

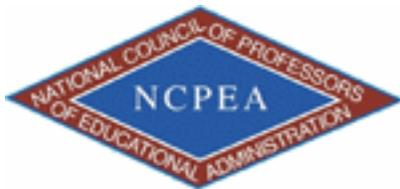
A MODULE FOR THE ADMINISTRATION OF HOMEBOUND INSTRUCTIONAL PROGRAMS*

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Abstract

Special program and other school administrators regularly confront the issue of whether students under their charge are entitled to receive homebound instruction and if so, what procedures and criteria they should apply in coming to a proper decision. Where a student is entitled to such services the administrator must decide what subjects must be taught as well as their duration, intensity and frequency. Although virtually all state legislatures have addressed a student's right to receive homebound instruction the right to such benefits may intersect with those arising under federal laws such as the Individuals with Disabilities Education Act (IDEA/2004), the Rehabilitation Act (§504) and the Americans with Disabilities Act, thereby creating confusion for many administrators. In June, 2007 the Virginia Department of Education ("VDE") promulgated Instructional Services guidelines implementing the state's statutory requirements. Since the problems of homebound instruction school administrators face are substantially similar across jurisdictions the 2007 VDE guidelines provide an outstanding pedagogical vehicle for educational leadership and policy students in Virginia to practice making decisions about educational entitlements in a safe way. Moreover, it affords them an opportunity to develop analytical and interpretive skills which are transferable to other contexts. It also affords the students an opportunity to consider how local policies are developed and the importance of including the right stakeholders in that process. The author has designed a series of fact patterns where students are asked to apply the VDE guidelines to those patterns. The patterns and their questions can easily be adapted to fit the requirements of other state jurisdictions.



NOTE: This module has been peer-reviewed, accepted, and sanctioned by the National Council of the Professors of Educational Administration (NCPEA) as a scholarly contribution to the knowledge base in educational administration.

NOTE: [Click Here to access Virginia's 2007 Homebound Instructional Services Guidelines¹](#)

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¹<http://cnx.org/content/m15855/latest/HomeboundRegs.pdf>

1 The Instructional Module

HOMEBOUND INSTRUCTIONAL SERVICES IN VIRGINIA

Purpose of Lesson:

1. To familiarize students with the requirements of the June, 2007, Virginia Department of Education, Homebound Instructional Services Guidelines (“HIG”) through a careful reading of HIG’s contents.

2. To appreciate the broader purposes of HIG, that is, to maintain comparability of instruction when students are subject to medical and psychological conditions which limit their ability to participate in regular in-school academic programming.

3. To develop students’ skills in applying the requirements of HIG to situations they are likely to encounter in their practice as school administrators.

4. To develop students’ analytic skills transferable to their analysis of other Virginia and United States Department of Education documents respecting legal obligations they will be required to interpret and implement.

5. To recognize and admit when problems fall outside their current skill sets and seek advice in appropriate circumstances.

6. To become comfortable in making decisions notwithstanding ambiguities in what a school division’s legal obligations may be.

7. To design and implement an effective local HIG program and policy, taking into account the pedagogical needs of the students; the structure of the school division; as well as the needs of relevant constituencies and to address as well fiscal and other relevant considerations.

8. To take pleasure in problem solving of a legal or quasi-legal nature.

Materials:

1. Virginia Department of Education Homebound Instructional Services Guidelines [As Revised, June, 2007], Virginia Department of Education, Office of Special Education and Student Services (“HIG”) [12 pages].

2. Application of the HIG to Fact Patterns Developed by the instructor.

3. Relevant sections of the Virginia Code and regulations which implement IDEA/2004.

4. Pertinent sections of the IDEA/2004 Part B Regulations (2006) issued by the United States Department of Education.

Method:

1. Approximately two weeks before the class the instructor will distribute copies of HIG and the Virginia and United States Department of Education Regulations to students along with their homework assignment.

2. Students will form groups of two [if odd number in class no more than three students], complete assignment prior to class, hand in their assignment at the beginning of the class, and retain copies for class discussion.

3. Student dyads [or triads] will be prepared to discuss their answers and rationale of their responses.

Limitations of Lesson:

1. Although homebound instruction laws exist in all states and have many similarities, the details are a matter of local concern. Therefore instructors using this module should carefully examine their local rules to insure accuracy in their presentation to students.

