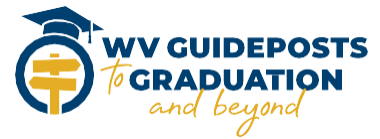


Monitoring Process for Indicator 13

Secondary Transition Planning



What is a secondary transition plan?

A secondary transition plan in West Virginia is a required part of the Individualized Education Program (IEP) for students starting at age 14. Its purpose is to help students prepare for life after high school.

The plan must include measurable post-secondary goals based on what the student wants to do after graduation. These goals are required for education or training, employment, and, when appropriate, independent living. The goals must be reviewed at each annual IEP meeting to measure the student's progress and changing needs.

The post-secondary goals must also be based on data from age-appropriate transition assessments. This means the school uses information about the student's interests, strengths, and preferences to guide planning. Transition assessments should begin as soon as the student turns 14 (or sooner if appropriate) and at age-appropriate intervals until they leave high school.

In addition, the secondary transition plan must outline transition services and activities (to be implemented beginning at age 14) that will help the student reach their post-secondary goals. The plan should also include a course of study, which is a list of classes that will prepare students for life after high school.

Finally, the IEP must include annual goals that support the student's transition needs. These goals are steps the student can work on each year to move closer to their long-term goals.

In West Virginia, all required parts of the transition plan must be in place for it to be considered compliant. Schools are expected to ensure that each student's plan fully supports their move from school to adult life.

Why are secondary transition plans monitored for compliance?

Federal laws require state education agencies (SEAs) to report how many students with IEPs have complete secondary transition plans. State reviewers check all parts of the secondary transition plan. If one part is missing or incorrect, the entire secondary transition plan is considered noncompliant.

Noncompliance happens when a school district (also known as a local educational agency or "LEA") has one or more secondary transition plans that are missing required parts under federal or state rules. These plans must be updated each year and include:

- Clear, measurable post-secondary goals for what the student will do after high school which are based on secondary transition assessments given at age-appropriate intervals.
- Courses of study, services and activities that will help the student reach those goals.
- Annual transition goals that match the student's needs and services.
- Proof that the student was invited to the transition meeting.
- If appropriate, proof that outside agencies, that may be providing or paying for services, were invited to the IEP meeting with parent permission.

[OSEP OA 23-01](#) says the state must confirm that the LEA:

- Follows all required special education rules (100% compliance for secondary transition plans) after reviewing updated data and information; and
- Corrects each case of noncompliance for individual students, unless the student no longer attends the LEA and no further corrective actions are required for that student through a state complaint or due process.

The SEA must also make sure that any noncompliance is corrected as soon as possible, but no later than one year after the LEA receives written notification. WVDE OSE has created timelines to help LEAs meet this federal requirement when correcting issues.

What is the process for monitoring secondary transition plans?

The West Virginia Department of Education, Office of Special Education (WVDE OSE) checks that LEAs follow all state and federal rules regarding secondary transition plans for students with IEPs ages 14–21. This check is called an Indicator 13 file review. LEAs are placed into cohorts and monitored every four to six years. This usually occurs during their regular on-site monitoring year, but some are reviewed sooner if concerns arise. Data may also be reviewed for new LEAs in their second year, or when LEAs are identified with issues through the State’s general education accountability system.

The first data collection, called a data pull, is used to measure compliance for Indicator 13. These results are included in the annual determination of whether the LEA is following special education regulations. If the LEA receives written notice that it did not meet the requirements for secondary transition plans, it must:

- complete corrective actions; and
- take part in additional file reviews until it reaches 100% compliance (if the LEA has an initial score below 80%).

What is the timeline for monitoring secondary transition plans?

To make sure LEAs understand the requirements and process, WVDE OSE has created a monitoring timeline that provides LEAs with opportunities for support before the first file reviews. The timeline includes when the data will be collected and when to expect the official notice of noncompliance.

