TRANSITIONING TO NOWHERE: AN ANALYSIS OF THE PLANNING AND PROVISION OF TRANSITION SERVICES TO STUDENTS WITH DISABILITIES IN NEW YORK CITY

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EXECUTIVE SUMMARY

Mike is an engaging young man with average intelligence and a learning disability. At the age of nineteen, he left the New York City public school system with no diploma, very low academic skills, no vocational training, and no plan for his future. Approximately six months later, on his own initiative, Mike came to Advocates for Children seeking assistance.

Mike was then almost twenty years old, but reading at only a second-grade level. Passionate about music, he wanted to earn a General Equivalency Diploma and become an audio engineer. Advocates for Children accepted Mike's case and worked with him to access the services he would need to reach these goals. These services included one-to-one reading remediation, vocational training and workforce preparation, and a free adult literacy program where he would have the opportunity to continue improving his academic skills. After just months of reading remediation, with more instruction still to come, Mike's reading skills showed dramatic improvement, rising to a fifth-grade level.

Advocates for Children did for Mike what the New York City Department of Education ("NYC DOE") did not: engaged him in planning for his future and connected him with the services he needed to reach his goals. Throughout Mike's time in the public school system, no one ever sat down with him to discuss his future or offered any assistance in preparing for his life after high school. Without any support, Mike was left on his own to determine what goals to pursue and how to pursue them.

Background

This situation is by no means unique to Mike. Approximately 13,000 students with disabilities leave the New York City public school system each school year. This report examines the efforts of the NYC DOE to prepare this vulnerable population of students for life after school.

To avoid situations like Mike's, in 1990, Congress amended the federal law that governs the delivery of special education services, now called the Individuals with Disabilities Education Improvement Act, to require that school districts provide transition services to students with disabilities. As the term indicates, transition services are aimed at preparing students to move from high school to life after school. Through these activities, students should learn the skills necessary to enable them to reach their post-secondary goals.

In mandating transition services, Congress was responding to dismal graduation and employment rates for individuals with disabilities across the nation. Here in New York City, data continues to indicate that students with disabilities are leaving the school system poorly prepared for college, work, and other productive pursuits. In the 2005-2006 school year, over 82% of students with disabilities that exited the New York City public school system left without a regular high school diploma or its equivalent. Furthermore, according to the 2005 Disability Status Report for New York, compiled by

the Rehabilitation and Research Training Center on Disability Demographics and Statistics, the New York State employment rate for working-age people with disabilities was only 35.7%, compared to a 76.6% employment rate for working-age people without disabilities.

While transition services include academic preparation, they also aim to prepare students for post-school life in other ways, such as vocational training and counseling. If the NYC DOE fails to adequately plan for and provide transition services, then students with disabilities not only exit the school system without a diploma, but also without critical preparation for independent living, employment, and higher education.

In order to assess the state of transition services for students with disabilities, this report analyzed 264 Individualized Education Programs ("IEPs") for transition-age (15-21 years old) students throughout New York City. An IEP is the document that indicates what services, including transition services, must be provided to a student with a disability each year. It is also the document required for planning for the provision of transition services and therefore serves as a good indicator of whether such planning has occurred. Only if transition services are documented on IEPs can students and parents ensure that these crucial services will be provided.

To enhance and supplement the document analysis, this report also references the results of several interviews with experienced NYC DOE personnel and includes case studies of four actual students. This anecdotal material provides further context for the report's findings and recommendations.

Findings

This report documents pervasive failures of the NYC DOE to plan for and provide transition services to students with disabilities. The effect of these failures on the students themselves, and on society as a whole, is considerable. Major findings include:

- 1. In over 26% of the IEPs reviewed, the NYC DOE had conducted no transition planning whatsoever.
- 2. Despite the obvious importance and legal requirement of student and parent input in transition planning, students participated in developing approximately 31% of the transition plans and parents participated in developing less than 70% of the transition plans.
- 3. While the NYC DOE remains ultimately responsible for the planning and provision of transition services, policy guidance and legal mandates require the involvement of state and community-based agencies that could play a significant role in the transition process. Nevertheless, **fewer than 4% of the IEPs** reviewed indicated that an outside agency would be involved in the student's transition.

- 4. The majority of the transition plans failed to establish measurable goals, clearly identify services to be provided, or incorporate the student's needs, strengths, preferences, and interests.
- 5. The transition plans failed to indicate adequately the academic coursework, credits, and support services that the students required to earn their high school diplomas and achieve their long-term goals.

Notably, in a self-review of transition planning required by the New York State Education Department, the NYC DOE analyzed a random sample of student IEPs along eight criteria. The conclusion of the self-review confirms the findings of this report. In the data provided for the 2005-2006 school year, the NYC DOE "reported that none of their IEPs met all of the compliance indicators."

Recommendations

- 1. The NYC DOE must install systems to ensure that transition planning actually begins by the mandated age of fifteen. With the movement toward school empowerment and accountability, incentives and monitoring should be established to guarantee timely transition planning and discourage delays.
- 2. Parents and students must be fully involved in the transition planning process. Several steps, identified in the full report, should be taken to ensure that these individuals can and do serve as informed participants.
- 3. Outside agencies must be fully involved in the planning and provision of transition services. Information about the roles played by a variety of agencies should be disseminated among students, parents, and NYC DOE staff involved in the transition process. The referral and application processes should be bolstered.
- 4. *Transition goals must be measurable*. Common sense and the law demand some method to assess the progress that students make toward achieving their post-secondary goals.
- 5. *Transition services must be individualized*. Each student has a unique set of needs, strengths, and interests that must be considered when developing transition services. The pervasive use of generic recommendations and boilerplate language must cease.
- 6. A specific course of study must be recommended for each student each year. A diploma objective should be established with each student and flowing from that diploma objective, a specific course of study that will enable the student to fulfill his or her graduation requirements should be recommended. This course of study should also identify credits and classes required, as well as vocational programs relevant to the student's interests.

- 7. Transition services must be meaningful recommendations for the student to follow in pursuing his or her post-secondary goals. Transition services should build on the student's current activities and enable the student to progress toward achieving his or her future aspirations.
- 8. NYC DOE personnel involved in the transition process must be fully trained and supported in transition planning. These personnel should be well informed of the various program options; the roles of students, parents, school staff, and outside agencies in the transition process; and the legal requirements for planning and providing transition services. The NYC DOE must commit the resources to ensure that staff have enough time to address each student's transition needs.
- 9. *Post-school student progress must be tracked*. Such tracking will enable self-assessment and external review of the planning and provision of transition services by the NYC DOE.
- 10. To the extent that the failures of transition planning stem from an absence of needed programs and services to facilitate transition, more programs and services, addressing a wider range of ability levels and student interests, must be developed. A review of 264 IEPs suggests a dearth of vocational training programs, academic remediation services, and other transition activities.

Conclusion

As a matter of sound public policy, as well as federal and state law, it is vital that school districts prepare students with disabilities for independent living, vocational training, employment, higher education, and the other post-secondary opportunities awaiting them. Only the meaningful planning and provision of transition services will ensure that this population of students is able to lead fulfilling and productive lives. The most vulnerable students, those who need the greatest assistance in preparing for life after high school, are instead being shuttled through inadequate programs where no real efforts are made to prepare them for their futures. We urge the NYC DOE to address this area of overwhelming failure aggressively and immediately.

Introduction

The vast majority of students with disabilities in the New York City public school system leave school without a regular high school diploma. In June 2005, Advocates for Children of New York, Inc. issued the report "Leaving School Empty Handed: A Report on Graduation and Dropout Rates for Students who Receive Special Education Services in New York City," which analyzed the abysmal graduation data for students with disabilities. The 2005-2006 school year, the most recent year for which graduation data is available, revealed a continuation of this trend.

One cause at the root of this systemic problem is the failure of the New York City Department of Education ("NYC DOE") to comply with its legal obligation to assist this population of students in planning and preparing for the transition to life after high school. Under the Individuals with Disabilities Education Improvement Act ("IDEA"), the federal statute governing the delivery of special education services, school districts have been required to provide transition services to students with disabilities since 1990. With over 13,000 students with disabilities exiting the New York City public school system each school year, transition services to prepare these students to lead productive and fulfilling lives are essential.

As this report will show, the NYC DOE routinely fails to provide transition planning or services sufficient to prepare students with disabilities for the available opportunities in independent living, vocational training, employment, and higher education.

I. BACKGROUND

Brief Overview of Special Education under the IDEA

The IDEA requires that a free appropriate public education ("FAPE") must be available to "all children with disabilities . . . between the ages of 3 and 21." States receive substantial federal funds in exchange for their agreement to provide a FAPE to all children with disabilities in the state, and to comply with the IDEA's procedural and substantive mandates. The IDEA's statement of purpose demonstrates the particular importance of transition services: "to ensure that all children with disabilities have

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¹ Available at http://www.advocatesforchildren.org/pubs/2005/spedgradrates.pdf (last visited Sept. 4, 2007).

² According to the New York State Education Department PD-5 report for New York City in school year 2005-2006, 14,605 students with disabilities exited special education. Of this total, 31 died and 1,100 were declassified and returned to general education. Of the remaining 13,474 students with disabilities, only 2,275 students (16.88%) earned a regular high school diploma (360 students earned Regents Diplomas and 1,915 earned Local Diplomas). Another 148 students (1.10%) earned GED Diplomas. The remaining 82.02% of students with disabilities exited the New York City public school system without a regular high school diploma or its equivalent.

³ 20 U.S.C. § 1400 et seq. (2004).

⁴ According to the New York State Education Department PD-5 reports for New York City, 13,505 students with disabilities exited the New York City public school system in school year 2005-2006 and 13,151 students with disabilities exited the New York City public school system in school year 2004-2005. ⁵ 20 U.S.C. § 1412(a)(1)(A); 34 C.F.R. § 300.101(a).

available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and *prepare them for further education, employment, and independent living.*"⁶

The Special Education Process

The first step in the special education process is referral. A child may be referred for an evaluation if that child's behavior or performance gives rise to a suspicion that the child may have a disability. The law requires that school districts put in place procedures to identify, locate, and evaluate all children with disabilities in need of special education and related services. The law provides that these evaluations must be conducted pursuant to certain minimum standards, which include the requirements that children be assessed in all areas related to the suspected disability and that the evaluation be sufficiently comprehensive to identify all of the child's special education and related services needs. 8

Once a child is evaluated and found to have a disability, an Individualized Education Program ("IEP"), which will serve as the blueprint for the delivery of special education services for that child, must be developed every year. An IEP is developed by a multidisciplinary team generally consisting of a child's parents and NYC DOE staff that have worked with the child as well as staff that can interpret all assessments and recommend programming. In developing an IEP, the team must consider a number of factors including the strengths of the child, the concerns of the parents for enhancing the child's education, the results of the child's most recent evaluation, and the academic, developmental, and functional needs of the child. The IEP itself must include a statement of the child's present levels of academic performance, a statement of measurable annual goals, and the special education services, related services, and supplementary aids and supports required to enable the child to advance toward those goals. 12

⁶ 20 U.S.C. § 1400(d)(1)(A)(emphasis added); 34 C.F.R. § 300.1(a).

⁷ 20 U.S.C. § 1412(a)(3)(A); 34 C.F.R. § 300.111(a)(1)(i).

⁸ 20 U.S.C. § 1414(b)(3)(B); 34 C.F.R. § 300.304(c)(4) and (6).

⁹ 20 U.S.C. §§ 1414(d)(2)(A)-(C) and 1414(d)(4)(A)(i); 34 C.F.R. §§ 300.323(c) and 300.324(b)(i). ¹⁰ 20 U.S.C. § 1414(d)(1)(B)(i)-(vii)(requiring that the IEP team be composed of the child's parent(s); a general education teacher when the student is participating or may participate in general education; a special education teacher; a representative of the local school district; an individual who can interpret evaluation results; where appropriate, the child; and others who have knowledge or special expertise regarding the child); 34 C.F.R. § 300.321(a)(1)-(7). Additionally, New York State law requires the attendance of a parent member. 8 N.Y.C.R.R. § 200.3(a)(1)(viii)(defining a parent member as "an additional parent member of a student with a disability residing in the school district or a neighboring school district, provided that the additional parent member may be the parent of a student who has been declassified within a period not to exceed five years or the parent of a student who has graduated within a period not to exceed five years.").

¹¹ 20 U.S.C. § 1414(d)(3)(a)(i)-(iv); 34 C.F.R. § 300.324(a)(i)-(iv).

¹² 20 U.S.C. § 1414(d)(1)(A)(i)(I)-(IV); 34 C.F.R. § 300.320(a)(1)-(4).

On an annual basis, the IEP must be reviewed by another duly constituted IEP team and the school district must provide an appropriate placement. Placement decisions must be made by "a group of persons, including the parents, and other persons knowledgeable about the child, the meaning of the evaluation data, and the placement options." ¹⁴

Transition Services

Federal and State Laws and Regulations Requiring Transition Services

Under the IDEA, transition services are defined as "a coordinated set of activities for a child with a disability that" –

- (A) is designed to be within a results-oriented process, that is focused on improving the academic and functional achievement of the child with a disability to facilitate the child's movement from school to post-school activities, including postsecondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation;
- (B) is based on the individual *child's needs*, taking into account the *child's strengths*, *preferences*, *and interests*; and
- (C) includes instruction, related services, community experiences, the development of employment and other post-school adult living objectives, and, when appropriate, acquisition of daily living skills and functional vocational evaluation. ¹⁵

The IDEA mandates the provision of transition services as follows:

Beginning not later than the first IEP to be in effect when the child is 16, and updated annually thereafter, [the IEP must include:]

(aa) appropriate measurable postsecondary goals based upon age appropriate transition assessments related to training, education, employment, and, where appropriate, independent living skills; (bb) the transition services (including courses of study) needed to assist the child in reaching those goals ¹⁶

New York State law provides a more expansive right to transition services for students with disabilities. State regulations require that these services commence at the age of fifteen (one year earlier than under the IDEA), or even earlier if the IEP team determines it to be appropriate.¹⁷ For example, transition services should commence earlier than the

¹⁵ 20 U.S.C. § 1401(34)(emphasis added); 34 C.F.R. § 300.43(a); *see also* 8 N.Y.C.R.R. § 200.1(fff)(setting forth a nearly identical definition of transition services).

¹³ 20 U.S.C. § 1412(a)(5); 34 C.F.R. § 300.116(b)(1)-(2).

¹⁴ 34 C.F.R. § 300.116(a)(1).

¹⁶ 20 U.S.C. § 1414(d)(1)(A)(VIII)(emphasis added); 34 C.F.R. § 300.320(b)(1)-(2).

¹⁷ 8 N.Y.C.R.R. § 200.4(d)(2)(ix).

age of fifteen for students "who are considered to be at risk of dropping out of school, or who could benefit from transition services." ¹⁸

Furthermore, state regulations require that the IEP include "a statement of the transition service needs of the student that focuses on the student's courses of study, such as participation in advanced-placement courses or a vocational education program." This provision emphasizes the role of instructional activities in transition services. It also offers two concrete examples of types of courses of study relevant to transition services: advanced placement classes and vocational programs.

Finally, New York State regulations require that the IEP include "a statement of the responsibilities of the school district and, when applicable, participating agencies for the provision of such services and activities that promote movement from school to post school opportunities, or both, before the student leaves the school setting." New York State regulations mandate that a student's IEP actually allocates responsibility for transition services among the public school system and any relevant social service agencies.

The Transition Planning Process

"To assist school districts in coordinating transition planning and services," the New York State Education Department developed "Transition Services: A Planning and Implementation Guide" ("Guide") in January 1993. This document, which is currently being revised, provides valuable insights into how the New York State Education Department interprets transition planning requirements.²¹

The Guide demonstrates two overarching points. First, as clearly stated in the federal statute, IEP team meetings encompass transition planning. The student's IEP must include transition services. Therefore, the requirements applicable to the development of an IEP described above apply with equal force to the development of a transition plan. Second, the transition planning process should be collaborative. Parents, students, representatives of social service agencies, and school district personnel should all be involved. Despite the emphasis on cooperation, however, responsibility for the planning and implementation of transition services ultimately falls on the school district.²²

¹⁸ Office of Vocational and Educational Services for Individuals with Disabilities, Transition Services: A Planning and Implementation Guide, Introduction, Jan. 1993, p. 3.

¹⁹ 8 N.Y.C.R.R. § 200.4(d)(2)(ix)(c).

²⁰ 8 N.Y.C.R.R. § 200.4(d)(2)(ix)(e). This New York State provision expands the involvement of outside agencies beyond that described in the IDEA.

²¹ The following discussion of the model transition process flows primarily from Guide, Steps in the IEP Process when Transition Services are Considered, p. 12-14.

²² See e.g., Guide, Questions and Answers, p. 29 ("The [school] district is responsible for coordinating all transition services." Also, "[i]t is the [school] district's responsibility to insure that transition planning and services are incorporated within the student's IEP and to ensure that these services are being provided appropriately to meet the student's needs, preferences and interests in the least restrictive environment.").

The Guide divides the transition planning process into the four phases outlined below and describes recommendations at each step of the process:

1) "Creating the climate:"

- The school district is advised to "identify resources, programs, and options available within the school and the community."
- The school district is advised to "identify and orient potential participants to the process, roles, responsibilities, and purpose" of IEP meetings.
- District staff should be provided with "training and orientation."
- Parents and students should receive explanations of their roles in transition planning as well as assistance in identifying goals, interests, and adult services options and resources.
- Finally, the school district should help community service providers and representatives of local and state agencies to understand the educational service system and the roles expected of service agencies in the transition process.

2) Prior to the IEP team meeting:

- The school district should compile comprehensive information regarding the student's needs, preferences, and interests.
- The school district should also prepare a "suggested list of service options to address skill development or resource planning concerns."

3) At the IEP meeting:

- The school district should explain the reasons for transition planning and the roles and responsibilities of the participating members.
- All IEP team members should discuss the student's needs, preferences, and interests.
- The IEP team should identify "WHAT IS (the student's present level of performance) and WHAT SHOULD BE (vision of the student's future)."
- The team should then "choose activities to eliminate/reduce barriers, increase opportunities and/or create programs or services to achieve long term adult outcomes."
- The team should "develop transition services and the annual goals and objectives that guide the provision of special education."
- The team should identify resources to assist the student in achieving both long term adult outcomes and annual goals.
- In developing the IEP, the team should "determine and specify responsibilities (include participating agencies)" and "establish timelines."

4) After the IEP meeting:

• The school district should implement the IEP and monitor outcomes. This includes compiling information "regarding the quality and effectiveness of services provided by agencies and the methods used" and ensuring that the participating agencies are providing services.

"If a participating agency fails to provide agreed-upon transition services contained in the student's IEP, the district responsible for the student's education shall, as soon as possible, initiate a meeting to identify alternative strategies to meet the transition objectives, and if necessary, review the student's IEP."