2. Federal law generally does not impact significantly on homebound instruction. However, it may do so where a student is classified as having an IDEA or §504 disability. On rare occasions, a federal due process issue may arise if a deprivation of a state entitlement like homebound instruction occurs without due process being provided. Although this lesson does not emphasize the IDEA or §504, the author included in one fact pattern issues which might arise with an IDEA classified pupil. The purpose such inclusion was to made students aware of the intersection of state law with the IDEA and other disability related issues emanating from federal statute.

FACT PATTERN

Effective August 27, 2007 you have been newly appointed as the principal in the Horace Mann elementary school, a K-6 facility which is part of the XYZ school division located in Virginia. Saul Sympathetic, the division’s Director of Instruction, has made a series of statements in connection with HIG asking you whether

they are true or false, and if they are false to state what change was required to make them true. Comply with Sympathetic's request in connection with Items # 1 through 28, inclusive.

1. Homebound instruction is designed to provide continuity of educational services between the classroom and home or health care facilities. [True, page 3].

2. Homebound instruction is intended solely for the benefit of students with physical impairments. [False. It is intended to benefit students suffering from psychiatric impairments as well, page 3].

3. Students who are enrolled in private religiously affiliated secondary schools are ineligible to receive homebound instructional services from the public schools. [True. Students must be enrolled in a public school in Virginia in order to receive homebound instruction, page 3].

4. Students who are enrolled in private secular [non-religiously affiliated schools] are eligible to receive homebound instruction. [False. Private school students whether enrolled in secular or non-secular school are ineligible for homebound instruction, page 3].

5. A homebound teacher is required to maintain communication about the student's course content and assignments with the student's regular classroom teacher(s). [True, page 4].

5. The homebound teacher must employ assignments and materials prepared by the classroom teacher or supervisor of instruction. [True, page 4].

6. A school division may never use online instructional providers to deliver instruction to homebound students. [False. Online instruction is expressly contemplated in the rules. Such instruction must conform to the division's pacing guidelines, page 4].

7. A division may be reimbursed for direct instruction to homebound students if the teacher providing that instruction is licensed by the Virginia Department of Education. [True, page 4].

8. A division may be reimbursed for provision of instruction to homebound students if a teacher licensed by the Virginia Department of Education reviews the work performed by an unlicensed teacher who furnishes the direct instruction. [False. The rule requires that direct instruction be provided by a teacher licensed by the Virginia Department of Education, page 4].

9. If online instruction is provided to a homebound student, a teacher licensed by the Virginia Department of Education always must oversee the use of the online program in order for the division to receive reimbursement for that service. [False. The definition of a licensed teacher on page 9 states: "or if teaching online, a license from Virginia or another state." Therefore it's more likely than not false].

10. When students are expected to be out-of-school in excess of nine calendar weeks, a homebound transition plan should be prepared. [True. It should be made collaboratively among the physician or licensed clinical psychologist; the parent or guardian and school personnel and recorded by the school division. Page 4].

11. A homebound transition plan must explain the student's need for extending homebound instruction, the anticipated duration of the absence, and proposals for the students return to the classroom. [True, page 4].

12. The duration and extent of homebound services is a school division decision based on the physician's or licensed clinical psychologist's certification of need. [True, according to page 4].

13. Under HIG, a licensed physician is an individual who is licensed to practice medicine by the Virginia Board of Medicine. [True, page 9].

14. Under HIG, a physician licensed to practice medicine in Virginia, but who is not a board certified psychiatrist, may never certify a student for homebound instruction based on a student's mental disease. [False. On page 9 its states that "it is expected that the physician will only certify those conditions that fall within their documented experience and training". A general practitioner may have the requisite experience and training to satisfy HIG's requirement to certify a student's mental condition.].

15. Under HIG, a licensed clinical psychologist who is consulted by a student's parents for a diagnosis only, may certify the student for homebound instruction based on the student's mental condition. [False, page 9. The licensed clinical psychologist must either be in a treatment relationship or in the process of establishing a treatment relationship with the student. Here there is no fact to suggest either of these conditions is satisfied].

16. Under HIG, a school psychologist may certify a student as having a mental condition necessitating a homebound instructional program. [False, page 1 and page 9. 8 VAC20-131-180 states that the certification shall be made by a licensed physician or licensed clinical psychologist].

17. “Home instruction” is instruction provided as an alternative to attendance in a public or private school in accordance with the Code of Virginia (22.1-254.1 instruction delivered in the home setting). [True, page 9].

