

# Six Things to Never Say or Hear During an IEP Meeting

## *Educators as Advocates for Families*

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Education professionals and parents need to be able to understand federal requirements for individualized education program (IEP) meetings, both to ensure compliance and also so that they are able to recognize potential violations. Part of this understanding should include knowledge of certain “core principles” of the Individuals With Disabilities Education Act (IDEA; 2006): zero reject, nondiscriminatory evaluation, individualized and appropriate education, least restrictive environment, procedural due process, and parent participation (H. R. Turnbull, Stowe, & Huerta, 2007).

Although many schools have made significant strides in providing special education services to students with disabilities, recent studies indicate that many barriers still exist to fully implementing IDEA. For example, although some general and special educators and school administrators support inclusive services for students with

disabilities, others do not (Pugach, 2005; Wolery & Odom, 2000; Young, 2008), citing lack of resources, class size, and inadequate training for teachers (Carlson, Brauen, Klein, Shroll, & Willig, 2002). Similarly, schools may provide families with little helpful information regarding IDEA (Lake & Billingsley, 2000)—or provide them with information that’s not easy to understand (Fitzgerald & Watkins, 2006; Mandic, Rudd, Hehir, & Acevedo-Garcia, 2010). Thus, many families may face challenges in their pursuit of an IDEA-mandated equitable education for their children with disabilities (Harry, 2008; Hess, Molina, & Kozleski, 2006); these struggles are evidenced by the frequency of adjudicated due process hearings nationwide (i.e., approximately 2,800 per year; Zirkel & Gischlar, 2008)—which likely represents only a proportion of family-school disputes.

Current research on parental reports of their experiences during the IEP process suggests that favorable perceptions are the exception rather than the norm. In their review of 10 studies on parental views of the IEP process published since 2004, Reiman, Beck, Coppola, and Engiles (2010) found only one study reporting that the majority of parent participants indicated overall positive experiences (i.e., Fish, 2008). The remaining studies indicated that parents felt high levels of dissatisfaction during IEP meetings, with parents citing difficulty processing the information (Stoner et al., 2005), being intimidated by educators and blamed for their children’s academic and behavioral difficulties (Fish, 2006), and being relegated to roles in which their participation was limited to listening to information about their child’s education, answering questions, and signing preset forms on students’ goals (Childre & Chambers,



2005). These findings underscore the importance of supporting educators with research-based recommendations for enlisting parents as collaborators during the IEP process.

When educators and parents collaborate to confront and resolve disputes, parent satisfaction with special education services can increase (Mueller, Singer, & Draper, 2008). The Council for Exceptional Children's (CEC) best practice recommendations for collaboration (2009) provides guidance for parents and educators to work together in the best interest of the student. Some first steps towards productively addressing conflicts that may arise during the IEP process include IEP team members understanding the IDEA requirements, including the core principles of IDEA (H. R. Turnbull & Turnbull, 1998; H. R. Turnbull, Stowe, & Huerta, 2007) listed below:

- *Zero reject*: All students with disabilities are entitled to a free appropriate public education (34 C.F.R. §§ 300.121 and 300.122; Timothy W. v. Rochester School District, 1989).
- *Nondiscriminatory evaluation*: Assessment of students with or suspected of having a disability must be fair (34 C.F.R. § 303.323).
- *Individualized and appropriate education*: Students with disabilities must receive individualized services to provide a beneficial education (34 C.F.R. §§ 300.320–300.324).
- *Least restrictive environment (LRE)*: To the greatest extent beneficial, students with disabilities should be educated in a typical setting with students who do not have disabilities (34 C.F.R. § 300.550[b][1] and [2]).
- *Procedural due process (safeguards)*: Schools and parents hold each other

mutually accountable; these safeguards also provide dispute resolution procedures (34 C.F.R. § 300.507[a] and 300.508[a]–[c]).

- *Parent participation*: Parents and students with disabilities are partners with educators in decision making about students' education (34 C.F.R. § 300.345).

IEP team members must also have the confidence to speak up when its mandates are not being followed. In this way, special educators can speak up in response to things that should not be said during IEP meetings.