The NYC DOE's Transition Planning Form

The New York City Department of Education has developed a transition services page, which constitutes page ten of all New York City IEPs.²³

Loosely tracking the language of the federal and state laws and regulations regarding transition services, page ten divides transition planning into two distinct sections: (i) Long Term Adult Outcomes and (ii) Transition Services. Long term adult outcomes are broad goals that "will reflect the student's employment, postsecondary education, and community living aspirations,"²⁴ such as the goal to attend college or to obtain a license to practice a trade. These goals are divided into four categories: community integration, post-secondary placement, independent living, and employment.

The other transition planning section on this IEP page is entitled "Transition Services." The IEP notes that this section is "[r]equired for students 15 years of age and older." ²⁵ The transition services "should be designed to systematically prepare students to pursue their desired long term adult outcomes through a variety of activities."²⁶ The IEP should also "specify the service and/or funding source for the service and the participating agency providing the service."²⁷

Page ten of the IEP delineates five categories of transition services, largely paralleling the long term adult outcomes: instructional activities, community integration, post high school, independent living, and acquisition of daily living skills/functional vocational assessment. The following are the NYC DOE's definitions of the five categories of transition services:

- **Instructional activities** "Educational instruction that will be provided to the student to achieve the stated outcome(s) (e.g., general and/or special education course instruction, rehabilitative counseling services, occupational education and advanced placement courses)."
- **Community Integration** "Community-based experiences that will be offered, or community resources utilized as part of the student's school program, whether utilized during school hours or after school hours, to achieve the stated outcome(s) (e.g., local employers, public library, local stores.)"

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 ²³ See App. A (a blank transition page).
 ²⁴ Guide, Laws, Regulations, and Policies, p. 8.

²⁵ See App. A.

²⁶ Supra note 24.

²⁷ *Supra* note 24.

- **Post High School** "Educational services that will be provided to the student to prepare for employment or other post school activity."
- Independent Living "Post school activities that will determine what other skills or supports will be necessary for the student to succeed as independently as possible. Examples include participation in a work experience program, information about colleges in which the student has an interest and travel training."
- Acquisition of Daily Living Skills/Functional Vocational Assessment "ADL skills necessary to achieve the stated outcome(s) (e.g., dressing, hygiene, self-care skills, self-medication). If the vocational assessment has not provided enough information to make a vocational program decision, additional assessment activities can be performed to obtain more information about the student's needs, preferences and interests." ²⁸

The Primary Agencies Involved in the Provision of Transition Services in New York City

The New York City Department of Education

As discussed above, school districts bear ultimate legal responsibility for the transition process. In fall 1992, two departments of the New York State Education Department signed a "Joint Agreement on the Provision of Transition Services" that underscores the central role of local school districts in the provision of transition services. This document, agreed to by the Office of Vocational and Educational Services for Individuals with Disabilities ("VESID") and the Office of Elementary, Middle, and Secondary Education, declares that "[s]chool districts have the primary planning and programmatic responsibilities for the provision of transition services." School districts are also financially responsible for transition services and should not simply abdicate responsibility for a student's transition in reliance on VESID. In combination with the law, such guidance clearly indicates that the NYC DOE bears primary responsibility for the planning and provision of transition services to New York City students with disabilities.

The Office of Vocational and Educational Services for Individuals with Disabilities

Under the 1992 "Joint Agreement on the Provision of Transition Services," VESID is responsible for the provision of "vocational rehabilitation services." Vocational rehabilitation services "include vocational assessment, vocational counseling, assistance with transition from school to the world of work, job training and placement, job follow-

New York City Department of Education, Creating a Quality IEP - Individualized Education Program Manual, Jan. 2005, p. 66-67, http://schools.nyc.gov/NR/rdonlyres/69D78629-9B1B-4247-A23B-C09B581AFAB1/2962/THENEWIEPMANUALJANUARY2005.pdf (last visited Aug. 22, 2007).
 Available at http://www.vesid.nysed.gov/specialed/transition/japts.htm#vesid__memo (last visited Aug. 23, 2007).
 Id.

³¹ *Id*.

up, and other services to support the individual's employment objectives."³² In addition, VESID is responsible for "the coordination of educational programs and services for students with disabilities in lifelong learning systems, including higher education, adult education, and other activities beyond high school."³³ This document sets forth the goal of collaboration between VESID, the school districts, and other New York State agencies and establishes referral criteria for the school districts to follow in referring youth with disabilities to VESID. It also grants VESID district office staff the opportunity to participate in transition planning for students.

The Office of Mental Retardation and Developmental Disabilities

The New York State Office of Mental Retardation and Developmental Disabilities ("OMRDD") is responsible for the coordination and delivery of services for individuals with developmental disabilities throughout New York State. A 1992 "Memorandum of Understanding between the NYSED and OMRDD," which sets forth the goal of enhancing "transition to adult services," aims to integrate the resources of both agencies in order to "enable persons with developmental disabilities to take their rightful place as participating members of their communities."

The Office of Mental Health

The New York State Office of Mental Health ("OMH") provides programs and services designed to meet the needs of individuals diagnosed with mental illness, including children with serious emotional disabilities, and their families. A 1993 "Memorandum of Agreement between OMH and NYSED" offers the overarching goal of enhancing "the ability of individuals diagnosed with mental illness, including children with serious emotional disturbances, to take their rightful places as participating members of their communities." To this end, the document calls for the establishment of "clear roles and

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³² Office of Vocational and Educational Services for Individuals with Disabilities, Services Provided by VESID, Vocational Rehabilitation Services, http://www.vesid.nysed.gov/all/services.htm (last visited Aug. 22, 2007).

³³ *Supra* note 29.

³⁴ Memorandum of Understanding Between the New York State Office of Mental Retardation and Developmental Disabilities and the State Education Department regarding Cooperative Efforts to Improve Access and Delivery of Services to Persons with Developmental Disabilities and Their Families (Apr. 1992), http://www.vesid.nysed.gov/specialed/transition/iagy_omrdd.htm (last visited Aug. 22, 2007). This document enumerates specific approaches to enhancing transition:

[•] More effective and earlier coordination between educational and adult services;

[•] Improved preparation of youth for employment through expanded integrated employment opportunities;

Streamlined access to lifelong support services;

[•] Increased participation in independent living services;

[•] Continuity between school and community-based vocational training and integrated employment, including supported employment;

[·] Increased involvement of business and industry in the educational and vocational process; and

[•] Opportunities for access to lifelong learning in community based and educational settings, including post-secondary education.

³⁵ Memorandum of Agreement Between the New York State Office of Mental Health and the State Education Department Regarding Cooperative Efforts to Improve Access and Delivery of Services to

responsibilities for the transition services which secondary school-aged children will need to achieve successful employment, postsecondary education, and community living outcomes."³⁶

The Interplay of the Agencies

The set of documents discussed above reveals the intended collaborative, interagency nature of the transition process. The NYC DOE, VESID, OMRDD, OMH, and other agencies must work together to provide transition services to students with disabilities in New York City. Within this collaboration, the NYC DOE has the primary responsibility for planning and implementing a New York City student's transition services. As the VESID website clarifies, VESID, OMRDD, OMH, and other adult service agencies must be available in a secondary role - for consultation with the school district as well as for the provision of individualized services directly to the student.³⁷

II. FINDINGS

Methodology

In order to assess the state of transition planning for New York City public school students with disabilities, this report examines 264 IEPs created for 193 students who are or were clients of Advocates for Children of New York, Inc. Advocates for Children offers free individual case assistance to families and children who are experiencing problems in obtaining appropriate educational services. All of the IEPs were created in the previous five school years (school year 2002-2003 through school year 2006-2007). Only IEPs created after a student's fifteenth birthday were collected. In addition to the

Individuals Diagnosed with Mental Illness (Feb. 1993),

http://www.vesid.nysed.gov/specialed/transition/iaomh.htm (last visited Aug. 22, 2007). ³⁶ *Id.*

There was also one IEP on which the conference date was not listed, but had to fall within this timeframe because it referred to testing conducted on Aug. 5, 2005.

Office of Vocational and Educational Services for Individuals with Disabilities, Frequently Asked Questions about Transition, http://www.vesid.nysed.gov/specialed/_archive/faqslist.htm (last visited Aug. 22, 2007) ("Adult service agencies are available for consulting with the Committee on Special Education as appropriate and for helping districts design new services. Adult service agencies have extensive experience with adults who have made successful or unsuccessful transitions in the past. Adult agencies will provide individualized services directly to consumers who are found eligible for the specific service.").

Nevertheless, one NYC DOE employee lamented that "there aren't enough adult programs for the kids who

graduate."

38 Clients must meet income guidelines and therefore, the 193 students included in this analysis are from low-income households. As a result, these are some of the most vulnerable students and the students most in need of transition services.

³⁹ School year 2002-2003: 46 IEPs School year 2003-2004: 68 IEPs School year 2004-2005: 54 IEPs School year 2005-2006: 55 IEPs School year 2006-2007: 40 IEPs

⁴⁰ Age 15: 113 IEPs Age 16: 67 IEPs

data analysis, a number of NYC DOE employees with substantial experience in the public school system were interviewed.

After a discussion of the findings, this report offers an in-depth exploration of the situations of four of the 193 students. These case studies add context to the data with concrete examples of the impact of the NYC DOE's failures on actual students.

Findings

1. In over 26% of the IEPs reviewed, the NYC DOE had done no transition planning whatsoever.

Under New York State regulations, transition planning must commence by the age of fifteen, if not earlier. As a result, the first IEP to be created after a student's fifteenth birthday must include transition services. Nevertheless, in 69 (over 26%) of the 264 IEPs analyzed, no transition services were developed. For these students, their IEPs indicated no transition planning whatsoever.

2. Students participated in developing approximately 31% of the transition plans. Parents participated in developing less than 70% of the transition plans.

Under the IDEA, the IEP team must include the student's parent(s) and when appropriate, the student.⁴² Under New York State regulations, when "the purpose of the meeting is to consider the postsecondary goals for the student and the transition services needed to assist the student in reaching those goals, the school district shall invite the student."⁴³ Thus, if the student was not previously a member of the IEP team, once the student reaches the age of fifteen, he or she must be invited to participate. The VESID website explains that "[I]egislative intent is that transition planning provides the opportunity for the student and parent to have ownership roles in setting the direction of the IEP and providing a clear direction for the student's educational program."⁴⁴

Despite legal requirements that the student and parent attend IEP meetings that will include transition planning, the student was present at the IEP meeting for only 82 of the 264 IEPs considered, or approximately 31% of the IEP meetings. A parent was present at

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Age 17: 41 IEPs
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Age 18: 24 IEPs

Age 19: 12 IEPs

Age 20: 5 IEPs

Age 21: 0 IEPs

There was one IEP for which the student's age could not be ascertained because the conference date was not listed on the IEP. This IEP, however, referenced testing conducted on Aug. 5, 2005, at which time the student would have been nineteen years old based on the student's date of birth.

http://www.vesid.nysed.gov/specialed/_archive/faqslist.htm (last visited Aug. 22, 2007).

⁴¹ Supra note 17.

⁴² Supra note 10.

⁴³ 8 N.Y.C.R.R. § 200.4(d)(4)(i)(c)(further requiring that "[i]f the student does not attend, the district shall take steps to ensure that the student's preferences and interests are considered").

⁴⁴ Frequently Asked Questions About Transition,

182 of the 264 IEP meetings, an attendance rate of only about 69%. One social worker with over ten years of experience at the NYC DOE explained that when a student or a parent is not present at an IEP team meeting, the remaining members of the IEP team never call the student or the parent to obtain their input. Without student or parental input, the IEP team cannot develop an appropriate transition plan which takes into account the individual student's needs and goals.

3. Outside agencies were involved in less than 4% of the transition plans reviewed.

New York State regulations clearly require that other agencies should be involved in the transition process:

When "the purpose of the meeting is to consider the postsecondary goals for the student and the transition services needed to assist the student in reaching those goals . . . [t]o the extent appropriate and with parental consent or consent of a student 18 years of age or older, the school district must invite a representative of any participating agency that is likely to be responsible for providing or paying for transition services." ⁴⁵

In addition, the IEP must include "a statement of the responsibilities of the school district and, when applicable, participating agencies for the provision of such services and activities that promote movement from school to post school opportunities, or both, before the student leaves the school setting." Furthermore, the Joint Agreement, the Memorandum of Understanding, and the Memorandum of Agreement discussed above reveal an established interconnectedness between the school district and the various state agencies involved in the transition process.

Despite this foundation, collaboration appears to be minimal. As a Committee on Special Education ("CSE")⁴⁷ employee noted, "In all of my years, I have never seen anyone from VESID, OMRDD, OMH, or any other outside agency at a CSE review at the CSE." Another CSE employee, a social worker with over ten years of experience, explained that the NYC DOE does not call outside agencies before the meeting or follow up with outside agencies after the meeting. This social worker explained that at most, the IEP team gives the parent information on how to contact a relevant agency and begin the referral process. None of the 264 IEPs reviewed identify a funding source for the recommended transition services and only very rarely did the IEPs allocate any responsibility to a state or community-based agency.

⁴⁵ 8 N.Y.C.R.R. § 200.4(d)(4)(i)(c)(further requiring that "[i]f an agency invited to send a representative to a meeting does not do so, the [school] district should take steps to involve the other agency in the planning of any transition services").

⁴⁶ Supra note 20.

⁴⁷ The NYC DOE contains ten Committees on Special Education with each CSE responsible for discrete geographic regions. These CSEs are responsible for conducting evaluations, determining student eligibility for special education services, recommending special education services, developing IEPs, and ensuring that procedural safeguards are provided to parents throughout the process.

In our review of the 264 IEPs, only ten indicate involvement by or referral to an identified agency. VESID is listed on seven of the ten IEPs. Private social service providers are listed on six IEPs: YAI/National Institute for People with Disabilities Network is identified on three IEPs (which also list VESID), and the Center for Alternative Sentencing and Employment Services, United We Stand of New York, and Advocates for Children are listed on one IEP each. Not a single IEP reviewed in this study allocates responsibility for the provision of transition services to OMRDD or OMH. Given the legal mandates and the emphasis on interagency involvement, it is striking that 254 of the 264 IEPs examined, or greater than 96%, never allocate responsibility to another agency.

4. The majority of the transition plans failed to establish measurable goals, clearly identify services to be provided, or incorporate the student's needs, strengths, preferences, and interests.

The IDEA requires that an IEP recommend "measurable postsecondary goals." The statute requires that there be some method to assess the progress that the student makes toward achieving his or her long term adult outcomes. Furthermore, the IDEA requires that the IEP identify transition services based on the individual student's needs, as well as the youth's strengths, preferences, and interests. The law thus mandates individual tailoring of both the long term adult outcomes and the corresponding transition services.

One social worker with over ten years of experience with the NYC DOE, however, confirmed that the NYC DOE fails to individualize students' transition plans. "Everything is stock phrases. As far as individualized education plan, if there was going to be one page that is not individualized, it is the transition page. It is the least individualized [page] of the individualized education plan." This NYC DOE employee went to explain that before IEP Pro, a computer software program currently used in the completion of IEPs, "there were three standard [transition] pages: for a student in need of minimal support, for a student in need of maximum support, and for a student where there is the possibility of getting an actual Regents Diploma." IEP teams now have access to IEP Pro which gives them the "possibility of selecting from a pick list" for long term adult outcomes. There are no drop-down menus for the five categories of transition services, but IEP teams type in "stock phrases" over and over again. When questioned about the pervasive use of boilerplate language, this social worker rationalized that "everything comes down to time. The transition page takes a back seat." The social worker continued that the "transition page is an afterthought. We do the rest of the IEP, then realize that the student is 14 or 15. We think 'Oh shit.' Then we use IEP Pro." This

⁵⁰ Supra note 15.

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⁴⁸ The Center for Alternative Sentencing and Employment Services specializes in helping adult and youth offenders reintegrate into society. United We Stand of New York focuses on educational advocacy and on making parents aware of their rights under the IDEA. Advocates for Children of New York, Inc. provides a range of educational support, legal, and advocacy services for parents, young people, and professionals. None of these community-based organizations provides or funds transition services for New York City public school students with disabilities. Therefore, these organizations were inappropriately identified as playing a role in the transition process.

Supra note 16; see also supra note 15 (defining transition services as a "results-oriented process").

long-time NYC DOE employee concluded that IEP teams "should probably be ashamed of how we do transition planning," but time constraints make the work impossible. As the social worker noted, "I usually have about two seconds left by the time I get to the transition page. I do everything I can."

Our research confirmed that the NYC DOE's transition plans rarely meet the measurability or individualization mandates. As illustrated in Figures 1-4, long term adult outcomes in all four categories tend to be standardized, overly general, and often impossible to measure.⁵¹

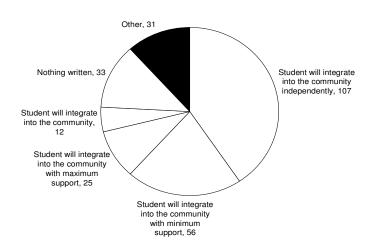
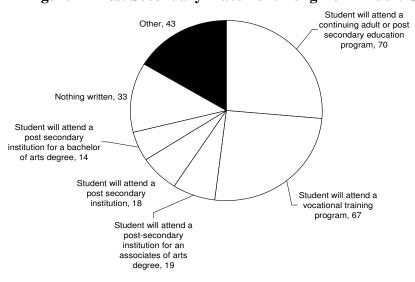


Figure 1 - Community Integration Long Term Adult Outcomes





⁵¹ Figures 1-4 depict the long term adult outcomes that appeared on ten or more of the 264 IEPs reviewed. For a complete list of the IEP responses, please refer to App. D.

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Figure 3 - Independent Living Long Term Adult Outcomes

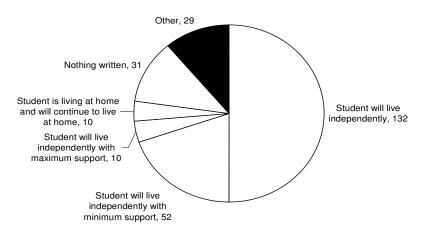
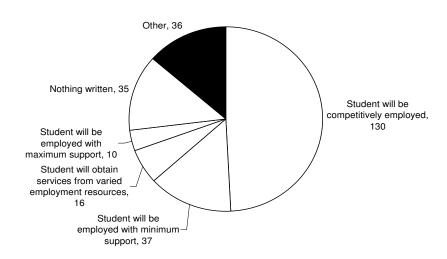


Figure 4 - Employment Long Term Adult Outcomes



Although it is theoretically possible that vague and immeasurable long term adult outcomes could support the development of targeted and individualized transition services, our research indicated that for the most part, the transition services recommended on IEPs tend to be as standardized and meaningless as the long term adult outcomes. As a result, transition services are unlikely to be provided, and the support promised by the transition mandate is rendered illusory.