Technical Assistance and Professional Development Opportunities (July – January)

Before the yearly Indicator 13 data pull, LEAs have several chances to get help and support so they can meet all requirements at 100% compliance. They can:

- Complete the “*Writing High Quality Secondary Transition Plans*” Canvas course
- Join twice-monthly office hours about secondary transition planning
- Use resources from the WV Guideposts to Graduation webpage
- Get extra support from WVDE OSE staff
- Use the secondary transition plan file checklist review provided by WVDE OSE to do their own internal practice reviews.

LEAs that regularly check their own work often have better results during the yearly initial Indicator 13 data pull. These self-reviews are optional and should **not** be sent to WVDE OSE. After the internal review, LEAs should fix any problems they find by holding a full or targeted IEP meeting, or by correcting clerical errors in the IEP through an amendment.

Indicator 13 Data Pull from State Data System (February – April)

All Indicator 13 data pulls use the State’s online system (WVEIS). Each year, staff from the WVDE OSE randomly select between five (5) and fifteen (15) student secondary transition plans for review.

WVDE OSE uses a checklist called the “Secondary Transition File Review Checklist.” This checklist is used to determine compliance with Indicator 13 requirements. Each item on the checklist must be correct. If one item is not correct, the whole transition plan is marked as noncompliant.

If the LEA gets 100% compliance (all plans meet the rules), no further action is needed until the next review. If the LEA does not reach 100%, they will receive written notice and must begin fixing the problems.

Note: The number of plans reviewed depends on how many special education students ages 14-21 are enrolled in each LEA. For more information on how the sample size is chosen, please contact WVDE OSE.

Written Notification of Noncompliance (May - June)

WVDE OSE staff follow set procedures when sending letters reporting noncompliance. LEAs are usually notified in writing within 90 days after staff confirm there is noncompliance with the Indicator 13 data pull. The letter explains what parts of each student file did not meet requirements. It also lists the steps the LEA must take to fix the issues and offers tips to help prevent future problems.

The LEA is required to correct all areas of noncompliance described in the notice.

What is the timeline for correcting secondary transition plans?

To make sure LEAs are correcting problems according to federal and state rules, WVDE OSE has created a timeline for how to fix each type of identified noncompliance.

Correcting Findings of Individual Noncompliance (as soon as possible)

To fix problems found in student records, each secondary transition plan must be reviewed and corrected. WVDE OSE will re-check each plan after 60 days to make sure the issue has been fixed, unless the student is no longer in the LEA. WVDE OSE uses data from a statewide system (WVEIS) and all student-specific problems must be fixed within one year of the written notice.

To fix student-specific problems, the LEA must hold either a targeted or full IEP meeting. If the issue was a simple clerical error the LEA can amend the IEP (see Policy 2419 Ch. 5 §3.B). If there is any discussion about whether a student may need compensatory services, it must be included in the Prior Written Notice (PWN).

All student-specific problems must be fixed no later than one year from the date the LEA receives a written notice from WVDE OSE. This includes any additional file reviews done by WVDE OSE to confirm that problems that appear often are no longer occurring in the LEA.

Correcting Findings of Systemic Noncompliance (July – February)

Systemic problems are issues that happen repeatedly, not just once. When the WVDE OSE identifies a systemic problem, the LEA must fix them as soon as possible. Systemic issues must be corrected within six months after the written notice. WVDE OSE then checks to make sure each LEA has fixed their problems, and addressed the root cause within the one-year federal timeline.

An LEA cannot be cleared of systemic noncompliance if any student-specific problems are not fixed, or if the required corrective actions listed in the written notice are not completed.

What is the tiered system for addressing systemic noncompliance?

WVDE OSE uses a tiered system to respond to system-wide problems with secondary transition plans. This system helps staff decide whether a problem happens once or if it has happened over time. The results for each LEA are also used in the annual LEA determination process.

Universal Tier

LEAs that score between 80% and 99% are in the Universal Tier. These LEAs usually need to fix only a small number of individual problems. They must do this within the timeline for correcting secondary transition plans described above.