Following are six illustrative case vignettes, which include statements that parents and professionals should not hear at IEP meetings, a commentary about each case vignette, and suggested responses for educational professionals should they encounter situations similar to those in the vignette.

## 1. The Time Saver

At a recent IEP meeting, Jonas's mother entered the conference room and enjoyed a friendly chat with the general education teacher, special education teacher, and the school principal. The group began the formal part of the meeting by sharing their concerns for 15-year-old Jonas at school. Jonas's mother said that she had been worried about Jonas's math skills for years. At the time of the IEP meeting, he continued to lag behind his peers, but had made progress. The teachers confirmed that Jonas continued to have difficulty with math problem solving, in both science and math class, despite the help of his special and general education teachers. The special education teacher said, "Good news! We have a new book with tons of IEP goals. We picked a few and entered them on the IEP. So the IEP's all done. I'll read the goals and then you can sign here."

Special education professionals are seemingly always pressed for time. Any strategy that can save time is valuable. This vignette involves two principles of IDEA that are relevant to Jonas's math goals: individualized/appropriate education and parent participation. First, to meet IDEA requirements for an *individualized appropriate education*, special education teachers must support students' access to the general education curriculum and meet state standards (U.S. Department of Education, 2010). Goals and objectives should be developed as a team, on the basis of formal and informal assessment data regarding the child's current strengths and weaknesses gathered through a nondiscriminatory evaluation (A. Turnbull, Turnbull, & Wehmeyer, 2010; 34 CFR § 303.322). Although a "bank" of IEP goals can be a productive place to start the process of identifying student goals (and many school districts provide them), these resources may not be appropriate as goals to meet an individual student's needs. IDEA requires teachers to gather assessment data to determine the student's present

level of academic achievement and functional performance (34 C.F.R. § 320[a]), which leads to collaborative development of IEP goals during the IEP meeting. The IEP team determines which goals are most appropriate and most likely to meet the individual needs of the student. This individualization and personalization means that the team must adapt any "off-the-shelf" goals to meet the individual student's needs.

Moreover, IDEA requires that parents must be provided opportunities for *meaningful participation* in any discussion of their children's education (34 CFR § 300.322). Clearly, Jonas's mother was excluded from collaborating with the other IEP team members regarding Jonas's goals. Simply reading a list of predetermined goals and asking for a parent signature does not engage parents in collaborative decision making; instead, it relegates them to recipients of the school professionals' decisions (A. Turnbull, Turnbull, Erwin, Soodak, & Shogren, 2010). School personnel can enhance parent participation by allowing sufficient time for meetings, refraining from completing forms in advance of parental input, and perhaps even providing parents with a copy of draft IEP goals and objectives a few weeks before the meeting. All of these actions are part of a democratic process that enhances parental sense of ownership as team members (Blue-Banning, Summers, Frankland, Nelson, & Beegle, 2004; Fish, 2006, 2008). Instead of a directive to sign an IEP absent meaningful parental input, what IEP team members should hear is the friendly buzz of voices as educators and parents work together toward understanding and agreement about the students' strengths and areas for improvement, which naturally leads to individualized goals and objectives.

### ✓ The Right Response

Instead of "I have already prepared the goals; please sign here," educators should emphasize, "I think we can all agree how important it is to work as a team for Jonas. Other IEP team members have important things to share

about Jonas and, like you, we'd like to work together to develop the best IEP goals for Jonas that we can."

## 2. The LRE Plea

Marissa is an energetic 5-year-old with communication and cognitive delays, previously served successfully in an inclusive preschool setting. At the start of Marissa's IEP meeting, Marissa's parents were happy to learn that the professionals at their daughter's new elementary school seemed to have collaborated effectively with her previous preschool teachers. However, when discussing the setting for her special education services, the educators were reluctant to place Marissa in a general education kindergarten setting. "Because she's new to kindergarten and to the school," one teacher said, "let's see how well Marissa does in a resource room or self-contained classroom before we place her in a more inclusive setting where she may be overwhelmed." Marissa's parents were disappointed, because they strongly believed Marissa benefited from being educated with her typical peers and previously had been successful in this type of setting.

