

Applied Research Project

**The Behavioral Assessment and Intervention Mandates of the 1997 Amendments to  
IDEA and Implications for Special Education Programs**

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## Applied Research Project Abstract

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Public education has always been a hot topic in United States politics, and remains one of the areas of public administration in most need of reform. The 1997 Amendments to the Individuals with Disabilities Education Act (IDEA '97), like most education reform efforts of the 1990s, placed emphasis on assessment and accountability in the special education programs throughout the country. One mandate of IDEA '97 requires that students in special education programs be given functional behavioral assessments and have behavior intervention plans developed for them if behavior problems exist that are destructive to their learning environment or to the learning environment of others. This study explores the behavioral assessment and intervention mandates of IDEA '97.

The purposes of this research are to identify elements of a practical ideal type special education program with regards to treating problem behavior according to IDEA '97 and to use this practical ideal type to gauge whether Texas public schools are in compliance based on the perceptions of Special Education Directors statewide. Furthermore, this study explores the perceptions of these same Directors on how the implementation of the IDEA '97 mandates has progressed in Texas public schools.

Survey research was determined the best method to gather statewide data to fulfill the research purposes and surveys were mailed to every Special Education Director in Texas. The findings indicate from the perspective of these Directors that Texas public

schools are in compliance with the IDEA '97 behavioral assessment and intervention mandates. Also, the findings suggest that in meeting compliance, schools were faced with challenges that include primarily resource issues of time and funding.

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# **The Behavioral Assessment and Intervention Mandates of the 1997 Amendments to IDEA and Implications for Special Education Programs**

## **Chapter 1**

### **Introduction**

#### *Education in America*

Public education has always been a hot topic in United States politics, and remains one of the areas of public administration in most need of reform. "Exacerbating this situation are dwindling public resources, expanding class size, and repeated calls for accountability" (Ellis & Magee, p. 292). Since the year 2000 is a presidential election year, voters have heard a great deal of education reform proposals, principles, and promises. Media attention frequently focuses on educational issues, likely because the state of this country's educational system affects us all, and affects all of our children. Running an effective school is no easy task. With each new policy, public schools are required to implement new mandates sometimes without additional funding.

One part of the public education system that is given an increasing amount of attention is special education.<sup>1</sup> For more than 25 years, special education programs in the United States have been subject to scrutiny, review, and criticism.<sup>2</sup> School critics argued that excluding students with disabilities or special needs "from public schooling because of the severity of their disabilities was fundamentally unjust and a violation of these students' basic human rights" (Christensen & Dorn, p. 181). The 1997 Amendments to the Individuals with Disabilities Education Act (IDEA '97), like most education reform efforts of the 1990s, placed emphasis on

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<sup>1</sup> Osborne, DiMattia and Curran argue that special education programs are subjected to greater scrutiny than most education programs due to the amount of funds expended for these programs and the source of the funds (p. 19).

<sup>2</sup> Virginia Smith Harvey explains that controversy over the manner in which special education services are delivered to students continues to be highly visible in the professional literature and practice (p. 205). Carol Christensen and

assessment and accountability in the special education programs throughout the country. One mandate of IDEA '97 requires that students in special education programs be given functional behavioral assessments and have behavior intervention plans developed for them if behavior problems exist that are destructive to their learning environment or to the learning environment of others.

### *Research Purpose*

The purpose of this research is threefold. The first purpose is to specifically address the behavioral assessment and intervention requirements of IDEA '97 to identify elements of an ideal model of a special education program with regards to treating problem behavior according to the law. The second purpose of this research is to gauge the extent to which Texas public schools meet the criteria of this ideal model based on the perceptions of Texas Special Education Directors throughout the state. The final purpose is to explore the perceptions of these same Directors about how the implementation of the IDEA '97 mandates has progressed in Texas public schools. Since the 1997 Amendments did not go into effect until May of 1999, this past school year was the first year that schools were required to adhere to the mandates. This study is intended to be an initial look at how Texas public schools are doing with regards to following the behavioral assessment and intervention mandates of IDEA '97.

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Sherman Dorn add to this argument by highlighting critiques that revolve around issues of equity, social justice, and human rights which have resulted in major policy shifts and extensive reforms (p. 181).



### *Practitioner Perspective*

Courtney Bandalo,<sup>3</sup> a Speech/Language Pathologist for the Austin Independent School District, is directly affected by the new legislation. She is responsible for serving three separate schools in the Austin area and sometimes has up to 86 individual students in her everyday caseload. She provides a wide range of special services to students with any communication disorder needing help in developing language and speaking skills. She also works with children who have learning disabilities. Through her direct experience with students in the special education system, Ms. Bandalo has made the observation that children would rather be seen as “bad” than “dumb.” Most students are fully aware that they are not catching on to fundamental skills as quickly as their classmates, and some of these students would rather be seen as the “bad kid” who always misbehaves instead of the “dumb kid” who is always behind in class. So, in a population of students that are already struggling in comparison to most of their classmates, she has noticed a consistent amount of disruptive behavior over the years ranging from students not following instructions, not completing work, to even throwing things, leaving the room without permission, or trying to run away.

Ms. Bandalo also explains that it is difficult for teachers to be responsible for the rest of the class when having to focus all of their attention on one or two students who are disruptive. Even in the special education classroom where there are sometimes only 15 students or less, teachers still have to deal with behavior problems. If a teacher is attending to the disruption, she is no longer focused on helping the other students learn. When some of these children are not

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<sup>3</sup> Courtney Bandalo was informally interviewed in Austin, Texas, on August 19, 2000, and again on October 28, 2000. On both occasions she provided information valuable to this study. Firstly, she evaluated the survey instrument before it was sent to the Special Education Directors. She also provided examples of common situations where unwanted behavior causes disruption in the classroom and explained how the FBA and BIP process is conducted in the Austin Independent School District. Ms. Bandalo received her Bachelor's of Science in Speech Pathology from the University of Pittsburgh and her Master's of Speech Pathology from the University of North Carolina.

receiving the specialized and individualized services they need, they are not successful in their studies. So, really, any disruption is a problem in this setting. Several students need one on one attention as it is; unfortunately resource constraints make one on one attention infeasible.

### *New Mandates in the Classroom*

Addressing repeated misconduct, Ms. Bandalo regularly participates in functional behavioral assessments and frequently develops behavior intervention plans as now required for some students per IDEA '97. The new assessment and intervention mandates of this law have increased her workload a great deal. Not only has the documentation process become more complex and time consuming, but there is also now significant emphasis placed on teachers, counselors, and specialists to meet together regularly to discuss any student acting out in the classroom. Whereas these effects of the legislation surely are a setback in the resource drain of time and energy, Ms. Bandalo feels that the forced coordination and cooperation between different individuals to come up with a unique plan to help each student is the best benefit of IDEA '97. Teacher morale may be negatively affected because of the additional workload, but the student greatly benefits when all of his teachers and support personnel are on the same page and implementing the same plan. According to the observations<sup>4</sup> of Ms. Bandalo, unwanted disruptions are decreasing where intervention plans are implemented by all of the student's teachers. She feels that without this legislation, teachers and support personnel would have not come together as they have to tackle student behavior problems as a team on a regular and frequent basis.

This applied research project intends to provide statewide indicative information about whether or not Texas public schools are adhering to the federal mandates of IDEA '97 and to provide information about any implementation problems the school systems may have had in making process modifications to comply with the new requirements. Before trying to determine whether or not Texas public schools are in compliance with the special education assessment and intervention mandates of the new legislation, the important elements of these requirements are identified. The next chapter provides a legislative history and important information about the 1997 Amendments to IDEA and explores issues that schools must plan for to meet compliance with the law. The chapter also highlights significant points presented in current education and special education journal articles.

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<sup>4</sup> Ms. Bandalo recognizes that even though it is too early to determine the overall effectiveness of this new legislation, she has nonetheless noticed a positive difference in student behavior when each and every teacher is cooperating and focusing on identified objectives that are outcomes of the newly mandated process.

## Chapter 2

### Literature Review

The purpose of this chapter is to offer information important to understanding the policy and legislative elements of this study. A history of special education legislation is presented, along with the significant elements of the behavioral assessment and intervention mandates of IDEA '97 itself.

#### *Legislative History*

Prior to 1975, few educational services were available to students with disabilities. Often times, students with severe disabilities simply were not enrolled in the school system. It was in this year that significant reforms in special education finally came in the form of federal legislation when Congress passed Public Law 94-142, the Education for All Handicapped Children Act (EHCA). All levels of the educational system have responsibilities that are defined by law and by policy, and each level is responsible for complying not only with its own laws and policies, but also with those of the next higher levels from which it derives authority or funding.<sup>5</sup> Therefore, the passage of this legislation at the federal level was important for special education programs across the country. The EHCA "sought to ensure that students with disabilities receive a free and appropriate public education in the least restrictive environment" (Hendrikson, et al., p. 280), thus opening the schoolhouse gates to a population of students who previously had been excluded. Programs now would consist of special education and related services designed to meet the specific unique needs of the child with a disability (Osborne, et al., p. ix.). Principles such as zero rejection from education, nondiscriminatory assessment, parent participation,



individualized programming, and needs for due process in special education programs were the driving force of this legislation (Christensen & Dorn, p. 186).

Fifteen years later in 1990, Congress reauthorized EHCA with the passage of Public Law 101-476, and through the reauthorization bill retitled the legislation the Individuals with Disabilities Education Act (IDEA). "This legislation broadened the concept of transition services to include instruction, community experiences, development of employment and other post-school adult living objectives, and acquisition of daily living skills and functional vocational evaluation when appropriate" (Frank & Sitlington, p. 41). The most successful principle in both the original passage of EHCA and the new IDEA has been the notion that every child is entitled to an education. This means that all children have access to schooling, regardless of their disability. In fact, in a period of less than 20 years, the number of children served under elementary special education programs alone has escalated from 3.7 million in 1976-1977 to 5.4 million in 1993-1994, a 45% increase.<sup>6</sup> This is one of the great legislative accomplishments of our government on behalf of public education. To see that all children have rights to the same public services—namely education—reinforces the democratic foundation this country was built on. By mandating that all children be allowed to participate in public education the federal government recognized and included an entire population of individuals that had previously been underserved in this country's education system.

On June 4, 1997, President Clinton signed Public Law 105-17, the Individuals with Disabilities Education Act Amendments of 1997 (IDEA '97), that both amended and reauthorized the IDEA of 1990. The Department of Education adopted the final regulations in

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<sup>6</sup> The relationship between the state and federal government with regards to education funding is explained in *Developing the Compliance Monitoring System in Special Education: A Process Manual for State and Local Education Agencies*, p. 1.

March two years later, and they became effective May 11, 1999. Building on the growing momentum of this legislation the additions to this law represent some of the most significant changes since its original passage in 1975. The new regulations require immediate and long-term changes in the way we educate students with disabilities, especially due to the section involving the discipline of these students (Yell & Shriner, p. 246). These amendments "include a number of provisions that are likely to substantially alter public school practices" (Hendrikson, et al., p. 280).

Reform efforts in the 1990s called for increased accountability and adequate assessment. IDEA '97 was no different. "Assessment to gauge the progress of students, schools, states, and the nation toward meeting higher standards has taken on a leading role in major legislation at all levels" (Shriner, p. 232). IDEA '97 is simply the latest of federal laws affecting assessment, this time for students with disabilities, requiring students in special education programs be given functional behavioral assessments if behavior problems exist that are destructive to their learning environment or the learning environment of others.

### *IDEA '97*

With IDEA '97, Congress wanted not only to make schools safe and orderly environments but also to address the issue of disciplining students with disabilities.<sup>7</sup> IDEA '97 represents "Congress's attempt to balance school officials' obligation to ensure that schools are safe and orderly environments conducive to learning and the school's obligation to ensure that students with disabilities receive a free and appropriate public education" (Yell & Shriner, p. 246). This legislation gave students with disabilities specific rights to access to a free and

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<sup>6</sup> Christensen and Dorn provide these statistics to illustrate the dramatic increase in the number of students receiving special education services during the period the legislation has been in effect, p. 189.

appropriate education not only by continuing to require that educational services be available to these students, but also by disallowing expulsions, limiting suspensions, and regulating placements into alternative educational settings (Katsiyannis & Maag, p. 280). "Congress sought to help schools respond appropriately to behavior problems of students with disabilities, promote the use of appropriate behavioral interventions, and increase the likelihood of success and school completion for some of our most at-risk students" (Hartwig & Ruesch, p. 240).

