute a shorter and more concise version of the procedural safeguards to be distributed to parents annually.
- Most reporting requirements could be streamlined without lessening the protection of rights.
- Ensure that all U.S. Department of Education data collections use the same terminology with the same definitions, cover the same time span and have purposes that are appropriate under existing law.
- Remove data collection related to the second level of correction under OSEP Memo #09-02.
- States should collect data to use based on their own needs and not be required to submit reports to OSEP.

Additional Comments

Respondents were asked to provide any additional information they had about paperwork reduction issues. A few suggested that paper submissions should be discontinued and all data submitted electronically. However, two other comments presented an opposing view:

- "The electronic format does not reduce time that must be spent on these activities. In fact, it has increased time because of the notion that, because we can collect the data, we do whether or not it is ever used in a productive way."
- "Electronic submission does not always reduce burden. Online electronic data reporting such as ED*Facts* may lessen the paper, but increase the burden hours. Technology makes it tempting to increase the amount of information requested or the amount of detail included because it is so easy to do so resulting in more work and more information than is useful."

Other general recommendations made by respondents were:

- Reduce paperwork for teachers. Excessive amounts of paperwork are driving teachers out of the field.
- IEP requirements should be reviewed to identify elements that could be reduced. This would allow increased time for classroom activities.
- Reporting for ESEA and IDEA should be a single, one-time data collection.
- All reporting should be reviewed to determine the relevancy of use in improving performance of students.
- Data should be used to bring about improvement in student performance and not just for reporting purposes. Consider reporting that measures growth, not only absolute values against targets.
- States would appreciate any reduction in data collections that do not require excessive staff time for verification of the data and duplicative reporting.

OBSERVATIONS AND CONCLUSIONS

The paperwork issues most frequently cited in the survey conducted for this report were the data collection required by the SPP/APR process and the perceived continuation of duplicative requests for information from different offices of the Department of Education. A wide variety of suggestions were made to address the SPP/APR issue[10] and the elimination of duplication was a consistent suggestion. General suggestions for reducing reporting requirements and/or increasing efficiency included providing additional resources to support training at the LEA level and ensuring better alignment of reporting between OSEP and ESEA.

Although many states identified advances in technology that have reduced the amount of paperwork, some also cited negative results such as reduced staffing levels and increases in the number of requests for information.

In addition to specific data collections, areas cited as the single most time consuming reporting requirement included the extensive paperwork involved in the evaluation and eligibility process from pre-referral through IEP development, discipline requirements and monitoring disproportionality.

Clearly, finding an acceptable balance between the paperwork required to demonstrate compliance with federal laws and states' need for relief from perceived time consuming, unnecessary, or duplicative reporting is a challenge. However, it continues to be important to satisfy the need for information while also recognizing the pressures of lowered resources currently available to state departments of education.

---

[10] OSEP is currently reviewing input received through a recent policy forum on this topic to address this issue.

*in*Forum

This document, along with many other Forum publications, can be downloaded from the Project Forum at NASDSE website:

http://www.projectforum.org

To order a hard copy of this document or any other Forum publications, please contact Nancy Tucker at
NASDSE, 1800 Diagonal Road, Suite 320, Alexandria, VA 22314
Ph: 703-519-3800 ext. 326 or Email: nancy.tucker@nasdse.org