For the 264 IEPs analyzed, Figures 5-9 depict the transition services recommended for each of the five required categories. Services few of the transition services listed incorporated the student's needs, strengths, preferences, or interests. Statements supposedly recommending transition services often do not recommend services at all, but instead declare broad objectives that in no way relate to the individual student's character or needs.

⁵² Figures 5-9 depict the transition services that appeared on five or more of the 264 IEPs reviewed. For a complete list of the IEP responses, please refer to App. D.

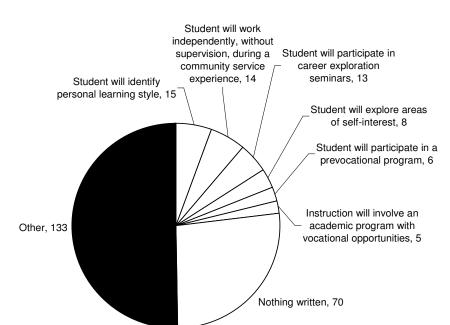


Figure 5 - Instructional Activities Transition Services

- These common transition services in the category of instructional activities are vague and extremely difficult to measure. For example, what benchmarks can be used to measure student progress in identifying personal learning style? How many areas of self-interest will the student explore, and how will the student explore them?
- None of these transition services identify the student's career, academic, or vocational interests. Furthermore, the state regulations mandate that the IEP must incorporate "a statement of the transition service needs of the student that focuses on the student's courses of study."⁵³ Instructional activities would be the most logical category under which to include such a recommendation. Nevertheless, a specific course of study is rarely recommended under instructional activities, appearing in approximately six of the 264 IEPs reviewed.

It is not hard to envision instructional activities as transition services that are measurable and individualized. For example:

- For a student struggling in math, an appropriate transition service might be "student will receive instruction in the form of after-school tutoring three days a week to remediate math deficits. The student will also complete 90% of math homework assignments."
- For a nineteen year old student with all of the credits needed for graduation, a local diploma objective, and a passing score on the Math RCT exam, an appropriate transition service might be "student will prepare for and pass the remaining five RCT exams with a score of 65% or higher. In preparation, the

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⁵³ Supra note 19.

- student will enroll in Global History, Science, Reading, Writing, and American History." This service is tailored to meet the student's remaining graduation requirements.
- For a student who enjoys working with her hands and is interested in becoming an electrician, an appropriate transition service might be "student will attend a NYC DOE vocational course intended for aspiring electricians 90% of the time. The student will successfully complete this course with a passing grade."

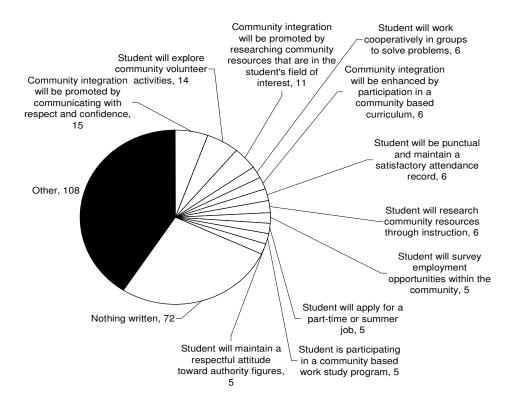


Figure 6 - Community Integration Transition Services

- Most of these responses provide no benchmarks against which to measure student progress. For example, how many employment opportunities will the student survey? What is a respectful attitude, what constitutes an authority figure, and how will student progress in maintaining a respectful attitude be measured?
- These services fail to integrate the student's needs, preferences, and strengths. Rather than simply referring to the "student's field of interest," the IEP team has a responsibility to determine, with the student, the student's particular field of interest.

Examples of measurable and individualized community integration transition services are also easy to imagine:

• For a student who enjoys athletics, an appropriate transition service might be "student will explore membership in at least three different community athletic

- activities, such as a local basketball team, YMCA membership, and a community softball league."
- For a student interested in cooking, an appropriate transition service might be "student will volunteer at his church's soup kitchen for at least 50 hours during the school year."

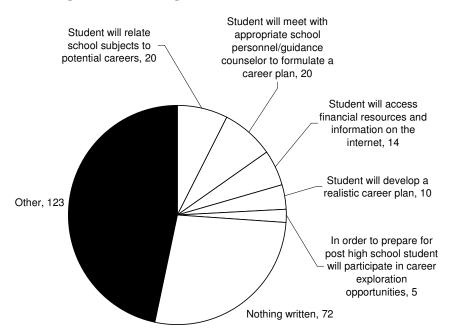


Figure 7 - Post High School Transition Services

- Once again, many of these transition services fail to provide any criteria by which
 to measure student progress. For instance, how does one measure student
 progress in relating school subjects to potential careers? What constitutes a
 realistic career plan and how will the student's progress in developing one be
 measured?
- None of these transition services incorporates the individualized needs, preferences, and strengths of the students. For example, "student will relate school subjects to potential careers" fails to identify the school subjects the student should take or the potential careers that the student may pursue.

Examples of measurable and individualized post high school transition services are easy to envision:

- For a student tracked to graduate with a local diploma who is interested in health care, an appropriate transition service might be "student will research ten postsecondary programs in the health care field and write one-page evaluations of each program."
- For a student interested in becoming a mechanic, an appropriate transition service might be "student will enroll in a NYC DOE vocational course in mechanics and student will work at a body shop for at least 50 hours throughout the school year.

- Student will also apply to VESID for further vocational training in mechanics after exiting high school." This example involves an appropriate state agency to assist in the student's transition.
- For a student classified as mentally retarded with severely deficient academic skills, an appropriate transition service might be "student's transition linkage coordinator (or guidance counselor) will refer the student to OMRDD and ensure that all of the student's records and evaluations are complete. The student and family will follow through with the OMRDD application process. The transition linkage coordinator (or guidance counselor) will track the student's involvement with OMRDD through monthly telephone conversations with an OMRDD representative. This process will commence within two years of the student's anticipated exit from the public school system." This theoretical transition service incorporates an appropriate state agency to assist in the student's transition and provides a meaningful referral to address the student's need for assistance after high school.

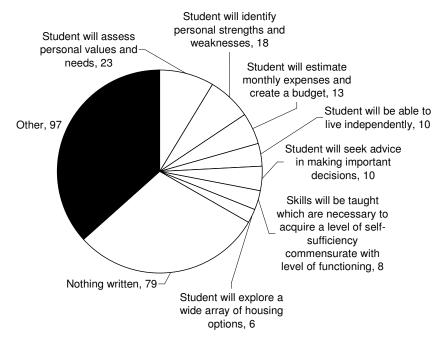


Figure 8 - Independent Living Transition Services

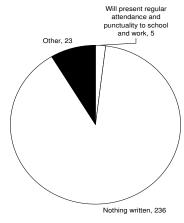
- As in every other part of the transition planning process, the vague nature of most of these transition services renders student progress difficult, if not impossible, to measure. How would student progress toward assessing personal values and needs or identifying personal strengths and weaknesses be measured? What constitutes an important decision, who should the student seek advice from when facing an important decision, and how will this behavior be measured?
- The NYC DOE has again failed to tailor transition services to specific student needs, strengths, and interests. What skills need to be taught to a particular student so that he or she may achieve a level of self-sufficiency commensurate

with his or her level of functioning? What skills does a student need to improve upon in order to be able to live independently?

It is not hard to imagine independent living transition services that are measurable and individualized. For example:

- For a student who is close to his family and plans to live independently after high school, an appropriate transition service might be "student will research and visit at least three different housing options within twenty minutes of the family's home."
- For a student who is not able to travel independently using public transportation, an appropriate transition service might be "student will be enrolled in a NYC DOE travel training course. Student will learn to use public transportation proficiently as measured by the student's final grade in the course."
- For a student with a traumatic brain injury, an appropriate transition service might be "student's guidance counselor will refer the student to OMRDD and will assist the family in completing the application process for the OMRDD waiver program. This will enable the student to obtain funding for residential services. This process will commence within two years of the student's anticipated exit from the public school system." This hypothetical transition service incorporates an appropriate state agency to assist in the student's transition and provides a meaningful referral to address the student's need for assistance after high school.

Figure 9 - Acquisition of Daily Living Skills⁵⁴/ Functional Vocational Assessment Transition Services



- This transition service fails to target the underlying causes of a particular student's absences or tardiness.
- In addition, it will be difficult for a student to attend regularly and to be punctual if he or she does not have a job to attend because of a lack of transition planning and appropriate skills.

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⁵⁴ *Supra* note 28 (daily living skills include, but are not limited to, "dressing, hygiene, self-care skills, [and] self-medication"). Most students with disabilities are unlikely to require transition services targeting the acquisition of daily living skills.

The following are examples of acquisition of daily living skills/functional vocational assessment transition services that would satisfy the measurability and individualization mandates:

- For a student interested in developing a more independent daily routine, an appropriate transition service might be "student will tell time, make change, read time schedules, recall his Social Security Number, and recall his phone number with 90% accuracy."
- For a student unsure of her future career pursuits, an appropriate transition service might be "the transition linkage coordinator will ensure that the student participates in a functional vocational assessment before the end of the school year." The NYC DOE could conduct the assessment or this responsibility could be allocated to another agency, such as VESID.

Transition services are intended to provide the student with measurable, individualized steps by which to achieve his or her personalized long term adult outcomes. As shown above, the ambiguity and broad nature of the recommended transition services renders ineffective this model of gradual improvement. IEPs invariably fail to offer adequate benchmarks against which to measure student progress with the recommended transition services or even to recommend actual services to aid in the student's transition to postsecondary life. The NYC DOE clearly failed to create measurable or individualized long term adult outcomes and transition services in the IEPs reviewed for this report.

5. The transition plans failed to address adequately the students' courses of study.

Under the IDEA, transition services must include the "courses of study" necessary to enable the student to reach his or her long term adult outcomes.⁵⁵ The New York State regulations further require that the IEP include "a statement of the transition service needs of the student that focuses on the student's courses of study, such as participation in advanced-placement courses or a vocational education program."56 In the IEPs we examined, this requirement is frequently overlooked. The goals designed do not envision a student building his or her academic skills, but rather seem to assume a complete end to any further academic progress beyond the student's current status.

In New York State, a student's course of study is intended to culminate in the receipt of one of several different diplomas.⁵⁷ Each type of diploma requires that a different set of criteria be met and that a different course of study be pursued. Therefore, a student's diploma goal will have a considerable impact on that student's course of study and the

⁵⁵ *Supra* note 16. ⁵⁶ *Supra* note 19.

⁵⁷ New York State regulations enumerate five different diploma options: the Regents Diploma, the Regents Diploma with an advanced designation, the State High School Equivalency Diploma, the Individualized Education Program Diploma, and the Regents Diploma/Regents Diploma with an advanced designation with an affixed technical endorsement. 8 N.Y.C.R.R. § 100.5(b)(7)(i)(a)-(e). An additional type of diploma, the Local Certificate, is also available to students with disabilities. 8 N.Y.C.R.R. § 100.6. ⁵⁸ 8 N.Y.C.R.R. § 100.5.

services needed by that student. Furthermore, the diploma that a student ultimately earns will have a significant impact on that student's future prospects. Neither the High School Equivalency Diploma (commonly referred to as the "GED") nor the Individualized Education Program Diploma ("IEP Diploma") are considered regular high school diplomas. Unlike a student who has earned a Regents Diploma or a Local Diploma, a student awarded a GED or an IEP Diploma remains entitled to a free appropriate public education until the end of the school year in which he or she turns 21 years old; a student awarded a GED or an IEP Diploma has the right to continue in high school working towards a Regents Diploma or a Local Diploma.⁵⁹ Furthermore, an IEP Diploma certifies that a student has completed his or her IEP goals, but it is "not accepted for admission to college or enlistment in military service."

The following pie chart depicts the number of IEPs reviewed that recommended each type of diploma:

No Diploma Objectives IEP Diplomas, 45 Local Diplomas, 52 Regents Diplomas,

In 123 of the 264 IEPs analyzed, or approximately 47% of the time, the NYC DOE failed to indicate any diploma track for the student. These IEPs fail to indicate what diploma objective the student will pursue during his or her remaining time in school. Without any indication of a diploma objective, the IEP teams could not possibly have been planning appropriately for these students.

Furthermore, when the IEP does indicate a diploma objective, the documents suggest that the majority of these decisions are made without any indication of the number of high school credits that the student has earned or needs to earn to reach that diploma goal.

⁵⁹ 8 N.Y.C.R.R. § 100.5(b)(7)(iii).

⁶⁰ New York City Department of Education, Office of Youth Development, Parents' Guide to Graduation Requirements, Questions Parents Frequently Ask About Graduation Requirements, p. 2, undated, http://schools.nyc.gov/NR/rdonlyres/B1DFAFCD-9E7D-41DA-9D81-

⁸B4200902C85/22119/doe_ydbooklet_Eng.pdf (last viewed Aug. 23, 2007).

⁶¹ Note that the four options listed on the page ten of the NYC DOE's IEP (Regents Diploma, Advanced Regents Diploma, Local Diploma, and IEP Diploma) do not include the High School Equivalency Diploma or the Regents Diploma/Regents Diploma with an advanced designation with an affixed technical endorsement, thereby omitting two of the diploma options made available under the New York State regulations.

Across the various diploma options, the NYC DOE's IEP teams systematically fail to incorporate the number of credits earned into the diploma objective calculus:

	IEPs Indicating	IEPs Failing to Note	Percentage of IEPs
	the Diploma as a	the Credits Earned	Failing to Note the
	Goal		Credits Earned
Regents Diplomas	44	30	68.18%
Local Diplomas	52	27	51.92%
IEP Diplomas	45	25	55.56%

Moreover, when the IEP does contain a diploma objective, it often fails to include a specific course of study for the student to follow. The IEP may provide the student with a diploma goal, but not with a reasonable plan to reach that diploma goal. According to one psychologist with over twenty years of experience working in the NYC DOE, "Kids don't know how many credits they have. They don't know what they need to do to get through high school. . . . It boggles my mind that these students have no idea what they need to do to graduate from high school." Transition planning should address such an easily identified lack of understanding, but seldom does. Specific courses of study or plans to fulfill graduation requirements rarely appear under the instructional activities category of transition services or anywhere in the IEP.

In those relatively rare circumstances when an IEP does feature course recommendations, they are often too general to satisfy the legal standards. For example, statements such as "student will participate in a hands-on vocational program" do nothing to improve the possibility that the student will actually participate in any such program. If the relevant student was interested in carpentry, then the transition service should specify that the "student will participate in a hands-on vocational carpentry program." Under transition services for independent living, one IEP recommends that the "student will enroll in a computer course." The category under which this transition service appears seems inappropriate, but with more elaboration, this recommendation could serve as an adequate course of study. Will this computer course be a vocational training program or a high school class? Where will the course occur? What skills will it emphasize? Will the student earn any high school credits for his participation in the course? A specific course of study provides a student with direction that is vital to both achieving the diploma objective and preparing for the future.

Finally, the NYC DOE has yet to recognize the critical importance of academic remediation and enrichment as transition services. Many students need intensive remediation services to address deficits in reading, mathematics, and other foundational academic skills and to achieve their post-secondary goals. Nevertheless, "student will improve basic reading and math skills which impact on everyday life," "instructional activities will be enhanced by mastering first grade academic levels," and "student will receive intensive academic remediation in all deficit areas daily" each appeared only once in the 264 IEPs examined. Despite the crucial significance of being able to read and perform basic mathematical operations in order to function in today's society, only very rarely did the NYC DOE recommend the remediation of basic academic skills under the

instructional activities category of transition services or elsewhere. In spite of the fact that transition services are clearly intended to encompass academic remediation and enrichment services, transition-age students with low academic skill levels are almost never given the opportunity to address these deficits.

The NYC DOE's Self-Report on the Planning of Transition Services

The New York State Education Department recently launched a comprehensive Special Education State Performance Plan for 2005-2010.⁶² During the course of this initiative, a representative sample of school districts throughout the state must provide data on a set of indicators each year for six years, beginning with the 2005-2006 school year. New York City is one of the school districts required to report.

One of the indicators to be assessed is the "[p]ercent of youth aged 15 and above with an IEP that includes coordinated, measurable, annual IEP goals and transition services that will reasonably enable the student to meet the post-secondary goals." In reviewing this transition services indicator, the New York State Education Department has directed school districts to evaluate eight factors, called compliance indicators, including whether students actively participate in transition planning and whether recommended services will assist students in meeting their transition goals. 64

The compliance indicators largely track the issues discussed in this report. Therefore, this State Performance Plan offers a unique insight into how the NYC DOE perceives its own performance regarding the planning of transition services.

As required, the NYC DOE examined the IEPs of at least 100 randomly selected transition-age students. In the baseline data provided for the 2005-2006 school year,

• Students actively participate in planning their educational programs leading toward achievement of post-secondary goals.

- IEPs are individualized and are based on the assessment information about the students, including individual needs, preferences, interests and strengths of the students.
- Transition needs identified in the students' assessment information are included in the students' present levels of performance.
- Annual goals address students' transition needs identified in the present levels of performance and are calculated to help each student progress incrementally toward the attainment of post-secondary goals.
- The recommended special education programs and services will assist the students to meet their annual goals relating to transition.
- The statements of needed transition services are developed in consideration of the students' needs, preferences, and interests, are directly related to the students' goals beyond secondary education and will assist the students to reach their post-secondary goals.
- Courses of study are linked to attainment of the students' post-secondary goals.
- The school district and appropriate participating agencies coordinate their activities in support of the students' attainment of post-secondary goals.

⁶² The information in this section is derived from the following document: Part B State Performance Plan (SPP) for 2005-2010, Indicator #13,

http://www.vesid.nysed.gov/specialed/spp/2007plan/secondarytrans.htm (last visited Aug. 22, 2007).

⁶⁴ *Id.* The eight compliance indicators are as follows:

the New York City Department of Education "reported that none of their IEPs met all of the compliance indicators."65

The New York State Education Department has mandated that "[a]ll school districts identified through the self-review or verification process as not having IEPs that include appropriate documentation of post-secondary goals and transition services on a student's IEP will be directed to correct the noncompliance as soon as possible, but no later than one year from the date of identification."66 Even by its own assessment, the NYC DOE has a very long way to go before the provision of transition services satisfies the State Performance Plan compliance indicators and the mandates set forth under federal and state law from which the compliance indicators are derived.

The NYC DOE's Recent Initiatives to Improve Transition Services

In an interview held in August 2007, Linda Wernikoff, the Executive Director of the Office of Special Education Initiatives, and Sean O'Shea, a Senior Special Education Program Specialist in the Office of Special Education School Improvement, discussed the efforts underway to improve the provision of transition services in the NYC DOE.