IDEA '97 changed the focus of special education programs from providing accessibility to placement in the general education classroom to the accountability of academic instruction. Accountability for positive behavioral interventions, strategies, and supports is now a priority (Hendrickson, et al., p. 281). Although the majority of the IDEA '97 discipline requirements address the reactive application of disciplinary procedures, the law clearly directs that problem behavior be addressed in a proactive manner (Yell & Shriner, p. 253). The law now requires that teams proactively address problem behavior "by conducting functional behavioral assessments (FBAs), developing individualized education programs (IEPs) that include measurable goals and benchmarks or objectives, and developing and implementing behavioral intervention plans (BIPs)" (Drasgow, et al., p. 258).

### *The Individualized Education Program*

From the first passage of this legislation in 1975, the individualized education program (IEP) has been at the heart of the mandated provision of a free appropriate public education (Osborne, et al., p. ix). "Based on an individual assessment of student needs, the IEP is both the process and the blueprint for the services to be delivered" (Huefner, p. 195). Every student must have an IEP that is developed jointly by the student's parents or guardians and key education

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<sup>7</sup>This observation is a common one, as seen in articles by Drasgow, et al., p. 244, and also Yell & Shriner, p. 246.



personnel including the child's teacher, special educators, and school officials or specialists.

IDEA '97 requires that if a student exhibits behavior problems that impede his learning or the learning of others, the team creating his IEP must consider strategies to specifically address these undesired behaviors. This applies to all students in the special education system, regardless of the student's disability or disability category (Yell & Shriner, p. 253).

IDEA '97 also affected the IEP development process by emphasizing the increased importance of writing annual goals and benchmarks or objectives that are measurable. In the IEP, an annual goal would be a projection made by the IEP team regarding the progress of the student in the current school year. Teachers track the student's achievement towards an annual goal by using benchmarks or short-term objectives that are designed and intended to be measurement tools in gauging a student's progress (Drasgow, et al., p. 251). When a student exhibits problem behavior, the IEP team must incorporate into that student's IEP a strategy to deal with that problem behavior. "This includes writing goals and objectives to address the problem behavior, developing measurable evaluation criteria to assess progress toward those goals, conducting a functional assessment of behavior, and developing a proactive behavioral intervention plan to include in the IEP" (Yell & Shriner, p. 253).

To illustrate the difference between an annual goal and a benchmark or objective consider a situation where a special education teacher has in his classroom a student who simply leaves her desk and walks around the room talking to other students and generally disturbing the rest of the class. This is not uncommon, especially among students who have hyperactive disorders and have difficulty staying in one place for any length of time. An annual goal for this student would be that she only left her desk at designated and appropriate break times. At the end of the year, or at the IEP review, teacher records of her disturbances over the weeks could



measure achievement of this goal. Prior to review, though, in order to make progress towards her annual goal, it is expected that the student work to meet benchmarks or objectives, essentially the small steps taken one at a time to adjust her behavior to bring her closer and closer to reaching her final goal. The first benchmark or step in this process may be that she only be allowed to leave her desk after she has been sitting quietly or working for a ten minute period. The number of times she does so out of turn can be recorded, and thus measured. Another benchmark or objective could be that she be allowed to leave her desk only to sharpen a pencil or use the bathroom, or any other task that does not interfere with the other students' concentration. Again, if she instead decides to leave the room without permission or decides to walk around talking to her classmates, those instances can be recorded. Likewise, her teacher can document the number days where she is completely on task and only takes breaks during designated and appropriate times.

### *Behavior and Discipline*

Not all children in public schools act appropriately in the classroom. Regardless of whether they lack the ability to do so or simply do not desire to do so, teachers must attempt to provide these children and their classmates an educational setting conducive to learning. Some students are not able to follow instructions, and others may be prone to outbursts. These are examples of classroom situations that are providing challenges to school personnel nationwide (Ellis & Magee, p. 291). As a result of more severe incidents, public schools are sometimes portrayed in the media as being playgrounds for violence, gang activity, and drug trafficking. Disobedience, disrespect and the destruction of property are by comparison less severe but more commonplace and continue to cause great disruptions in the classroom (Katsiyannis & Maag, p.

276). Not only are these incidents disruptive to the teaching environment, but they also have a lasting effect on the student who continually misbehaves. "Without effective behavioral support, students who exhibit problem behaviors face educational isolation, vocational isolation, community isolation, social isolation, medical risk, and exposure to highly intrusive forms of control and treatment" (Horner & Carr, p. 84).

"These problems, and their perceived ownership by the public schools, have resulted in an increased and predictable emphasis on practices for disciplining students" (Katsiyannis & Maag, p. 276). When trying to change problem behavior, you must first determine the cause or purpose of the misconduct. Nearly every action taken by a student is purposeful, and if an educator is trying to successfully eliminate the undesired actions permanently, the purpose must be determined prior to modification (Carr, et al., p. 4). "The challenge to school professionals has been how to analyze an individual's behavior, because that individual engages in different activities as well as performing the same activity differently under the same or similar environmental conditions" (Ellis & Magee, p. 292). Recognizing this challenge, Congress made functional behavioral assessments a requirement in the IDEA '97 to assist in addressing problem situations caused by students. "Although neither IDEA '97 nor the regulations detail what problem behaviors are covered under the statute, inferences can be made from previous litigation that these behaviors include disruptive behaviors that distract the teacher from teaching and other students from learning, noncompliance, abuse of property, verbal abuse, and aggression towards students or staff" (Drasgow, et al., p. 245). Functional behavioral assessment (FBA) refers to a comprehensive and individualized approach to gathering information about the disruptive conduct to better understand and describe the reasons why it occurs so that its purpose may be determined. With this information, educators can examine variables maintaining the challenging

outbursts or mannerisms taking place in the classroom and will be better able to try to modify these behaviors into actions more suitable to the classroom.<sup>8</sup>

Information gathered from the FBA should be used to develop and guide an intervention plan for treatment (Nelson, et al., p. 278). A behavioral intervention plan (BIP) is created after considering the strategies and supports available that are most likely to produce successful change in the student's classroom conduct. The overall purpose of the BIP is to eliminate any challenging behavior and replace it with desirable alternatives (Yell & Shriner, p. 254). In addition to reducing undesired outbursts or mannerisms, BIPs should also be geared toward improving the long-term living options of the individual as well (Horner & Carr, p. 94). In the IDEA '97, "the federal government provides little guidance for the development of BIPs beyond saying that they must be included in the IEP when appropriate and that they should include positive behavior intervention strategies and supports" (Drasgow, et al., p. 252). Both the FBA and subsequent BIP are discussed in detail in the next sections.

### *The Functional Behavioral Assessment*

IDEA '97 requires that if a student is exhibiting problem behavior that is disrupting the classroom and causing an interference with their learning or the learning of others, then at a minimum that student's IEP must address the problem situation (Drasgow, et al., p. 244). For more severe outbursts or when the student is continually disrupting the classroom, an FBA may be required. IDEA '97 is specific about when FBAs must absolutely be conducted. "If a student is going to be removed for more than 10 consecutive days in a school year, or if the school is going to remove a student constituting a change in placement, then the school needs to conduct

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<sup>8</sup> This idea of pinpointing the cause of an outburst in order to modify it into something not as disruptive is found consistently in the behavioral modification literature. For example, see Drasgow, et al., p. 245, and also Hartwig &

an FBA either before or not later than 10 business days after taking disciplinary action" (Hartwig & Ruesch, p. 243). FBA procedures, and the subsequent BIP development, are not required by IDEA '97 when removals are less than 10 days cumulatively. If, however, there is a removal of 10 school days or greater, or the student is placed in an alternative educational setting for a 45 day period because they possessed weapons, drugs, or are dangerous to others, then an FBA is required. While "IDEA '97 added the requirement that schools conduct FBAs and develop BIPs, neither the law nor regulations specifically address the content of either" (Drasgow, et al., p. 261), and school administrators are not given instructions on how to do them.

FBA has been proven to assist in developing socially valid interventions for students with challenging behaviors. The perspective gained through this research-based methodology can provide a foundation for understanding, interpreting, and subsequently successfully altering a child's undesired mannerisms. School personnel must identify and analyze many different contextual factors related to the occurrence of the specific unwanted action so that a conclusion can be drawn about its purpose, function, or the intent it fulfills for the student.<sup>9</sup> These factors or variables "consist of consequences (i.e., the purpose, intent, function, or goal of the behavior, with these terms being roughly synonymous); antecedents (i.e., the cues that trigger the behavior); and setting events (i.e., the broad context that influences the likelihood that a specific cue will trigger problem behavior)" (Horner & Carr, p. 85).

Gathering information about consequence, antecedent, and setting event variables that reliably predict and maintain problem behavior is necessary for the development of more effective BIPs (Drasgow, et al. p. 248). As previously mentioned, "the law does not provide details with respect to the components of the FBA or BIP, except that the plan must address

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Ruesch, p. 243.

<sup>9</sup> See for example Katsiyannis & Maag, p. 281-283; Symons, et al., p. 153; and Drasgow, et al., p. 250.



behavior that led to the student's removal" (Hartwig & Ruesch, p. 243). The professional literature<sup>10</sup> does, however, provide a list of outcomes that FBA should achieve if conducted correctly. One of the first should be an operational definition of the misconduct being presented by the student. Factors that predict problem outbursts such as times, places, or activities must be identified. Additionally, hypotheses should be developed about the consequences or purposes of this problem behavior. Finally, a successful FBA should provide verification of the predictors and consequences through some form of direct observation. "With the requirement of FBA, education personnel can no longer simply attempt to suppress unacceptable student behavior, but instead are expected to determine why the student is motivated to engage in that behavior" (Hendrickson, et al., p. 281).

An FBA should follow a multi-stage, multi-informant approach that draws upon different assessment data from significant persons within the student's environment (Symons, et al., p. 156). In addition to providing the expected outcomes of an FBA, the professional literature<sup>11</sup> also supplies procedures to be considered when conducting an FBA to arrive at socially valid interventions. There are three methods that may be used when conducting a functional assessment: interview, descriptive observation, and functional analysis. The procedures included involve defining a behavior, interviewing knowledgeable adults, and sometimes students, about occurrences and non-occurrences of the unwanted action, and observing the behavior that is causing disruption or concern. Developing hypotheses about the potential function and effect of context and curriculum on a disruption is another important step in the FBA procedures as outlined by the current literature. The final step is to verify or test the hypotheses, usually by

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<sup>10</sup> Sources include Drasgow, et al.; Horner & Carr; Katsiyannis & Maag; Nelson, et al.; and Symons et al.

<sup>11</sup> See for example Drasgow, et al.; Horner & Carr; Katsiyannis & Maag; Nelson, et al.; and Symons, et al.

manipulating controlling variables. The next sections discuss the three basic methods of conducting an FBA in detail.

### *Interviewing*<sup>12</sup>

Indirect or informant methods of assessment, the methods most commonly used by practitioners, generally involve interviewing student contacts--including teachers, parents, and other relevant persons--to discuss the student's behavior, or even to complete checklists, rating scales, or questionnaires. Teachers, family members, or professionals who are most familiar with the individual in question are asked to describe several things. The person doing the assessment first needs a physical description of the problem behavior. Then, those interviewed are asked to describe the circumstances that predict occurrence and nonoccurrence of the misconduct. The assessor also needs to know about the reactions that the problem behavior evokes from others. "The primary outcome and goals of the interview process are to develop an operational definition of the problem behavior, to allow a quick review of a huge number of antecedents and consequences, and to provide a good starting point to begin descriptive observation" (Drasgow, et al., p. 249). Based on the information gathered during this process, the educator conducting the interviews can begin to hypothesize about the possible factors that contribute and maintain the student's undesirable behavior. Any hypothesis developed should define the challenging behavior or disturbance, list the events that predict or trigger the problem situation, and identify the factors that maintain the misconduct in the classroom. Basically, hypotheses developed by school personnel should define the context in which the problem behavior occurs as completely as possible.

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<sup>12</sup> The importance of interviewing student contacts and the purpose of doing so is well documented in the literature. See for example Nelson, et al., p. 278; Horner & Carr, p. 89-93; and Drasgow, et al., p. 249.

Interviewing typically allows for a great deal of information to be reviewed in a short amount of time. For example, interviewing the student's teachers provides a quick review of the problems they are seeing in the classroom, and talking to the parents may reveal additional unwanted mannerisms the student displays at home. Inquiring about these problematic actions or outbursts to individuals in contact with the student may yield valuable information about possible causes or predictors of the misconduct. Behavior patterns across the entire day and a wide range of conditions can be discussed. Although the interview process provides a good starting point for an FBA, interviewing carries some disadvantages. "The major disadvantage of using interviews is that they rely on the subjective impressions of people, not on systematic observation of behavior" (Horner & Carr, p. 90). Impressions are sometimes inaccurate and therefore should be viewed with restraint in the assessment process. Whereas using interviews instead of more involved analysis and observation may save time, this time may be lost if the subjective impressions of those interviewed are incorrect. It is a basic professional standard to expect all hypotheses developed through interviews to be tested through some other method of assessment, such as descriptive observation or functional analysis. For instance, a teacher may hypothesize that her student acts out when she is lecturing the class because he is not the center of attention, but he may instead be acting out only when he doesn't understand the subject matter being taught. In nearly every situation, an interview alone does not constitute an appropriate functional assessment.

