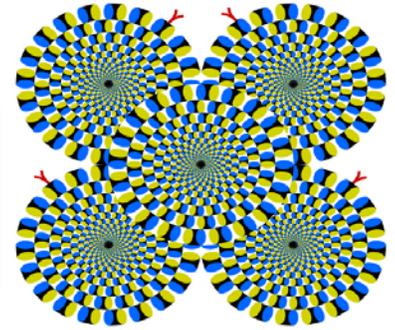


## TRANSITION WHEEL



### SUMMARY OF PERFORMANCE

#### Description/Definition

The Summary of Performance (SOP) documents a “child’s academic achievement and functional performance,” including “recommendations on how to assist the child in meeting the child’s postsecondary goals.” It is provided to a child whose eligibility for special education services has terminated “due to graduation from secondary school with a regular diploma, or due to exceeding the age eligibility for a free appropriate public education under State law” (Individuals with Disabilities Education Act of 2004 [IDEA], §614(c)(5)(B)).

#### Relevance

The SOP is an important document for students transitioning to postsecondary education or training, employment, and independent living. “The goal of the SOP is to enhance post-high school outcomes for students with disabilities by providing them with relevant information about their academic achievements and functional performance” (Kochhar-Bryant, 2007, p. 162). Project Forum is a national project charged with identifying critical topics in special education, conducting policy analyses and forums, and distributing information to improve outcomes for students with disabilities. According to a survey of 40 State Education Agencies (SEAs) conducted by Project Forum in January 2008, “respondents perceive the SOP as a tool that enables students to

- transition seamlessly from secondary education to postsecondary education or employment (37 states);
- be empowered as self-advocates in the postsecondary setting (33 states);
- access disability services and have a record of [recommended] accommodations to use in postsecondary education settings (32 states);
- be engaged in the process of gathering information about the student’s strengths and postsecondary goals (30 states)
- facilitate the development of an Individual Plan for Employment (IPE) under vocational rehabilitation services (24 states); and/or
- acquire appropriate employment (18 states)” (Sopko, 2008, pp. 34).

Additionally, respondents from 17 states felt that the SOP would “reduce the need for a comprehensive...evaluation to acquire postsecondary disability services” (Sopko, 2008, p. 4).

However, reports from the Association for Higher Education and Disability (AHEAD) appear to indicate that this is not happening on a widespread basis at the postsecondary education level (January 2009 Transition Community of Practice [CoP] national conference call)<sup>1</sup> and that collaboration is needed between special educators and Vocational Rehabilitation (VR) counselors in order to “identify common guidelines for documentation of an individual’s disability and the request for accommodations” (Lamb, 2007, p. 11).

## **History/Legal Basis**

The SOP was introduced in IDEA as an exit requirement for youth whose eligibility for special education services terminates when they exit secondary school with a regular diploma or exceed the age eligibility for a free appropriate public education.

Regulations indicate that: “State and local officials should have the flexibility to determine the appropriate content in a child’s summary, based on the child’s individual needs and postsecondary goals” (U.S. Department of Education, 2006, p. 46,645). State and district flexibility in developing local forms was reiterated by the Florida Department of Education in a Bureau of Exceptional Education and Student Services’ (BEESS) memo that states: “Districts have the flexibility to adopt one of the attached forms or to use information from either of the forms to develop a form that meets local district needs” (Lockman, 2005).

## **Overview**

The SOP is still a relatively new requirement. Efforts to collect information on SOP content, uses, and policies are under way by a number of organizations, including the National Secondary Transition Technical Assistance Center (NSTTAC), Project Forum, the IDEA Partnership Transition Community of Practice, and the Council of State Administrators of Vocational Rehabilitation (CSAVR).

A template for the SOP was developed at the National Transition Documentation Summit in 2005 that could be modified or adapted as needed by states and school districts. However, because IDEA allows states and districts to develop their own SOP policies, there is wide variation in form and content. A study of 43 SEAs (not including Florida) by Miller, Shaw, Banerjee, and Vitello (2009) found that 88 percent met minimum IDEA requirements for (a) written summaries of academic achievement and functional performance and (b) recommendations for meeting postsecondary goals. Forty percent of the SEAs were influenced by the national template.

The national template is included as an SOP option for Florida school districts in a memorandum on SOP requirements from the Florida Department of Education, BEESS (Lockman, 2005). It is important to note that the template has been ratified by seven national disability organizations.