Many educators are apprehensive about inclusive settings. Some believe that students with disabilities need specialized settings outside of the general education classroom to best access individualized instruction (Kavale & Forness, 2000). Others may not believe students with disabilities should be held to the same academic standards as students without disabilities (Agran, Alper, & Wehmeyer, 2002), which can lead to recommendations like that of the educators on Marissa's team.

However, the IDEA principles of *least restrictive environment* (LRE) and *appropriate education* apply here. LRE guarantees a student's right to be educated in the setting most like that for peers without disabilities wherein the student can be successful with appropriate supports and services (Palley, 2006; 34 C.F.R. § 300.550[b][1] and

[2]). The result is a presumption of educating students with disabilities in general education settings; this presumption may be set aside by the team (which includes the parents) only after intensive supports, supplementary aides, and services have been provided in the general education classroom without success (Friend & Bursuck, 2009). Therefore, the discussion of Marissa's placement must begin with consideration of the general education setting before moving to a discussion of more restrictive settings—instead of the reverse. The IEP team should also outline the continuum of services available to Marissa and meet the IDEA requirement for appropriate education by tailoring a program to meet her individual needs.

*Universal design for learning* is a research-based strategy that promotes inclusion of students with disabilities (A. Turnbull, Turnbull, & Wehmeyer, 2010) and can result in academic and social benefits for all students (Cole, Waldron, & Majd 2004; Idol, 2006; McGregor & Vogelsberg, 1998; Salend & Duhaney, 1999; see [www.cast.org/udl](http://www.cast.org/udl)). The IEP team meeting should include a discussion of the specific techniques and adaptations that address Marissa's presenting areas of need and how these can be integrated as part of the teacher's instructional delivery naturally and throughout the course of the school day.

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### ✓ **The Right Response**

The IEP meeting should include a fruitful discussion about the availability of strategies for supporting the student in the least restrictive environment. A teacher can say, "I can appreciate your concerns for Marissa's success given the new challenges she and all of the other new students will experience in the kindergarten classroom. I have no doubt that if we put our heads together

about ideas for strategies to support her, we'll feel confident in providing Marissa the opportunity to start off in the kindergarten classroom."

### **3. Who's in Charge?**

Suzie is a third grader who loves science. She has a specific learning disability in reading decoding and comprehension. The IEP meeting included the special education teacher, the general education teacher, the speech/language pathologist, and Suzie's mother, and was going very well. After developing the IEP goals based on the state standards (as required by IDEA, 34 C.F.R. § 200.1[f][2][ii][B]), they determined Suzie should receive 2 hours a week of speech/language services to meet her academic goals. However, no local education agency (LEA) representative, such as the principal or special education director, was present (or designated) at the meeting, as required by IDEA. As the meeting was winding down, the special education teacher said, "I need to check with the special education director before determining the recommended level of speech/language services for Suzie" and left the meeting room to get the LEA's signature.

The salient IDEA principle in this situation is the assurance of *procedural safeguards* (i.e., due process rights; 34 C.F.R. § 300.507[a] and 300.508[a]–[c]). Procedural due process ensures that schools carry out IDEA principles. IDEA mandates that the IEP team include a representative of the school system who is qualified to provide or supervise special education and is also knowledgeable about the general education curriculum and school

resources (34 C.F.R. § 300.321[a]). During IEP meetings, the LEA representative has the responsibility to (a) make sure the appropriate special education services are provided to the student and (b) supervise and commit resources for those services listed on the IEP. It is the responsibility of the LEA representative and the other members of the IEP team to ensure that these decisions and responsibilities are met and that procedural safeguards regarding the participation of appropriate team members are followed. The IEP team should be appropriately convened (i.e., all required members present) before proceeding. This means that the team members include the special education teacher, the general education teacher, a representative of the district/school who has the authority to release the resources of both time and personnel, the parent, and any other required member necessary to conduct the IEP meeting.

### ✓ **The Right Response**

In planning the IEP meeting, educators should ensure that everyone who is required to be at the meeting attends. At the beginning of the meeting, the team should be able to answer the question "Which IEP team member is ultimately responsible to supervise and ensure that appropriate educational services will be provided for this child?"