### *Descriptive Observation*<sup>13</sup>

Descriptive observation, considerably refined since its introduction several decades ago, consists of a person directly observing the problem behavior in the natural environment where the misconduct typically takes place. This person can be the child's teacher, or it can be another staff member or counselor, when one is available, who is brought in from outside the classroom to provide a new perspective and a fresh approach to the situation. Structured observations, which can continue for short periods across days or weeks, are conducted during the student's typical routine so that data about the unwanted action and any events or situations that may influence the mannerism or outburst can be collected. The educator administering the descriptive observation records the immediate antecedents and consequences each time that the undesired action is taken by the student. Information about antecedents, such as task demands, prompts, or negative feedback, is important because it helps the teacher pinpoint those aspects of the instructional situation that will need to be modified or redesigned to avoid future problem behavior. "Systematic observation of the student can provide extremely valuable information about the context and triggers that covary with a problem behavior, the intensity duration and form of the problem behavior, and the events that follow the problem behavior" (Horner & Carr, p. 90). For example, if a student begins shouting every time he or she is asked to complete a mathematical calculation on the chalkboard, the observer can note this and discuss with the teacher possible alternatives to this particular task.

Like interviews, the end product of descriptive observation should also be a hypothesis about when, where, and why the problem behavior occurs. The results of a descriptive observation, however, offer a more objective opportunity to validate hypotheses developed

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<sup>13</sup> For more information about descriptive observation, see references such as Drasgow, et al., p. 249; Horner & Carr, p. 88-91; and Nelson, et al., p. 278.



during the initial interviewing stage. The accuracy of a hypothesis<sup>14</sup> is extremely important because the success of the intervention hinges on identifying and addressing the function of the behavior. By accurately defining the problem and hypothesizing about its specific causes, teachers are better equipped to develop useful ways to change a student's disruptive behavior. There are many important reasons why direct observation data are collected after an interview. Direct observation typically generates more detailed information about the triggers and social reactions for problem behavior than would be gained from an interview or set of interviews. As previously noted, interview information is sometimes inaccurate. By adding an element of descriptive observation to the assessment, education personnel can attempt to validate proposed hypotheses through triangulation. Importantly, variables not discussed during an interview session are sometimes uncovered during the course of direct observation. The improved level of detail obtained from descriptive observation often reveals subtleties that may not be evident to a teacher or administrator always in contact with the student. "Understanding the consequences that maintain a problem behavior is a key to building effective interventions" (Horner & Carr, p. 86).

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<sup>14</sup> Regarding hypotheses in general, it should be noted that a hypothesis can only be supported or not supported by situational experimentation or by direct observation. When certain articles describe methods to "validate" a hypothesis or discuss the "accuracy" of a hypothesis these articles are referring to the attempt and best effort to try to find the most appropriate predictions of problem behavior. Although a hypothesis can not be "proven" to be accurate, by going to the trouble and striving to do so the student is best served because less supported hypotheses are discarded and interventions are therefore not based upon them. The more support a given hypothesis receives through methods of observation or experimentation, the more likely an intervention based upon this supported hypothesis will be successful.

## *Functional Analysis*<sup>15</sup>

"When the reason for problem behavior is not clear from the interview and descriptive observation information, a functional analysis can test hypotheses<sup>16</sup> by systematically manipulating specific antecedents and consequences to determine whether or not the problem behavior occurs" (Dragow, et al., p. 249). This kind of experimental assessment directly manipulates the possible controlling environmental variables as identified or observed during interviews or descriptive observation. "The assumptions underlying the rationale for functional analysis are that behavior is related to the environment in which it occurs and behavior is functional--it produces changes in the environment that function as reinforcers for the student whose disruptive behavior is causing problems in the classroom" (Ellis & Magee, p. 313). A functional analysis or experiment is the key method that can as accurately as possible test the critical controlling variables and any hypotheses developed.

During a functional analysis, situations are devised where different variables and factors are purposely manipulated by the person doing the assessment to discover the effects of the events on the student's behavior. "Student behavioral changes are monitored continuously as various antecedent or consequent stimuli are repeatedly presented and withdrawn contingent on the specified target behaviors" (Symons, et al., p. 136). Due to this intentional manipulation, in cases where the problem behavior is severe enough to put the student or others at risk for harm, a functional analysis may not be the best method of assessment because this technique by design produces increases in challenging behaviors. Nevertheless, "functional analysis is the most

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<sup>15</sup> For more information on functional analysis, or experimental assessment, refer to Carr, et al., p. 91; Dragow, et al., p. 250; Durand, p. 105; Hartwig & Ruesch, p. 243; Horner & Carr, p. 91-92; Nelson, et al., p. 278; and Symons, et al., p. 136.

<sup>16</sup> Here again, the literature specifically addresses "testing" a hypothesis. Although a hypothesis can not be proven, by trying to find the most promising explanation for repeated misconduct school personnel can use better supported hypotheses to structure behavioral interventions.

precise and rigorous method of conducting an FBA because it directly tests an association between environmental events and problem behaviors" (Dragow, et al., p. 249).

To refer back to the basic example of the student who shouts when asked to perform mathematical calculations on the chalkboard, a specialist<sup>17</sup> conducting a functional analysis may ask him to write a sentence on the board using a specific word. If he objects to the sentence writing request and begins shouting, perhaps the chalkboard task is the critical variable causing the outbursts. On the other hand, if he does so throughout the day continually without any outbursts, the specialist may conclude that the student is comfortable with writing in the front of the room on the chalkboard. If this is the case, then perhaps the mathematical equations are causing the student to act out. The specialist may then try to narrow down the variable causing the disruption by asking him to perform addition, subtraction, multiplication, or division calculations. If all these math problems cause shouting, then mathematics may be his trigger to disruptive outbursts. But it is possible that only one or two kinds of calculations are giving the student problems. From there, the specialist discusses the situation with the student's teacher to advise her of the circumstances surrounding their student's misconduct and begins to develop an intervention plan to replace the unwanted action with a socially acceptable alternative.

There are a few drawbacks to functional analysis. Not only is there a potential risk for harm by students exhibiting the most severe problem behaviors, but there is also a greater amount of time and energy expended during this process than with the other methods of FBA. Although functional analysis provides a more precise assessment, this precision should be weighed against the greater efficiency of direct observation or interviewing. "The goal of a functional analysis is not to find the one true approach but to find the most appropriate strategy

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<sup>17</sup> A specialist can be a number of different individuals. In larger school systems, speech pathologists, counselors, or special education administrators are just some examples of the kinds of specialists that are trained to conduct FBAs.

that will provide the most information and that will ultimately result in an effective intervention that can be implemented by the relevant personnel in a particular setting" (Ellis & Magee, p. 297).

The results of any FBA should be written in the student's IEP so that anyone who reads it can understand the outcomes. The results should also specifically address how a student's repeated misconduct affects his or her involvement in the general education curriculum. A functional assessment directs school personnel to develop proactive strategies that teach acceptable alternative behaviors to the student, rather than simply trying to suppress the challenging outbursts. Functional assessment is now expected professional practice. "Previous research has shown consistently that the function of problem behavior must be identified prior to intervention" (Wacker, p. 108). When identifying the function of misconduct through an FBA, the results lead to the development of a behavior intervention plan (BIP) that subsequently and specifically addresses that function of the problem behavior. FBA is intended to improve the effectiveness and efficiency of an intervention through "understanding what maintains the behavior, predicting when a problem behavior will and will not occur, identifying ways to prevent occurrence of the problem behavior, and designing procedures for responding to the problem behavior when it does occur" (Horner & Carr, p. 85).

### *The Behavior Intervention Plan<sup>18</sup>*

"An FBA is the first, and most critical, step toward developing a BIP because it guides the selection of an intervention strategy that is related to the purpose of the problem behavior and to the specific circumstances and context of each particular student" (Dragow, et al., p. 250).



FBA results are critical to planning effective interventions because without knowing the cause of an undesired action taken by a student, a teacher would not know how to teach a relevant and appropriate alternative. Teachers can also use this information to change certain situations so that the challenging behavior is avoided altogether in some circumstances. A BIP must be based on the results of an FBA. For the intervention to be successful, the information gained from the FBA needs to be as specific as possible. In fact, the intervention plan may fail if each component of intervention is not matched to the function of the problematic behavior.

An intervention plan is not simply a management plan delineating disciplinary procedures to be used in attempt to reduce the student's undesirable outbursts or mannerisms. BIPs "are written documents that describe how an environment will be structured to change specific patterns of an individual's behavior and are intended to replace negative behaviors that interfere with a student's learning with positive behaviors that are critical for success" (Drasgow, et al., p. 252). Going back to the fact that, in general, problem behavior often serves a purpose for the student, the main goal of a BIP is to teach the individual new ways of influencing others so that the unwanted behavior is no longer necessary, not simply behavior reduction.

In addition to the definitions and identified purposes of the behavior problems as discovered through the FBA process, a BIP should contain some generic key features. A BIP should contain a general strategy, or combination of strategies, for changing the problem behavior, and a game plan for when, where, and how often the strategy will be implemented. There should also be a consistent system of monitoring and evaluating the effectiveness of the plan. Interventions are considered comprehensive when they are applied throughout the day, blend multiple intervention procedures, and incorporate procedures that are consistent with the

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<sup>18</sup> More information about behavior intervention plans can be found in the following sources: Horner & Carr, p. 87-94; Carr, et al., p. 4; Drasgow, et al., p. 246-254; Hartwig & Ruesch, p. 245; Nelson, et al., p. 268; Wacker, p. 109;

values, skills, and resources of the implementers. Education personnel should also remember that the long term goals are more important than the short term in an intervention. Whichever strategy that is going to provide the student with skills and behaviors that can be used in the future should be followed.

In the case of a student who objects to mathematical problems on the chalkboard, education personnel would work on developing her math skills so she is more comfortable with the problems. During that time, her teacher would perhaps give her extra problems on paper or to take home with her to make up for not performing calculations on the chalkboard. Gradually, the teacher may instruct the student that instead of shouting she can instead request to perform the problem on paper at her desk first. A goal for this student would be that at the end of the year she would not object to chalkboard math problems. In another example, if a student constantly talks and interrupts the teacher, he may have a BIP item that explains his tendency to disrupt the classroom, and, to replace this unwanted behavior, the child's teacher instructs him to raise his hand if he would like to be recognized and allowed to talk.

School administrators should keep in mind that a discipline plan that has been discussed and developed in advance with the student's parents and is implemented as part of the IEP is more likely to meet with success in both the home and the school. Furthermore, by having parents involved in the intervention process from the beginning, the parents are going to be less likely to legally challenge the discipline strategy. In addition to keeping the parents informed about behavior intervention procedures, "students with disabilities who have a history of misbehavior must have behavior goals and objectives and a behavior intervention plan included in their IEP" (Yell & Shriner, p. 255).

## *Evaluation and Modification*

"Many people assume, mistakenly, that assessment occurs only before the initial intervention" (Horner & Carr, p. 93). Direct observation should never discontinue when a student is exhibiting problem behaviors. Structured observation can continue in the classroom on a daily basis, and, with more data collected, a new hypothesis may be generated that perhaps had not been considered before. Assessment can not simply be dropped because an intervention plan has been developed. If the intervention plan shows no sign of reducing or replacing the undesired conduct with socially acceptable alternatives, functional assessment must continue (Carr, et al., p. 45). Also, these assessments only provide directive information. They do not dictate which specific intervention strategies must be followed for success (Horner & Carr, p. 97). The first attempts at intervention may not be successful. "Functional assessment is an ongoing process that must be continued periodically throughout the entire course of intervention, especially when there is reason to believe that new information may be gained from additional assessment" (Carr, et al., p. 45).