Ms. Wernikoff drew a distinction between students placed in the Citywide District 75 program and all other students with disabilities. The NYC DOE considers the transition process to be working better for District 75 students.⁶⁷

Regarding the vast majority of students with disabilities, individuals who are not placed in District 75, Ms. Wernikoff and Mr. O'Shea described a number of steps the NYC DOE is taking to improve the provision of transition services. First, the NYC DOE hosted "The Road to Tomorrow: Exploring Pathways to the Future, a College and Career Fair for Students with Disabilities" on Saturday, May 19, 2007. The event featured nationally recognized educators speaking about the obstacles that students with disabilities face in college settings as well as workshops to help students and parents prepare for postsecondary opportunities. The NYC DOE officials noted that 900-1,000 students (out of the approximately 13,000 students with disabilities exiting the New York City public school system each year) and their families were in attendance. The NYC DOE intends to hold this fair annually.

Second, the NYC DOE has made strides in smoothing student referrals to VESID and OMRDD. Specifically, they have eased requirements for providing current psychological evaluations to these state agencies.

⁶⁵ *Id*.

⁶⁷ District 75 is a division of the NYC DOE that serves approximately 23,000 students with moderate to severe disabilities. District 75 provides citywide educational, vocational, and behavior support programs. New York City Department of Education, District Information, http://schools.nycenet.edu/d75/district/default.htm (last visited Aug. 21, 2007).

The school district officials highlighted the NYC DOE's efforts to expand programs they call "Transition Services Employment Opportunities." A recently launched initiative, the Educational Training Institute, Inc., provides special vocational training to New York City students with disabilities considered overage and undercredited. Students aged 18-21 with fewer than 17 high school credits are able to apply for spots in the following programs: hotel operations, customer service and job readiness, pharmacy technician, and the Culinary Training Institute. These six-month programs offer various employment opportunities for students with a range of abilities. The training programs are run out of certain high schools, but students from any high school may apply.

Also part of the "Transition Services Employment Opportunities" initiative, the Summer Youth Employment program offers supervised summer work opportunities in the public and private sector for up to 1,400 participants on a lottery basis. The Training Opportunities Program offers supervised work experience in the public sector for up to 800 participants. Slots are distributed among schools which then determine student participation. A new Internship Program offers supervised work experience in the private sector for up to 85 participants. Together with the Educational Training Institute, these programs offer internship or training opportunities for 2,529 students with disabilities eligible for transition services.

The New York City Department of Education aims to complete a draft transition manual by December 2007. This guide will be divided into two parts. The first part will address the laws and standards regarding the provision of transition services. The second part is a "practical, how-to-do manual" including frequently asked questions. The NYC DOE ultimately plans to disseminate this manual to school district personnel, parents, students, and the general public.

Furthermore, Mr. O'Shea clarified that the various transition programs would be catalogued on the NYC DOE website. Publication of this listing is vital so that guidance counselors, transition linkage coordinators, teachers, principals, and other school district employees are aware of these programs and their requirements.

We are encouraged by the recent attempts of the NYC DOE to implement policies and initiatives to improve the state of transition services. We fear, however, that given the scope of the transition services crisis as revealed in the analysis of 264 IEPs undertaken in this report and in the NYC DOE's self-review, these steps will be far from sufficient. The NYC DOE must continue to expand the capacity of its current programs and develop new services to support transition. It is not only crucial that more programs be offered, but also that IEP meetings include the required transition planning.

III. CASE STUDIES

The following narratives, drawn from among the 264 IEPs analyzed for this report, provide in-depth illustrations of the failures of the New York City Department of Education to provide transition services. The names of the four students described below have been changed to protect their privacy, but all other details are true.

Peter⁶⁸

Peter is a young man with a learning disability who managed to accrue more than half of the credits needed to earn a regular high school diploma. Nevertheless, Peter did not graduate from high school, does not have a job, and does not possess any meaningful job skills. At a more basic level, Peter remains unable to travel independently on the public transportation system at his current age of 21.

Close examination of Peter's IEPs for school year 2002-2003 through school year 2004-2005 shows that transition services that could have helped Peter were not recommended. In fact, Peter's transition planning only grew worse throughout the IEPs, rather than becoming more focused as he grew older.

Peter was not present at a single one of the three IEP meetings during that time. The transition plans on the IEPs failed to consider his preferences and interests. Peter's mother, a required member of the IEP team, participated in only the first IEP conference. Despite the goal of affording the student and parent "ownership roles" in the transition planning process, Peter's experience exemplifies the marginalization of these key players. ⁶⁹

Although the IEPs recommend transition services such as Peter "will explore various careers and what they involve" under instructional activities and Peter "will explore employment or career development options" under post high school, they do not identify any agency to provide such services and thus fail to involve or direct Peter to agencies outside of the NYC DOE. In truth, such vague recommendations have little chance of resulting in the real involvement of an outside agency. VESID might have served as a useful resource for this student, but the NYC DOE failed to propose this connection.

Peter's IEPs reveal a profound disconnect between what the NYC DOE developed as his long term adult outcomes and his recommended transition services. His January 2003 IEP features a long term adult outcome of "attend[ing] a post-secondary institution for an associate of arts degree," but as of June 2002, Peter had earned no high school credits. Nevertheless, the IEP indicates that Peter will earn a local diploma (which now requires 44 credits) by June 2005. It would be difficult for any student to fulfill all of the requirements of the local diploma in only three school years, but it would be particularly difficult for a student such as Peter, with reading and math skills ranging from the second through fourth grade levels, to do so. Despite these obstacles, Peter's transition services state only that he "will relate school subjects to potential careers" under instructional activities. This supposed transition service clearly fails to address how Peter will achieve his long term adult outcome of entering higher education. This boilerplate IEP provides no assistance for Peter.

The two other IEPs for Peter do no better. Under instructional activities, the 2004 IEP states only that Peter "will acquire the necessary credits to earn a high school diploma."

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⁶⁸ See App. E (the transition pages for this student).

⁶⁹ Supra note 44.

That IEP notes that Peter has earned only 12 credits as of June 2004 and that he is expected to complete high school with a local diploma in June 2005. His instructional activities fail to specify a course of study that will enable Peter to accumulate the remaining required credits. The final IEP states only that Peter "will explore various careers and what they involve." The evolution of Peter's instructional activities demonstrates a process of swiftly diminishing expectations; no longer does Peter's final IEP mention higher education or even a course of study, but it merely assumes that Peter will immediately enter the workforce without any additional education, training, or assistance.

Rather than grow more focused and specific as Peter grew older, the quality of his transition planning deteriorated. Looking at his long term adult outcomes across the three IEPs, the reduction in expectations for Peter's future is striking. In 2003, his goal for post-secondary placement was to "attend a post-secondary institution for an associate of arts degree." In 2004, it was to "attend college." In the final IEP, no long term adult outcome is given for post-secondary placement. Under independent living, Peter's initial long term adult outcome was to "live independently." But the later two IEPs shift to "liv[ing] independently with minimum support." Whereas the earlier two IEPs both track Peter to receive a local diploma in June 2005 and list the number of credits he has earned, the final IEP fails to include such information. This decline is not due to any life-altering event experienced by Peter, but rather an indication of resignation on the part of the NYC DOE staff in spite of Peter's accumulation of high school credits.

Peter's transition planning failed to meet the requirements set forth in federal and state statutes and regulations in all significant respects. It set unrealistic goals, offered no benchmarks for the student to follow in pursuing his goals, and identified no services that might have helped Peter turn his goals into a reality. The 2004 IEP's repeated misidentification of Peter by another name underscores the impersonality of the effort.

Amanda⁷⁰

Our second case study is also a grave example of the NYC DOE's failure to plan appropriately for the transition and future of a student. Amanda, a student with mental retardation, was associated with a foster care agency. She requested tutoring from her case worker because she was failing her high school courses. Her case worker soon brought her situation to the attention of Advocates for Children. At that time, she was nineteen years old, her academic skills were on a second-grade level, and she was a young mother attending a public high school with a LYFE (Living for the Young Family through Education) Center. Eventually, Amanda became depressed and surrendered her hope of graduating with a regular high school diploma.

The NYC DOE had effectively ignored its legal obligation to plan with Amanda for her life after high school. The NYC DOE never referred Amanda to VESID or OMRDD for

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⁷⁰ See App. F (the transition page for this student).

⁷¹ LYFE Centers provide day care facilities for the non-school age children of teenage parents who are still attending school or wish to resume their education.

vocational training or the receipt of other services. The NYC DOE also failed to try to link Amanda to child care services outside of the LYFE Center in which she was already participating.

This report examined the IEP developed for Amanda when she was eighteen years old. Neither Amanda nor her guardian was included in the IEP meeting. Furthermore, there is no indication that the NYC DOE ever tried to contact Amanda's guardian to provide notice of the meeting.

As in the first case study, the NYC DOE failed to involve any outside agencies in the transition process. Despite recommending transition services such as Amanda "needs to brainstorm 3 possible careers to pursue. She also needs to apply to VESID and research other GED/vocational opportunities," the NYC DOE failed to include a VESID representative at the IEP meeting or to allocate responsibility to VESID. Given Amanda's classification as a student with mental retardation, OMRDD could have been a valuable resource and would have been part of any meaningful transition plan for her future. OMRDD, however, is not mentioned.

The IEP team's suggested transition services illustrate an inadequate analysis of Amanda's personal situation. For instance, Amanda's post-secondary placement long term adult outcome includes that "[s]he may attend college." Given that at the time of IEP creation, Amanda was eighteen years old and had only 1.5 credits, and that teacher observations indicated reading, writing, and math skills at the second-grade level, this goal seems impossible without drastic remediation measures. The IEP, however, fails to address how to prepare Amanda for college and offers only a suggestion in the category of post-high school transition services that Amanda "may need a GED and vocational program." No specific course of study is outlined for her transition.

Finally, the IEP team failed to identify a diploma objective for Amanda. Although the IEP recommended that "she may attend college," she was not tracked for any kind of diploma. The contradiction between college as a goal and the absence of any specific course of study for her to obtain the necessary credits to receive a diploma or to prepare for the GED examination shows the hollow nature of this transition plan. It is as if the IEP team does not believe that transition planning is anything more than a paperwork requirement.

Walter⁷²

When Walter's situation came to the attention of Advocates for Children, he was nineteen years old and basically illiterate. He was classified as having a learning disability based on an evaluation conducted when he was fourteen years old. Walter's most recent IEP meeting had occurred three years ago, when he was sixteen years old and still in the sixth grade. Because of his age, this IEP meeting was required to include transition planning. Here, however, the NYC DOE tragically missed an opportunity to salvage Walter's

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⁷² See App. G (the transition page for this student).

education. In particular, his transition services totally failed to address his inability to read, despite his desperate need for literacy skills to function productively as an adult.

Moreover, Walter's transition plan failed to include any outside agencies, and responsibility for his transition was allocated only to the school, the student, and the parent. The transition plan did call for a functional vocational assessment, but failed to indicate who would conduct such an assessment or how it would happen.

Walter's transition plan is another example of generic suggestions with no practical application. Instead of a specific academic or vocational course of study for a sixteen year old toiling in the sixth grade for the third time, the IEP team simply recommended that Walter "[i]dentify personal learning style" as a transition service for instructional activities. This task was placed on Walter's shoulders after he had been neglected by the NYC DOE for years.

The IEP offered other pitiful transition services to prepare Walter for the world after school:

- "Relate school subjects to potential careers" under post high school; and
- "Assess personal values and needs" under independent living.

Walter's long term adult outcomes, developed without his presence at the IEP meeting, offer only broad goals such as "[i]ntegrate into the community independently," "[a]ttend a vocational training program," "[l]ive independently," and competitive employment. The point of transition services is to serve as steps toward these goals. But the vague nature of Walter's transition services coupled with the absence of any actual detailed steps precludes such an incremental progression toward Walter's long term adult outcomes. For example, how can the NYC DOE determine if Walter is fit to fulfill his goal of living independently, if the corresponding transition service is merely to "[a]ssess personal values and needs?" Transition services must be concrete and measurable activities that facilitate the achievement of a student's long term adult outcomes.

Walter's transition plan left him adrift with an inadequate strategy and without the help of any outside agency. Such practices violate the very purpose of the IDEA, to prepare students for a productive future. Walter eventually left the public school system with no diploma and no plan for the future.

Mike⁷³

Our last example may be the most egregious. As a result of the NYC DOE's failure to provide Mike with appropriate transition planning, he exited the public school system with no diploma, very low academic skills, no vocational training, and no plan for his future. Mike came to Advocates for Children seeking assistance on his own initiative, approximately six months after he left the NYC DOE. Through the assistance of Advocates for Children, Mike received over 600 hours of private reading remediation to address his severe academic deficits. Advocates for Children was also able to connect

⁷³ See App. H (the transition pages for this student).

Mike to VESID where he will have the opportunity to receive vocational training and job preparation as well as to an adult literacy program where he will have the opportunity to continue improving his academic skills. While in the NYC DOE system, Mike was never engaged to plan for his future and never received any assistance in preparing for his life after high school. Without the support of teachers, guidance counselors, or other students, Mike must now determine what goals to pursue and how best to pursue them on his own.

We analyzed four different IEPs for Mike, a student with a learning disability. The earlier three IEPs identified long term adult outcomes, but failed to recommend any transition services whatsoever. The earliest IEP was created when Mike was sixteen years and eight months old, when, under New York State law, transition planning had already been required for approximately twenty months. This IEP, however, listed "none" under each category of transition services. This failure carried over into the next IEP, composed when Mike was seventeen years and ten months old, as the word "none" was once again written under each category. The third IEP, created just six months later, contained a completely blank transition services section. Finally, Mike's fourth IEP, developed when he was twenty years old, included transition services, but suffered from many of the failures previously discussed. For example, one transition service (Mike "will develop a realistic career/vocational training plan through guidance from both the school and career counseling") requires the assistance of an outside agency, but the IEP team failed to designate any such agency.

The fourth IEP's long term adult outcomes diverged significantly from the long term adult outcomes of the first three IEPs in a manner that reveals the absolute failure of the NYC DOE to plan effectively for Mike's transition. In the first three IEPs, the NYC DOE indicated that Mike will both live and integrate into the community independently and "attend a continuing education program" after high school. In the third IEP, the DOE upgraded the employment goal from being "employed with minimum support" to being "competitively employed." Yet in the fourth IEP, the vision of Mike's future was drastically altered. Now, instead of being competitively employed and living and integrating into the community independently, Mike was deemed to need "maximum support" in all three areas. Higher education was replaced as a goal by "a vocational training program."

The transition services listed on this fourth IEP blatantly contradict the long term adult outcomes listed on Mike's three previous IEPs. Most of the transition services in the fourth IEP concerned basic life skills, such as Mike "will identify, define and demonstrate the work ethic by allowing himself to live and function as a mature adult." This recommendation is unclear to the point of being nonsensical. What is "the work ethic?" Was Mike in some way prohibiting himself from living and functioning as a mature adult? Rather than dictate that Mike will allow himself to live and function as a mature adult, this transition plan should have specified particular skills that Mike needs to develop and how he will develop them.

⁷⁴ Supra note 17.

Mike's case shows how the transition planning process is too often treated as meaningless paperwork. Contrary to legal mandates, Mike received no assistance in harnessing his strengths and addressing his needs. Like the goals on his fourth IEP, his future opportunities were bleak following his exit from the NYC DOE. In Mike's fourth IEP, it is as if the NYC DOE sought to compensate for previous failures to deliver transition services by scaling back Mike's future prospects. In Mike's case, we see an inexcusable failure by the NYC DOE to provide an appropriate transition plan and the unnecessary blow to a young man's expectations that occurred as a result.

IV. RECOMMENDATIONS

This study documented consistent and pervasive failures of the NYC DOE in the realm of transition planning. With so many students with disabilities exiting the public school system each year, the effect of these failures on the students themselves as well as society is considerable. The most vulnerable students, those who need the greatest assistance in preparing for life after high school, are shuttled through inadequate programs where no real efforts are made to prepare them for their futures. When they leave the school system, they are completely unprepared for the world. This area of overwhelming failure by the NYC DOE needs to be addressed aggressively and immediately.

It is worth noting that many of the following recommendations echo those made five years ago by New York Lawyers for the Public Interest.⁷⁵ Unfortunately, the NYC DOE does not appear to have implemented them.

- 1. Develop a timely transition plan for every student.
 - Transition planning must be provided in a timely manner. The NYC DOE should install systems to ensure that transition planning actually begins by the mandated age of fifteen, at the latest.
 - Everyone involved in the IEP creation process, including parents and students of the appropriate age, should receive a copy of the transition planning timeline. This document should be sent to the parents of a student with a disability before he or she turns twelve years old. The parents of a student with a disability before he or she turns twelve years old.
 - The NYC DOE should properly incentivize transition planning. With the move toward school empowerment, the NYC DOE has announced plans to hold schools accountable for student performance. Schools must be held accountable for the quality of transition planning. The NYC DOE should encourage effective transition planning through rewards to schools, such as

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⁷⁵ ROBERTA MUELLER, MISSED OPPORTUNITIES: THE STATE OF TRANSITION SERVICES FOR YOUTH WITH DISABILITIES IN NEW YORK CITY (SEPT. 2002), http://www.nylpi.org/pub/NYLPI_Transition_Report.pdf (last visited Sept. 4, 2007).

⁷⁶ See App. C.

⁷⁷ MUELLER, *supra* note 75, at 44.

⁷⁸ New York City Department of Education, Children First: A Bold, Common-Sense Plan to Create Great Schools for all Children, p. 6, http://schools.nyc.gov/NR/rdonlyres/386D059A-A5B8-4FA4-89E5-334E773DD7E8/18245/Children_First_Report2.pdf (last visited Aug. 23, 2007) ("We will reward strong school performance and enforce strict consequences for poor performance.").

monetary bonuses. The NYC DOE should discourage poor transition planning through punitive measures, such as leadership changes.

- 2. Fully involve students and parents in the transition process.
 - Conduct citywide seminars on transition services for parents of students with disabilities at different ages. These seminars should familiarize parents with the transition process, thereby enabling them to become informed participants.
 - Provide ample notice to the student and parent(s) well in advance of IEP meetings that will include transition planning. Notice should be provided by mail, telephone, email, and letters sent home with the student.
 - Guidance counselors or transition linkage coordinators should hold regular meetings with all of the students with disabilities aged fifteen and older assigned to them. These meetings should cover the transition process as well as familiarize students with the available options and the corresponding prerequisites.
 - The NYC DOE needs to develop programs that enable students to satisfy prerequisites for the programs that interest them.
 - Provide the parent(s) and student with a prior opportunity to discuss any concerns or questions about the upcoming IEP meeting or the transition process with a designated school official such as the guidance counselor, transition linkage coordinator, or district representative.
 - Create a parent- and student-friendly guide on transition services to supplement
 the transition manual currently being developed. We fear that a lengthy and
 technical discussion of transition services, standing alone, will not directly
 affect the real-world planning and provision of transition services and will be of
 little use to parents and students.
 - Replicate the "The Road to Tomorrow: Exploring Pathways to the Future, a College and Career Fair for Students with Disabilities" on a quarterly basis. Hold the fair at various locations throughout the five boroughs to ensure that more students and parents will be able to attend. Increase publicity for the fair throughout the public school system.
- 3. Fully involve outside agencies in the transition process.
 - Develop conferences for school staff, parents, and students that discuss the various state and community agencies and the roles they play in the transition process. Require school district personnel involved in the transition process to attend these conferences.
 - The NYC DOE should host biannual information sessions on the various outside agencies. These information sessions should be held at the schools and after the work day to allow for maximum parent and student attendance.
 - Guidance counselors and transition linkage coordinators should be proficient in assisting students with the application process for VESID, OMRDD, OMH, and the other outside agencies. These school personnel must make referrals, assist

students in the application process, and arrange for the required evaluations to be conducted and transmitted via student records.