18. “Home instruction” may be used interchangeably with the term “homebound instruction”. [False. Home instruction is provided by the parent, or parents, guardians or persons of similar status while homebound instruction is furnished to public school students by public schools under certain conditions. Page 9].

19. “Home tutoring” is often used as an alternative form of home schooling. [True, pages 9-10].

20. Teachers furnishing “home tutoring” possess qualifications prescribed by the Virginia Board of Education. Such instruction is approved by the Division Superintendent in accordance with the Code of Virginia. [True, pages 9-10].

21. XYZ is responsible for providing homebound services to a student enrolled in the school division who is confined at home or in a health care facility in another county or city of Virginia, if otherwise qualified for homebound instruction. [True, page 5].

22. XYZ must develop policies and procedures for implementing HIG. [True, page 5].

23. XYZ must designate an individual to coordinate HIG services for the school division, including the supervision of the instruction provided. [True, page 5].

24. Reimbursement under HIG is subject to submission of an Annual Report memorializing the division’s activities in connection therewith. [True, page 5].

25. The HIG require XYZ to include processes for the program coordinator to document receipt of requests for homebound instruction. [True, page 5].

26. The HIG require XYZ to include processes for the program coordinator to coordinate provision of services in a timely manner. [True, page 5].

27. The HIG require XYZ to include processes for the program coordinator to consider the possibility of available technology for the student to participate in certain classroom activities at home. [True, page 5].

28. The HIG require XYZ to include processes for the program coordinator to facilitate the student’s return to instruction in the classroom. [True, page 5].

Charles Charming, XYZ’s Superintendent, has appointed you as Acting Program Coordinator for Homebound Instructional Services. Assume that under Virginia law your appointment is valid. HIG implementation issues have arisen in connection with Bonita Franklin, Carl Charisma and W.A. Mozart, all residents of the XYZ school division and students enrolled in its schools.

Bonita Franklin is a first grader with chronic urinary incontinence due to a medical condition. In addition, because of deficiencies in her immune system, Bonita is subject to frequent fevers due to infection [not easily treated with antibiotics], and fatigue resulting in her being frequently absent from school.

Carl Charisma is a 5’2” sixth grader who weighs 235 pounds. Carl has been subject to frequent name calling by his classmates. Carl brings some of his poor treatment on himself [frankly, he’s obnoxious]. Students refer to Carl as “fat face”, “Piggie” and similar terms. Carl is a compulsive eater. Carl’s parents take him weekly to psychotherapy with Cindy Adler, a certified social worker. Carl has become increasingly depressed due mainly to the treatment he has received from classmates and some teachers. Carl has recently refused to attend school because of the frequent name-calling to which he has been subject. During the 2006-2007 school year Carl was absent for more than 45 school days. He still achieved the highest grades among all of the sixth graders in XYZ.

W.A. Mozart just entered the school division as a kindergartener. At registration W.A.’s parents reported to XYZ school officials that at age two, W.A. was diagnosed with autism. On the day before the school year began in September, 2007, XYZ’s IEP team classified W.A. as a student with autism under the Individuals with Disabilities Education Act [“IDEA”] and developed an IEP for W.A. W.A.’s IEP places W.A. in an “inclusion” general education kindergarten program. Under the I.E.P., W.A. will receive special education

instruction for two hours per day in his kindergarten class in a group not to exceed three students, and a 1:1 aide as a supplementary aid and service during the time the special education teacher is not assigned to W.A. In addition, W.A.'s IEP obligates the division to provide speech and language services to W.A. three times per week on a 1:1 basis for 30 minutes and two times per week in a group not to exceed three students. W.A.'s IEP also requires occupational therapy on alternate school days in a 1:1 setting for 30 minutes.

Answer questions #32 through #80 with a true or false response. When you conclude they are false, explain what change would make the statement true.

Questions #32 to #43 apply to Bonita Franklin.

Assume that Bonita's parents submitted to her school principal, a request for homebound instructional services for a period of three consecutive calendar weeks starting on Tuesday, September 4, 2007. This request is supported by a note from Bonita's urologist who is a physician licensed in Virginia by its Board of Medicine.