Education personnel must understand that the teaching environment is dynamic. Students are faced with many different situations in the classroom each day, and the circumstances and variables are different most of the time. Each new circumstance or variable, whether it be new curricula, new staff, or new classmates, may precipitate new problem situations. If assessment is restricted to occur only prior to any intervention, all of these potential variables are not being considered.<sup>19</sup> "Thus, repeated assessments, or intervention checks, will likely be needed for substantial periods of time" (Wacker, p. 109). Teachers should also evaluate what progress the student is making throughout the course of the intervention. By evaluating the efficacy of the behavior intervention procedures used they become aware of what is working for each individual

student and what is not (Yell & Shriner, p. 256). If the intervention is successful and the "behavioral support is effective, it works for everyone in a context, not just for the student with problem behaviors" (Horner & Carr, p. 99). When a student acts out in the classroom setting, the entire class is disrupted. The students are not doing what they should be because they are paying attention to the sudden outburst and activity. The teacher must also take time to deal with the situation, so therefore is also not teaching. If these outbursts are eliminated, that means everyone in the classroom can be on task and can get more work done.

### *Challenges to School Districts<sup>20</sup>*

The mandates of IDEA '97 have posed many different challenges to school districts. In this case, "the laws driving public policy may have exceeded the existing FBA knowledge base" (Drasgow, et al., p. 261). Accurate assessment requires specific technical training and experience. Often times, the assessor is typically an education specialist, psychologist, parent trainer, group home manager, or vocational supervisor. Unfortunately, a person with such training and experience is not always available in every school district when one is needed. Another reason there may be a shortage of personnel with this technical know-how is that the coursework at colleges and universities is not updated to prepare incoming professionals for the new requirements in a timely fashion. Many feel that "the training of teachers, administrators, and staff in the use of positive behavior interventions, functional assessment of behavior, writing behavioral goals and objectives, and writing behavioral intervention plans is crucial" (Yell & Shriner, p. 254). Furthermore, to result in lasting effects, ongoing support must be provided to

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<sup>19</sup> See for example Wacker, p. 109, and Horner & Carr, p. 93.

<sup>20</sup> Many sources identified potential challenges that public schools must be prepared for in meeting compliance with the IDEA '97 behavioral assessment and intervention mandates. For more information, see Carr, et al., p. 42;



school districts once the training has been completed because new situations will likely generate a number of questions and new regulations may need clarification.

"In addition to the lack of expertise in FBA and positive behavioral interventions, strategies, and supports, many educators lack the co-requisite skills such as teaming and collaboration abilities which are essential to the conduct of FBAs" (Hendrickson, et al., p. 283). Although a functional analysis should always be conducted by a person trained in the procedure due to the provocation of the problem behavior, teachers and support personnel indicate that they do not feel adequately prepared for this important responsibility. "The entire school staff need substantial training if FBA is to be seen as a system of effective behavioral support, which includes a systematic approach for identifying students at risk for behavioral difficulties and providing proactive interventions" (Nelson, et al., p. 276).

FBAs are generally thought to be complicated and time consuming. Some even criticize that the process requires too many people and resources to be effective. These are likely the reasons that functional assessment has not been embraced widely by educators. During the experimentation of an FBA, or in functional analysis, additional disruption must be endured in order to test the possible controlling variables of problem behaviors. Furthermore, if a teacher is actively involved in teaching and is expected to conduct FBA as well, "it is often difficult for that person to find the time to carry out detailed assessments of a given individual, particularly when the person is also responsible for providing services to many other individuals simultaneously" (Carr, et al., p. 42).

"Education personnel too often have been tugged in different directions, frustrated by competing, sometimes contradictory policies which exhaust available time, energy, and

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Dragow, et al., p. 250-259; Hendrickson, et al., p. 283-284; Horner & Carr, p. 92; Huefner, p. 201; Katsiyannis & Maag, p. 282; and Durand, p. 105.

resources" (Hendrickson, et al., p. 286). To help school districts face the challenges created by the IDEA '97 mandates, the federal government needs to increase its funding to match the levels of additional expertise needed at each school. "Although a variety of increasingly sophisticated strategies and tactics for classroom observation (e.g., laptop computers) and functional analysis have been developed and extensively researched, their use may require resources beyond that available in many classrooms" (Symons, et al., p. 156). "The expectations of IDEA '97, with inadequate funds for more services and better training, do not generate a master plan for success" (Huefner, p. 203). In other words, Congress hopes to see a great deal of change by enacting this legislation, but could perhaps be setting public schools up for great disappointment by not providing funding and support necessary for the IDEA '97 directives to be followed sufficiently.

The next chapter describes the conceptual frameworks used in this study that helped to organize the research. Two frameworks were developed, one that provides a tool for gauging whether Texas public schools are adhering to the IDEA '97 behavior assessment and intervention mandates and another that is used to organize ideas about possible implementation issues the schools may be facing. Categories were developed from the scholarly literature that facilitated the development of the survey instrument.

## Chapter 3

### Conceptual Frameworks

The purpose of this chapter is to explain and illustrate the conceptual frameworks used in the empirical portion of this study. The components of each framework have been explained in detail in Chapter 2, but they are referenced again here to highlight the main points and most significant aspects of this research and how each component applies to the study.

#### *Practical Ideal Type Conceptual Framework<sup>21</sup>*

This study uses two different conceptual frameworks. The first is a practical ideal type conceptual framework. "Practical ideal types provide benchmarks with which to understand (and improve) reality" and "can be viewed as standards or points of reference" (Shields, p. 219). The framework used in this study was developed from recent literature (Table 3.1) explaining the fundamental points of IDEA '97 regarding student behavior and how schools are to address problem behavior according to this legislation. The first purpose of this research is to specifically address the behavioral assessment and intervention requirements of IDEA '97 in order to identify elements of a practical ideal type special education program with regards to treating problem behavior. This framework serves that purpose. Using the literature, practical ideal categories were developed to aid in gauging whether Texas public schools are in compliance with the behavioral assessment and intervention requirements of IDEA '97. The categories listed in Table 3.1 are linked to recent literature and comprise the practical ideal type guidelines that public schools should adhere to when teaching students with problem behavior.

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<sup>21</sup> Dr. Patricia Shields in "Pragmatism as Philosophy of Science" adds the practical ideal type as a conceptual framework because "the four traditional research purposes didn't do justice to some common public administration research problems" (p. 219), such as program evaluation. This research essentially evaluates special education programs statewide as to whether they are in compliance with the IDEA '97 assessment and intervention mandates.

### *Individualized Education Program Category*

The **Individualized Education Program (IEP)** is an important piece of all programs in special education systems nationwide and is a requirement for every student receiving special education services by IDEA '97. Not only must every student have an IEP, but this IEP must also be "developed jointly by school officials, including the child's teacher and special educators, and the child's parents or guardians" (Osborne, et al., p. ix). This legislation also affected the IEP development process by emphasizing the increased importance of writing annual goals and benchmarks or objectives that are measurable. Furthermore, these goals and objectives should specifically address any problem behavior a student may have.

Table 3.1: Practical Ideal Categories for IDEA '97 Behavior Mandates

Practical Ideal Categories	Source
<b>Individualized Education Program (IEP)</b> All Special Education Students Have an IEP IEP Team Composition Includes Benchmarks and Goals Any Behavior Problems are Specifically Addressed	<ul style="list-style-type: none"><li>• IDEA '97</li><li>• Drasgow, Yell, Bradley and Shriner (1999).</li><li>• Osborne, DiMattia and Curran (1993)</li><li>• Yell and Shriner (1998)</li></ul>
<b>Functional Behavioral Assessment (FBA)</b> For Students Exhibiting Problem Behavior Conducted When More Than 10 Days of Suspension Interviewing Student's Contacts Descriptive Observation of Student Developing Hypotheses About Causes of Behavior Functional Analysis to Test Hypotheses Results are Written in the IEP	<ul style="list-style-type: none"><li>• IDEA '97</li><li>• Carr, Levin, McConnachie, Carlson, Kemp and Smith (1994)</li><li>• Drasgow, Yell, Bradley and Shriner (1999)</li><li>• Ellis and Magee (1999)</li><li>• Hartwig and Ruesch (2000)</li><li>• Horner and Carr (1997)</li><li>• Katsiyannis and Maag (1998)</li><li>• Nelson, Roberts, Rutherford, Mathur and Aaroe (1999)</li><li>• Symons, McDonald and Wehby (1998)</li><li>• Wacker (1997)</li></ul>
<b>Behavior Intervention Plan (BIP)</b> Based on the Results of the FBA Includes Benchmarks and Goals Evaluation and Revision	<ul style="list-style-type: none"><li>• IDEA '97</li><li>• Carr, Levin, McConnachie, Carlson, Kemp and Smith (1994)</li><li>• Drasgow, Yell, Bradley and Shriner (1999)</li><li>• Horner and Carr (1997)</li><li>• Wacker (1997)</li><li>• Yell and Shriner (1998)</li></ul>



### *Functional Behavioral Assessment Category*

IDEA '97 also mandates that each student in a special education program who exhibits problem behavior be given a **Functional Behavioral Assessment (FBA)**. FBA generally involves gathering information about a problem behavior in attempt to understand why it occurs. FBAs must absolutely be conducted if the student is going to be removed from the classroom for more than 10 days in the school year. While this law explains when to conduct an FBA, it does not provide specific directions about how to carry out the process. Recent literature<sup>22</sup>, however, suggests that the FBA process be a multi-stage approach drawing upon different assessment data provided by significant persons that frequently interact with the student.

One stage in the FBA process should include a set of interviews where teachers, school personnel, and the student's parents or guardians are asked about the problem behavior in question and what they have observed during the times when the student displays this behavior. Interviewing can provide information about many possible causes and subsequent effects of the student's undesired actions. During the course of the behavioral assessment, time should also be spent on a process of descriptive observation. Direct and structured observation helps school personnel to further understand not only the problem behavior itself but also its possible causes. "Like interviews, the end product of descriptive observation is development of hypotheses about when, where, and why the problem behavior occurs, hypotheses that can be used to devise effective and efficient interventions" (Horner & Carr, p. 91).

The final stage of an FBA should be a functional analysis. Functional analysis directly tests an association between events in the student's environment and the problem behavior through experimental manipulation of stimuli that are thought to be causes of this undesired behavior. Essentially, this functional analysis tests the hypotheses developed from the

interviewing and descriptive observation processes. Familiarity with the critical variables surrounding the problem behavior will provide better opportunities for success when attempting a behavior intervention to change a student's habits.<sup>23</sup> For each student who is administered an FBA, that student's IEP should include the results found in that assessment according to IDEA '97 mandates.

### *Behavior Intervention Plan Category*

A **Behavior Intervention Plan (BIP)** is a strategy for eliminating or changing student problem behavior, and is required by IDEA '97 under the same circumstances that FBA becomes a requirement, after 10 days of suspension. The BIP must be based on the results of an FBA. This support plan should also include goals and objectives and should be designed for the long-term benefit of the student. An important thing to remember is that first attempts at intervention may not be fully successful. Whenever an intervention is not working, school personnel must continue the FBA process to devise alternatives for intervention.

### *Working Hypothesis Conceptual Framework*

While the **first conceptual framework** used in this research addressed the federal mandates imposed on public schools by IDEA '97, the second conceptual framework is a working hypotheses framework that addresses possible challenges special education program administrators may be facing. Table 3.2 links these working hypotheses to scholarly literature in

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<sup>22</sup> Sources include Horner & Carr, p. 89; Katsiyannis & Maag, p. 281; and Symons, et al., p. 156.

<sup>23</sup> Understanding and being familiar with each of the potential causes of a student outbursts (such as room temperature, the subject matter of the lesson, or periods of time where the student is not supposed to talk) enables school personnel to proactively plan for each situation where one or more of these variables is inevitable. By being familiar with things that may set off undesired actions, teachers and personnel can better plan for them.

special education. Implementation of the IDEA '97 amendments is likely hindered by two major factors:

WH 1: Education personnel are not fully trained to conduct an FBA as mandated by law.

WH 2: The FBA and subsequent BIP processes are resource intensive.

Table 3.2: Working Hypotheses on Implementation of IDEA '97 Behavior Mandates

Working Hypotheses	Sources
WH 1: Education personnel are not fully trained to conduct an FBA as required by IDEA '97.	<ul style="list-style-type: none"> <li>• Drasgow, Yell, Bradley and Shriner (1999)</li> <li>• Hendrickson, Gable, Conroy, Fox and Smith (1999)</li> <li>• Huefner (2000)</li> <li>• Nelson, Roberts, Rutherford, Mathur and Aaroe (1999)</li> </ul>
WH 2: The FBA and subsequent BIP process are resource intensive.	<ul style="list-style-type: none"> <li>• Carr, Levin, McConnachie, Carlson, Kemp and Smith (1994)</li> <li>• Durand (1997)</li> <li>• Hendrickson, Gable, Conroy, Fox and Smith (1999)</li> <li>• Horner and Carr (1997)</li> <li>• Huefner (2000)</li> <li>• Katsiyannis and Maag (1998)</li> <li>• Symons, McDonald and Wehby (1998)</li> </ul>
WH 3: Public schools are having difficulties in implementing the behavioral assessment and intervention requirements of IDEA '97.	<ul style="list-style-type: none"> <li>• Drasgow, Yell, Bradley and Shriner (1999)</li> <li>• Hartwig and Ruesch (2000)</li> <li>• Hendrickson, Gable, Conroy, Fox and Smith (1999)</li> <li>• Huefner (2000)</li> <li>• Katsiyannis and Maag (1998)</li> </ul>

Many public policies have this effect on the programs or departments that are charged with their implementation, and this research explores the perceptions of Texas Special Education Directors on what challenges schools in their districts have dealt with. The third working hypothesis is general in nature:

WH 3: Public schools are having difficulties in implementing the behavioral assessment and intervention requirements of IDEA '97.