- 4. Create measurable transition goals.
 - The NYC DOE should produce a non-exclusive list of appropriate, measurable, and specific transition services as examples for IEP teams. In the current system, IEP team members rely on a drop-down menu of generalities for long-term adult outcomes with only a few options in each category and stock phrases repeated over and over again for transition services. Such a model is doomed to be ineffective; it will never adequately guide IEP team members or provide meaning for the process. School district personnel must not settle into a pattern of rote reliance on any such improved list of transition services as it would undermine the individualization mandate.
 - Transition goals should be quantifiable, thereby facilitating the measurement of student progress. If a particular transition goal or service cannot be quantified, some other criteria for measuring student progress must be provided.
 - Transition service progress reports should be required. School personnel should be made responsible for providing four transition services progress reports each year. It is crucial that this responsibility not be dismissed as tedious paperwork, but rather as essential to a student's and a school's success (as per recommendation 1).
- 5. Incorporate the student's needs, strengths, preferences, and interests into the transition process.
 - Increase the focus on informing the student of the transition process and then on having the student attend the IEP meeting.
 - Guidance counselors or transition linkage coordinators should familiarize students with the transition process before transition planning begins. They should underscore the role that students play and the value of student input.
 - Create a transition questionnaire for students to complete (if functionally able).
 This questionnaire should be completed on at least an annual basis. It should address the student's needs, strengths, preferences, and interests. It will provide IEP teams with valuable information if the student is unable to attend the IEP meeting.
- 6. Recommend a specific course of study for each student.
 - Track the student for a realistic diploma objective from the very first transition planning session. Most students should pursue regular high school diplomas. Only those students with severe disabilities should be placed on IEP Diploma

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⁷⁹ See App. B. The current list must be significantly improved if it is to offer meaningful guidance to IEP team members.

- tracks. Specific courses of study and remediation for academic deficits should be planned and implemented.
- Inform both students and parents of graduation requirements for the different diploma options. Discuss with students and parents the limitations and opportunities associated with each diploma option. A straightforward, concise, and easy-to-read document describing the various diplomas should be developed and given to all parents and students at IEP meetings following the student's fifteenth birthday.
- With the diploma objective in mind, the IEP team should suggest specific courses for the student to take in the coming school year. Student participation would greatly facilitate this process.
- Chart year by year how the student will meet graduation requirements for the student's diploma objective. Review and revise this chart at each IEP meeting. Emphasize that students have the right to remain in school until the end of the school year in which the student turns twenty-one.
- Recommend specific vocational programs relevant to student interests.
- Mandate the inclusion of the credits earned for each student on each transition page to ensure that the diploma objective remains realistic and appropriate.
- 7. Transition services must not simply state an activity in which the student is already engaged.

Amanda's community integration transition service stated that she "is already integrating into the community." Her community integration long term adult outcome recommended that she "will be fully integrated into the community." The recommended transition service fails to identify any activities or instruction which will assist Amanda in achieving the corresponding long term adult outcome. Until a student has realized his or her long term adult outcome, the corresponding transition service must offer a meaningful recommendation as to how to achieve that long term adult outcome.

- IEP teams must always consider a student's long term adult outcomes when developing the corresponding transition services.
- Ensure that all transition services build on the student's current activities and progress toward achieving his or her long term adult outcomes.
- 8. NYC DOE staff must be fully trained and supported in transition planning.
 - While a transition manual can provide comprehensive direction, it cannot guarantee that these directions are followed. The NYC DOE must institute training sessions on transition services for district representatives and widespread supervision of IEP team personnel to ensure that the principles prescribed in the transition manual are effectively implemented. It is imperative that the ideals of this transition manual are espoused by those actually involved in the development of transition services the IEP team members. IEPs remain the only documentation that a parent or student can rely upon to ensure the provision of transition services.

- The NYC DOE must commit the resources necessary to ensure that staff have enough time to address each student's transition needs.
- The NYC DOE should hold annual seminars where school district personnel involved in the transition process can exchange information on useful programs, strategies, agencies, etc. These seminars should focus on services that actually prepare students for a successful transition, e.g., raising reading levels to ready a student for employment.
- Require that the district representative, a mandated member of the IEP team, be aware of all of the relevant outside agencies and the services they provide as well as the various services provided by the school district. This awareness will increase coordination between the NYC DOE and the various outside agencies.

9. Track the progress of students after high school.

The New York State Education Department has recognized the necessity of tracking students as they transition out of the public school system. Indicator 14 of the State Performance Plan for 2005-2010 requires a representative sample of school districts, including New York City, to determine the "[p]ercent of youth who had IEPs, are no longer in secondary school and who have been competitively employed, enrolled in some type of post secondary school, or both, within one year of leaving high school." This measurement requires the NYC DOE to track the post-school outcomes of at least a minimum number of students who received special education services and then left school with a credential, reached the maximum age for educational services, or dropped out. While Indicator 14 requires only that the NYC DOE assess the employment and education status of these students within one year of leaving high school, it nevertheless mandates the collection of data that could be used to assess whether the NYC DOE transition process effectively assists recent exiters in pursuing their post secondary plans.

- The NYC DOE should begin the wholesale implementation of the post high school tracking outlined in Indicator 14 to evaluate student progress.
- Such tracking should be expanded from one year of exit from the public school system to five years of exit from the public school system.

 Technology should be developed to facilitate such long-term tracking and reduce any associated costs.
- Such tracking should be made a permanent feature of the transition process.

10. Develop better programs for a wider range of ability levels.

The NYC DOE must develop more comprehensive programs to support transition for a wider range of ability levels if reforms to the transition planning process are to have any real impact. A review of 264 IEPs revealed a dearth of vocational training programs, academic remediation services, and other transition activities. The Educational Training

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⁸⁰ MUELLER, *supra* note 75, at 45.

⁸¹ New York State Education Department, Part B State Performance Plan (SPP) for 2005-2010, Indicator #14, http://www.vesid.nysed.gov/specialed/spp/2007plan/postschool.htm (last visited Sept. 5, 2007). ⁸² *Id.*

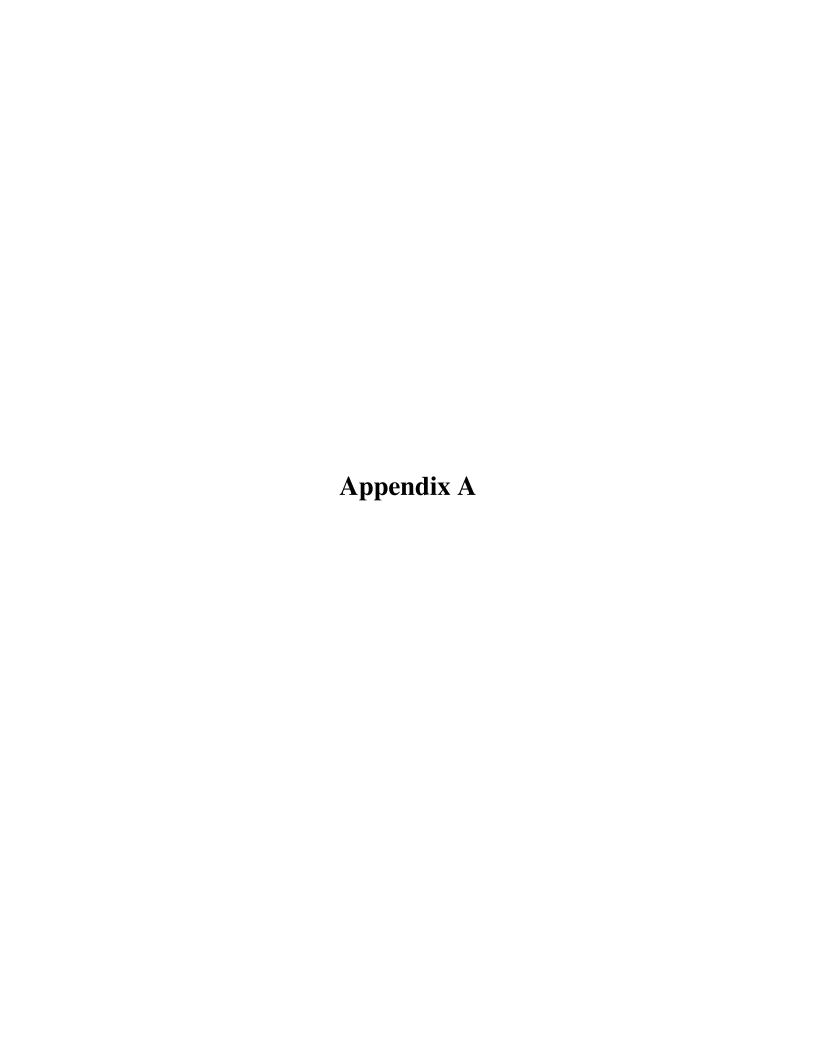
Institute, Inc. described by the NYC DOE officials currently enrolls a combined 229 students. The Transition Services Employment Opportunities initiative serves another 2,300 students. With over 13,000 students with disabilities exiting the New York City public school system each year, however, there is an urgent need for more programs, and these programs must be able to serve a wider range of ability levels.

- Students must be able to access these programs while still in school. The NYC
 DOE cannot wait until the student is nearing his or her exit from the public
 school system to refer the student to a transition program. Transition services
 must commence at the age of fifteen and students must have access to a wide
 array of programs at that time.
- The NYC DOE intends to develop a catalogue of the various transition programs on its website. Transition linkage coordinators, guidance counselors, and IEP team members must be made aware of these programs and must have access to this electronic catalogue during meetings with students and parents.
- In addition to the electronic catalogue of transition programs, printed copies should be provided to students with disabilities and their families before the student reaches his or her fifteenth birthday.

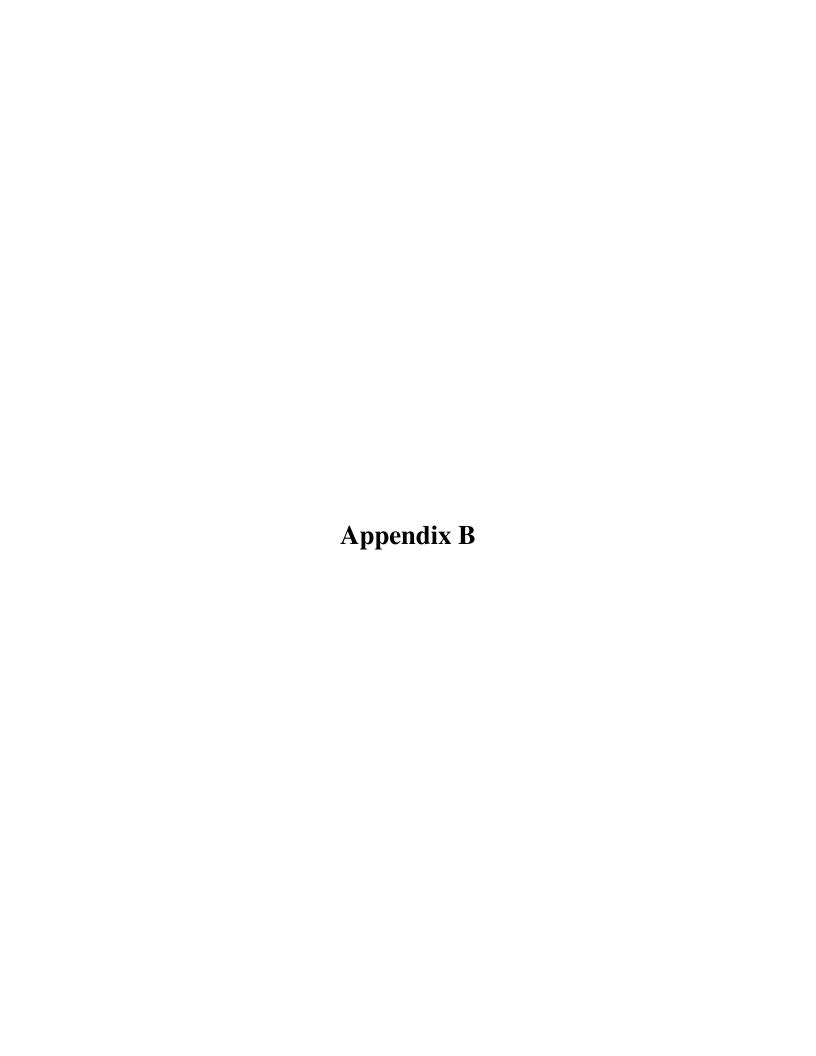
Conclusion

The failures of the NYC DOE to provide transition services to students with disabilities are evident in this study and others before it. The importance of transition services to the thousands of students with disabilities leaving the public school system every year without preparation for their futures is equally manifest. Meaningful reform, however, is too slow in coming. In a recent self-review, the NYC DOE itself found that none of the IEPs it examined satisfied all of the relevant compliance indicators.

The IDEA mandates that school districts prepare students with disabilities for independent living, vocational training, employment, higher education, and the other post-secondary opportunities awaiting them. Our study demonstrates the NYC DOE's failure to comply with this mandate. It is critical that the above recommendations be implemented and that transition planning be improved. Only the meaningful provision of transition services will ensure that thousands of vulnerable students are able to exit the school system and go on to lead fulfilling and productive lives.



Student		N	C ID#	CSE #		Date of Confe	rence
			TRANS	SITION			
			LONG TERM AD	OULT OUTCOMES			
(E Community Integra	4!	, , ,	propriate, state long term		•	, needs and inte	rests.)
Post-Secondary Placem							
			DIPLOMA	OBJECTIVE			
		Regents Diploma	☐ Advanced Regents	Diploma □ Local Di	iploma □ IEP Diplo	oma	
Expected High School Com		3	_	Earned		of Date	
				N SERVICES 15 years of age and older.)			
Instructional Activities			(required for eladerite	o yours or ago and class.			
Instructional Activities							
Responsible Party: Pare	nt □ Schoo	l □ Student	☐ Agency			☐ Spring	☐ Summer
Community Integration							
_							
Responsible Party: Pare	nt □ Schoo	l □ Student	□ Agency		D Fall	□ Spring	☐ Summer
Post High School							
-							
Responsible Party: Pare	nt 🗆 Schoo	l □ Student	□ Agency		□ Fall	□ Spring	□ Summer
Independent Living							
_							
Responsible Party: Pare	nt □ Schoo	l □ Student	□ Agency		□ Fall	☐ Spring	□ Summer
☐ Acquisition of Daily Living	Skills 🛮 Fun	ctional Vocationa	I Assessment				
Responsible Party: Pare	nt 🗆 Schoo	l □ Student	□ Agency			☐ Spring	□ Summer



SAMPLE TRANSITION GOALS AND OBJECTIVES¹

EMPLOYMENT

Goal: Explore a variety of career options.

Objectives: Student will identify 2 major career fields of interest.

Activities:

- 1. Job shadow three businesses of interest.
- 2. Participate in two volunteer work experiences.
- 3. Interview worker in career area of interest.
- 4. Tour supported employment programs.
- 5. Enroll in Careers class and participate in related work experiences.
- 6. Attend a "Career Days" seminar.

LIVING SKILLS

Goal: Live independently.

Objectives: Student will increase awareness of community living options.

Activities:

- 1. Determine personal needs/limitations in a living situation.
- 2. Visit two apartments for rent.
- 3. Look through ads and choose three possible living options.
- 4. Explore dorm possibilities on campus of choice.
- 5. Determine criteria for subsidized housing.
- 6. Visit a group home.

Objectives: Student will increase independent living skills.

Activities:

- 1. Take Home Economics.
- 2. Review a lease.
- 3. Cook dinner one time per week.
- 4. Shadow maintenance person to learn basic home maintenance skills.
- 5. Develop a personal budget.

¹ Office of Vocational and Educational Services for Individuals with Disabilities, Transition Services: A Planning and Implementation Guide, App. I, Sample Transition Goals and Objectives, Jan. 1993, http://www.vesid.nysed.gov/specialed/publications/transition/guideapx.htm#I (last visited Aug. 23, 2007).

- 6. Open a checking/savings account.
- 7. List strengths/weaknesses and achievements.
- 8. List hobbies/interests and how they may relate to a realistic occupation.

VOCATIONAL

Goal: Review vocational options.

Objectives: Student will participate in vocational options.

Activities:

- 1. Shadow Vo-Tech program for two days.
- 2. Contact VESID to determine eligibility.
- 3. Tour a Vo-Tech school.
- 4. Identify two vocational programs; tour and arrange an interview with instructor.
- 5. Identify a vocational program which would meet personal vocational needs.
- 6. Take vocational aptitude test.
- 7. Participate in high school vocational program of choice.

EDUCATION

Goal: Identify educational options.

Objectives: Student will select and apply for a college program.

Activities:

- 1. Complete and submit financial aid packet.
- 2. Contact career learning center to determine options.
- 3. Work with counselor/instructor to determine credits.
- 4. Contact/visit college of choice.
- 5. Contact guidance counselor to determine most appropriate high school classes to take to reach long-term goal.
 - 6. Review three postsecondary catalogs.
 - 7. Take SAT/ACT exam.

ASSESSMENT

Goal: Update vocational assessment.

Objectives: Student's current vocational preferences, interests and aptitudes will be identified.

Activities:

- 1. Review vocational aptitude scores with instructor or counselor.
- 2. Complete an interest inventory.
- 3. Self-assess vocational abilities and interests after completing work samples.
- 4. Shadow a vocational program/business and access necessary skills.
- 5. Collect assessment data.

FINANCIAL

Goal: Obtain needed financial assistance.

Objectives: Student will determine all possible financial resources available.

Activities:

- 1. Call identified financial resources to determine eligibility requirements.
- 2. Apply for SSI.
- 3. Make applications through college Financial Aid Office for Scholarships.
- 4. Discuss work incentive options with local social security administration office.

RECREATION/LEISURE

Goal: Become aware of/participate in community recreation/leisure programs or activities.

Objectives: Student will identify local recreation options.