1. XYZ may request that Bonita's parents sign a release of information form allowing Bonita's urologist to share information about Bonita or clarify the information provided in the note for approval of homebound instruction. [True, page 4].
2. XYZ may consider Bonita's participation in after-school clubs in determining Bonita's eligibility for homebound instruction. [True, page 4].
3. Under HIG XYZ must initiate homebound instruction as soon as possible following its receipt of the request. [True, page 4].

35. If XYZ approved Bonita's receipt of homebound instruction on September 5, 2007, XYZ may initiate Bonita's homebound instruction program on September 14 and be in compliance with HIG. [False, page 4. Under HIG the program must be initiated "as soon as possible following receipt of the request by the school division, but no later than five instructional days upon approval of the request". Here, the fifth day following approval would be Wednesday, September 12.] Assume Bonita is entitled to receive homebound instructional services.

36. If delays in timely delivery of Bonita's homebound services occur because XYZ had difficulty finding a licensed homebound instructor, XYZ must determine whether compensatory services for the student are warranted. [True, page 4].

37. If delays in timely delivery of homebound services occur because XYZ negligently failed to look for a licensed homebound instructor for Bonita, the school division must determine whether compensatory services for the student are warranted. [True. If it had to do this when it made a good faith effort, it certainly must do it when it wholly failed to meet its responsibilities.]

38. If Bonita's condition warrants it, she should ordinarily receive not less than five hours per week of homebound instruction during her confinement. [True. For elementary students, five hours per week is the suggested minimum amount.]

39. XYZ necessarily would be acting outside of its powers if it determined to provide Bonita 10 hours per week of homebound instruction. [False. The guidelines state five hours is the suggested minimum. Since every effort should be made to insure progress [page 5] and sustain continuity of instruction [page 4] the implication is that hours in excess of five for elementary students are permissible].

Assume Bonita's homebound program falls within your area(s) of responsibility.

40. Upon her approval for homebound instruction you must ensure that Bonita is dropped from the first grade class roll until her return to the XYZ School. [False. Students on homebound instruction are maintained on their class roll, page 6].

41. You and the classroom teacher must provide the homebound teacher with appropriate instructional materials and information. [True, page 6].

42. You and the classroom teacher are responsible for grading procedures for Bonita in collaboration with the homebound teacher. [True, page 6].

43. Once Bonita's homebound instructional program begins, the sole responsibility for monitoring Bonita's instructional progress shifts to the homebound teacher [until Bonita returns to XYZ School]. [False.

During her confinement the classroom teacher and the homebound coordinator must maintain close contact with the homebound teacher to monitor instructional progress of the student and collaborate about the curriculum and appropriate instructional strategies, page 6].

Questions #44 to #62 apply to Carl Charisma or to his sister Carla.

Carl and his family went on a trip to the Natural Bridge for the weekend and stopped at a shopping mall on the way home, on Sunday afternoon. On the pretense of looking for new sneakers, Carl left his parents, entered the food court and went right to the pizza concession stand. Carl began to eat rapidly. Upon stuffing the seventh slice into his mouth, Carl began to choke and collapsed. The food court manager called an ambulance which rushed Carl to a community hospital located in ABC County, Virginia. The hospital is located about 50 miles from the XYZ border. While traveling to the hospital the EMTs successfully removed the pizza wedged in Carl's esophagus. Unbeknown to the EMTs, Carl ate three chocolate bars after the EMTs removed the pizza and before the ambulance arrived at the hospital. Upon arrival at the emergency room Carl collapsed into a coma. The emergency room physician, Dr. Humanitarian, diagnosed Carl with childhood diabetes. Humanitarian concluded that Carl must remain in the hospital for at least three weeks for observation and rehabilitation but that Carl's condition allowed him to receive grade level instruction at the hospital during his confinement.

44. If Carl's parents request homebound instruction at the hospital from XYZ, XYZ may deny that request since the hospital is not Carl's home. [False. Homebound instruction shall be made available to students confined to a health care facility, page 3].

45. If Carl's parents request homebound instruction at the hospital from XYZ, XYZ may deny that request on the ground that the hospital is not located in XYZ County. [False. Since Carl is enrolled at XYZ it is responsible for furnishing his homebound instruction at the hospital, pages 11-12].

46. If XYZ decided to provide instruction to Carl at the hospital it may contract with the ABC school division to deliver those services to Carl. [True, pages 11-12].