### **4. The Search Ain't Over Until It's Over**

Johnny is a fifth-grade student whose IEP meeting started off congenially until it came to addressing IEP goals—when Johnny's parents noticed that his proposed reading goals were nearly the same as those in his IEP from the previous school year. When his father asked why, the special education teacher explained, "I don't know what else to try with him. He has not improved this year even after I've tried every strategy to help him attain his goals and nothing works."

The IDEA principle of an *individualized/appropriate education* (34 CFR §§ 300.121 and 300.122) is important here. The key word in the vignette is *everything*. At times, teachers continue to implement familiar strategies rather than investigating different research-based interventions or discussing ideas for strategies with parents and other professionals. After an IEP is written for a student, it is the responsibility of the special education teacher to continually measure progress against the IEP goals. This can be accomplished through *systematic progress monitoring*—when teachers assess student performance on a regular basis to determine whether children are benefiting from instruction, implement research-based strategies, and then monitor students' progress or lack thereof (Fuchs & Fuchs, 2003). The special education teacher's role is similar to that of a detective: to research instructional strategies while also collecting data to determine if the strategy is effective, and to discard those strategies that are ineffective (i.e., strategies that do not help students make progress on their IEP goals).

School districts must provide ongoing training for teachers regarding research-based instructional strategies to meet the needs of individual students with disabilities. The parent can also be a resource for ideas regarding the child's learning style, which may help in researching appropriate strategies. Discussing interventions with other professionals (e.g., administrators, school social workers, psychologist, curriculum specialists, and/or other teachers) is also a way to discover ideas to implement with the student. The U.S. Department of Education refers states and districts to some Internet web sites, which supply quality information regarding research-based strategies (e.g., <http://nichcy.org/research/basics/disabilities>, <http://www.nectac.org/topics/evbased/evbased.asp>).

### ✓ The Right Response

After reviewing the list of strategies that have been implemented with the

student, how long each strategy was used, and evidence illustrating the effectiveness of use, the team might instead ask the teacher, "Have you discussed this challenge with other professionals to see if they have any other research-based teaching suggestions?" or "What kinds of professional development could benefit the IEP team's decisions about instructing Johnny?"