Activities:

- 1. Visit/contact three recreation options.
- 2. Determine cost, rules, and hours of recreation option of interest.
- 3. Evaluate recreation/leisure options of interest.
- 4. Participate in a specific recreation activity.
- 5. Explore school activities/sports.

TRANSPORTATION

Goal: Travel independently.

Objectives: Student will review and determine best mode of transportation.

Activities:

- 1. Obtain driver's license.
- 2. Find co-worker with whom to ride.
- 3. Compare cost/purchase insurance.
- 4. Complete driver's education training.
- 5. Call Rapid Transit to determine cost/services.

- 6. Practice riding Rapid Transit.
- 7. Explore transportation option in nearest city.
- 8. Purchase a car.

PERSONAL/FAMILY RELATIONSHIPS

Goal: Become aware of appropriate community resources to meet counseling/support needs.

Objectives: Student will determine personal and family support agencies and services.

Activities:

- 1. Identify counseling/support needs.
- 2. Contact and interview potential professionals/groups to determine suitability to individual needs.
 - 3. Participate in mentor program.

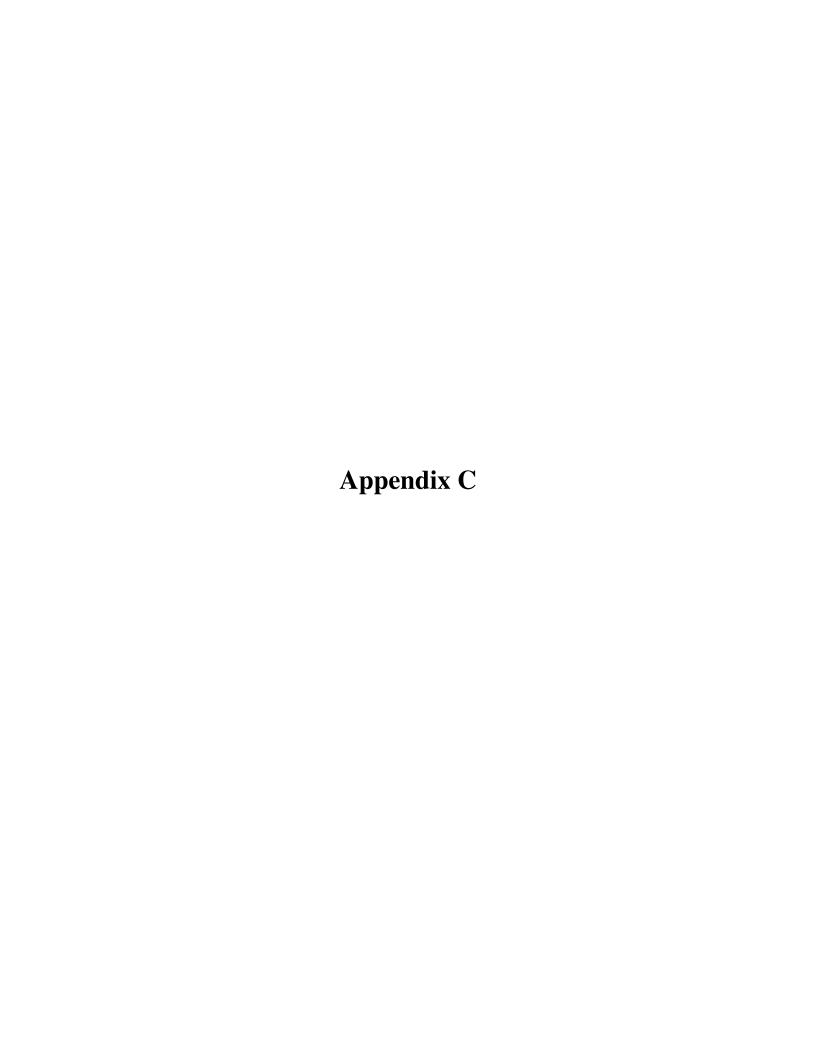
MEDICAL

Goal: Determine and manage health care needs.

Objectives: Student will become aware of/obtain medical support and assistance.

Activities:

- 1. Identify helping professionals in medical field.
- 2. Contact/locate medical assistance agencies in area of need.
- 3. Apply for Medicaid/appropriate medical resources in the community.
- 4. Determine appropriate questions to ask medical professional.
- 5. Call medical professionals to compare services and costs.
- 6. Visit/research local community health services.
- 7. Design a file with all pertinent medical information.



TRANSITION PLANNING TIMELINE¹

From an individual student perspective, the following is a series of events that may need to be considered during the student's transition process. All items will not be applicable to all students. The list is provided to serve as an optional planning tool.

	<u>Action</u>	Suggested Age Range
	Administer initial vocational assessment	12
	Discuss the following curriculum areas at IEP meetings:	12-15
	 Academic Social Language/communication Occupational Self-help skills Self advocacy skills 	
	Develop and implement strategies to increase responsibilities and independence at home.	12-15
	Complete periodic vocational evaluations.	12-21
	Introduce & discuss Transition Services	14
	Notify parents that transition services will be incorporated into the IEP beginning at age 15	14
	Assure that copies of work-related documents are available:	14-16
•]	Social security card Birth certificate Obtain working papers (if appropriate)	
	Obtain parental consent so that the appropriate adult agency representative can be involved	14-16

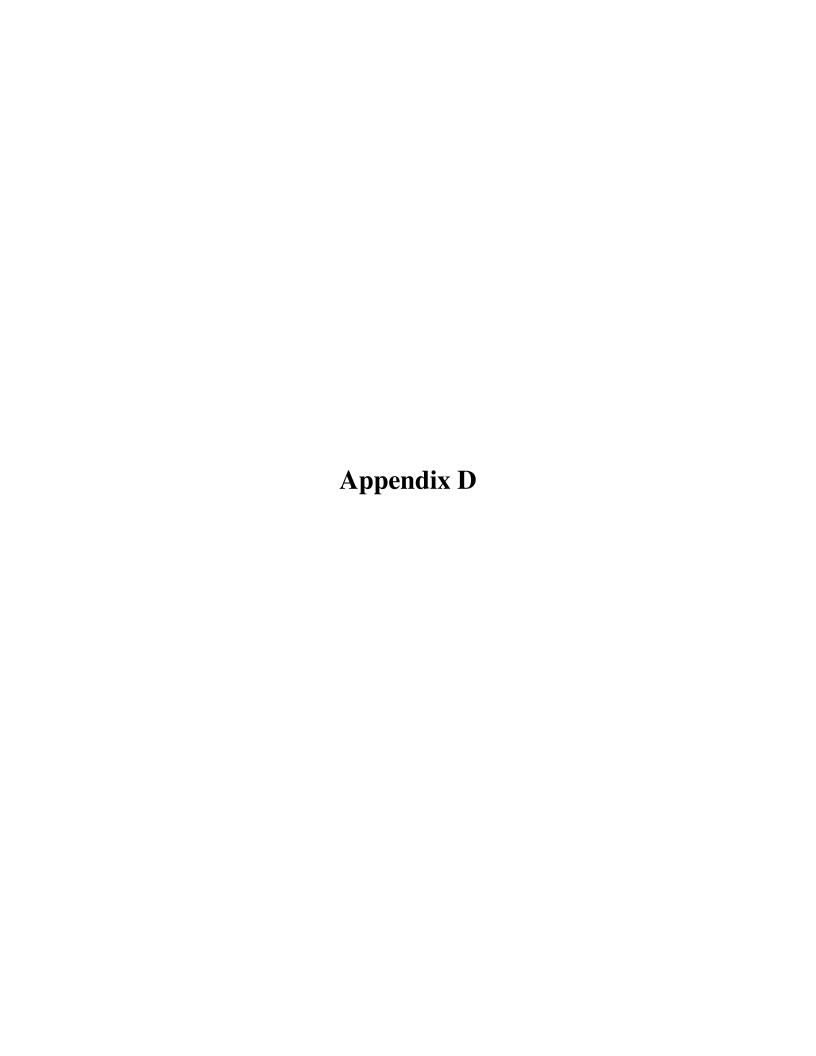
¹ Office of Vocational and Educational Services for Individuals with Disabilities, Transition Services: A Planning and Implementation Guide, Sec. 5, Transition Planning Timeline, Jan. 1993, http://www.vesid.nysed.gov/specialed/publications/transition/guide.htm#trans (last visited Aug. 23, 2007).

 Develop transition component of IEP and annually thereafter	15+
 Discuss adult transition with CSE	15-21
 Consider summer employment/ volunteer experience	15-20
 Explore community leisure activities	15-21
 Consider the need for residential opportunities, including completing applications, as appropriate.	15-21
 Obtain personal ID card	16-18
 Obtain driver's training & license	16-18
 Develop Transportation/Mobility Strategies:	16-21
 Independent Travel Skills Training Public or Paratransit Transportation Needs for Travel Attendant 	
 Investigate SSDI/SSI/Medicaid programs	16-18
 Consider guardianship or emancipation	16-18
 Develop & update employment plans	16-21
 Involve VESID/CBVH, as appropriate, within 2 years of school exit	16-21
 Research possible adult living situations	16-18
 Investigate post-school opportunities (further educational vocational training, college, military, etc.)	16-18
 Seek legal guardianship	18
 Apply for post-school college & other training programs	17-21
 Male students register for the draft. (No exceptions)	18
 Register to vote	18

 Review health insurance coverage: inform
insurance company of son/daughter
disability & investigate rider of continued
eligibility

Complete transition to employment, further education or training, and community living, affirming arrangements are in place for the following

- 1. Post-Secondary/Continuing Education
- 2. Employment
- 3. Legal/Advocacy
- 4. Personal Independence/Residential
- 5. Recreation/Leisure
- 6. Medical/Health
- 7. Counseling
- 8. Financial/Income
- 9. Transportation/Independent Travel Skills
- 10. Other:



Long-Term Adult Outcomes

Community Integration	Number of IEPs
Student will integrate into the community independently	107
Student will integrate into the community independently with	56
minimum support	
Nothing Written	33
Student will integrate into the community with maximum support	25
Student will integrate into the community	12
Student will incorporate into the community with assistance	7
Student will gain knowledge of the community where student lives	3
Student will integrate into the community with moderate support	3
Student will be employed with minimum support	2
Student will integrate into the community with the assistance of	2
family and/or outside agencies	
Participating in a community volunteer experience	1
Salaried or Free-lance work within community	1
Student enjoys going out with student's family	1
Student is already integrating into the community	1
Student plans to be an active member of the community	1
Student will demonstrate work appropriate behaviors	1
Student will explore voluntary and leisure activities in the community	1
Student will integrate into the community independently with support	1
Student will investigate religious, social, recreational, political,	1
voluntary community based agencies	
Student will learn skills to help student integrate into the community	1
Student will maintain respectful attitude toward authority figures	1
Student will volunteer in a community project, i.e. a block cleaning	1
Student works for the SY program. Student also works at father's car	1
dealership and with children at student's church.	
Student will function independently in the community	1
Total	264

Post-Secondary Placement	Number of IEPs
Student will attend a continuing adult or post secondary education	70
program	
Student will attend a vocational training program	67
Nothing written	33
Student will attend a post secondary institution for an associate of arts	19
degree	
Student will attend a post secondary institution	18
Student will attend a post secondary institution for a bachelor of arts	14
degree	
Student will become aware of post-secondary opportunities	4
Student will attend college	3
Student will develop realistic post secondary plans	2
Student will explore career opportunities	2
Student will integrate independently into the community	2
Emphasize skills and abilities	1
Student is undecided about post secondary placement	1
Student wants to go to 2 years of college and become a firefighter	1
Student will attend a college program based on student's abilities	1
Student will attend a community college or vocational program	1
Student will attend a job training program	1
Student will attend a post secondary educational/vocational program	1
Student will attend a post secondary institution for vocational training	1
Student will attend a post secondary placement at exit level	1
Student will attend a vocational program/VESID training support	1
work program	
Student will attend a vocational program; student may attend college	1
Student will attend adult care facility	1
Student will attend an adult education program	1
Student will complete 11th grade course for post secondary	1
expectations	
Student will complete a VESID application and attend interview	1
Student will develop career plans for varied levels of educations and	1
career goals	
Student will explore a variety of post secondary placements	1
Student will obtain education concerning career development	1
Student will participate in a recreational program	1
Student will plan for a job in the community	1
Student will receive day service for focusing on vocational and	1
functional skills	
Student will receive day services focusing on vocational skills	1
Student will research student's academic options	1
Student will research the post secondary schools throughout NY	1
needed for student's target	
Student will seek a vocational training program in the area of	1

electrical or mechanics	
Student will work hard to gain skills in writing and reading	1
Student will work with appropriate agencies for post secondary	1
placement	
Student would like to attend college	1
Student would like to join the Air Force	1
Technical school or 2-4 year college	1
Total	264

Independent Living	Number of IEPs
Student will live independently	132
Student will be able to live independently with minimum support	52
Nothing Written	31
Student will live independently with maximum support	10
Student is living at home and will continue to	10
Student will live independently with support	6
Student will develop an understanding of living outside of the family home	3
Identify personal strengths and weaknesses	2
Student will live independently with some support from family and/or outside agencies	2
Paid-wage job: full or part-time, with plan for money management	1
Student plans to move to Virginia	1
Student will develop and utilize a plan for effective decision making	1
Student will explore independent living with supports	1
Student will identify individual needs for independent living	1
Student will learn how to care for a home and student's self	1
Student will live in a highly supervised setting	1
Student will live in care facility or with family	1
Student will live independently with moderate support	1
Student will remain at home and later explore other residential options	1
Student will reside in a group home or with family members	1
Student will seek advice when making important decisions	1
Student will seek skills to maintain oneself independently while in school	1
Student will work independently	1
Student would like to have own apartment	1
Student would like to live on own	1
Total	264

Employment	Number of IEPs
Student will be competitively employed	130
Student will be employed with minimum support	37
Nothing Written	35
Student will obtain services from varied employment resources	16
Student will be employed with maximum support	10
Student will be employed with support	6
Student will explore career options	4
Student will be competitively employed with support of state or	2
community agencies	
Student will receive services from VESID employment services	2
At this point, employment opportunities are being explored.	1
However, it is not a viable option at this time.	
Behavior permitting, student will obtain an in-school supervised job	1
Currently employed	1
Job of future or currently-stated preference (refer to Ed Report)	1
Student enjoys working on cars and hopes to work in that field in the	1
Air Force	
Student is interested in finding employment in the area of art, science,	1
or sports	
Student is undecided about career choice	1
Student will be able to get employment from various sources of	1
employment	
Student will be able to seek employment according to student's skills	1
Student will contact more than one job opportunity and apply for	1
employment	
Student will explore possibilities for employment with assistance	1
Student will function with maximum supports	1
Student will have a full time job	1
Student will integrate into the community independently	1
Student will learn job skills, i.e. get to work on time, be polite, etc.	1
Student will learn to seek gainful employment	1
Student will not be employed	1
Student will obtain services from varied employment resources with	1
minimal support	
Student will obtain supported employment	1
Student will research, role play and apply for part-time community	1
based employment	
Student will understand and follow safety rules and regulations	1
Student will volunteer services at a community organization	1
Total	264

Transition Services

Instructional Activities	Number of IEPs
Nothing Written	70
Student will identify personal learning style	15
Student will work independently, without supervision, during a	14
community service experience	
Student will participate in career exploration seminars	13
Student will explore areas of self-interest	8
Student will participate in a prevocational program	6
Instruction will involve an academic program with vocational	5
opportunities	
Instruction will be enhanced by maintaining attention span and work	4
rhythm to complete assignments	
Student will provide the necessary documents for his transition file	4
Student will complete all requirements to complete high school	4
Student will attain basic job related information	4
Student will relate school subjects to potential careers	4
Instruction will be enhanced by: understanding and following rules	3
and regulations, maintaining attention span and work rhythm	
Student will develop functional skills	3
Student will complete a variety of job applications	3
Student will complete instructional activities leading to IEP diploma	3
Student will apply for age appropriate working papers	3
Student will become more comfortable within the academic setting	3
by attending regularly and being on time	
Student will seek advanced instruction in an area of personal interest	2
Student will maintain attention span; student will practice social	2
skills, student will learn that performance contributes to self-esteem	
Student will maintain attention span to complete a task	2
Student will continue to work on IEP goals	2
Student will explore job search strategies	2
Student will attend after school tutoring and complete 90% of	2
homework assignments	
Student will attend a program with academic and vocational	2
components	
Student will participate in the IEP conference	2
Student will seek tutoring services available in the school	2
Instruction will include an academic program with career exploration	2
opportunities	
Student will formulate an education/career plan	2
Student, with the help of an advisor, will complete the requirements	2
for a secondary education program	
Student will participate in the IEP conference as measured by the	2
signature	

Will explore the different job sites available to him	2
Student will assume responsibility for completion of work tasks	2
Student will explore educational requirements for careers of interest	2
Student will improve basic reading and math skills which impact on	1
everyday life	1
Instruction will be enhanced by submitting required documents for	1
the transition file as measured by photocopies placed in the transition	1
folder	
Student will independently complete a job application with 90%	1
accuracy	
Student will participate in a vocational program that will allow her to	1
develop skills and to explore possible future careers of interest	
Student will complete the requirements necessary for high school	1
graduation	
Will continue to explore areas of academic and personal interest	1
Student will apply the skills acquired in school to day-to-day living	1
Student will continue to develop independent living and vocational	1
skills	
Student will take part in activities that require the student to make	1
change	
Student will develop adaptive skills abased on assessment and	1
teachers' observation	
Student will complete a resume	1
Student will identify his personal learning style with grade advisor	1
Student will participate in all schoolwork as assigned, in exploration	1
of vocational skills and interests, and in vocational training	
Student will job shadow in his stated area of interest	1
Student will be actively participating in the education program	1
Hands-on and visual activities may be used to increase student's	1
knowledge of community resources	
Student will participate in a volunteer community service	1
Student will attend to all his current academic responsibilities in	1
preparation for pursuing career as a NYC employee	
Through prevocational activities will become familiar with different	1
kinds of work	
Student will develop appropriate skills to aid in passing necessary	1
state and local exams	
Will be enhanced by working independently without direct	1
supervision	
Student needs to brainstorm 3 possible careers to pursue; student	1
needs to apply to VESID and research other GED/vocational	
opportunities	
Instruction will be enhanced by participating in summer youth	1
employment program	
Student needs to continue in a highly structured and supportive	1

nuccessor with correcting and other supportive convices	
program with counseling and other supportive services	1
Student will participate in a hands-on vocational/academic training	1
program Student needs to attend all of his classes, everyday; student will not	1
graduate if not	1
	1
Student will understand and follow safety rules and regulations Student will relate academic instruction to day-to-day living	1
SETSS	
	1
Student will explore interests and abilities through a vocational	1
Survey Student will loom strategies that will hale the student to willies visual.	1
Student will learn strategies that will help the student to utilize visual	1
strength	1
Instructional activities will be enhanced by mastering 1 st grade	1
academic levels	1
Student will attend Saturday academy or peer tutoring	1
Following a set of directions to complete a work activity	1
Student will learn to read and write efficiently	1
Student will follow a set of directions to complete a work activity	1
Instruction will involve participation in a community based	1
curriculum	
Student will continue to apply herself to complete course	1
requirements	
Instruction will be enhanced through participation in various	1
programs at the high school for arts and business	
Special education courses will be provided to student	1
Student will outline class notes to form a study guide	1
Student will identify personal learning style and participate in a	1
vocational/academic program	
Courses in work responsibilities and resume completion; instruction	1
and information/application availability for employment	
Student will participate in a hands-on vocational program	1
Student will continue to attend high school until graduation	1
Student will work on courses required for high school graduation	1
Student will learn to type on a computer; through a typing program,	1
student will learn to write a business letter	
Student will formulate an education/career plan; VESID; computers	1
Student will complete the requirements for a secondary education	1
program	
Student will participate in tutoring services available in the	1
community	
Student will continue to work on basic skills that will enable the	1
student to fill out applications and take employment	
Transition coordinator will research, with student's input, bridge	1
programs, college admissions requirements for students with learning	
disabilities	

