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Memorandum

TO: Jaime Hernandez, Research Director, Office of the Independent Monitor
FROM: Jenifer Harr-Robins, AIR
DATE: October 19, 2012
SUBJECT: Memo on analyses of services with no evidence of provision in the *Study to Measure the Delivery of Services in Accordance with the Individualized Education Programs of Students with Disabilities: Year 9 (2011-12)*

This memo reviews the results of an examination of reasons why some students showed no evidence of service provision in the Year 9 (2011-12) OIM study submitted by AIR. For this study, we examined evidence of provision during a specific 8-week/2-month period using electronic provider logs for a sample of 7,712 service records.¹ Of those, 6,009 had evidence of at least one provided session during the period examined for the study, and 400 service records did not have evidence of service.² Among these 400 cases, 229 services (57%) did not appear at any point in the provider log database used for the analysis, which spanned January through April 2012. Another 171 services (43%) had at least one session (whether completed or cancelled) documented between January and April, but this session did not occur during the 8-week/2-month time period specified for the study (referred to as “track period” henceforth).

Number of services with no evidence of service during the specific track period	400
<ul style="list-style-type: none"> Number of services that did not appear in the January – April 2012 log database 	229 (57%)
<ul style="list-style-type: none"> Number of services that had at least one session documented between January and April, but not during the specific track period examined 	171 (43%)

To further understand possible reasons for why these services were not provided as specified on the IEPs, AIR with support from the Office of Data and Accountability and OIM conducted additional examinations, described below.

¹ For the vast majority of services, we examined the February – March period. Other periods (e.g., January – February or March – April) were examined for students who were off-track during the February - March time frame.

² 1,303 records were dropped from the analyses for various reasons.

IEP Irregularities

We first examined these records for irregularities in the IEP documentation. To analyze the records, AIR developed a computer program to code each case, utilizing a complex set of rules. Irregularities in the way services are documented in the IEPs may have resulted in the program coding some services as non-provided when in fact they are no longer required. Of the 229 services that did not appear at all in the January – April log database, 29 had service end dates on the IEP that occurred *before* the end of the 8-week/2-month time period. However, we determined that there should have been enough time for a majority (20 of 29) to have at least one service during the track period³ and all should have had at least one service from January onwards. In addition, 111 of the 229 records were missing a service end date in the IEP; this was changed to June 30, 2012 for the analysis on the assumption that the services with missing end dates should continue through the current school year. A missing service end date could be problematic for the analysis if the service was intended to end before or during the track period.

Among the 171 records that appear in the January – April database (with either completed or cancelled sessions), 18 had at least one session documented during the track period, but they did not count as evidence of service provision according to the coding rules (for example, if all sessions documented were provider absence, they did not count as evidence). The remaining 153 records did not have any evidence of a session during the track period, of which 129 had at least one completed session that occurred outside the track period. Again, we examined irregularities in the IEPs. Twenty-four of the 153 records had services that ended before the end of the track period. However, in 17 of those 24 cases, there was enough time in the track period to reasonably expect at least one service session to occur. And 75 of the 153 records were missing the service end date; as with the above cases, these were changed to June 30, 2012 for the analysis.

Although 47% of the records for which the analysis program did not find evidence of service lacked a service end date, it is worth pointing out that 61% of the 6,009 records for which there was evidence of service were also missing a service end date, suggesting that this should not be a reason for non-provision. In summary, IEP irregularities do not appear to be a driving factor in explaining the lack of service provided observed with the Year 9 cases.

Division Information

In addition to checking for irregularities in the IEP documentation, we also asked the Division to examine their Welligent records to determine if there were reasons to explain the lack of service provision for these cases. We reviewed these reasons and attempted to categorize them into discrete groups. Table 1 summarizes the reasons provided for records which do not appear in the January – April 2012 log database, and Table 2 does the same for services which were not provided during the specific track period.

³ If there were at least 3 weeks available from the start of the track period to the service end date to provide a weekly or daily service and at least 4 weeks available to provide a monthly service, we considered this sufficient time to provide a service.