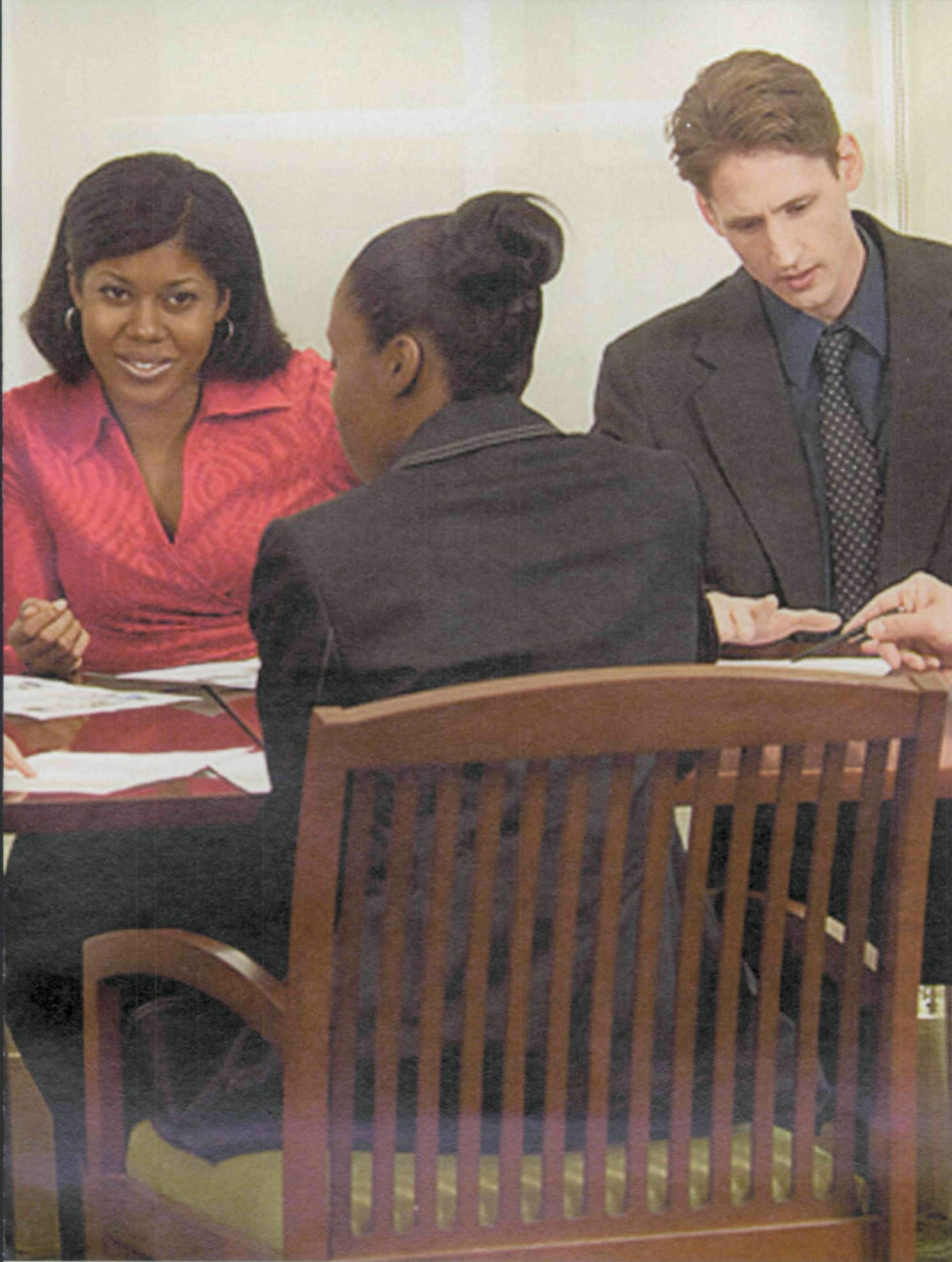
### 5. Pass The Buck

Nick is an 11th-grade student with learning disabilities who is in an inclusive class for mathematics for the first time this year. At the IEP meeting, the mathematics teacher shared some positive comments about Nick's behavior in class but struggled when describing Nick's mathematics performance: It seemed to him that Nick viewed high school as more about socializing than academics. In frustration, the mathematics teacher blurted out, "Look, honestly, Nick, you are just not interested in mathematics like the other students. I prepare for the class each day. I have asked you a million times how you learn best and you always reply, 'I don't know.' Perhaps if he spent an hour or two at home each night on mathematics and you [his parents] encouraged him to do better at school, we wouldn't have this problem. Or if not, we could refer him to a separate class that caters to students who are not motivated where he can be more successful."

Two principles of IDEA apply here: *LRE* and *parent participation*. Teachers in content-area classes may not have received adequate preparation for inclusive practices (DeSimone & Parmar, 2006). As frustration grows, particularly because the other students in the class seem to grasp concepts quickly, teachers may assume that the home environment is to blame. Consequently, they may recommend alternative placements for the student's "own good," placing the student in a more restrictive environment with



other students who have similar challenges. Student outcomes can suffer; according to Kerr and Nelson (2010), parents may avoid interactions with school personnel because of perceived blaming by teachers. It is incumbent upon the school staff to invite parents' suggestions and their participation in their student's education. Friend (2011) admonished teachers to be aware of parents' diverse understandings of their children's special needs and emphasized that the teacher's responsibility is to overcome negative perceptions, to offer help to families, and to provide services that are exemplary and appropriate to the individual student. In this case, a mutual sharing of information regarding Nick's specific math challenges should have set the agenda for the discussion.



Parents' participation in decisions regarding the education of their student with special needs is emphasized in IDEA. Viewing parents as a support for mutual academic and behavioral goals rather than the source of the school problems should underlie collaborative efforts (Duchnowski, 2007; Eber & Keenan, 2004). Helping families support academic and behavior improvements made at school is an effective collaborative approach to addressing inconsistency between home and school behaviors. Moreover, parents need to have input about interventions if they are expected to support learning goals (Kerr & Nelson, 2010). Nick's parents needed the opportunity to communicate his successes at home and to use those as a springboard to

address the challenges Nick faced in class.