Student will learn to prioritize to successfully meet deadlines	1
Student will learn about the various career opportunities and skills to	1
seek employment	
Student will develop basic academic skills prerequisite for	1
employability and/or college	
Career exploration; vocational programs	1
Student will receive intensive academic remediation in all deficit	1
areas daily	
Student will explore interests and abilities through career/vocational	1
assessment	
Student will develop a long term plan of action culminating with full-	1
time employment	
Maintain attention and application to complete assignments	1
Student will practice social skills in a variety of situations; student	1
will participate in a school club or curricular activity	
Student will explore various careers and what they involve	1
Student will explore interests and abilities through career assessment	1
Total	264

Number of IEPs
72
15
14
11
6
6
6
6
5
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3
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Community integration will be promoted by participating in a	1
community volunteer experience	1
Community integration will be promoted by participating in agency-	1
based programs	1
Employment as child care worker	1
Maintaining a part time job	1
Being punctual and maintaining satisfactory attendance record and	1
work behaviors	1
School program will provide experiences to help student integrate	1
independently into the community	1
Student has limited access to local community; student would benefit	1
from training on community safety	4
Student participates in after school activities and bible study at church	1
Student will accept criticism and follow through in a volunteer	1
situation around student's community	4
Student will access community based organizations	1
Student will access community services to address personal needs	1
Student will acquire a library card and working papers	1
Student will apply for a part-time job	1
Student will apply methods of coping with and solving conflict on the	1
job	
Student will attend community based activities with assistance	1
Student will be able to access community resources as needed	1
Student will be encouraged by family, friends and school personnel to	1
access employment opportunities	
Student will be functional and maintain a satisfactory attendance	1
record and will follow staff directions	
Student will become familiar with the community by participating in	1
community walks and store with maximum support	
Student will communicate with respect	1
Student will communicate with respect and confidence; student will	1
select activities based on personal interests	
Student will complete and file local, state, and federal income taxes	1
Student will continue in his community until student is ready for	1
independent living	
Student will cooperate with peers and maintain self-control	1
Student will define and demonstrate work ethic	1
Student will develop self-advocacy skills to promote community	1
integration	
Student will develop skills in order to access social/communal	1
services with minimal support	
Student will develop social skills which foster positive relationships	1
with peers and community members	
Student will examine occupational bias/discrimination as it relates to	1
gender, culture, race, religion, and disabilities	
-	

	T a
Student will explore community organizations to support hobbies	1
Student will explore neighborhood opportunities for future realistic	1
career goals and plans	
Student will explore opportunities within the community	1
Student will focus career choices with NYC based upon the interest	1
in working for the Department of Sanitation and the student's abilities	
Student will have the opportunity to be in the community, behavior	1
permitting; student will attend these trips with peers and staff	
Student will identify community resources for social and recreational	1
activities; identify community services such as police, hospital, etc.	
Student will identify at least one way to make a positive contribution	1
to the community (i.e. volunteer, helping others, etc.)	
Student will identify, define and demonstrate the work ethic by living	1
and functioning as a mature adult	
Student will integrate into the community by maintaining satisfactory	1
attendance and work behaviors	_
Student will integrate into the community by participating in a	1
volunteer community service experience or applying for a part time	1
or summer job	
Student will integrate into the community independently	1
Student will integrate into the community through community-based	1
organization	1
	1
Student will learn besig again skills that will anable him to integrate	1
Student will learn basic social skills that will enable him to integrate	1
into the community	1
Student will maintain a part time job throughout the summer	
Student will obtain a list of recreational services provided by the city	1
and by accessing community based recreational organizations	
Student will participate in a program that will promote positive social	1
interaction	
Student will participate in canvassing local businesses for job	1
opportunities	
Student will participate in community activities	1
Student will research community resources such as public libraries	1
and museums	
Student will research community resources, such as hospitals,	1
churches, community centers and businesses, for recreational and	
vocational purposes	
Student will seek appropriate recreation and leisure activities with	1
same-aged peers in the community	
Student will seek involvement in community-based	1
organizations/clubs that offer services related to substance abuse	
Student will take trips into the community	1
Student will target a specific community agency to provide service	1
and to receive mentoring from	
	1

Student will utilize visual abilities to compensate for verbal	1
weaknesses in the community	
Student will work cooperatively in small groups to generate a	1
solution to a given problem 80-85% of the time as measured by	
teacher observation	
Through tours and visits, student will identify important resources in	1
the neighborhood	
Volunteer work with community agency, or paid work at same (i.e.	1
soup kitchen, local library, hospital)	
Transition coordinator will assist student in applying to and locating	1
internship opportunities in student's areas of interests	
Total	264

Post High School	Number of IEPs
Nothing written	72
Student will meet with appropriate school personnel/guidance	20
counselor to formulate a career plan	
Student will relate school subjects to potential careers	20
Student will access financial resources and information on the	14
internet	
Student will develop a realistic career plan	10
In order to prepare for post high school student will participate in	5
career exploration opportunities	
Student will meet an advisor who will provide information about	4
appropriate programs	
In order to prepare for a post high school outcome: student will select	3
activities based on personal interest	
Student will become familiar with opportunities in the work place	3
that are more realistic given student's abilities	
Student will complete a VESID application and attend the interview	3
Student will develop career plans for varied levels of education and	3
training	
Student will discuss and explore vocational programs and colleges	3
Student will examine non-traditional job opportunities	3
Student will explore the different careers that the student can	3
realistically pursue	
Student will review high school transcript with appropriate school	3
personnel to determine what is still needed to meet graduation	
requirements	
Will explore careers related to working with animals that the student	2
can realistically pursue	
In order to prepare for post high school life, a work study experience	2
will be provided as well as career exploration activities	
Student will attend a community college to develop skills in an area	2
of personal interest	
Student will attend a vocational training program in occupation of	2
choice	
Student will develop several realistic goals	2
Student will develop the appropriate academic skills to participate in	2
college	
Student will discuss and develop career goals and pursue appropriate	2
training	
Student will emphasize skills and abilities	2
Student will examine post high school vocational programs	2
Student will explore desired careers using careerzone.org	2
Student will explore vocational training opportunities	2
Student will find a work/study program for training opportunity skills	2
for future employment	

Student will know how to meet high school graduation requirements	2
Student will know how to meet high school graduation requirements	2
Student will meet with a college advisor/school staff and create a vocational plan for the future	<u></u>
*	2
Student will research the educational requirements for careers that match personal skills and interests	<u></u>
Student will practice drafting letters of inquiry to companies as part	2
of a job search	
Behavior permitting, student will obtain an in school supervised job	1
while at JRC; in NY, she will participate in VESID support work	
program	
College	1
Discuss and develop alternative career goals and appropriate training	1
Emphasize skills and abilities	1
In order to prepare for post high school outcome, student will	1
examine the advantages of positive interpersonal skills	1
Lessons and courses relevant to college selection and exposure	1
Plans will be promoted by applying to VESID	1
Post high school placement will be researched and decided at exit	1
level	1
Post secondary outcomes will be determined by researching and	1
identifying school and career goals	1
Services will be provided to prepare student for making choices	1
beyond high school	_
Student continues to explore vocational interests; student needs	1
assistance	
Student may need a GED and vocational program	1
Student wants to go to college in preparation for becoming a	1
firefighter	
Student will apply for age-appropriate working papers	1
Student will apply for community colleges that will utilize student's	1
visual strength	
Student will apply self-advocacy skills and meet high school	1
graduation requirements	
Student will apply self-advocacy skills to apply for post high school	1
placement	
Student will attend a post secondary program to develop skills for the	1
world of work	
Student will attend college fair	1
Student will attend job or career fairs	1
Student will attend summer school	1
Student will be gainfully employed	1
Student will begin to develop several post high school realistic goals	1
and plans for varied levels of education	
Student will complete college/trade school applications	1
Student will complete the requirements for a secondary education	1

program and/or develop a post-secondary education plan	
Student will continue to meet with guidance counselor at school and	1
to discuss and make plans for his future after high school	1
Student will develop a realistic career/vocational training plan	1
through guidance from both the school and career counseling	1
	1
Student will develop the skills to either apply to college or seek	1
employment	1
Student will develop with advisor a post secondary education plan	1
Student will discuss the importance of developing alternative career	1
goals	
Student will emphasize skills and abilities, develop a realistic career	1
plan, and develop career plans for varied levels of training and	
education	
Student will explore education opportunities based on interest	1
Student will explore employment or career development options	1
Student will explore post secondary goals	1
Student will explore post-secondary training or education leading to a	1
diploma, certificate, or license in his field of interest.	
Student will explore the educational requirements for careers in the	1
areas of electrical installation and auto mechanics	
Student will follow a curriculum appropriate to her transition needs	1
Student will identify a job he would like to have and will become	1
gainfully employed	
Student will identify and expand skills and abilities	1
Student will identify jobs that he would like to have	1
Student will identify skills related to personal interests; will	1
participate in a vocational training program	
Student will inventory skills and abilities	1
Student will meet with advisor to plan course schedule	1
Student will meet with the college counselor to look at four year	1
colleges	
Student will participate in activities that research and discuss various	1
career choices of interest	
Student will participate in an adult program focusing on vocational	1
skills	
Student will participate in an apprenticeship program	1
Student will participate in extracurricular activities	1
Student will relate school subjects to potential careers and meet with	1
appropriate school personnel to formulate a career plan	1
Student will relate school subjects to potential careers as measured by	1
informal assessments and verbal explanation	1
Student will research and study one career of choice; student will	1
develop an awareness of right for accommodation/education-	1
±	
employment Student will research appropriate agra facilities	1
Student will research appropriate care facilities	1

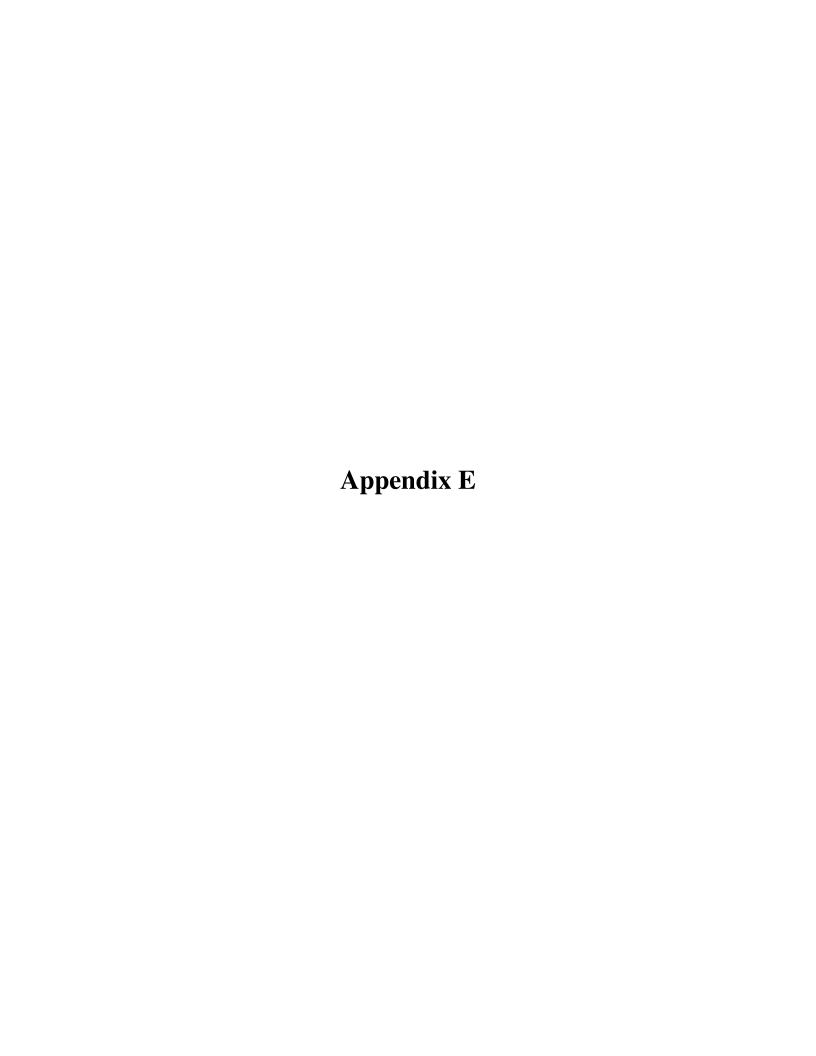
	,
Student will research various vocational sites	1
Student will research various vocational sites; explore alternative	1
career goals; formulate a career plan; complete a VESID application	
Student will review application process for post high school	1
placement	
Student will review educational and social skills requirement for their	1
targeted job	
Student will schedule a meeting with his grade advisor	1
Student will schedule and arrange college tours	1
Student will try to work toward attending post graduate education	1
Student will work with appropriate agencies to assist him with	1
transitioning after high school	
Transition coordinator will assist student in locating and exploring	1
alternate career opportunities in cosmetology	
Will devise list of social/vocational organizations who can assist in	1
employment opportunities	
Will research post secondary opportunities in school/public library	1
Total	264

Independent Living	Number of IEPs
Nothing Written	79
Student will assess personal values and needs	23
Student will identify personal strengths and weaknesses	18
Student will estimate monthly expenses and create a budget	13
Student will be able to live independently	10
Student will seek advice in making important decisions	10
Skills will be taught which are necessary to acquire a level of self-	8
sufficiency commensurate with level of functioning	
Student will explore a wide array of housing options	6
In preparation for independent living student will develop and utilize	4
an action plan for effective decision making	
Student will research various ways to reach a decision and solve	4
problems	
Student will strengthen independent living skills	4
Student will describe the influence income has on personal lifestyle	3
Student will familiarize herself with skills necessary for running her	3
personal life such as banking, shopping, etc.	
Student will seek advice from school personnel and/or other adults	3
when making important decisions	
Student will acquire the skills necessary to manage his own living	2
environment	
Student will apply for a library card	2
Student will carry identification and emergency money while	2
traveling	
Student will cope with work related conflicts	2
Student will develop the skills necessary for him to become	2
competitively employed	
Student will distinguish between needs and wants when making	2
career choices	
Student will find employment so that he can become self-supporting	2
Student will identify personal strengths and weaknesses as measured	2
by informal assessment and/or verbal explanation	
Student will identify the reasons people choose to work	2
Student will seek information and an application for obtaining a	2
driving learner permit	
Student will research various internet services	2
Distinguish between needs and wants when making career choices	1
Identify one behavior that needs as it is preventing him from	1
participating appropriately in school and he will take steps to reduce	
the behavior	
Identify strengths and weaknesses when making career choices	1
In order to prepare for independent living, student will demonstrate	1
the problem solving process as it applies to decision making.	
Participation in work experience program or after school job with	1

school staff follow-up	
Seek advice when making important decisions; action plan for	1
effective problem solving; money management, prioritizing, and self-	1
care	
Skills will be promoted by learning bus routes to and from school and	1
work	1
Student continues to improve the area of self-care; she continues to	1
work on increasing her ability to perform household chores	1
independently	
Student will apply for VESID services and meet with the VESID	1
counselor	1
	1
Student will assess personal value and needs while living at home and	1
learn how to manage health/monetary needs	1
Student will compare the relationship of attitudes, interpersonal skills,	1
and productivity to job success	1
Student will continue to reside with family and continue to work on	1
skills that enable to be self-sufficient	1
Student will continue work on self care skills	1
Student will create a self-improvement project by identifying a skill	1
or behavior in need of change	
Student will demonstrate appropriate decision-making skills by	1
choosing to complete all homework assignments and turn them in on	
time to the teachers	
Student will demonstrate improved attendance by arriving punctually	1
to her classes and scheduled activities on a regular basis	
Student will demonstrate problem solving strategies	1
Student will describe the effect good grooming has on employment	1
Student will develop and utilize techniques for managing stress and	1
coping with anxiety	
Student will develop daily living skills based on assessment and	1
teachers' observation	
Student will develop employability skills and utilize support services	1
for securing employment	
Student will develop skills and/or access support to increase	1
independence	
Student will develop the skills that will enable him to get his own	1
apartment and live independently	
Student will enroll in a computer course	1
Student will explore the importance of financial planning	1
Student will explore various career opportunities	1
Student will fill out job applications	1
Student will further identify and further discuss steps in decision	1
making	
Student will have the opportunity to complete a variety of ADL's	1
Student will identify individual needs for personal support and for	1
201 personal support and for	<u>l</u>

financial and medical assistance	
Student will identify realistically personal strengths and weaknesses	1
so as to facilitate independence at work and in his leisure time	
Student will investigate new and unfamiliar leisure/recreational	1
activities	1
Student will learn about specific community resources of interest and	1
how to access them	
Student will learn and practice how to make important decisions	1
regarding his educational and vocational needs with support and	
feedback from staff	
Student will learn such skills as money management, prioritizing and	1
self-care to foster independence	
Student will learn to maintain appearance, cook simple meals, clean	1
room, maintain personal possessions responsibly, meet school	
responsibilities	
Student will learn to manage his personal finances	1
Student will list and discuss steps in decision making	1
Student will live independently and care for all needs as she pursues a	1
course of study related to her areas of interest	
Student will live independently in the community and develop money	1
and health management skills	
Student will live independently with/without support	1
Student will live independently, be gainfully employed and be	1
responsible for that which is required to maintain employment	
Student will maintain immunization records	1
Student will participate in a functional vocational evaluation	1
Student will participate in activities required for independent living	1
Student will participate in experiences that will prepare her to	1
function independently in her community	
Student will prepare a household budget for independent living	1
Student will remain at home	1
Student will research various housing options; student will seek	1
advice when making important decisions	
Student will seek advice prior to making major decisions; develop the	1
skills that will enable him to get his own apartment and to live	
independently	
Student will seek appropriate personnel to assist in money	1
management, school schedules, and paperwork	
Student's living will be determined based on wants and needs	1
Will develop pragmatic community skills	1
Will notify appropriate school personnel of educational needs	1
consistent with personal IEP	
Total	264

Acquisition of Daily Living Skills/Functional Vocational Assessment	Number of IEPs	
Nothing Written	236	
Will present regular attendance and punctuality to school and work	5	
Not needed	3	
Student will participate in vocational assessment; use the internet to	2	
learn about possible colleges and programs; visit colleges		
Activities of daily living will include the maintenance of personal	2	
health, safety and homemaking skills		
After her admission to JRC, student will be administered a career	1	
interest inventory to determine her current career goals and		
aspirations		
District 75	1	
Focus on job propositions, with review of responsibilities, outcomes,	1	
etc.		
Functions independently	1	
List and discuss steps in decision-making	1	
Needed	1	
Student completed a questionnaire regarding his vocational goals; his	1	
hopes surround personal comforts; desire to pursue a career in		
construction		
Student requires that a formal vocational assessment be completed in	1	
his new educational environment		
Student will acquire daily living skills by modeling appropriate adult	1	
models via self instructional exercises and group work on a high		
school level		
Student will be able to maintain self-care, complete daily chores, and	1	
prepare small meals		
Student will complete ADL skills independently	1	
Student will continue to work on personal hygiene and safety	1	
awareness with support		
Student will learn to accurately tell time, make change, read time	1	
schedules, recall her SSN, find a specific phone number in the yellow		
pages		
Will continue to work on extending range of living skills	1	
Will make choices about health, meals, hygiene needs	1	
Not needed for standardized assessment students; needed for alt	1	
assessment students		
Total	264	



Date of Comercing

NYC ID#

LONSITION

OFAIL @ Spring O Summer
Responsible Party: [] Parent
Post High School
ration
WILL RELATE SCHOOL SUBJECTS TO POTENTIAL CAREERS. Responsible Party. Parent School Student Agency Fall Spring Summer
(Required for students 13 years of the years of the students 13 years of the years of th
Expected High School Completion Date 6/30/05 TRANSITION SERVICES TRANSITION SERVICES
DIPLOMA OBJECTIVE DIPLOMA OBJECTIVE Advanced Regents Diploma Ø Local Diploma D IEP Diploma
Community Integration: Post-Secondary Placement: Compension
TERM ADILIT OUTCOMES

Independent Living

WILL ASSESS HIS PERSONAL VALUES AND NEEDS.