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<sup>1</sup> Transition Community of Practice conference call transcripts are available from Mariola Rosser ((703) 519-3800) at the IDEA Partnership, National Association of State Directors of Special Education, Alexandria, VA.

The template is available on-line from a number of sources, including the Council for Exceptional Children and the Learning Disabilities Association of America.

The variation in SOPs poses a challenge for postsecondary institutions and other adult service providers that work with youth from multiple school districts and other states. Information collected by the IDEA Partnership's Transition CoP found a number of issues in effectively implementing SOPs:

- To be useful, the SOP must provide information that will meet the needs of the “next environment,” including postsecondary education, VR, and adult service providers (December 2008 Transition CoP conference call).
- Disability documentation, which may be attached to the SOP, may not be adequate for postsecondary institutions (January 2009 Transition CoP conference call) and adult service providers, particularly because IDEA no longer requires a reevaluation when a student graduates from high school with a regular diploma or ages out of public education (IDEA 2004, §614(c)(5)(B)(i)).
- Collaboration in determining the contents of the SOP with organizations such as VR helps youth access services more quickly and reduces costs—but does not seem to be a widespread practice (December 2008 Transition CoP conference call).
- A small, informal survey of members of AHEAD found that half of the respondents had not seen an SOP and that content of the SOPs varied widely (January 2009 Transition CoP conference call).
- Some disability services staff in postsecondary institutions who receive SOPs may not have a background in disability/special education; therefore, they may not understand information provided in an SOP (January 2009 Transition CoP conference call).

### **Evidence-based and Best Practices**

AHEAD, the Council for Exceptional Children's (CEC) Division on Career Development and Transition, and four national learning disability organizations participated in a National Transition Documentation Summit in 2005 that developed a national SOP template. The template is being used in a number of states and districts and has five parts:

- Background information
  - Student name, address, birth date, graduation date, etc.
  - Disability and individual educational plan (IEP)/504 plan information
  - Most recent copy of diagnostic and functional assessments
- Student's postsecondary goal(s)
- Summary of performance
  - Present level of performance in academic, cognitive, and functional areas
  - Essential accommodations in academic, cognitive, and functional areas
- Recommendations to assist the student in meeting postsecondary goals
  - Suggestions for accommodations, adaptive devices, compensatory strategies and/or collateral support services for postsecondary education, employment, independent living, and community participation (NOTE: Postsecondary goals are only required for the areas of education or training, employment, and, if appropriate, independent living.)
- Student input and signature (Recommended)

- Student’s description of his or her disability’s effects, supports, successful and unsuccessful accommodations and supports, strengths, and needs
- Student signature and date

Instructions for the national SOP template note that:

- SOP “recommendations should not imply that any individual who qualified for special education in high school will automatically qualify for services in the postsecondary education or employment setting. Postsecondary settings will continue to make eligibility decisions on a case-by-case basis.”
- “The SOP is most useful when linked with the IEP process and the student has the opportunity to actively participate in the development of this document.”
- “The SOP must be completed during the final year of a student’s high school education. The timing of the SOP may vary depending on the student’s postsecondary goals” (National Transition Documentation Summit, 2005, instruction page).

Project 10, a discretionary project of the Florida Department of Education, Bureau of Exceptional Education and Student Services, is charged with improving secondary transition through the provision of technical assistance, training, and product development and dissemination. The project is currently developing a training module, *Helping Students Develop Their Summary of Performance*, that explains the background and conceptual framework of the SOP, identifies its benefits for youth, and explains how to complete the sections of the national SOP template using a fictitious student as an example. This module will soon be available on the Project 10 Web site at <http://www.project10.info>.

The diagnostic assessments attached to the SOP are especially important for students who plan to request accommodations in higher education and/or apply for VR services. Information on the type of disability documentation needed for higher education and VR is available from the following sources:

- AHEAD’s disability documentation best practices (AHEAD, n.d.-a),
- The report of the National Joint Committee on Learning Disabilities (NJCLD, 2007) on the documentation disconnect for students with learning disabilities (LD)
- A Rehabilitation Services Administration (2005) Technical Assistance Circular on assessing functional capacities of individuals with LD for “order of selection” purposes
- The Florida Division of Vocational Rehabilitation policies and procedures manual described below

Note: “Order of selection” is a system in which people with the most significant disabilities are served first because VR offices do not have the resources to serve everyone who applies. Over 40 states (including Florida) operate under an order of selection, and in most of them “the majority of transition-age students (16–21 years of age) will not meet the definition of most significant disability and will be placed on a waiting list for services” (Lamb, 2007).

