

The first special education case brought to the Supreme Court defined “appropriate education” through the lens of the *Education for All Handicapped Children Act* in order to prohibit discrimination against students with disabilities (*Board of Education v. Rowley*, 1982; Education for All Handicapped Children Act of 1975). In the decades following this landmark ruling, the definition and interpretation of appropriate education has undergone a transformation. Where initially it was “enough” to simply open the door for children with disabilities, more recent rulings—such as *Endrew v. Douglas County School District*—have clarified that states are responsible for providing an education program that supports **meaningful** and **measurable** skill acquisition for students receiving special education services (*Endrew v. Douglas Co. School District*, 2016).

## **Instruction Must Be Informed by Peer-Reviewed Research**

When the Individuals with Disabilities Education Act (IDEA) was reauthorized in 2004, a new emphasis was placed on applying *proven* methods of teaching in special education settings. Instruction should be based on peer-reviewed research and address students’ unique needs while preparing them for further education, employment, and independent living. To this end, IEPs **must** include a statement of the peer-reviewed research-based special education services provided to the student.

## **Services and Goals Are Outcome-Oriented Rather Than Process-Oriented**

The reauthorization of IDEA in 2004 also shifted special education services from a process-oriented approach where participation in special education was the measure of success to an outcome-oriented approach that requires measurable progress. Goals must be both aligned to learning standards and, at the same time, functional for the student and valued by the family. A lack of forward planning and focus on functional outcomes is what led to the decision in Dracut Massachusetts to award a student two additional years of education services post-graduation so that he could acquire skills that would allow him to succeed after transitioning from high school (*Student v. Dracut*, 2009).

## **Individualized Education Plans (IEPs) Are Based on Data**

An IEP is the foundation of the education that a student in special education receives (“A guide to the IEP”, 2000). As a collaborative document co-created by administrators, teachers, families and students, the goals that are identified within the IEP must take into consideration the student’s strengths and needs as they relate to a typical developmental trajectory. The IEP is driven by data-based decisions and should consider the student’s present levels of development as well as the typical developmental trajectory for that set of skills.

## **The Classroom Meets the Needs of the Individual**

Students receiving special education services should be educated in the Least Restrictive Environment. For some individuals, that may be a general education setting. For others, placement in a typical classroom would result in a lack of meaningful participation in the learning environment. For these children, consider a setting with fewer students that is intentionally designed to work with their unique learning styles. The classroom teacher(s) and paraprofessionals should have the resources they need to work with the population in their classroom. Curriculum designed specifically with special populations in mind can improve student learning outcomes. However, simply having the curriculum available isn’t enough. Teachers and other professionals must also have access to professional development opportunities in order to use specialized curriculum with fidelity.

## **References**

- A guide to the Individualized Education Program*. (2000). Washington, DC: Office of Special Education and Rehabilitative Services, U.S. Dept. of Education.
- Education for All Handicapped Children Act of 1975, Pub. L. 94-142, 89 Stat. 773, codified as amended at 20 U.S.C. §§ 1401.
- Endrew F. v. Douglas County School District*, 136 S.Ct. 2405 (2016).
- Gollub, J. P., & Bertenthal, M. (2002). Designing Curriculum, Instruction, Assessment, and Professional Development. In *Learning and understanding: Improving advanced study of mathematics and science in U.S. high schools*. Washington, DC: National Academy Press.
- Hendrick Hudson District Board of Education v. Rowley*, 458 U.S. 176 (1982).
- Hessler, T., & Konrad, M. (2008). Using curriculum-based measurement to drive IEPs and instruction in written expression. *Teaching Exceptional Children*, 41(2), 28-37.
- Individuals with Disabilities Education Act, 20 U.S.C. § 1400 (2004).
- Student v. Dracut Public Schools*, BSEA 08-5330, 15 MSER 78 (2009).

## Key Considerations

## Compliance

## STAR/Links Curriculum

### Instruction Must Be Informed by Peer-Reviewed Research



IEPs must include a statement of the special education services based on peer-reviewed research and provided to the child.

*IDEA reauthorization: 2004*

The STAR/LINKS curricula use peer-reviewed and empirically validated methods to teach students with Autism Spectrum Disorder and other developmental disabilities. STAR and LINKS use ABA principles delivered through Discrete Trial Training, Pivotal Response Training and Task Analysis practices to ensure a learning environment that suits the behavioral and educational needs of students with ASD and other developmental disabilities.

### Meaningful and Measurable Progress



Schools must offer students with disabilities an education “reasonably calculated” to enable them to make progress.

*Supreme court ruling: Endrew F v. Douglas County School District*

The STAR/LINKS developmentally sequenced student assessment and program guides support practitioners in determining appropriate goals for students that are attainable based on current skills.

### Services and Goals Are Outcome-Oriented Rather Than Process-Oriented



IEPs must confer meaningful educational benefit while ensuring that students learn skills that will allow them to be successful beyond the school environment.

*Dracut Public School Decision (BSEA No. 08-5330)*

STAR and LINKS lessons are aligned to learning standards. Additionally, both curricula include intentional opportunities to generalize skills, promote independence in routines, and develop life skills.

### IEPs Are Based on Data



Annual goals should be established based on the correlation between the PLAAFP and the student needs. This is accomplished through a curriculum-based assessment.

*(Hessler & Konrad, 2008)*

The STAR and LINKS programs use a curriculum-based assessment to identify students’ present levels of functioning and determine appropriate goals. Data is collected daily to ensure skill acquisition. Progress monitoring is frequent, practical, and leads directly to data-based decision-making to guide instruction.

### The Classroom Meets the Needs of the Individual



“The classroom” is a blend of the curriculum and the teaching staff. The successful combination of these two resources promotes student progress.

*(Gollub, 2002, p. 134)*

STAR Autism Support provides workshops and in-class coaching for teachers implementing the STAR and LINKS curriculum. Teachers learn both the basics of ABA and how to implement the specific curriculum with fidelity.