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NYC ID# TRANSITION SERVICES (cont.)

(Required for students 15 years of age and older)

N/A Responsible Party:	Responsible Party: Parent School Student Agency Responsible Party: Parent School Student Agency Agency Responsible Party: Parent Spring Summer Parent Acquisition of Daily Living Skills Functional Vocational Assessment

LONG TERM ABULT OFFICIAL LONG TERM ABULT OFFICE LONG TER
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Responsible Parry Parent School x Student

Agency

Date of Common or or

Community Integration: STUDENT WILL LIVE INDEPENDENTLY MINH MINHUM SUPPORT. Community Placement: Hill LIVE INDEPENDENTLY MITH MINHUM SUPPORT.			Sindeni
	VE Local Diploma 🛭 IEP Diplo	LONG TERM ADULT OUTCOMES (Beginning at age 14 or younger if appropriate, state long term outcomes based on the student's preferences, needs and interests.) Community Integration: STUDENT WILL INTEGRATE INTO THE COMMUNITY INDEPENDENTLY. Post-Secondary Placement: Independent Living:STUDENT WILL LIVE INDEPENDENTLY WITH MINIMUM SUPPORT. Employment: STUDENT WILL BE COMPETITIVELY EMPLOYED.	NYC ID#

Instructional Activities WILL EXPLORE VARIOUS CAREERS AND WHAT THEY INVOLVE.

Expected High School Completion Date

(Required for students 15 years of age and older.) TRANSITION SERVICES

: ☑ Parent ☑ School ☑ Student ☐ Agency

Responsible Party:

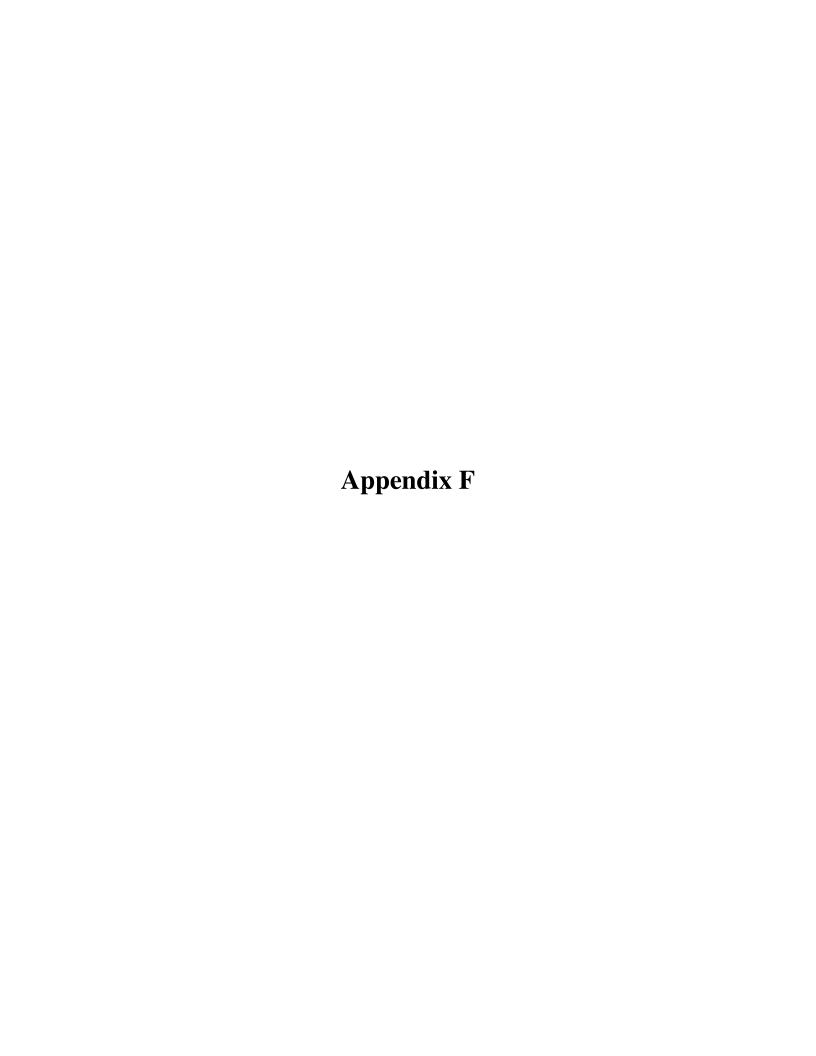
Community Integration

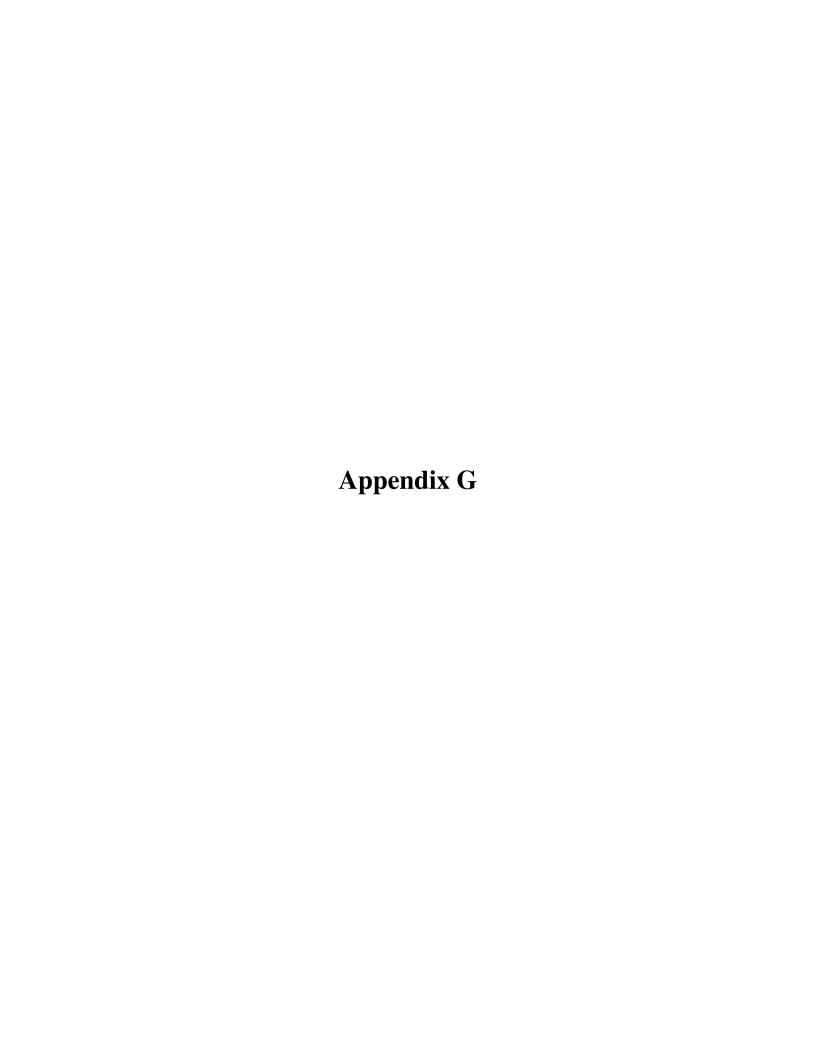
WILL EXPLORE OPPORTUNITIES WITHIN HIS COMMUNITY.

Responsible Party: | Fall | Spring : ☑ Parent ☑ School ☑ Student ☐ Agency

Post High School

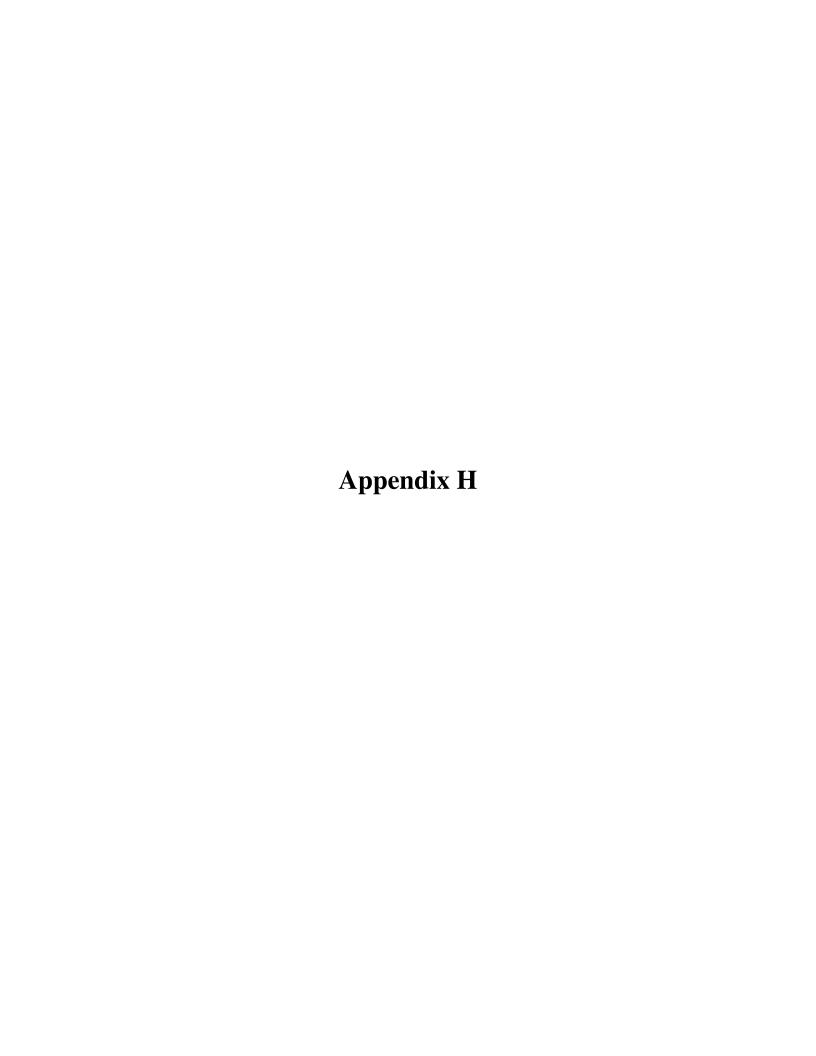
WILL EXPLORE EMPLOYMENT OR CAREER DEVELOPMENT OPTIONS





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	(Beginnir	ng at age 14 or	LONG TERM A: (Beginning at age 14 or younger if appropriate, state long to	LONG TERM A	 JLT OUTCOMES 1 outcomes based on the student's preferences, needs and interests.)
Community Integration:		rate into the s	Integrate into the community independently	endently	
Post-Secondary Placement		d.a.vocations	Altend.a.vocalional.ltaining.ptogram	M	
Independent Living		ndependently	Live independently		
Employment:		e competilixs	Will be competilizely employed		
	Regents	Regents Diploma	☐ Advanced	Diploma Objective Advanced Regents Diploma	kjective □ Local Diploma □ IEP Diploma
Expected High School Completion Date	ool Completic			Credits Earned	rnedAs Of Date
				Legis .	
				I ranskion (Required for students 15)	I ranskion Sei vices or รเมษาเร 15 years of age and older.)
Instructional Activities	Identify.persor	ldentify.personal.learning.style	le .		
Responsible Party:	☐ Parent	⊠ School	Student .	Agency	(
Community Integration	Apply.for.a.pa	Apply.for.a.part.lime.or.summer.job	nerjob		O Eall & Soring O Summer
Responsible Party:	⊠ Parent	⊠ School	Student	Agency	
Post High School	Relate school	.\$4.0].\$12.8[d.48]	Relate_schoot_subjects_to_potential_careers		
Responsible Party:	☐ Parent	⊠ School	⊠ Sjudent	☐ Atjency	
Independent Living	Assess perso	Assess personal values and needs	needs)
Responsible Party:	☐ Parent	🛭 School	⊠ Student	□ Agency	O Hall (@) Spring O Surilliter
Aquisition of Daily Living Skills		X Functional	M Functional Vocational Assessment	ssment 🗌 Needed	ded Not Needed
Responsible Party:	☐ Parent	School	Student	☐ Agency	
	Copy For:		CSE	PARENT	SCHOOL STUDENT OTHER



Date of Conference

TRANSITION

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NYC ID#

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Date of Conference

3/14/03

TRANSITION SERVICES (cont.)
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 (cont.)

(Required for students 15 years of age and older.)

NONE Responsible Party: Parent School Student Agency Fall Spring Summer	□ Acquisition of Daily Living Skills □ Functional Vocational Assessment	Responsible Party:	NONE	Independent Living
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TRANSITION

Responsible Party:
Post High School
Responsible Party: Parent School Student Agency Fall Spring Summer
Community Integration
Responsible Party:
NONE
(Required for students 15 years of age and older.)
Expected High School Completion Date As of Date
DIPLOMA OBJECTIVE ☐ Regents Diploma ☐ Advanced Regents Diploma ☐ Local Diploma ☐ IEP Diploma
Community Integration: STUDENT WILL INTEGRATE INTO THE COMMUNITY INDEPENDENT. Post-Secondary Placement: STUDENT WILL ATTEND A CONTINUING EDUCATION PROGRAM. Independent Living:STUDENT WILL LIVE INDEPENDENTLY. Employment: STUDENT WILL BE EMPLOYED WITH MINIMUM SUPPORT.
LONG TERM ADULT OUTCOMES (Beginning at age 14 or younger if appropriate, state long term outcomes based on the student's preferences, needs and interests.)

Student

Independent Living

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	TRANSITION SERVICES (cont.)

(Required for students 15 years of age and older.)

Responsible Party: Parent School Student Agency Fall Spring Summer	NONE	Responsible Party: Parent School Student Agency	

CSE #

TRANSITION

Responsible Party:
Post High School
Responsible Party:
Community Integration
Responsible Party:
Instructional Activities
TRANSITION SERVICES (Required for students 15 years of age and older.)
Expected High School Completion Date Credits Earned
DIPLOMA OBJECTIVE □ Regents Diploma □ Advanced Regents Diploma □ Local Diploma □ IEP Diploma
LONG TERM ADULT OUTCOMES (Beginning at age 14 or younger if appropriate, state long term outcomes based on the student's preferences, needs and interests.) Community Integration: _wīlī integrate into the community independent

		Responsible Party:
		☐ Acquisition of Daily Living Skills ☐ Functional Vocational Assessment
		Responsible Party:
		Independent Living
		TRANSITION SERVICES (cont.) (Required for sludents 15 years of age and older.)
11/18/2004	Date of Conference	Student CSE #

Date of Conference

9/6/02

TRANSITOR SOLICA

LONG TERM ADULT OUTCOMES
(Beginning at age 14 or youngar if appropriate, state long form outcomes based on the student's preferences, needs and interests.)
Community Integration: YILL INTEGRATE INTO THE COMMUNITY WITH ARKINON SUPPORT.
Post-Secondary Placement: WILL ATTEND A VOCATIONAL TRAINING PROGRAM.
Independent Living with Live independently with maximum support.
Employment: AILL BE EXPLOYED WITE MAXIMUM SUPPORT.
DIPLOMA OBJECTIVE
☐ Regents Diploma ☐ Advanced Regents Diploma ☐ Local Diploma ☐ IEP Diploma
Expected High School Completion Date 966
TRANSITION SERVICES (Required for sludents 15 years of age and older.)
Instructional Activities
WILL MAINTAIN ATTENTION TO TASK AND ON-TASK BERAVIOR THROUGH COMPLETION.
Responsible Perly: D'Farent D'School D'Student D'Agency EFFell D'Spring D'Summer
Community Integration
DESTIFY, DEFISE !
Responsible Party: Parent Pschool Oswdent Agency Orfall Chapting Psummer
Post High School
WILL DEVELOP A REALISTIC CAREER/VOCATIONAL TRAINING PLAN THROUGH GUIDANCE PROM BOTH THE SCHOOL AND CAREER COUNSELING.
Responsible Party: Typarent TySchool TiStudent DiAgency Type at Chepping DiSummer

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TRANSITION SERVICES (CON1.)
(Required for students 15 years of ege and older.)

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AND WEAKHERES	
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LEISURE TIME.

Responsible Party: (947/aren) @School @Student @Agency @Fail @Spring @Summer Responsible Party: Experent Exchool Exstudent - Agency WILL ACRIEVE THE ACQUISITION OF DAILY LIVING SEILLS BY MODELING APPROPRIATE ADULT MODELS VIA SELF INSTRUCTIONAL ☐ Acquisition of Daily Living Skills ☐ Functional Vocational Assessment