Nick himself should also be a critical participant in the development of his IEP. Mason, McGahee-Kovac, and Johnson (2004) found that students who led their IEP meetings meaningfully contributed to them, demonstrated an understanding of their disability rights and accommodations, increased in their self-confidence, were able to self-advocate, interacted more positively with adults, assumed more responsibility for themselves, and were more aware of their limitations as well as the resources available to them; moreover, parental participation increased. Students in Hawbaker's (2007) study consistently reported that leading their IEP meeting was one of the most memorable learning experi-

ences of the school year. Further, students who were involved with the student-led IEP process felt greater empowerment when they were actively involved in their decision-making process (Barrie & McDonald, 2002).

### ✓ The Right Response

During the IEP meeting, teachers should stress the common goal of meeting the student's needs (e.g., "We are all concerned about Nick's success."). Asking IEP team participants to highlight the student's strengths can help identify ways to enhance progress toward goals. For instance, the math teacher could say to the parent, "I remember you said that Nick uses a computer assisted design program at home—he loves to construct buildings and produce blueprints. You also said that he rarely declines a math challenge. How do you think we could incorporate some of Nick's interests into classroom activities and his learning goals?"

## 6. The Old Standby

Jacob is a friendly 13-year-old boy with retinitis pigmentosa, a hereditary eye disorder characterized by progressive vision loss. Although he has participated actively in school programs (including general education classes) over the course of his childhood, Jacob has experienced persistent visual loss, resulting in significant low vision, and receives special education services via an IEP. Jacob's family recently moved to a new school district in another state just at the start of the school year. At the IEP team meeting, the educators told his parents that their school did not serve students with significant vision problems or students who are blind, stating "We don't have the personnel to serve students with vision impairments. We always refer these students to the school for the blind, which has excellent programming for students like Jacob and can better cater to his unique needs."



Many educators may have concerns about serving students with relatively low-incidence disabilities with which they may not be familiar. At the secondary level, many teachers still believe students with severe disabilities cannot be appropriately served in gen-

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eral education classes or even in their neighborhood schools (Smith, 2000). The IDEA principle of *zero reject* applies in this case: special education services must be available wherever there are students who qualify for its benefits (A. Turnbull, Turnbull, & Wehmeyer, 2010; *Timothy W. v. Rochester*

*School District*, 1989). Although the team members may not believe that they are refusing Jacob an appropriate education—because they are offering an alternative that they believe is a more appropriate placement—the team is still subtly violating the zero reject principle. Regardless of the nature or severity of the disability, the school district has the responsibility to provide a free and appropriate education by implementing the existing IEP or starting the assessment process to develop a new one. Schools must document efforts to provide an appropriate education at the student's home school and in the least restrictive environment before determining an alternative setting is more suitable to address the student's needs.

#### ✓ **The Right Response**

Jacob's school personnel showed a lack of effort to provide appropriate services, instead relying on "the old standby"; their recommendations were based on the way things had always been done. A more appropriate response to a situation like this would be for the teachers and parents to emphasize the child's strengths and previous services as outlined in his IEP. For example, an educator could say, "Because Jacob's parents knew that he was slowly losing his sight, he has developed, with the help of his teachers, the necessary mobility skills to move safely from class to class and other skills to compensate for his low vision. He has always been placed with

his same-age peers and we should continue that level of service. Let's consult with the state school for resources and support to help us with Jacob here."

#### **Final Thoughts**

Families and schools face many challenges as they work toward following

the letter and spirit of IDEA. Although educators are typically well meaning in their efforts to educate students with disabilities, some things should never be said or heard during IEP meetings. When education professionals know the six principles of IDEA and words to respond to potential violations of the principles, IEP teams can better meet the needs of students with disabilities.

