TIPS FOR WRITING COMPLIANT TRANSITION PLANS (INDICATOR 13)

Utah State Board of Education Special Education Services

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Please be advised that meeting federal and state requirements ensures compliance. Districts and charter schools may set their standards higher. Consult with your Director of Special Education for clarification about your local requirements.

Contents

Purpose of Transition Planning Within the Individuals with Disabilities Education Act (IDEA)

Transition planning for students with disabilities is connected to one of the most fundamental purposes of the IDEA which is "to ensure that all students with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living" (Rules VII.B.1.).

When individualized education program (IEP) teams are determining how to provide a free appropriate public education (FAPE) to students, appropriate transition planning is a critical part of this process. This technical assistance document is intended to support local education agencies (LEAs) in understanding the requirements outlined in the Utah State Board of Education Special Education Rules (Rules) as well as effective practices that could be considered when developing and implementing quality transition programs.

Compliance and Effective Practices

1. Compliance is based on state and federal rules and regulations. Everything that is outlined as a compliance requirement within this document is connected to a specific Rule. Each state and local agency is required to understand and comply with the Rules. Compliance with the Rules and IDEA is the minimum standard required during implementation.

2. Effective practices enhance compliance and are formulated from evidence-based tools and strategies. LEAs are encouraged to implement effective practices to enhance the services provided to students but are not required by law.

Current Measurement Language for Indicator 13

Special education is a federally funded program with specific monitoring and compliance requirements established by the federal Office of Special Education Programs (OSEP). The USBE is held to specific accountability requirements to ensure compliance with federal laws and mandates. The USBE is required to monitor compliance within a sample of student IEP files and report all identified non-compliance to the federal government as part of the Annual Performance Report (APR). The APR consists of 17 different Indicators used to measure each state's compliance with the federal regulations. The following measurement language outlines accountability requirements for writing compliant transition plans (Indicator 13).

> *"[Indicator 13 measures the] percent of youth with IEPs aged [14] and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age-appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency*

was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority (20 U.S.C. 1416(a)(3)(B))" (OSEP, 2020).

Indicator 13 Compliance Requirements

When the USBE monitors IEP files within an LEA, the following questions are used to determine compliance within individual student files. To have a compliant transition plan, each compliance question below must meet the minimum compliance requirements. If there are items or questions within the transition plan that are identified as being non-compliant, the IEP team must correct them. Corrections of non-compliance within a transition plan can generally be corrected through the IEP amendment process if there is already an existing plan. A meeting must be held when a transition plan is being developed for the first time.

Question 1: Is a Transition Plan Included in the Student's File?

Based on the student's age at the time the current IEP was written, was there a transition plan included for the student who is at least 14 years of age? (Rules VII.B.5.)

Question 1 Compliance

1. If the student is 14 at the time the IEP is written, the student must have a transition plan (Rules VII.B.)

2. Some IEP teams have written transition plans for students who are 13, which may be appropriate for the student, but cannot be included in the APR monitoring sample.

Question 1 Non-Compliance

1. All the other questions are dependent on whether this question is marked compliant. If there is not a current transition plan in the file, all other questions are automatically counted as non-compliant and must be corrected.

Question 2: Was the Student Invited to the IEP Team Meeting?

Was the student invited to attend the IEP meeting to consider postsecondary goals and transition services? (Rules VII.B.4.a.)

Question 2 Compliance

1. Students must be invited to the IEP meeting if a purpose of the meeting will be the consideration of postsecondary goals for the student and the transition services needed to assist the student in reaching those goals (VII.B.4.).

   a. The purpose of a meeting, as outlined on the notice of meeting, must include the discussion, development, and determination of postsecondary transition services for all students ages 14 and older, or younger if determined appropriate by the IEP team, at the time of the IEP (Rules III.H.2.).

2. If the student is invited but does not attend the meeting, the LEA must take other steps to ensure the student's preferences and interests are considered. It is the responsibility of

the LEA to ensure the student's input is considered and to determine what documentation would be considered appropriate.

