**PAAC on SEAC feedback on Part E, The Individual Education Plans (IEP) of the Ministry document, Special Education in Ontario K to Grade 12, Policy and Resource Guide**

The Provincial Parent Association Advisory Committee on Special Education Advisory Committees (PAAC on SEAC) has prepared this response after a presentation was made in November 2017 by Ministry of Education representatives. PAAC on SEAC was established in 1983 and is the only group in Ontario that brings together provincial parent associations to communicate and co-operate on issues pertaining to Special Education Advisory Committees (SEACs). PAAC, and its 16 member organizations, encourage valuable partnerships among trustees, educators, voluntary organizations and parents.

PAAC on SEAC has collaborated to provide input and a response to the Ministry’s request for feedback on the IEP section of the *Special Education in Ontario K to Grade 12 Policy and Resource Guide.* Members of PAAC on SEAC support and encourage the use of the IEP and the IEP process to identify and support individual students’ strengths and needs, and establish good working relationships and common plans, goals and strategies with educators, families (parents/guardians) and community service providers.

Through IEPs, specific, assessed educational and human support needs can be documented - leading to continuous growth and strengthened understanding among educators, families, service providers and the students.  As identified in the guide, this documentation is also important in transitions and transition planning as well as when staffing changes occur, in creating achievable short and long term goals and monitoring success.

We appreciated the opportunity at our November meeting to identify some concerns, including:

* Lack of accessibility to the resource guide due to the format as a Adobe Acrobat pdf file with live links. Recommend it be in HTML format like many other documents on the Ministry website
* Loss of diagram that illustrates the IEP process from gathering information to the regular review (This was in 2004 IEP Resource Guide and was a great illustration of the process)
* Lack of focus on parent role in the IEP process. Although mentioned the guide seems to reduce the role and value of parent participation in IEP development
* Lack of linkage to Regulation 181/97 that was included in 2004 guide and highlighted parent and student rights
* Use of qualifying words in developing an IEP such as “realistic”, “readiness to learn”, “limitations and barriers” and “appropriateness of plan”. This language is not used in other Ministry documents
* Need for sharing of more effective practices in parent engagement (suggest getting examples of school board effective practices, such as Thames Valley DSB (TVDSB) IEP resources)
* Need for more explanation of parents role and rights
* Stronger emphasis on parent participation from early in the process
* Clarity about who sets goals for IEP (should be collaboratively, not a school team process that decides without parent participation)
* Clarification of the reason the Principal signs the document and that parents only sign to document their consultation
* Explanation of the Parent Consultation process and how it should be used to document the information and concerns that were shared, not just date and purpose of consultation
* Stronger linkages between transition information in Part C on Early Identification, Assessment and Transitions and IEP section
* Improved accountability for quality of the IEPs through more Ministry and school board audits
* More information on accountability for implementation and monitoring of IEP (parents don’t know what to do when the plan is not implemented as described)

Further feedback from PAAC on SEAC members, based on the consultation questions provided:

**Questions**

**1. Does the IEP content align with other directions and resources provided to the sector, including but not limited to *Learning for All: A guide to Effective Assessment and Instructions for All Students Kindergarten to Grade 12; Assessment, Evaluation, and Reporting in Ontario Schools,* and *Creating Pathways to Success: An Education and Career/Life Planning Program for Ontario Schools* and the *Ontario First Nation, Metis, and Inuit Education Policy Framework?***

a) Please provide examples where this is reinforced

* There are links to the above documents within the resource guide; also a link to [Shared Solutions – A Guide to Preventing and Resolving Conflicts Regarding Programs and Services for Students with Special Education Needs](http://www.edu.gov.on.ca/eng/general/elemsec/speced/shared.html) is valuable.

b) Please provide comments/examples that can be added to strengthen this.

* In Preventing and Resolving Conflicts Regarding IEPs it would be good to include some examples from Shared Solutions; e.g. Chart of Factors Contributing to Conflict, and Possible Solutions, on page 12.

**2. What are the strengths of the existing IEP resources in the Guide?**

* Live links within the document are helpful, if presented in a way that is accessible by all.
* The sample IEP template is useful and it is good to see the space for Parent/Guardian and Student Comments (which had been missing in recent Ministry sample templates).
* It would be helpful to have sample IEPs, including sample Transition Plans (which were present in the 2004 IEP Resource Guide), with links to further IEP samples on the EduGains website.

**3. Where are there gaps in the IEP content? What are the areas of concern? What about considerations for Indigenous and/or francophone learners?**

Gaps and concerns:

* + - * Elimination of a diagram that illustrates the IEP process from gathering information to the regular review (This was in 2004 IEP Resource Guide and was a great illustration of the process).
      * Order of sections of IEP components does not follow IEP template order (for example, Accommodations come after Special Education Program in the Guide, but before the Program section in the template). It is important to consider accommodations before deciding on modifications to curriculum.
      * There is not enough focus on the parent role in the IEP process. The role and value of parent participation in IEP development needs to be emphasized *at all points* in the process.
      * There is limited linkage to Regulation 181/97, unlike the 2004 IEP Resource Guide which highlighted parent and student rights (In the 2004 IEP Resource Guide sections of the Regulation are quoted in relevant sections).
      * The use of qualifying words in developing an IEP such as “realistic”, “readiness to learn”, “limitations and barriers” and “appropriateness of plan” can lead to goal-setting that does not assume each individual student's competence, capacity and potential to learn. This can limit educational opportunities for students.
      * There should be more information in section 5.3, Individualized Equipment, about the SEA grant for equipment. It would be useful to link [Special Equipment Amount (SEA), 2017-18](http://www.edu.gov.on.ca/eng/funding/1718/2017_18_sea_guidelines_en.pdf) for further information.
      * Assessment of student achievement for alternative programs is limited to anecdotal report – this is inconsistent with PAAC on SEAC submissions stating that alternative programs should link to curriculum and to achievement of recognized credentials.
      * There is limited information on accountability for implementation and monitoring of IEP, and the role of parents in monitoring. There is no discussion of what parents can do when the plan is not implemented as described.
      * There should be more explanation of the Parent Consultation process and how it should be used to document the information and concerns that were shared, not just the date and purpose of consultation.
      * Stronger linkages are needed between transition information in Part C, *Early Identification, Assessment and Transition*s, and in Part E, the *Individual Education Plan* (as well as links to PPM 149 and 156).
      * Transition plans are a good place to identify supports and accommodations a student may require in their cooperative education and community connected experiential learning.
      * Transition planning to postsecondary studies should include information about the eligibility and documentation requirements of postsecondary institutions in order to provide accommodations.
      * References to the Ontario Human Rights Code are not as strong as in the 2004 IEP document; e.g. “Ontario Human Rights Code, s. 17(2)). Persons with disabilities should be considered, assessed, and accommodated on an individual basis.” This important statement from the 2004 IEP Resource Guide is absent, although a statement about ‘undue hardship’ is present in both.
      * There needs to be more clarification of the role of the Principal in signing the IEP, and the fact that the IEP goes ahead whether or not the parent (or student) signs the IEP.
      * The section on Preventing and Resolving Conflicts needs to be expanded and strengthened, e.g. by including information from Shared Solutions, and referring parents to look for their school board’s protocol for conflict resolution.

Francophone perspective:

* One of the areas of concern for francophone learners is access to alternative print formats (audio and PDF) of textbooks and other class material. Proof of this comes when our students request reading material in alternative format and these are more readily available for their English classes but are much harder to come by for French classes. Traditionally, students were given wands and asked to scan documents page per page, download to computer and save in PDF format. It’s unrealistic to expect students (who generally require more time to complete their regular workload) to do extra work to access their reading material.
* Both English and French speaking students need better access to alternative reading materials for the secondary level classes. Some electronic tools are only available in English.

**4. Does the updated IEP content clarify expectations with regards to IEP initiation, continuation and discontinuation?**

a) Please provide examples where this is reinforced.

* Part C, Integrating Planning Processes links the IEP to other planning activities including IPP, Co-operative Education/Community Connected Experiential Learning and to plans for safety, behaviour support and medical needs
* Part E, Section 14, Review and Updating describes some of the elements of the review process, however, it is limited in scope and does not emphasize requirement for report each term/semester, or for parent consultation in the review and updating.

b) Please provide comments/examples that can strengthen this.

* As more students with special education needs have the opportunity for Co-operative education and community connected experiential learning there may be a need to document the supports and accommodations that the student will require to be successful in the IEP. This could be done using the IEP Special Education Program section or the Transition section.
* There was no information on what happens if a student/parent chooses to de-identify a student as exceptional, or to cease having an IEP. Similarly, there should be information on what a parent can do if they disagree with the school wishes to de-identify a student or discontinue the IEP.

**5. What are the continued problems of practice in the development of IEPs which need to be addressed?**

* Human Resources section – many Principals still reluctant to include specific details of frequency and duration of support. Tend to use “as needed” “as appropriate”.
* Parent Consultation – parent involvement in IEP process varies and parents sometimes feel excluded. More examples and resources are needed on how to engage and support parent participation in IEP development. School staff report poor response to the IEP Parent Consultation form, with a significant percentage of parents not completing or returning the form. The value of the form as a tool in consultation process needs to be emphasized.to teachers and parents.
* Assessment – many IEPs continue to have limited or out dated information in assessment section – need clear guidelines on what should be included and how it links to strengths and needs and the rest of IEP.
* Implementation and Monitoring – need to be explicit in saying that everyone has a role in monitoring including classroom, teacher, parent and student.
* Need to identify for parents what steps they can take if the IEP supports are not provided or not working.
* Accountability – Ministry audits have been helpful in identifying weaknesses and opportunities for improvement. Many boards continue to do annual internal audits. Ministry could provide share more tools for teachers to use in reviewing the draft IEPs (performance indicators and “look fors’).
* There is ongoing need for professional development of classroom teachers on writing effective IEPs in collaboration with parents and students.

Thank you for the opportunity to provide this input into the ongoing revision of the IEP section of the **Special Education in Ontario K to Grade 12, Policy and Resource Guide**, on behalf of the member organizations of PAAC on SEAC. We look forward to providing further analysis of the other sections of the document.

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