#### **References**

- Agran, M., Alper, S., & Wehmeyer, M. (2002). Access to the general curriculum for students with disabilities: What it means to teachers. *Education and Training in Mental Retardation and Developmental Disabilities, 37*, 123–133.
- Barrie, W., & McDonald, J. (2002). Administrative support for student-led individualized education programs. *Remedial and Special Education, 23*, 116–121. doi:10.1177/074193250202300208
- Blue-Banning, M., Summers, J. A., Frankland, H. C., Nelson, L. L., & Beegle, G. (2004). Dimensions of family and professional partnerships: Constructive guidelines for collaboration. *Exceptional Children, 70*, 167–184.
- Carlson, E., Brauen, M., Klein, S., Shroll, K., & Willig, S. (2002, July). *SPeNSE: Study of personnel needs in special education. Key findings*. Washington, DC: U.S. Department of Education Office of Special Education Programs. Retrieved from <http://spense.education.ufl.edu/KeyFindings.pdf>
- Childre, A., & Chambers, C. R. (2005). Family perceptions of student-centered planning and IEP meetings. *Education and Training in Developmental Disabilities, 40*, 217–233.
- Cole, C., Waldron, N., & Majd, M. (2004). Academic progress of students across inclusive and traditional settings. *Mental Retardation, 42*, 136–144. doi:10.1352/0047-6765(2004)42 <136:APOSAI >2.0.CO;2
- Council for Exceptional Children. (2009). *What every special educator must know: Ethics, standards, and guidelines*. Arlington, VA: Author.
- DeSimone, J. R., & Parmar, R. S. (2006). Middle school mathematics teachers' beliefs about inclusion of students with learning disabilities. *Learning Disabilities Research & Practice, 21*, 98–110. doi:10.1111/j.1540-5826.2006.00210.x
- Duchnowski, A. (2007, October). *The role of mental health services in school-wide PBS*. Paper presented at the Forum on School-Wide Positive Behavior Interventions and Support: Planning for Systems Change, Chicago, IL.
- Eber, L., & Keenan, S. (2004). Collaboration with other agencies: Wraparound and