Question 2 Documentation

1. If the student is invited to the meeting as a member of the IEP team on the notice of meeting and the purpose of the meeting has included transition, that would be compliant.

2. If the notice of meeting is addressed to the student and the purpose of the meeting has included transition planning, that would also be compliant.

Question 2 Effective Practices

1. Help families understand the benefits of actively engaging their students in transition planning.

2. Get the student excited about being involved in the process and talk about transition planning openly at school.

3. If appropriate, consider having the student facilitate the transition section of the IEP.

   a. Student-led IEP meetings increase self-advocacy skills and disability awareness. They also can create a rich and meaningful IEP for the student.

4. IEP teams can use the [Transition Elevated](#) online application to engage students in the transition planning process.

Question 2 Non-Compliance

1. The student was not invited to the IEP meeting.

   a. Note: the student signature on the IEP does not remove the requirement that the student be invited to the IEP meeting.

2. The notice of meeting does not include "transition" as a purpose for the meeting for a student aged 14 and older, or younger if determined appropriate by the IEP team, at the time of the IEP.

Question 3: Is There an Age-Appropriate Assessment?

Is there documentation of an **annual** age-appropriate transition assessment(s) related to postsecondary education or training, employment, and, where appropriate, independent living skills? (Rules VII.B.5.a.(1))

Question 3 Compliance

1. The assessment is updated annually with the IEP (Rules VII.B.5.a.).

2. Any documentation of the **completion of at least one transition assessment by the time the IEP is developed**.

3. Transition assessment leads to the development of measurable postsecondary goals, transition services, courses of study, annual goals, and agency linkages.

Question 3 Documentation

1. Transition assessments may be documented in the transition plan itself.

2. The data from an assessment may be included in a Present Level of Academic Achievement and Functional Performance (PLAAFP).

3. The transition assessment, data of the assessments, or summary of the assessments could be attached to the transition plan or included somewhere else in the file.

4. Assessment protocols used for transition planning can be compliant if there is a date on the protocol that shows it was updated annually but prior to the development of the transition plan.

Question 3 Effective Practices

1. One of the most important reasons to conduct transition assessments is to help students learn about themselves as part of their preparation for taking an active role in determining postsecondary education, employment, and independent living goals.

2. Multiple types of assessments/evaluations are recommended in these domains:

   a. Employment/Career Interests

   b. College Readiness/postsecondary Training

   c. Self-Determination/Self-Advocacy

   d. Independent Living/Adult Living Skills

3. Effective practices also include aligning the transition assessment to PLAAFPs, goals, services, etc.

4. Age-appropriate assessments are required by the Rules and are interpreted to mean the student's chronological age, not developmental age.

Question 3 Non-Compliance

1. A transition assessment carried over from previous years.

2. If there is an assessment without a date, it cannot be identified as a current annual assessment.

Question 4: Measurable Postsecondary Goals

Does the IEP include measurable postsecondary goals for postsecondary education or training, employment, and, where appropriate, independent living skills? (Rules VII.B.5.a.(1))

Question 4 Compliance

1. The rule governing transition services requires that **each goal be measurable and postsecondary**. Two separate goals are required for the areas of employment and education/training. An independent living goal may be developed based on the needs of the student. This section will provide the OSEP guidance outlining the need for a minimum

of two goals and break down the guidance for how to make goals "measurable" and "postsecondary."