Some public schools could very well have personnel with adequate training to conduct FBAs and may also have the resources to facilitate process changes required by the new mandates. Implementation, though, may still have proved to be difficult given the lack of direction on how to follow through with full compliance.

The next chapter discusses survey research, the research methodology used in this study. The elements of the methodology are linked to the scholarly literature and to the conceptual frameworks presented here. The next chapter also identifies the population being studied and the statistical methods used to analyze the data collected.



## Chapter 4

### Methodology

The purpose of this chapter is to present the research methodology used in this study. Using survey research, each questionnaire item is linked to the conceptual frameworks presented in the previous chapter and is therefore linked to the scholarly literature as well. The population for this project is also identified.

#### *Survey Research*

The second purpose of this study is to gauge the extent to which Texas public schools meet the criteria of the practical ideal type categories presented in Chapter 3, based on the perceptions of Texas Special Education Directors. The final purpose of this research is to explore the perceptions of these same Directors on how the implementation of the IDEA '97 mandates has progressed in public schools, as represented by the working hypotheses in the previous chapter. Survey research<sup>24</sup> was determined to be the best method to gather data to fulfill these research purposes, according to the perceptions of key figures in special education. This methodology is appropriate for this project because "survey research is probably the best method available to the social scientist interested in collecting original data for describing a population too large to observe directly" (Babbie, p. 256). Due to the high quantity of school districts in the state education system and the fact that Texas is geographically a very large state, no other method of research would have allowed for a statewide study with comparable resources in a reasonable period of time.

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<sup>24</sup> For additional information about survey research, see references such as Sapsford's *Survey Research* (1999) or Fink & Kosecoff's *How to Conduct Surveys: a Step-by-step Guide* (1998), in addition to Babbie's *The Practice of Social Research* (1998).

**Table 4.1: Operationalization of Practical Ideal Categories**

Research Purpose	Ideal Category	Survey Items Scale: Strongly Disagree to Strongly Agree
The second research purpose of this paper is to gauge whether Texas public schools are in compliance with the behavioral assessment and intervention mandates of IDEA '97 based on the perceptions of key individuals in the Special Education System.	<b>Individualized Education Program (IEP)</b> <ul style="list-style-type: none"> <li>All Special Education Students Have an IEP</li> <li>IEP Team Composition</li> <li>Includes Benchmarks and Goals</li> <li>Any Behavior Problems are Specifically Addressed</li> </ul>	<ul style="list-style-type: none"> <li><b>Every student</b> in the Special Education Program <b>has a current</b> Individualized Education Program (IEP).</li> <li>Each student's <b>IEP</b> is <b>developed jointly</b> by school officials and the student's parents or guardians.</li> <li><b>IEPs</b> are <b>unique</b> to each student <b>based on</b> each student's <b>needs</b> and abilities.</li> <li>Students exhibiting behavior problems have items on their <b>IEP</b> that <b>specifically address</b> this <b>problem behavior</b>.</li> <li>Every student's <b>IEP</b> includes <b>annual goals and/or benchmarks</b>.</li> <li>Every student's <b>IEP</b> includes <b>annual goals and/or benchmarks</b> that are <b>measurable</b>.</li> </ul>
	<b>Functional Behavioral Assessment (FBA)</b> <ul style="list-style-type: none"> <li>For Students Exhibiting Problem Behavior</li> <li>Conducted When More Than 10 Days of Suspension</li> <li>Interviewing Student's Contacts</li> <li>Descriptive Observation of Student</li> <li>Developing Hypotheses About Causes of Behavior</li> <li>Functional Analysis to Test Hypotheses</li> <li>Results are Written in the IEP</li> </ul>	<ul style="list-style-type: none"> <li>Some <b>personnel</b> at this school are <b>familiar with</b> Functional Behavioral Assessment (FBA).</li> <li><b>Students</b> in the Special Education Program who are <b>removed</b> from the classroom for more than <b>10 days</b> due to behavior problems are <b>given FBAs</b>.</li> <li>As a part of this FBA, <b>extensive interviews</b> are <b>conducted</b> with those who interact most with the student.</li> <li>Students exhibiting behavior problems are <b>systematically and directly observed</b> to attempt to determine the cause of the problem behavior(s).</li> <li>School officials <b>develop hypotheses</b> about the <b>possible causes</b> of a student's problem behavior.</li> <li>These <b>hypotheses</b> are <b>tested through</b> an experimental assessment or <b>functional analysis</b>.</li> <li><b>If</b> the hypothesis developed initially appears to be <b>inaccurate</b>, the behavior <b>assessment continues</b> until another hypothesis can be reached.</li> <li>The <b>results of any FBA</b> of any student are <b>written in</b> that student's <b>IEP</b>.</li> <li><b>Assessments</b> are <b>conducted regularly</b> for each student exhibiting problem behavior.</li> </ul>
	<b>Behavior Intervention Plan (BIP)</b> <ul style="list-style-type: none"> <li>Based on the Results of the FBA</li> <li>Includes Benchmarks and Goals</li> <li>Evaluation and Revision</li> </ul>	<ul style="list-style-type: none"> <li><b>Students</b> exhibiting <b>problem behavior</b> have a Behavior Intervention Plan (BIP) developed for them.</li> <li><b>BIPs</b> are <b>based on</b> the <b>results of an FBA</b>.</li> <li>Any <b>BIP</b> is <b>included in</b> the student's <b>IEP</b>.</li> <li><b>BIPs</b> outline <b>annual goals and/or benchmarks</b> for behavior improvement.</li> <li><b>BIPs</b> include <b>goals and/or benchmarks</b> that are <b>measurable</b>.</li> <li><b>Intervention checks</b> are conducted to <b>evaluate</b> the <b>effectiveness of</b> the <b>BIP</b>.</li> <li><b>If</b> an intervention appears to be <b>ineffective</b>, the <b>assessment process</b> is <b>completed again</b>.</li> </ul>

### *Operationalization of the Conceptual Frameworks*

Table 4.1 shows which survey items correspond with each practical ideal category and Table 4.2 shows which survey items correspond with each working hypothesis from the two conceptual frameworks discussed previously in Chapter 3. (See Appendix A for the

administered survey questionnaire.) By linking the survey items to the conceptual frameworks, the questionnaire itself is supported by the associated scholarly literature. The questionnaire was pretested by distributing it to select personnel within the Austin Independent School District who have special knowledge of IDEA '97 and the FBA and BIP processes. This survey was then attached behind a cover letter (See Appendix B) and mailed with a self addressed stamped envelope for the convenience of the respondents.

**Table 4.2: Operationalization of Working Hypotheses**

Research Purpose	Working Hypothesis	Survey Items Scale: Strongly Disagree to Strongly Agree
The third purpose of this study is to explore the perceptions of Texas Special Education Directors about the progress of the implementation of the IDEA '97 mandates and any possible challenges faced by school personnel.	<b>WH 1:</b> Education personnel are not fully trained to conduct an FBA as required by IDEA '97.	<ul style="list-style-type: none"> <li>• Special Education personnel at this school (district) have the skills and expertise to conduct FBAs as mandated by the Individuals with Disabilities Education Act Amendments of 1997 (IDEA '97).</li> <li>• Special Education personnel at this school (district) have been extensively trained in the FBA process.</li> <li>• Special Education personnel have access to ongoing support for the technical advice that may be needed during the assessment process.</li> <li>• Teachers have expressed that they feel adequately prepared for FBA responsibilities.</li> <li>• Most of the school staff have been trained to conduct FBAs.</li> </ul>
	<b>WH 2:</b> The FBA and subsequent BIP process are resource intensive.	<ul style="list-style-type: none"> <li>• The FBA process is time consuming.</li> <li>• The FBA process takes time away from teaching when teachers must facilitate assessment.</li> <li>• The FBA mandates of IDEA '97 have caused this school (district) to hire additional staff.</li> <li>• The FBA process as mandated by federal law has required school personnel to enroll in and complete additional training causing resource expenditures of both time and money.</li> <li>• To conduct an FBA effectively, the involvement of several key school staff is a requirement.</li> </ul>
	<b>WH 3:</b> Public schools are having difficulties in implementing the behavioral assessment and intervention requirements of IDEA '97.	<ul style="list-style-type: none"> <li>• Implementing the behavioral assessment and intervention mandates of IDEA '97 has been a difficult process.</li> <li>• Many challenges had to be overcome for this school (district) to implement the mandates of IDEA '97.</li> <li>• This school (district) continues to face challenges in complying with the behavioral assessment and intervention requirements of IDEA '97.</li> </ul>

### *Threats to Validity and Reliability*

Generally, surveys are considered to be weak on validity. One reason for this is because people's opinions rarely take the form of strongly agreeing, agreeing, disagreeing, or strongly disagreeing (Babbie, p. 274). The questionnaire items are worded so that when the respondents answer using the identified options available some interpretation can be made of that response. Therefore, the construction of the survey instrument is important. The validity of this research is addressed through the development of the conceptual frameworks that are directly linked to the current special education literature. By tying each survey item to this literature, the questionnaire becomes a more valid and appropriate tool in attempting to serve the research purposes. Also, by obtaining information from respondents statewide, significant findings have more validity because the sample itself is not small nor does it have limited scope.

Reliability, on the other hand, is usually a strong point for survey research. This is due to the fact that each subject is administered the same stimulus, in this case, the survey instrument (Babbie, p. 274). Since each respondent is presented the same list of questions and given the same scale of response options, there is less opportunity for researcher to make incorrect or unreliable observations.

### *Limitations of Survey Research*

Survey research does have a drawback in this case. To determine if Texas schools are truly following mandatory guidelines of this legislation, a statewide case study resembling a major audit would need to take place. Without having near the time and resources for such a study, a survey instead provides data about the perceptions of key players in the Texas Special Education System—its Directors. This allows for the same all-encompassing statewide study,



but the results are limited by individual opinions. Perceptions are in fact important, however, to the research questions presented here, and it would be difficult to conduct a statewide audit of school compliance with a law as vague in detail as IDEA '97.

Another limitation of survey research is the risk that non-respondents who choose to not participate in the study are doing so simply because their schools are not following the mandatory guidelines and would rather not admit to it. Although the results of the questionnaire are presented anonymously, some Directors may nevertheless feel uncomfortable identifying shortcomings in their special education programs. This risk is balanced somewhat by a large sample size in the sense that, ideally, similar numbers of questionnaires are not returned by school districts adequately following the IDEA '97 mandates as compared to the number of surveys purposely not completed and returned due to noncompliance.

### *Scale Construction*

This questionnaire was constructed to determine whether or not Texas schools are in compliance with the IDEA '97 behavioral assessment and intervention mandates based on the perspectives of key individuals in the special education system. Also, the perspectives of these participants are important in determining whether any challenges were faced during implementation. By summarizing potential relevant perspectives into brief statements, respondents are asked whether they strongly agree, agree, disagree, or strongly disagree with the statements. This is known as a Likert scale (Babbie, p. 148). Since each questionnaire item has a response range from "Strongly Agree" to "Strongly Disagree," the coding ranges from +2 to -2, respectively, and allows simple review of agreement vs. disagreement based on the positive or negative value of each average.



### *Sample*

"Surveys make large samples feasible" (Babbie, p. 273). For this project, a survey questionnaire was mailed to all Special Education Directors within the state of Texas. This includes all 466 Directors in the Texas public school system, according to the Texas Education Agency's web-site<sup>25</sup> list of contacts. The Special Education Directors were chosen because they would ideally have both the practitioner experience needed to understand the different concepts in this study and also the knowledge of the new law. An assumption is made here that the Directors do in fact have ample experience and legal knowledge due to their position within the school system bureaucracy. Prospective respondents without this experience and knowledge could not provide meaningful answers. No sampling technique was used and every Director in every Texas school district was given the opportunity to participate in the study. As previously mentioned, this provides the opportunity for more valid results since a sampling technique is not used and instead the entire population has the opportunity to be included in the study.