As noted previously, IDEA no longer requires a reevaluation when a student exits public education, so the school or district cannot be required to provide the assessments. As a result, the most recent diagnostic and functional assessments in a student’s school record may not meet AHEAD and/or Rehabilitation Services Administration (RSA) requirements for documenting

disabilities. If this is the case, a strategy for arranging these assessments may be included in the SOP discussion.

For example, AHEAD recommends “a description of the current functional limitations,” including “relatively recent documentation” particularly for “changing conditions and/or changes in how the condition impacts the individual brought on by growth and development” (AHEAD, n.d.-b, Item 4). The Florida Division of Vocational Rehabilitation (DVR) policy guidelines state that: “When using existing medical, psychiatric, or psychological information, the counselor will determine if it is recent enough to document an impairment. Recency is determined by the current status of the individual’s condition compared to available reports....In instances where DVR is funding treatment, information can be no older than one year” (Division of Vocational Rehabilitation, n.d., §6.04 and §6.0402). However, DVR counselors may authorize “specialty examinations” to document a disability if necessary (§4.0704).

AHEAD and DVR are also specific in the types of documentation needed to verify the presence of a disability. AHEAD’s “seven essential elements of quality disability documentation” specify:

1. A licensed or otherwise properly credentialed professional with appropriate training and experience
2. A clear diagnostic statement identifying the disability
3. A description of the diagnostic methodology used
4. A description of the current functional limitations
5. A description of the expected progression or stability of the disability
6. A description of current and past accommodations, services, and/or medication
7. Recommendations for accommodations, adaptive devices, assistive services, compensatory strategies, and/or collateral support services (AHEAD, n.d.-b)

DVR policy (DVR, n.d., §4.10, §4.16, §4.18, and §4.19) requires reports signed by properly credential or licensed psychiatrists, clinical psychologists, school psychologists, speech language pathologists, audiologists, ophthalmologists, or physicians appropriate to the disability. Professional staff under the supervision of a properly licensed health professional are also authorized to conduct disability evaluations or diagnoses.

Neither AHEAD nor the Division of Vocational Rehabilitation mentions Response to Intervention (RtI) in their documentation guidelines. It appears that RtI information is accepted as part of the disability documentation package but is not accepted as the sole documentation of a learning disability. For example, the National Joint Committee on Learning Disabilities reviewed disability documentation guidelines from 100 postsecondary institutions and found that 67 percent had identified specific tests for documenting learning disabilities whereas 25 percent “used some form of discrepancy model to document an LD” (NJCLD, 2007, p. 8). Current DVR policy states that an “acceptable diagnosis of specific learning disabilities should be based on testing done in the 9<sup>th</sup> grade or later using the Wechsler Intelligence Scale for Children (WISC) ages 3 to 16 and/or the Wechsler Adult Intelligence Scale (WAIS) ages 16 and older” as well as school reports that meet Florida Administrative Code (F.A.C.) standards, with some caveats, described in 6A-6.03018, F.A.C. (Division of Vocational Rehabilitation, n.d., §4.17).

It should also be noted that each postsecondary institution develops its own disability policies, including those for documentation. Some use the AHEAD guidelines, and others do not. Some institutions publish their disability policies on their Web sites, while others may not have formal policies. When in doubt, it is best to contact the Disability Student Services office at the postsecondary institution for documentation requirements.

Best practices for transition can be applied to the SOP process by including person-centered planning and opportunities for students to practice self-determination and make informed choices. Self-directed (SD) SOPs are one way to increase student and family involvement in the transition planning process (Martin, Van Dycke, S'Ottavio, & Nickerson, 2007). The authors of self-directed SOPs suggest that students do the following:

- “begin the SD-SOP process in the ninth grade
- complete the SD-SOP yearly as part of developing transition plans and goals
- incorporate results of their transition assessments into SOP goals
- write their goals, perceptions of their disability, impacts of their disability, useful supports and accommodations for the SD-SOP, and
- learn to direct their IEPs as they learn the SD-SOP process” (Martin, Van Dycke, D'Ottavio, & Nickerson, 2007, pp. 15–16)

Confidentiality of the SOP may be protected by developing a specific school release form for the SOP that releases it directly to youth who have reached the age of majority (unless it is necessary to extend legal guardianship past that age; Kochhar-Bryant, 2007). Youth or guardians should then provide access to the SOP, or portions of it, only to those who need the information in order to provide postsecondary disability services, accommodations, or modifications.