> "Regarding postsecondary goals related to training and education, the IDEA and its implementing regulations do not define the terms 'training' and 'education.' However, the areas of training and education can reasonably be interpreted as overlapping in certain instances. In determining whether postsecondary goals in the areas of training and education overlap, the IEP Team must consider the unique needs of each individual student with a disability, in light of his or her plans after leaving high school. If the IEP Team determines that separate postsecondary goals in the areas of training and education would not result in the need for distinct skills for the student after leaving high school, the IEP Team can combine the training and education goals of the student into one or more postsecondary goals addressing those areas. For example, for a student whose postsecondary goal is teacher certification, any program providing teacher certification would include education as well as training. Similarly, a student with a disability who enrolls in a postsecondary program in engineering would be obtaining both education and occupational training in the program. The same is true for students with disabilities enrolled in programs for doctors, lawyers, accountants, technologists, physical therapists, medical technicians, mechanics, computer programmers, etc. Thus, in some instances, it would be permissible for the IEP to include a combined postsecondary goal or goals in the areas of training and education to address a student's postsecondary plans, if determined appropriate by the IEP Team. This guidance, however, is not intended to prohibit the IEP Team from developing separate postsecondary goals in the areas related to training and education in a student's IEP, if deemed appropriate by the IEP Team, in light of the student's postsecondary plans. On the other hand, because employment is a distinct activity from the areas related to training and education, each student's IEP must include a separate postsecondary goal in the area of employment" (OSERS, 2011).

Measurable

1. Measurable means there is language in the goal that allows for the goal to be objectively measured. Measurable goals should include detailed descriptions of what a student will be able to do when that student reaches the goal. Measurable goals are related to intended outcomes and not the process for achieving those outcomes. The postsecondary goals are required to address something the student will do in the future.

2. A future tense verb is the most common way to ensure a goal for the future can be measured. Future tense verbs are actions which create a statement of fact for something that has not occurred yet. There are two formulas that are commonly used for future tense verbs that would meet basic compliance requirements.

Measurable Compliance

1. Formula = "will" or "shall" + verb. EXAMPLE: Upon completion of high school, [Student] will [verb].

   a. What to Consider?

      A. Is the goal measurable? If this goal were a question, could it be answered with a yes or no response? (e.g., Did the student become/do_____?)

2. Formula = to be (i.e., "is") + going to + verb. EXAMPLE: Upon completion of high school, [Student] is going to [verb].

   a. What to consider?

      A. Is the goal measurable? If this goal were a question, could it be answered with a yes or no response? (e.g., Did the student become/do_____?)

Postsecondary

1. Postsecondary means it will occur after high school. When writing goals in the transition plan, the goals must include postsecondary language that clearly establishes they will occur after the student leaves the public school system. Any language that is implied or inferred as postsecondary is not compliant.

2. Eligible students can access special education and related services through post-high programs, adult education, etc. until the age of 22 or until they graduate with a regular high school diploma. Post-high and adult education programs that are part of the public school system cannot be included in postsecondary goals. Goals must be written for the time after the student leaves the program.

Postsecondary Compliance

1. Ask yourself: Would a stranger be able to read the goal and see that the goal will be completed after the student graduates from high school or leaves a post-high or adult education program?

   a. Please note that the postsecondary language can be anywhere within the goal to be compliant.

2. One Administrative Law Judge (ALJ) suggested that a well-written IEP goal should pass the "stranger test." Under that test, an IEP goal is appropriate if a person unfamiliar with the IEP would be able to implement the goal, implement the assessment of the student's progress on the goal, and determine whether the student's progress was satisfactory. *Mason City Cmty. Sch. Dist.*, 46 IDELR 148 (SEA IA 2006).

3. Examples of measurable postsecondary goals:

   a. After graduation from high school, Maria is going to be enrolled in welding courses at Davis Technical college.

b. After completing a post-high program, Lori will maintain her budget independently, paying all her utility bills on time.

c. Peter will work full time in the construction industry after high school.

d. After high school, Alexia will work in the music industry.

e. Carly will live at home and prepare her own lunch every day after graduation.

f. After post-high, Rachel will work part-time at a retail clothing store with the support of a job coach.

g. After high school, Luis is going to attend college majoring in accounting.

h. This list is not an exhaustive list. If the goal itself includes clear postsecondary language that can be defended by the IEP team, it would arguably meet the postsecondary requirement.

Question 4 Documentation

1. Each plan must contain a minimum of two postsecondary goals. One for education/training and one for employment.

2. Postsecondary goals are written into the transition portion of the IEP.

3. Postsecondary goals are measurable and include postsecondary language within the goal.

Question 4 Effective Practices

1. IEP teams should consider making the postsecondary goals more specific as a student gets closer to graduating.

2. Students should be able to help generate the postsecondary goals based on assessments, preferences, and interests.

3. A goal for independent living should be considered for all students:

   a. An independent living goal should include specific skills related to adult living such as managing budgets, making appointments, organizational skills, self-advocacy skills, etc.