- systems for care for children and youths with emotional and behavioral disorders. In R. B. Rutherford, M. M. Quinn, & S. R. Mathur (Eds.), *Handbook of research in emotional and behavioral disorders* (pp. 502–519). New York, NY: Guilford.
- Fish, W. W. (2006). Perceptions of parents of students with autism towards the IEP meeting: A case study of one family support group chapter. *Education*, 127(1), 56–68.
- Fish, W. W. (2008). The IEP meeting: Perceptions of parents of students who receive special education services. *Preventing School Failure*, 53(1), 8–14. doi: 10.3200/PSFL.53.1.8-14
- Fitzgerald, J. L., & Watkins, M. W. (2006). Parents' rights in special education: The readability of procedural safeguards. *Exceptional Children*, 72, 497–510.
- Friend, M. (2011). *Special education: Contemporary perspectives for school professionals* (3rd ed.). Upper Saddle River, NJ: Pearson.
- Friend, M., & Bursuck, W. D. (2009). *Including students with special needs: A practical guide for classroom teachers*. Upper Saddle River, NJ: Pearson.
- Fuchs, L. S., & Fuchs, D. (2003). *What is scientifically-based research on progress monitoring?* Washington, DC: National Center on Student Progress Monitoring.
- Harry, B. (2008). Collaboration with culturally and linguistically diverse families: Ideal versus reality. *Exceptional Children*, 74, 372–388.
- Hawbaker, B. W. (2007). Student-led IEP meetings: Planning and implementation strategies. *TEACHING Exceptional Children Plus*, 3(5), Article 4. Retrieved from <http://escholarship.bc.edu/education/teplus/vol3/iss5/art4>
- Hess, R. S., Molina, A. M., & Kozleski, E. B. (2006). Until somebody hears me: Parent voice and advocacy in special education decision making. *British Journal of Special Education*, 33, 148–157. doi: 10.1111/j.1467-8578.2006.00430.x
- Idol, L. (2006). Toward the inclusion of special education students in general education: A program evaluation of eight schools. *Remedial and Special Education*, 27, 77–94. doi:10.1177/07419325060270020601
- Individuals With Disabilities Education Act, 20 U.S.C. § 4301 et seq. (2006).
- Kavale, K. A., & Forness, S.R. (2000). History, rhetoric, and reality: Analysis of inclusion debate. *Remedial and Special Education*, 21, 279–296. doi:10.1177/074193250002100505
- Kerr, M. M., & Nelson, C. M. (2010). *Strategies for addressing behavior problems in the classroom* (6th ed.). Boston, MA: Pearson.
- Lake, J. F., & Billingsley, B. S. (2000). An analysis of factors that contribute to parent-school conflict in special education. *Remedial and Special Education*, 21, 240–251. doi:10.1177/074193250002100407
- Mandic, C. G., Rudd, R., Hehir, T., & Acevedo-Garcia, D. (2010). Readability of special education procedural safeguards. *The Journal of Special Education*. Advance online publication. doi:10.1177/0022466910362774
- Mason, C. Y., McGahee-Kovac, M., & Johnson, L. (2004). How to help students lead their IEP meetings. *TEACHING Exceptional Children*, 36(3), 18–24.
- McGregor, G., & Vogelsberg, R. T. (1998). *Inclusive schooling practices: Pedagogical and research foundations: A synthesis of literature that informs best practices about inclusive schooling*. Pittsburgh, PA: Allegheny University of the Health Sciences.
- Mueller, T. G., Singer, G. H., & Draper, L. M. (2008). Reducing parental dissatisfaction with special education in two school districts: Implementing conflict prevention and alternative dispute resolution. *Journal of Educational and Psychological Consultation*, 18, 191–233. doi:10.1080/10474410701864339
- Palley, E. (2006). Challenges of rights-based law: Implementing the least restrictive environment mandate. *Journal of Disability Policy Studies*, 16, 229–235. doi:10.1177/10442073060160040401
- Pugach, M. C. (2005). Research on preparing general education teachers to work with students with disabilities. In M. Cochran-Smith & K. M. Zeichner (Eds.), *Studying teacher education: The report of the AERA panel on research and teacher education* (pp. 549–590). Mahwah, NJ: Erlbaum.
- Reiman, J. W., Beck, L., Coppola, T., & Engles, A. (2010). *Parents' experiences with the IEP process: Considerations for improving practice*. Center for Appropriate Dispute Resolution in Special Education (CADRE). Retrieved from <http://www.directionservice.org/cadre/ParentExperiencesIEP.cfm>
- Salend, S., & Duhaney, L. (1999). The impact of inclusion on students with and without disabilities and their educators. *Remedial and Special Education*, 20, 114–126. doi:10.1177/074193259902000209
- Smith, M. G. (2000). Secondary teachers' perceptions towards inclusion of students with severe disabilities. *NASSP Bulletin*, 84(613), 54–60. doi:10.1177/019263650008461309
- Stoner, J. B., Bock, S. J., Thompson, J. R., Angell, M. E., Heyl, B. S., & Crowley, E. P. (2005). Welcome to our world: Parent perceptions of interactions between parents of young children with ASD and education professionals. *Focus on Autism and Other Developmental Disabilities*, 20(1), 39–51. doi:10.1177/10883576050200010401
- Timothy W. v. Rochester School District, 875 F.2d 954 (1st Cir. 1989).
- Turnbull, A., Turnbull, R., Erwin, E. J., Soodak, L. C., & Shogren, K. A. (2010). *Families, professionals, and exceptional-ity: Positive outcomes through partnerships and trust*. Boston, MA: Pearson.
- Turnbull, A., Turnbull, R., & Wehmeyer, M. (2010). *Exceptional lives: Special education in today's schools* (6th ed.). Columbus, OH: Pearson.
- Turnbull, H. R., & Turnbull, A. P. (1998). *Free appropriate public education: The law and children with disabilities* (5th edition). Denver, CO: Love.
- Turnbull, H. R., Stowe, M. J., & Huerta, N. E. (2007). *Free appropriate public education: The law and children with disabilities* (7th ed.). Denver, CO: Love.
- U.S. Department of Education. (2010, August). *Free appropriate public education for students with disabilities*. Retrieved from <http://www2.ed.gov/about/offices/list/ocr/docs/edlite-FAPES04.html>
- Wolery, R. A., & Odom, S. L. (2000). *An administrator's guide to pre-school inclusion*. Chapel Hill, NC: University of North Carolina, FPG Child Development Center, Early Childhood Research Institute on Inclusion.
- Young, K. (2008). An alternative model of special education teacher socialization. *Teaching and Teacher Education*, 24, 901–914. doi:10.1016/j.tate.2007.08.003
- Zirkel, P. A., & Gischar, K. (2008). Due process hearings under the IDEA: A longitudinal frequency analysis. *Journal of Special Education Leadership*, 21, 22–31.

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