In 52 of the records in Table 1 (22%), the Division indicated that the service was provided at some point between January and April, although the study team did not receive logs demonstrating this. Due to time constraints, we did not collect logs from the Division that supported these post-study statements. Nearly two-thirds of these cases, however, were attributed to Headstart Language and Speech, a service newly added to the study in Year 9 that was entirely missing from the log database provided to the study team. It is possible that this service was mistakenly omitted by Division staff when compiling the log database for the study. For another 32 cases (14% of the 229 records), the Division provided information showing a valid reason for why the service was not provided during the timeframe, such as changes in the IEP, graduated student, or parents withdrawing the student from the service.⁴ In nearly 40% of the records (n = 90), there was no valid reason for non-provision or the information provided did not apply to the January – April timeframe. Of concern were 12 records the Division could not locate in the system, which may suggest technical issues with Welligent. The Division noted that 5 records were for Carlson Home students; however, it is unclear why these students showed no documented services.

Table 1. Number of records by reason why the service record did not appear in the January – April 2012 log database (n = 229)

Explanation Category	N of records
Service provided and documented (but not documented in the log database used for the study)	28 ^{<1>}
Service provided but not documented	23 ^{<2>}
No service provided – IEP used for the study was outdated (e.g., student exited from service prior to study period)	14
No service provided – Inactive IEP during study time frame or student graduated	7
No service provided – Parents withdrew student from service/student refused	12
No service provided – No valid reason for non-service or reason given did not apply to the January – April timeframe	90
No service provided – Division could not find student ID in the system	12
Carlson student	5
Total with information provided	191
Insufficient information provided for BII, BID services (the Division provided notes but the information was insufficient for assigning a category)	38

^{<1>} More than half of these (n = 16) are for Headstart LAS; Headstart LAS logs were missing entirely from the log database used for the analysis.

^{<2>} Nearly all of these (n = 18) are for Headstart LAS.

Among the 153 records that appeared in the log database but had no services documented in the track period (Table 2), a third (n = 50) were reported to be based on outdated IEP service information, 14 were based on inactive IEPs or graduated students. In 6 cases, the parents withdrew student from the

⁴ Please note that the Division is requested each year to provide the study team with updated IEPs and other information (e.g., students that leave the District), so that the analysis reflects the current service specifications. It is not clear why information on such cases were not provided to the team during the study period.

service, and in 4 cases school schedules hindered delivery during the specific track period. Yet, in more than 40% of the cases (n = 65), there was no clear reason why the service was not provided during the track period.

Table 2. Number of records by reason why the service was not provided during the specific 8-week/2-month track period (n = 153; excludes the 18 records which had a non-countable session during the track period)

Explanation Category	N of records
Service provided and documented (but not documented during the track period in the log database used for the study)	7
Service provided but not documented	6
No service provided – IEP used for the study was outdated (e.g., student exited from service)	50
No service provided – Inactive IEP during study time frame or student graduated	14
No service provided – Parents withdrew student from service/student refused	6
No service provided – Scheduling issues (e.g., block scheduling for RSP)	4
No service provided – No reason for non-service or reason given did not apply to the track period	65
Carlson student	1
Total	153

Summary

When combining data across the two groups of services, we found no clear reason why 40% of the 400 cases did not have a valid service session during the track period.⁵ On the other hand, if a different track period had been selected for the study, 43% of the 400 cases (n = 173) might have been coded as having services delivered (although services coded as provided in the original track period might not have been provided in a different timeframe). While the methodological challenges of measuring moving targets (e.g., IEP changes, student movement) may inflate the rates of non-provision, there still appear to be – for no justifiable reason – students for whom no service is being provided. Also of concern are the students who receive services, but not at the frequency and duration specified in their IEPs which are explored in the service study report.⁶ Furthermore, the Division reported that a number of services were provided, but the study team did not receive the logs for these cases, suggesting improvements may be needed in the documentation process.

⁵ The 40% includes the 6 Carlson students for whom no service documentation was provided.

⁶ The Year 9 results showed that 83% and 70% of services provided to the population of special education students in the District did not receive their services at the frequency and duration, respectively, specified in their IEPs.