4. The Rules include the language "realistic and reasonable" measurable postsecondary goals. However, this is not reviewed in monitoring because IEP teams are responsible for determining whether the goals are "realistic and reasonable" for the student.

Question 4 Non-Compliance

Measurable Non-Compliance

1. Using any kind of language that does not create a statement of fact or is not measurable.

2. When writing a goal, the full formula must be included to make it measurable. Using the words "will" or "is going to" without a verb is non-compliant because the goal

cannot be measured in an objective way. The following are examples of non-compliant goals:

    a. Upon completion of high school, [Student] **will need** support from parents.

    b. Upon completion of high school, [Student] **wants to** become a _____.

    c. Upon completion of high school, [Student] is **thinking about** _____.

    d. Upon completion of high school, [Student] is **considering** _____.

Postsecondary Non-Compliance

1. Using any language that is implied or inferred as postsecondary.

    a. In the future, . . .

        A. The future could be after high school, or it could be tomorrow. This is not considered clear postsecondary language.

    b. Specific jobs without postsecondary language are non-compliant regardless of prerequisite skills needed for the job.

2. Although some jobs require prerequisite skills that can be implied as postsecondary, the rule requires the goal be explicitly postsecondary. This means postsecondary goals must still contain postsecondary language to clearly show that it will be accomplished after the student leaves the public school system.

    a. Non-compliant example: Student will become a doctor.

        A. Although a job as a doctor could be implied as postsecondary, the rule requires the goal itself is explicitly postsecondary. If "doctor" were replaced with "working in a hair salon" or "becoming a mechanic," those goals are not clearly postsecondary, as they could be done while the student is still in an educational setting. Again, these examples are demonstrating the importance of the post-secondary language.

    b. Compliant example: Upon graduation (postsecondary), student will become a mechanic (measurable).

Question 5: Transition Services

Are transition services for education or training, employment, and where appropriate, independent living, included in the IEP to reasonably enable the student to reach postsecondary goals? (Rules VII.B.5.a.(3))

Question 5 Compliance

1. "*Transition services* means a coordinated set of activities . . . focused on improving academic and functional achievement . . . to facilitate the student's movement from school to post-school activities . . ." (Rules VII.B.2.a.(1)).

2. Transition services are based on the individual student's needs. They take into account the strengths, preferences, and interests, and include:

a. Instruction;

b. Related services;

c. Community experiences;

d. The development of employment and other post-school adult living objectives; and

e. If appropriate, acquisition of daily living skills and provision of a functional vocational evaluation (Rules VII.B.2.a.(2)).

3. Transition services for a student may be special education, if provided as specially designed instruction, or a related service, if required to assist a student with a disability to benefit from special education (Rules VII.B.2.b.).

4. Transition services enable students to reach postsecondary goals that are based on the annual transition assessment.

Question 5 Documentation

1. Services for education or training and employment are required in the transition plan.

2. Services listed in the transition plan must outline what transition services, activities and/or specialized instruction are needed during this **annual IEP** for the student to develop the skills and knowledge to facilitate movement towards the student's postsecondary goals.

3. If transition services are outlining the specially designed instruction or related services already outlined in the IEP, then relist the service in the transition services section and ensure it is clear that those services will reasonably enable the student to achieve the postsecondary goal(s). Labeling services as "goal 1" or "goal 2" is not compliant as this does not identify a service that will be provided to the student to help the student achieve those goals.

4. If independent living services are not needed for a student, that must be documented as "considered and not needed."

Question 5 Effective Practices

1. IEP teams could use the [Transition Services and Activities Examples](#) and the [Pre-Employment Transition Services (Pre-ETS) Brochure](#) to develop appropriate services for students.

   a. [Pre-ETS Activity Guide](#)

2. Transition services are encouraged to be explicit and detailed with a clear connection to the postsecondary goals and the transition assessment(s).