In order to protect student confidentiality, some transition experts recommend that students **not** share their SOPs with employers unless they need to negotiate accommodations (Izzo & Kochhar-Bryant, 2006). Students who decide to disclose their disabilities and seek accommodations from employers must then decide what SOP information they will share. Employers' concerns usually relate to documenting the existence of a disability in order to determine reasonable accommodations, but most do not have specific disability documentation guidelines (Shaw, 2006).

## **Final Thoughts**

- The SOP should be written for two audiences: (1) the young person who is leaving school and (2) people in the environment to which the young person is transitioning (e.g., disability support staff at institutions of higher education, rehabilitation counselors, other postsecondary service providers, and employers).
- Students and IEP teams may begin working on development of the SOP in the eighth or ninth grade (Martin, Van Dycke, D'Ottavio, & Nickerson, 2007) to ensure adequate time for goal setting, collecting information, making recommendations, and preparing the student to use the SOP to advocate for his or her needs after exiting high school.

- Avoid or explain jargon when writing the SOP because some recipients of the SOP (e.g., postsecondary disability support staff and employers) may not be familiar with special education or disability terminology (Dukes, Shaw, & Madaus, 2007).
- Ensure that confidentiality of the SOP is maintained.
- Although SOPs are required for students served in exceptional student education who graduate from high school with a regular diploma or who age out of the system, SOPs may also be beneficial for students exiting with special diplomas or certificates of completion.

## Web Resources

### **IDEA 2004 Requirements for Summary of Performance**

<http://www.project10.info/StatePerformancePlan.aspx>

The November 30, 2005, memo from Bambi J. Lockman, Chief of the Bureau of Exceptional Education and Student Services, Florida Department of Education, regarding the IDEA SOP requirements, provides a summary of key points and two sample SOP forms. Districts may also develop their own SOP forms.

### **The Documentation Disconnect for Students with Learning Disabilities: Improving Access to Postsecondary Disability Services, A Report from the National Joint Committee on Learning Disabilities (July 2007)**

<http://www.ahead.org/resources/articles/njclld-paper>

This report outlines documentation issues for students transitioning from high school to postsecondary institutions, including best practices; the SOP; recommendations for secondary school personnel, postsecondary personnel, and policymakers; Web resources; and AHEAD Foundational Principles for the Review of Documentation and the Determination of Accommodations (2004).

### **Summary of Performance**

<http://www.nsttac.org/indicator13/sop.aspx>

The National Secondary Transition Technical Assistance Center Web page provides links to a national resource map of state SOP sites, annotated bibliography, SOP reference list, and more.

### **Summary of Performance Model Template**

<http://www.cec.sped.org/AM/Template.cfm?Section=Home&TEMPLATE=/CM/ContentDisplay.cfm&CONTENTID=6031> or

[http://www.lidaamerica.org/aboutld/adults/post\\_secondary/print\\_sop.asp](http://www.lidaamerica.org/aboutld/adults/post_secondary/print_sop.asp)

These links provide access to the SOP template developed at the 2005 National Transition Documentation Summit, including instructions and containing five sections:

1. Background Information to which diagnostic assessment reports may be attached
2. Student Postsecondary Goals
3. Summary of Performance in Academic Content, Cognitive, and Functional Areas
4. Recommendations to assist the student in meeting postsecondary goals
5. Student Input and signature

### **SOP Practice Group (National Transition Community of Practice, IDEA Partnership)**

<http://www.sharedwork.org/section.cfm?as=5&ms=5>

(Requires registration) This new practice group site currently contains the results of the January 2009 survey of service providers/AHEAD members regarding the SOP and a question about what states are doing with SOPs. Plans include development of a fact sheet and a dialogue guide as well as assisting NSTTAC in completing its SOP map.

### **Self Directed Transition Planning**

<http://education.ou.edu/zarrow/?p=37&z=7>

The Zarrow Center for Learning Enrichment at the University of Oklahoma provides eight research-based lessons, including one on the SOP, for teaching students to actively participate in their IEP meetings.

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