### *Statistics*

Descriptive summary statistics are derived from the survey response data collected. Using the Likert scale with a range of coded values from -2 to +2, the statistical means of each survey item can indicate general agreement or disagreement with the statement presented based on the positive or negative value of the mean. Also the strength of the agreement or disagreement is indicated by how far the mean value is from zero. In a small population or a limited sample size, statistical averages are not always considered adequate or decisive. In a population where 466 participants were given the opportunity to respond, the means derived

from the responses received carry more weight because it is much less likely that when reviewing the attitudes of such a large sample that the non-respondents would have attitudes or perspectives that differ significantly from all those who participated in the study. As previously mentioned, some non-respondents may be unwilling to participate due to noncompliance with the new mandates, but there may also be non-respondents from school districts following the law adequately. Therefore, the statistical means of a large sample are generally thought of as being representative of the entire population.

The next chapter presents the data collected and an analysis of the results.

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<sup>25</sup> The list of current Texas Special Education Directors is found under the Texas Education Directory which is accessed through the Texas Education Agency web page under the Special Education section. The exact URLs for all of these websites are listed in Appendix C.

## Chapter 5

### Results

The purpose of this chapter is to present the results of the administered survey to gauge whether Texas public schools are in compliance with the IDEA '97 behavioral assessment and intervention mandates according to the perspectives of the Special Education Directors and explore any challenges school districts may be dealing with in the implementation of these new requirements. Each practical ideal category and working hypothesis is initially analyzed separately and is then summarized at the end of this chapter. A total of 466 questionnaires were mailed out to each Director statewide in late August of 2000, and over the next several weeks 256 completed questionnaires were returned. This yielded a response rate of 54.9%, more than adequate for analysis and reporting (Babbie, p. 262), and a sizable sample to draw conclusions from. Furthermore, these responses were returned from all geographic regions of the state, including small towns, large metropolitan areas, and anything in between.

#### *Individualized Education Program*

The IEP category is the first category in the practical ideal type conceptual framework developed to help gauge whether Texas public schools are adhering to the IDEA '97 requirements. The survey presented to the respondents six statements regarding IEPs in their special education programs (Table 5.1). These items addressed issues that include the development of the IEP and who is involved in the development process, the unique or customized nature of each IEP, whether behavior problems are identified, and whether goals and benchmarks are specified.

**Table 5.1: Results of Individualized Education Program Compliance**

Survey Items	SA +2	A	N	D	SD -2	n =	Mean	Agreement?
Every student has current IEP	227 88.7%	27 10.5%	0	2 0.8%	0	256	1.87	Strong Agreement
IEP is developed jointly	155 60.8%	89 34.9%	8 3.1%	2 0.8%	1 0.4%	255	1.55	Strong Agreement
IEP unique based on needs	160 62.5%	85 33.2%	8 3.1%	3 1.2%	0	256	1.57	Strong Agreement
IEP specifically addresses problem behavior	128 50.0%	114 44.5%	11 4.3%	3 1.2%	0	256	1.43	Firm Agreement
IEP has annual goals and/or benchmarks	213 83.5%	42 16.5%	0	0	0	255	1.84	Strong Agreement
IEP goals/benchmarks are measurable	160 62.7%	85 33.3%	7 2.7%	3 1.2%	0	255	1.58	Strong Agreement
<b>Summary</b>							1.64	<b>Strong Agreement</b>

The responses received for this category provide overwhelming support that Texas schools are developing IEPs and are doing so in accordance with the legislation. Nearly all Directors (over 99%) claim that every student in their special education programs have current IEPs. This is not a surprise because the IEP has been a part of the national special education system since the original passage of the law with EHCA in 1975. Importantly, these IEPs are seemingly being developed jointly by both school administrators and students' parents. This indicates that people are getting together to address problems instead of one teacher trying one strategy that may undermine what another teacher is doing. Significant to IDEA '97, though, is the strong agreement that each IEP identifies benchmarks and goals for each individual student, and that these benchmarks and goals are measurable. By setting measurable goals, school personnel can actually evaluate how a student is doing. This way, if the student is not progressing or meeting certain benchmarks or objectives, administrators will know that it is time for a new strategy to be developed. Without measurable goals, it is difficult to determine whether or not a specific plan is effective.

As a part of this IEP section of questions, it is also important to note that nearly all school districts (almost 95%) are including in students' IEPs any behavior problem that a child may be exhibiting in the classroom. Misconduct is not only being specifically addressed, but by it being included in the IEP it is well documented so that each teacher is aware of potential situations and also understands that this is something they need to work on. With IDEA '97, addressing and eliminating disruptive or inappropriate actions has become a part of the special education process.

### *Functional Behavioral Assessment*

The FBA category is the second category in the practical ideal type conceptual framework developed to help gauge whether Texas public schools are adhering to the IDEA '97 requirements. The questionnaire provided the study participants nine opportunities to agree or disagree with the FBA elements presented (Table 5.2). The FBA requirement is a new mandate for public schools to comply with. Although the law itself is vague with regards to the composition of an FBA, the literature reviewed in Chapter 2 provided guidance as to what schools should be doing for those students exhibiting behavior problems with regards to assessment. Questionnaire items in this category addressed the interview, observation, and experimentation techniques of FBAs, as well as the notion that a hypothesis should be created identifying potential reasons why the student is acting out.

While the responses to this category also indicate agreement with the statements presented, and therefore seemingly indicate that Texas schools are in compliance with the IDEA '97 FBA mandates, the agreement is not as solid as seen with the IEP questionnaire items. Only about half of the Texas public school system (52%) appear to be testing any developed



**Table 5.2: Results of Functional Behavioral Assessment Compliance**

Survey Items	SA +2	A	N	D	SD -2	n =	Mean	Agreement?
Personnel familiar with FBA	141 55.3%	106 41.6%	3 1.2%	5 2.0%	0	255	1.50	Strong Agreement
Students removed 10 days given FBA	161 63.1%	72 28.2%	16 6.3%	5 2.0%	1 0.4%	255	1.52	Strong Agreement
Extensive interviews conducted	77 30.1%	128 50.0%	40 15.6%	9 3.5%	2 0.8%	256	1.05	Firm Agreement
Systematic and direct observation	74 28.9%	121 47.3%	40 15.6%	21 8.2%	0	256	0.97	Firm Agreement
Develop hypotheses about possible causes	68 27.1%	128 51.0%	38 15.1%	16 6.4%	1 0.4%	251	0.98	Firm Agreement
Hypotheses tested through functional analysis	36 14.1%	97 38.0%	70 27.5%	46 18.0%	6 2.4%	255	0.44	Slight Agreement
If hypothesis inaccurate, assessment continues	47 18.7%	89 35.5%	71 28.3%	36 14.3%	8 3.2%	251	0.52	Slight Agreement
Results of FBA written in IEP	111 43.5%	113 44.3%	23 9.0%	7 2.7%	1 0.4%	255	1.28	Firm Agreement
Assessments conducted regularly	64 25.1%	117 45.9%	52 20.4%	19 7.5%	3 1.2%	255	0.86	Firm Agreement
<b>Summary</b>							1.01	<b>Firm Agreement</b>

hypotheses through functional analysis or experimental assessment. On this particular questionnaire item over a quarter of the respondents answered "Neither," suggesting that perhaps they were unfamiliar with experimental assessment or functional analysis or that possibly they did not think it was necessary in their school district. This is not completely out of line with the law. In fact, if school personnel are continuously monitoring and observing a child's behavior and have developed an intervention strategy that appears to be working, a functional analysis is not necessary. Similarly, if teachers have already tried implementing one strategy and have observed that this is failing through observation and talking with each other, as long as they continue to try alternative strategies until they find one that works an experimental assessment is not needed. The student is getting the attention he needs and school personnel are working to make progress.

Already having mentioned the functional analysis component of assessment the other two pieces of the FBA process, interviews and descriptive observation, appear to be frequently used (over 80% and over 75% respectively) in Texas public schools. These methods of assessment are not difficult to administer and produce a great deal of data about student misconduct or unwanted actions. These processes also do not require the same level of expertise that a functional analysis does and are therefore more convenient for some schools. Interviewing especially takes less time than a formal experimental assessment, and descriptive observation can be conducted during regular classes.

Significant to IDEA '97, nearly every Texas school district according to its respective Director of Special Education (nearly 97%) has employed or trained at least some personnel that are familiar with the FBA process. For the few respondents who indicated that they did not have staff familiar with FBAs it is possible to speculate that these districts contract with larger school districts to outsource their assessment needs or otherwise perhaps do not have a need for personnel with these skills. Most participants in the study (over 91%) also responded with strong agreement that FBAs are conducted when the law requires that they do so.

One other significant observation that can be made from the survey responses is that school personnel are thinking about why a student is acting out or disrupting the class. When asked if school officials develop a hypothesis about the possible causes for a student's problem behavior, over three quarters (77%) of the respondents agreed that their staff were considering variables that might be causing the unwanted actions. This would indicate that school personnel are really trying to address the problem completely and not just suppress inappropriate conduct. By attempting to understand the purposes of actions, teachers can create more appropriate intervention plans to address these actions. Only about half of the participants (under 55%),

however, agreed that if the initial hypothesis about the variables causing the misbehavior later appeared to be off target that a new hypothesis should be found for possible controlling variables. That is not an extremely encouraging number considering several school systems are not trying to support their hypotheses developed through functional analysis.

This section of the survey also yielded data that support the notion that documentation is still important. Nearly all Directors (nearly 88%) have their special education staff write the results of any FBA into the student's IEP. And, for students who continue to display any kind of behavior problems, assessment for the most part continues. Overall, based on the data gathered from the questionnaire instrument, Texas schools would appear to be in compliance with the federal FBA mandates.

### *Behavior Intervention Plan*

The third category in the practical ideal type conceptual framework developed to help gauge whether Texas public schools are adhering to the IDEA '97 requirements is the BIP category. This survey addressed seven elements of the BIP process (Table 5.3) that included how the BIP is developed, its composition, and checks for effectiveness.

Respondents displayed strong agreement for most of this section. Importantly, almost all (93%) of the Texas Special Education Directors indicated that students in their system who are disturbing and disrupting the class have BIPs developed for them. Nearly the same amount of respondents (over 91%) agree that these BIPs are based on the results of an FBA. This is an important element in the questionnaire because it is a mandate of IDEA '97. Another requirement of this legislation is that the BIP be included in the student's IEP. Here again,

nearly the entire group of respondents (over 96%) agreed that any BIP developed for a student be included in their IEP.

**Table 5.3: Results of Behavior Intervention Plan Compliance**

Survey Items	SA +2	A	N	D	SD -2	n =	mean	Agreement?
Students with problem behavior have BIP	142 55.7%	95 37.3%	14 5.5%	2 0.8%	2 0.8%	255	1.46	Firm Agreement
BIP based on results of FBA	141 55.3%	92 36.1%	18 7.1%	3 1.2%	1 0.4%	255	1.45	Firm Agreement
BIP included in IEP	175 68.4%	71 27.7%	6 2.3%	2 0.8%	2 0.8%	256	1.62	Strong Agreement
BIP has annual goals and/or benchmarks	134 52.8%	91 35.8%	8 3.1%	15 5.9%	6 2.4%	254	1.31	Firm Agreement
BIP goals/benchmarks are measurable	100 39.7%	115 45.6%	19 7.5%	14 5.6%	4 1.6%	252	1.16	Firm Agreement
Intervention checks evaluate effectiveness of BIP	67 26.6%	113 44.8%	54 21.4%	17 6.7%	1 0.4%	252	0.90	Firm Agreement
If ineffective, assessment completed again	52 20.6%	115 45.5%	52 20.6%	32 12.6%	2 0.8%	253	0.72	Firm Agreement
<b>Summary</b>							1.23	<b>Firm Agreement</b>

Annual goals and benchmarks are as important to the BIP as they are for the IEP. The law requires that for the BIP a child should have behavioral goals and benchmarks and that they should be measurable. A vast majority of the Directors agree with these two elements that should be considered when writing a BIP (88% and 85% respectively). With not quite the same strength of agreement, the participants responded favorably that their special education support personnel are conducting intervention checks (70%) and are starting over with the assessment process if the BIP is not proving effective (66%). These responses are nevertheless encouraging. When a student has a plan then at least teachers and support staff had made the effort to try to address misconduct and the purpose it serves instead of simply attempting to suppress the behavior that doesn't always prove effective.