3. IEP teams should develop plans that are deliberate and meaningful for the student. This means the services are being individualized and strategically planned out for the student to achieve the postsecondary goal(s).

4. Consider the student's need for instruction and practice in self-advocacy and disability awareness.

5. Community-based instruction leads to better student outcomes for students who have difficulty generalizing skills to other settings.

6. Work-based learning and paid employment are strong predictors of post-school success.

7. Consider assistive technology instruction that may be needed for the student.

Question 5 Non-Compliance

1. The team documented "considered and not needed" for education or training and employment.

2. If the transition plan has a postsecondary goal for independent living, then the team cannot mark "considered and not needed" for an independent living service.

3. Services that cannot identify what activities, services, or experiences are needed to reasonably enable the student to reach postsecondary goals are non-compliant. This is often found when this section is written like a present level.

4. Services labeled as "goal 1, goal 2," etc. The goal label or goal number is not the service. List the actual service(s) being provided to help the student accomplish "goal 1, goal 2," etc.

   a. Non-compliant: goal 1.

   b. Minimum compliance: Math.

   c. Effective practice: Instruction on how to track money and balance a budget.

5. Blank or empty boxes.

Question 6: Services Provided or Paid for by an Outside Agency

If appropriate, is there evidence that parent or adult student's consent was obtained prior to inviting an agency representative to the meeting? Was the agency representative listed on the consent invited to the IEP meeting? (Rules VII.B.4.c.)

Question 6 Compliance

1. To the extent appropriate, with consent of the parent or adult student, the LEA must invite a representative of any participating agency that is likely to be responsible for providing or paying for transition services within the current IEP.

2. School teams must be able to document that agency participation was considered for each student on an IEP.

Question 6 Documentation

1. Teams need to consider whether it is appropriate to invite an outside agency to the meeting.

2. If outside agencies are not needed, there must be documentation, typically in the IEP, that the outside agencies were considered and not needed.

3. If an outside agency is needed, the IEP file must contain written consent **signed by the parent or adult student** and include documentation that the agency was invited.

   a. Note: Consent must be obtained, prior to the IEP meeting, to invite the outside agency.

4. If consent is obtained, the list of who will be invited to attend must be on the Notice of Meeting. It should include the name and agency of the representative invited. A copy of the Notice of Meeting should be provided to the agency.

5. If outside agency representatives attend a meeting at the invitation of the parents, that should be documented somewhere on the IEP, but does not require consent.

   a. For example, it could be noted after the agency representative's signature on the IEP, "Attended per parent invitation."

Question 6 Effective Practice

1. IEP teams should become familiar with outside agencies that provide transition-related services such as Vocational Rehabilitation (VR), Division of Services for People with Disabilities (DSPD), Community Rehabilitation Providers (CRPs), Pre-ETS Providers, Department of Workforce Services (DWS), community mental health agencies, college disability resource centers, etc.

2. USBE has an [interagency agreement with VR](). Each high school has a [VR liaison]() to fulfill mandates in the IDEA, the Rehabilitation Act of 1973, and the Workforce Innovation and Opportunity Act to facilitate the transition of students with disabilities from school to work.

3. A school may actively facilitate a student's referral to an adult agency. However, it may not commit another agency to providing services without the involvement and approval of that agency.

4. IEP teams should be connecting families and students with outside resources before the student leaves the LEA, even if an outside agency is not providing or paying for services outlined in the IEP.

Question 6 Non-Compliance

1. There is no documentation of the team's consideration of the need for outside agency participation.

2. There is no consent obtained to invite outside agencies, or the consent was obtained after the invitation was extended.

Question 7: Annual IEP Goal

Is there an annual IEP goal related to the student's transition services needs? (OSEP, 2020)

Question 7 Compliance

1. Annual goals state what the student will do or learn within the next year that will move the student toward achieving the postsecondary goal(s) and link to the student's transition services.

   ### Question 7 Documentation
   1. Documentation in the IEP has at least one connection between an annual IEP goal and the transition plan.