LEAs are strongly encouraged to:

- Complete the “*Writing High Quality Secondary Transition Plans*” Canvas course created by the WVDE OSE
- Use training resources provided on the WV Guideposts to Graduation webpage
- Review their own secondary transition plans regularly
- Complete a root cause analysis to understand why problems occur
- Develop written procedures to help staff review plans consistently across schools

Targeted Tier

LEAs that score between 70% and 79% are in the Targeted Tier. These LEAs must fix all individual noncompliant transition plans within the timeline.

In addition, all staff who write or review transition plans must complete the “*Writing High Quality Secondary Transition Plans*” Canvas course created by WVDE OSE before the end of the school year. To meet this requirement:

- At least 80% of staff enrolled in the course must score of 80% or higher on the final quiz
- Staff may take the quiz up to three times and must wait seven days between attempts

- The highest score will count as the final grade
- Staff who score 80% or higher will receive a certificate of completion

LEAs should keep these certificates until their next Indicator 13 monitoring activity, since WVDE OSE staff may ask to see them. WVDE OSE staff will also review course grades before the end of the school year to confirm that the LEA has met the requirement.

LEAs are strongly encouraged to:

- Use training resources provided on the WV Guideposts to Graduation webpage
- Review their own secondary transition plans regularly
- Complete a root cause analysis to understand why problems happen
- Develop written procedures to help staff review plans consistently across schools

Intensive Tier

LEAs that score between 0% and 69% are in the Intensive Tier. These LEAs must fix all individual noncompliant transition plans within the timeline.

In addition, all staff who write or review transition plans must complete the “*Writing High Quality Secondary Transition Plans*” Canvas course created by WVDE OSE before the end of the school year.

These LEAs must also submit:

- A root cause analysis explaining why problems keep happening
- Written procedures for how secondary transition plans are reviewed for consistency across schools in the LEA

LEAs are strongly encouraged to:

- Use training resources provided on the WV Guideposts to Graduation webpage
- Review their secondary transition plans regularly

Longstanding Noncompliance

If an LEA does not reach 100% compliance for more than one year, WVDE OSE will send a written notice about possible additional monitoring to address on-going issues, even if the LEA corrects issues each year. The written notice must explain any sanctions listed in the WVDE OSE [system of general supervision](#) document.

The LEA must also:

- Review five (5) secondary transition plans using the same checklist used by WVDE OSE
 - Submit the results using the LEA Self-Review Form
- NOTE: WVDE OSE will review the same student files for additional support and training needs

This self-review helps staff align expectations, improve training, and build skills needed to reach 100% compliance. After WVDE OSE reviews the results, they will confirm whether the LEA is following all requirements correctly.

If the LEA does not reach 100% compliance, WVDE OSE will continue additional data reviews until the LEA shows evidence they are following the rules for secondary transition plans.

Resources

West Virginia Guideposts to Graduation

Resources can be found at <https://wvde.us/academics/special-education/wv-guideposts-graduation>

Related IDEA Requirements

Transition services: The IEP, beginning not later than the first IEP to be in effect when the child turns 16, or younger if determined appropriate by the IEP Team and updated annually thereafter, must include appropriate measurable postsecondary goals based upon age-appropriate transition assessments related to training, education, employment and where appropriate, independent living skills; the transition services (including courses of study) needed to assist the child in reaching those goals. [34 C.F.R. § 300.320\(b\) and \(c\)](#).

- The term 'transition services' is defined in [20 U.S.C. 1401\(34\)\(A\) through \(C\)](#); [20 U.S.C. 1401\(34\)](#); [34 C.F.R. § 300.43](#).
- Free appropriate public education (FAPE). [20 U.S.C. 1412\(a\)\(1\)\(A\)](#); [34 C.F.R. § 300.101\(a\)](#).
- Consideration of special factors (behavior, limited English proficiency, blind or visually impaired, communication needs). [20 U.S.C. 1414\(d\)\(3\)](#); [34 C.F.R. § 300.324\(a\)\(2\)](#).
- Development, review, and revision of IEP. [20 U.S.C. 1414\(d\)\(3\)](#); [34 C.F.R. § 300.324](#).
- Access to instructional materials. [20 U.S.C. 1412\(a\)\(23\)](#); [34 C.F.R. § 300.172\(a\)](#).