## *Personnel Training*

The second conceptual framework used is a working hypothesis framework that was created to address the possible challenges special education program administrators may be facing. The first working hypothesis (WH 1) suggests that education personnel are not fully trained to conduct an FBA as mandated by law. To address this working hypothesis, five questionnaire items (Table 5.4) were included on the survey that questioned the skills and expertise needed to follow the FBA processes and whether Texas special education teachers and personnel staff have **these skills**. This part of the questionnaire also addressed training and teacher preparedness for the **IDEA '97** behavioral assessment and intervention requirements.

A surprising number of participants in the statewide survey (85%) believe that their special education personnel and staff have the skills and expertise required to conduct **FBA**s as mandated by **IDEA '97**. This is surprising because the literature indicated that in most school districts one might find otherwise. Two thirds of the Directors (67%) also claim that **their** personnel, in addition to their skills and expertise, have been extensively trained in the **FBA** process. Furthermore, and an even bigger surprise, nearly all (over 88%) of the respondents claimed that special education personnel have ongoing support for technical advice they may need when performing an assessment of behavior. These were not the expected results considering the recent scholarly literature on the topic and the conversations that have **taken** place with practitioners **in** special education.

It is interesting to review the results of the fourth item in this section of the survey. The statement read "Teachers have expressed that they feel adequately prepared for **FBA** responsibilities." Close to half (42%) of the respondents answered "Neither." This is **curious** information. Could this be because they have no contact with the teachers working **under them**



Table 5.4: Result of Personnel Training Hypothesis (WH 1)

Survey Items	SA +2	A	N	D	SD -2	n =	Mean	Agreement?
Personnel have skills/expertise to conduct FBAs	111 43.9%	104 41.1%	25 9.9%	12 4.7%	1 0.4%	253	1.23	Firm Agreement
Personnel trained in FBA process	63 24.9%	107 42.3%	49 19.4%	32 12.6%	2 0.8%	253	0.78	Firm Agreement
Ongoing support for technical advice	113 44.8%	111 44.0%	20 7.9%	7 2.8%	1 0.4%	252	1.30	Firm Agreement
Teachers feel adequately prepared	19 7.6%	66 26.5%	105 42.2%	54 21.7%	5 2.0%	249	0.16	Slight Agreement
Most school staff trained for FBA	13 5.2%	57 22.7%	57 22.7%	101 40.2%	23 9.2%	251	-0.25	Slight Dis-agreement
<b>Summary</b>							.64	<b>Firm Agreement</b>

or possibly the FBA process is simply not discussed? If the teachers have not expressly mentioned how they feel about the new mandates, it would have seemed logical to an outsider that the Directors of this group of people would have asked about how their direct reports felt and whether they were comfortable with the new requirements and responsibilities being asked of them. It is difficult to speculate the reasons for such a high percentage of participants to neither agree nor disagree.

The final item in this section regarded the entire school staff and their training. It was expected that most of the school staff, especially general education teachers and administrators, would not be trained to conduct the FBAs since they are only requirements for special education students. The statement read "Most of the school staff have been trained to conduct FBAs" and the overall response was negative. Even though the indications received from this one item were in line with the proposed hypothesis, the first working hypothesis of this study was not supported overall because the respondents claim that there are enough skilled individuals who have been adequately trained to support their school's needs.

## Resource Intensive

The second working hypothesis (WH 2) centered on the FBA and BIP processes being resource intensive in both time and money (Table 5.5). Two statements received strong support in this section. The first was that “The FBA process is time consuming.” Most survey participants (over 80%) agreed with that statement, and nearly half of all the Directors “Strongly Agreed.” One other strong agreement found in the results was that the respondents agreed that “To conduct an FBA effectively, the involvement of several key school staff is a requirement.” Over half of the respondents (52%) “Strongly Agreed” while most of the rest (44%) simply “Agreed.” This result was expected based on the review of the literature and also ties into what practitioners like Courtney Bandalo have explained.

Table 5.5: Results of Resource Intensive Hypothesis (WH 2)

Survey Items	SA +2	A	N	D	SD -2	N =	mean	Agreement?
FBA is time consuming	109 44.9%	88 36.2%	28 11.5%	17 7.0%	1 0.4%	243	1.18	Firm Agreement
FBA takes time away from teaching	51 20.2%	75 29.8%	69 27.4%	51 20.2%	6 2.4%	252	0.45	Slight Agreement
FBA caused hiring additional staff	36 14.3%	35 13.9%	48 19.0%	108 42.9%	25 9.9%	252	-0.20	Slight Dis-agreement
FBA required additional training	55 22.0%	92 36.8%	37 14.8%	55 22.0%	11 4.4%	250	0.50	Firm Agreement
Requires involvement of several staff	132 52.4%	112 44.4%	4 1.6%	3 1.2%	1 0.4%	252	1.47	Firm Agreement
Summary							.68	Firm Agreement

It is interesting that this process is admittedly time consuming according to the Directors, but according to their responses they have not needed to hire additional staff to compensate for the additional efforts being made by any of their staff involved with FBAs and BIPs. With teachers and school personnel already so busy, it seems strange that these new mandates did not

require the hiring of additional staff for support. Likely, each Director would jump at the chance to hire additional staff, but with unfunded mandates like this one they are stuck doing more and more with **no financial** assistance to pay for added headcount. Although the data gathered in this section are somewhat mixed, the overall picture presented by the survey results supports the second working hypothesis.

### *Implementation Issues*

The final working hypothesis (WH 3) used in this study was general in nature and centered on the notion that public schools are having difficulties in implementing the behavioral assessment and intervention requirements of IDEA '97. The survey participants generally agreed with the statements offered in this section (Table 5.6), although significant percentages neither agreed nor disagreed with the three items.

**Table 5.6: Results of Implementation Issues Hypothesis(WH 3)**

Survey Items	SA +2	A	N	D	SD -2	n =	mean	Agreement?
Implementing difficult process	63 25.0%	101 40.1%	48 19.0%	34 13.5%	6 2.4%	252	0.72	Firm Agreement
Many challenges overcome	46 18.3%	92 36.5%	58 23.0%	47 18.7%	9 3.6%	252	0.47	Slight Agreement
Continues to face challenges complying	52 20.7%	101 40.2%	46 18.3%	39 15.5%	13 5.2%	251	0.56	Firm Agreement
<b>Summary</b>							.58	<b>Firm Agreement</b>

The results received for this section of questioning are not surprising. In nearly every journal article reviewed challenges brought by IDEA '97 were identified. Texas is a huge state with several metropolitan areas where the schools are crowded and resources are limited. It is to be expected that any additional responsibility will bring challenges to this state's school systems.

Also, with a law as vague as IDEA '97 it is not surprising that schools have had difficulties and have faced challenges in meeting compliance. The third working hypothesis is thus supported.

### *Written Comments*

Each Texas Special Education Director was given the opportunity to make any additional comments at the end of the questionnaire. From the relatively few comments received overall, several points were identified and highlighted by the survey participants. (See Appendix D for a complete list of responses.) One participant wrote that their schools are “basically doing just enough to meet compliance [because there is] not enough time or personnel to do more than the minimum.” Another Director commented that “all campus staff should have more training in [the FBA and BIP processes] but unfortunately time and money are issues in making this happen.” These comments express that time is certainly an issue in special education programs and that these individuals are doing what they can, but obviously can only be spread so thin.

Comments received from the surveys collected also lend support to the information that Courtney Bandalo supplied at the outset of this research. Some Special Education Directors feel that the FBA process is a positive approach to treating behavior problems. One study participant claims that “an FBA, if done well, provides much more usable information than a psychological evaluation for behavioral issues. [This] district has begun the practice of writing BIPs for general education students.” Another respondent offers that the new mandates have “forced all of us to be more analytical about behavioral issues—that is a good thing!”

In summary, the comments gathered from the data submitted show that, in general, the new processes that special education departments have had to implement are time consuming, resource intensive, and difficult to conduct effectively. But overall the Directors seem to support



these initiatives set forth by Congress. It is difficult to speculate why that is, but perhaps they are seeing some results from implementing the FBAs and BIPs. Were additional funding included with the new mandates one would perhaps predict that the challenges presented by IDEA '97 would not be as significant as they are now with the caseload some of these educators deal with.

### *Results Summary*

Tables 5.7 and 5.8 summarize the findings of this research. The purpose of mailing out surveys to all 466 Texas Special Education Directors was to gather data on a statewide scale that would provide a big picture overview of how public school systems are handling the IDEA '97 behavioral assessment and intervention mandates. Of the 256 responses received, the participants indicated that for the most part, Texas schools are complying with the new regulations brought by this new law. Whereas the law itself is mostly vague, Texas education professionals and administrators have evidently made themselves aware of all of the IEP, FBA, and BIP components that are required by IDEA '97 and suggested practice by the most recent literature on the topic.

Table 5.7: Are Texas Schools In Compliance With IDEA '97?

<b>Practical Ideal Category Requirements</b>	<b>Texas Schools In Compliance</b>
Individualized Education Program	Directors in Strong Agreement
Functional Behavioral Assessment	Directors in Firm Agreement
Behavior Intervention Plan	Directors in Firm Agreement



## Chapter 6

### Conclusion

This chapter concludes this study. At the outset of this paper, three research purposes were presented that guided this project. These purposes were to identify the elements of a practical ideal type process **with** regards to treating problem behavior in the special education system according to the law **and** literature, to gauge whether Texas schools meet the criteria of the practical ideal type based **on** the perceptions of the Special Education Directors, and **finally** to explore the perceptions of **these** Directors on how they believe the implementation of **IDEA '97** has progressed in their schools.

### *Significant Findings*

Although this legislation is fairly new, there is a great deal of information available about the **IDEA '97** requirements. **In Chapter 2**, the behavioral assessment and intervention mandates were addressed **and** explored in order to identify the elements of a practical ideal type model for public schools to be following to meet compliance. Key components were recognized as being essential and were organized **in** a practical ideal type conceptual framework that would **later be used** to create a survey instrument. This effort served the first purpose of this study.

Questionnaire items were added to the survey that involved implementation issues and challenges that school districts might be facing.

After tallying the participant responses to each questionnaire item and gauging these responses **to the practical ideal type**, a determination was made based on the perceptions of Texas **Special Education** Directors as to whether public schools in this state are in compliance

with the IDEA '97 legislation. The survey instrument would also provide exploratory data that would either support or not support the three working hypotheses developed in Chapter 3.

The overall big picture that this study provides is that Texas public schools are in compliance with the behavioral assessment and intervention mandates of IDEA '97 according to key figures in special education administration. Accountability is becoming a factor in nearly every area of public administration and special education is no exception. While requiring additional documentation and adding processes to a host of other services educators must provide can be time consuming and an added burden to the almost unbearable caseload many of these teachers and specialists have, the FBA and BIP processes have proven successful. Not only is this evident in the scholarly literature, but even some of the Directors' comments indicate that this is so.

Yes, the new requirements of IDEA '97 have added pressure to an already strained population of professionals, but according to the survey data the law is apparently followed to the best of these schools' abilities. Without additional funding and resources, it would be difficult to ask for much more with regards to compliance. It is promising that behavior problems in schools are being addressed by Congress and it will be interesting to see if the FBA and BIP processes eventually become part of the general education administration strategy in the coming years.

### *Suggestions for Future Research*

There are several opportunities to build from and improve upon the information presented here in this study. First and foremost, only Texas Special Education Directors were included to participate in the survey. Although the Directors are likely knowledgeable about current public

policy and generally have experience in the field of special education, it would be interesting to conduct the same study and administer the same survey to special education teachers, counselors, or specialists. Any of these groups could very well have a different perspective of the IDEA '97 mandates and how they are being followed since each of these groups are involved in the day to day assessment and intervention process. Often times, a manager will tell his employees what they should be doing for every individual customer, but the employees in reality do things somewhat differently. This could perhaps be the case here where teachers and special education personnel are doing what they can for every student, but possibly not everything that their Directors have instructed. For example, it would be interesting to see if the practitioners would come close to matching the Directors' responses where reportedly over half of the school districts are conducting experimental assessments or functional analyses.

Another opportunity for further study would be to survey a specific group of professionals only in certain metropolitan areas. It is not surprising that the more populated areas have the biggest problems with discipline. It is not necessarily that kids in cities behave poorly as compared to those living in rural areas. Instead, city schools are generally much more crowded and students receive less individualized attention. Simply having more students on campus increases the opportunity for disruption. It would be interesting to see how the survey responses of any particular metropolitan group would differ from the statewide results of the Special Education Directors. The more crowded the school the more demanding the caseload for any special education service provider, and this may be a factor in the time spent on formal functional behavioral assessments and the subsequent behavior intervention plan processes.