Question 7 Effective Practice

1. The IEP could include a clear transition PLAAFP with information from the transition assessment annual goal and service(s).

2. The IEP could include annual goals that are specifically labeled and identified as transition goals.

3. The linkage between the annual goals and the postsecondary goal/transition services is direct and specific. If someone were to pick up the IEP and go directly to the annual goals, that person should be able to predict the broad postsecondary goal/transition services needs with a high degree of accuracy (e.g., student will attend college, will be employed in sales, etc.).

4. Transition planning should support the student's needs and be connected to services already considered within the IEP. A student's behavioral (including social skills), self-advocacy, or communication goals can readily link to any of the postsecondary goals.

IEP Goal Examples

1. Given direct instruction on researching careers, Sophie will verbally report out on three potential careers including needed training for chosen careers based on the results of her job shadows by the end of 3rd quarter.

2. Given instruction in the use of a planner, Jose will use his planner daily to keep track of assignments, multi-step projects, and extracurricular activities with a check-in at the end of each week for five consecutive weeks.

3. Given modeling from a peer tutor, Andrew will follow a checklist and complete work tasks on the job with 90% accuracy over three consecutive weeks.

4. After receiving instruction in disability awareness, Carlos will demonstrate self-advocacy skills by telling three of his teachers what accommodations he needs each semester.

5. Given instruction in PowerPoint and IEP participation, Tom will lead his own IEP meeting using at least four PowerPoint slides with his strengths, interests, needs, and goals by October 2019.

Question 8: Multi-Year Course of Study

Does the transition plan include a multi-year course of study that will reasonably enable the student to reach postsecondary goals? (Rules VII.B.5.a.(2))

Question 8 Compliance

1. A course of study must include a multi-year description of coursework that will reasonably enable the student to reach the postsecondary goals.

   ### Question 8 Documentation

   1. Courses can be listed in the courses of study section of the transition plan.

   2. Courses of study could be attached to the IEP (e.g., college and career readiness plan).

   3. Courses of study could be reflected in a graduation tracking sheet that shows future courses the student will take.

   4. It is acceptable to state "all classes to satisfy all requirements for a [TYPE] High School Diploma" as long specific courses that are aligned with the postsecondary goals are included.

   5. If the LEA provides an individualized four-year plan for each student, that plan could be acceptable if it provides a clear description of all course needs (not just required courses) leading to identified postsecondary goals and includes courses from the current year to the student's anticipated exit year.

   6. For 7th and 8th grade students, the courses of study section of the IEP should include specific classes that are helping prepare them to take courses required for graduation.

Question 8 Effective Practice

1. A student's course of study outlines specific courses from the current IEP to the student's exit year.

2. Does it stand up to the "Stranger Test" – is the course of study clear and transferable to another school?

3. Can another school build a class schedule based solely on this information?

4. Would the new school understand the school experiences as listed in the courses of study?

5. Courses of study should be individualized based on the needs of the student and specifically aligned to the goals and services outlined in the transition plan.

Question 8 Non-Compliance

1. A student transcript listing completed courses and credits already earned will not meet courses of study requirements.

2. No courses listed or found in any attached plan or tracking sheet.

Resources

1. Corrections Document
2. [OSEP Measurement Table](#)
3. [Utah State Board of Education Rules](#)
4. [USBE Transition Webpage](#)
   a. [Transition Services and Activities Examples](#)
   b. [Pre-ETS Brochure](#)
   c. [Pre-ETS Activity Guide](#)
   d. [Transition Timeline](#)
   e. [Transition App and support documents](#)
   f. [Indicator 13 compliance worksheet](#)

References

Office of Special Education and Rehabilitation Services (2011, September). *Questions and answers on secondary transition*. Retrieved from https://sites.ed.gov/idea/files/Transition.QA_.September_2011_FINAL.pdf

Office of Special Education Programs (2020, July). *Part B state performance plan (SPP) and annual performance plan (APR) Part B indicator measurement table*. Retrieved from https://osep.grads360.org/#communities/pdc/documents/19741