Lastly, this study could be expanded greatly by using different research methodologies to gather data. Conducting structured interviews could bring depth to the many behavior problems

that teachers are facing in public schools and exploring how these problems are dealt with could provide a broader and more accurate picture of how the IDEA '97 mandates are being followed. Case studies could also broaden the scope of this research and provide some real life examples of how the process of assessment and intervention works. Perhaps the researcher could follow the progress of a few students from the point of the behavior assessment through the first weeks of intervention and gather data from the students' teachers, counselors, and specialists where necessary—such as speech pathologists or physical therapists. This would give the researcher a sense of what teamwork is needed to help support a child with a tendency to disrupt the class and first hand knowledge of everything that must be done to document their behavior. This topic is an interesting one and could be explored on many different levels.

## Appendix A: Survey of Texas Special Education Directors

### *Instructions:*

*Beside each of the questions presented below, please answer with one of the following responses:  
Strongly Agree (SA); Agree (A); Neither Agree nor Disagree (N); Disagree (D); Strongly Disagree (SD)*

	Questions	SA	A	N	D	SD
1.	Every student in the Special Education Program has a current Individualized Education Program (IEP).					
2.	Each student's IEP is developed jointly by school officials and the student's parents or guardians.					
3.	IEPs are unique to each student based on each student's needs and abilities.					
4.	Students exhibiting behavior problems have items on their IEP that specifically address this problem behavior.					
5.	Every student's IEP includes annual goals and/or benchmarks.					
6.	Every student's IEP includes annual goals and/or benchmarks that are measurable.					
7.	Some personnel at this school are familiar with Functional Behavioral Assessment (FBA).					
8.	Students in the Special Education Program who are removed from the classroom for more than 10 days due to behavior problems are given FBAs.					
9.	As a part of this FBA, extensive interviews are conducted with those who interact most with the student					
10.	Students exhibiting behavior problems are systematically and directly observed to attempt to determine the cause of the problem behavior(s).					
11.	School officials develop hypotheses about the possible causes of a student's problem behavior.					
12.	These hypotheses are tested through an experimental assessment or functional analysis.					
13.	If the hypothesis developed initially appears to be inaccurate, the behavior assessment continues until another hypothesis can be reached.					
14.	The results of any FBA of any student are written in that student's IEP.					
15.	Assessments are conducted regularly for each student exhibiting problem behavior.					
16.	Students exhibiting problem behavior have a Behavior Intervention Plan (BIP) developed for them.					
17.	BIPs are based on the results of a Functional Behavioral Assessment.					
18.	Any BIP is included in the student's IEP.					
19.	BIPs outline annual goals and/or benchmarks for behavior improvement.					



	Questions	SA	A	N	D	SD
20.	BIPs include goals and/or benchmarks that are measurable.					
21.	Intervention checks are conducted to evaluate the effectiveness of the BIP.					
22.	If an intervention appears to be ineffective, the assessment process is completed again.					
23.	Special Education personnel at this school (district) have the skills and expertise to conduct FBAs as mandated by the Individuals with Disabilities Education Act Amendments of 1997 (IDEA '97)					
24.	Special Education personnel at this school (district) have been extensively trained in the FBA process.					
25.	Special Education personnel have access to ongoing support for the technical advice that may be needed during the assessment process.					
26.	Teachers have expressed that they feel adequately prepared for FBA responsibilities.					
27.	Most of the school staff have been trained to conduct FBAs.					
28.	The FBA process is time consuming.					
29.	The FBA process takes time away from teaching when teachers must facilitate assessment.					
30.	The FBA mandates of IDEA '97 have caused this school (district) to hire additional staff.					
31.	The FBA process as mandated by federal law has required school personnel to enroll in and complete additional training causing resource expenditures of both time and money.					
32.	To conduct an FBA effectively, the involvement of several key school staff is a requirement.					
33.	Implementing the behavioral assessment and intervention mandates of IDEA '97 has been a difficult process.					
34.	Many challenges had to be overcome for this school (district) to implement the mandates of IDEA '97.					
35.	This school (district) continues to face challenges in complying with the behavioral assessment and intervention requirements of IDEA '97.					

Please provide any additional information or comments about the implementation of the IDEA Amendments of 1997 behavioral assessment and intervention mandates that have affected you or your school (district):

## Appendix B: Cover Letter Attached to Survey Instrument

Southwest Texas State University  
Masters of Public Administration Program  
601 University Drive  
San Marcos TX 78666

Jena Whitley Pratt  
Graduate Student – MPA Program  
11504 Powder Mill Tr.  
Austin TX 78750

To: All Directors of Special Education in the State of Texas Education System  
Re: Survey Concerning the 1997 Amendments to the Individuals with Disabilities Education Act

Dear Sir or Madam,

I am a Graduate Student in the Public Administration Program at Southwest Texas State University. For the final requirement of this program, each student must complete an in depth Applied Research Project on a topic of their choice. I have selected to study the behavioral assessment and intervention mandates that were set forth by the 1997 Amendments to the Individuals with Disabilities Education Act that became effective in May of 1999.

I am sending the enclosed survey to every Special Education Director in the state in an attempt to obtain information about whether Texas schools statewide are adhering to these federal requirements and what possible challenges schools have faced in doing so. Your response is extremely valuable to this study and would be greatly appreciated.

For your convenience, I have included a self-addressed stamped envelope for the completed survey to be returned directly to my attention. All responses will remain anonymous. Please return your completed questionnaire (two sides of one page) by September 15, 2000. Thank you in advance for your timely response.

Sincerely,

Jena W. Pratt

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[The above URL provides specific lists of the Special Education Directors in Texas sorted by last name or school district, used in mailing out the survey questionnaire. Other helpful websites include the home page of the Texas Education Agency that provides general information about the public school system (<http://www.tea.state.tx.us/>) and also the Special Education Department website (<http://www.tea.state.tx.us/special.ed/>) that provides information specific to special education programs statewide, including links to federal law information and funding resources.]

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## Appendix D: Written Comments in Survey Responses

Our Co-op serves four school districts (about 1000 special education students). We have two behavior specialists who are highly trained and provide support to campus staff. It is not enough. We try/strive to participate in "best practices." All campus staff should have more training in these areas--unfortunately time and money are issues in making this happen. As the result, there is too much dependence on Co-op staff to do the FBAs/BIPs.

IDEA is, and has been, out of control. It will continue to be out of control as long as lawyers and advocacy groups are the powers that guide it.

The FBA doesn't have to be so hard to complete or so time-consuming. Training regular education personnel in special-ed issues has always been a challenge!

Adjusting to change is always a difficult process. However it has been a smooth one that has not caused undo problems.

Having more paperwork requirements doesn't make it happen. Principals are still not implementing no matter how much inservice--it's business as usual. Special Ed does it because it's required; we had our own system before that worked fine.

Basically doing just enough to meet compliance--not enough time/personnel to do more than minimum.

The district must now comply with IDEA '99.

Some schools have 100+ faculty--not all have been formally trained, but anyone who attends the ARD have input and is asked to be involved.

I would caution you on your final interpretation of your data. The degree of inconsistency of what is a FBA or BIP has not been clearly defined.

This school is very small and behavior is not always the issue. We are not faced with outrageous behaviors from students and at this time we have no BIPs. We are very fortunate in this aspect. We also contract services from Region XIX.

Implementation is not a choice for schools receiving IDEA funds. Schools that are found non-compliant must return the portion of funding for areas where they are consistently non-compliant. Schools are already strapped for operational resources, and this pressure generally insures a high degree of compliance.

We have a 7 district shared service arrangement--some districts have been able to comply more easily than others.

FBA's conducted by Special Education Counselors. BIP developed by Sp Ed Counselor with input from teachers, principal/assistant principal, diagnosticians, and special education directors.

I personally feel that the FBA is a positive approach. In the past, chronic behavior problems have often resulted in the referral for a psychological assessment. An FBA, if done well, provides much more usable information than a psychological evaluation, for behavioral issues. Our district has begun the practice of writing BIPs for general education students.

Small districts use Special Education Coops for services, therefore we are not trained in every aspect of Special Ed but rely on the Coop for guidance.

I think the FBA/BIP requirements are noble and good and can make a difference in behaviors, but paired with all of the other requirements given our teachers, it is an overwhelming task that is rarely done with the quality asked of the school staff.

There are always challenges we face.

It has forced all of us to be more analytical about behavioral issues--that is a good thing!

Any intervention plan is dependent on the willingness of teacher to implement. Some say they are but???

We are continually training staff in this area.

The '97 mandates are very concrete or black and white. A student's behavior does not necessarily "fit" the necessary paper trail handed down by Bureaucrats.

This is a TYC incarcerated youth facility. All students are required to participate in 16-hour behavior modification program as ordered by court. Treatment programs include chemical dependency, sexual offender treatment program, and capital offender. If students don't behave in class, they are put in jail cells in security. Parents are not involved in more than 1% of time in students ARDs. This is another intrusive federal mandate which is a full employment program for "educrats" and provides little added value to educating youth.

As a director new to this district, I discovered some mandates not being implemented and others such as the FBA and BIP being implemented without proper training of personnel. The effectiveness of the BIP is rarely reviewed and reassessment rarely occurs. Guidelines from the TEA (sooner than 3 years later) would have been extremely helpful. Districts interpret the new regulations of '97 differently.

Generally, the FBA takes place at the ARD when teachers, parents, administrators, and appraisal staff bring data and observation information. The ARDs take forever!

To complete FBAs, BIPs, etc. effectively, we have tried to provide appropriate training. However, it has been very difficult to implement a truly effective process.

We have just recently become a free-standing special education entity after having been part of a co-op (SSA) for numerous years. As part of that co-op, we were on the least receiving end of any and all special education services. Until this school year, we've only had one resource teacher. Now both of our resource teachers are alternatively certified in special education, therefore, the knowledge-base is somewhat limited. Additionally, so many things have been out of compliance that it has been a struggle to just develop an operating special education department.

All FBAs in this district are conducted by special education staff. Principals/assistant principals will sometimes complete behavioral questionnaires for the assessment process. All BIPs are written primarily by the assessment staff in ARD meetings. More feedback from school personnel is given at this time than any other—especially for special disciplinary procedures.

[For the FBA process w/ regards to time]....Usually a time trade-off—bad behavior takes away from teaching time. All new federal requirements cause time concerns.

Training for FBA/BIP is in place, however, the challenge is using information appropriately to write BIP and complete assessments.

Behavioral plans for students exhibiting behavior problems has long been in effect. The process has been refined in the past few years, but the districts I've been involved with have done a good job of writing and implementing them [BIPs & FBAs] for many years.

Prior policies did not require behavioral component of goals and objectives to go with behaviors in BIP. Vague language does not lend consistency.

It just takes more time--and the FBA/BIP/MDR sequence replaced a sequence we'd developed and really found effective. It feels like we're jumping through hoops--and kids aren't getting the help that they need. We'd do better with less regulatory influence.



We belong to a special education co-op--FBAs, BIPs, etc. are conducted and developed by LSSPs with input from special education personnel, general education personnel, parent, administrator, etc. during an ARD or manifest determination.

Assessing student behavior problems is time consuming but needed. We do not assess every child with a behavior problem. This, in my opinion, is not the intent of the law.

The requirements of IDEA 97 are simply those we should be doing--the problems of implementation have been greatly exaggerated--I don't understand all the concern unless districts were simply not paying attention to what we were supposed to be doing all along to provide services for our students.

Parent attendance and participation in annual ARD meetings vary considerably. Problem behaviors are addressed in IEP when behavior is exhibited frequently or intensely or both. Lack of actual baseline data results in lack of measurable goals and objectives. Additional staff have not been hired directly as result of IDEA '97 but existing staff have additional new responsibilities and re-assignments.

We are always trying to improve.

Time and training and on-going updates of legal information have resulted in a basically good program of compliance--with room for continued growth and improvement.

I have no idea what an experimental assessment is. The biggest problem we have is no standardized forms for IEP meetings. Also, sending progress reports for IEPs--difficult to monitor.

The biggest problem exists when a student misbehaves and parents expect their child to be exempt from school rules!

Our SSA is made up of small districts. We've not had an abundance of need to address many behavioral issues.

When are we going to work with "kids"?

The questions you have asked boil down to basically, "Are you following IDEA law or not?" IDEA should be handled professionally/completely/eagerly/etc. by district/campus personnel just as the responsibility for GT/Title Programs/etc. are to be handled. The BIP and FBA and emotional issues have become such factors because of the wide-openness of the due process component of IDEA which permits major league legal play w/o parents working with the school before "leap frogging" to the court arena.



FBA's are hard but productive.

We have difficulty getting parents to actively participate.

Administrators seem to be "stuck" and have difficulty remembering to contact special education personnel before expulsion. It is extremely difficult to implement IDEA without support.