47. Assume ABC is located in another state. If Carl's parents request homebound instruction at the hospital from XYZ, XYZ may deny that request on the ground that the hospital is not located in Virginia. [False. Since Carl is enrolled at XYZ it is responsible for furnishing his homebound instruction, pages 11-12].

48. Assume the medical information presented to XYZ by Carl's parents requesting homebound instruction was written and signed by a Registered Nurse at Carl's hospital. XYZ may deny that request for the Charismas' failure to satisfy VDOE requirements. [True, page 11].

49. Your answer to the previous question would be different if the medical information was provided to XYZ by a chiropractic physician? [False, it would be the same since under HIG this doctor is unable to certify Carl for homebound instruction.][Note: the legal question is whether a chiropractic physician is a "licensed physician" within the meaning of Virginia law and the intent of the HIG].

50. Upon submission by Carl's parents of adequate medical certification, XYZ may deny the Charismas' request for homebound instruction of any kind because Carl was absent during 2006-2007 for 45 school days and still attained the highest grades in his class. [False. Although the amount of homebound instruction is based on individual needs of a student, it is unlikely that Carl's previous academic success would justify denying him all educational support, page 11].

51. If Carl were an average achieving middle school student and he was otherwise qualified to receive homebound instruction, he would [all things being equal] receive eight hours per week of that service. [True, page 5].

52. If Carl were an average achieving high school student taking four subjects and he was otherwise qualified to receive homebound instruction, he would [all things being equal] receive eight hours per week of that service. [False. He would receive 10 hours of homebound instruction, page 5].

53. If Carl were an average achieving high school student taking two subjects and he was otherwise qualified to receive homebound instruction, he would [all things being equal] receive eight hours per week of that service. [False. He would receive five hours of homebound instruction, page 5].

54. As a Homebound Program Coordinator you must consider the possibility of delivering Carl's instruction through available technology. [True, page 5].

For questions #55 to 58, assume Carl has returned home from the hospital and at all relevant times he is

certified by appropriate physicians to continue on homebound instruction. Further assume that XYZ agrees to furnish those services to Carl at home.

55. The Charismas must have a responsible adult in the home during the entire period of his instruction. [True, page 6].

56. If Carl misses an excessive number of appointments with the homebound teacher, XYZ may suspend provision of homebound instruction to Carl. [True, page 6].

57. The Charismas must provide to Carl's homebound teacher adequate facilities for teaching Carl including a quiet room without interruptions, with a table, chairs and appropriate supplies. [True, page 6].

58. Carl's homebound teacher must notify XYZ of any changes in Carl's status that would necessitate modification or termination of his homebound instruction. [True, page 6].

Assume Carl's 15-year old sister Carla [a student enrolled at XYZ] voluntarily became pregnant and was confined to her house due to a pregnancy related medical impairment and she was otherwise qualified to receive homebound instruction under HIG [Questions #59 through # 62].

59. If the Charismas request homebound instruction for Carla from XYZ, it may deny that request on the ground that Carla's pregnancy resulted from a voluntary act. [False. There is nothing in the rules which makes eligibility dependent on the cause of the impairment].

60. Assume that Carla is eligible for homebound instruction and that her pregnancy-related impairment terminates. Because Carla is pregnant, XYZ must under HIG continue to furnish homebound instruction to Carla until at least the birth of the child. [False. Under HIG if Carla is medically able to attend school the district has no obligation to furnish homebound instruction to her, page 12].

61. Assume Carla gives birth and after six weeks of post-delivery care she is medically able to return to school. Under HIG the district must continue her on homebound instructional services to enable Carla to care for her child. [False. HIG is based on a student's medical or psychological condition only].

62. If at all pertinent times Carla attended the Theodore Creighton Academy [a private school for rich kids], under HIG Carla would be eligible for homebound services if her pregnancy resulted in a medically disabling impairment in excess of nine weeks. [False. Students must be enrolled in public schools for HIG eligibility, page 12.].

Questions # 63 through #72 pertain to W.A. Mozart.

On September 10, 2007 while at home pretending to be superman, W.A. jumped from the roof of his house. W.A. broke his right femur and badly bruised his right hip. An orthopedic surgeon at a local hospital treated W.A. and determined W.A. must remain at home to heal. W.A.'s doctor estimated that W.A. will be able to return to school on or about October 10, 2007. Assume W.A. meets all of the medical criteria under HIG for his receipt of homebound instruction.

63. After validating W.A.'s need for services under HIG, the Homebound Program Coordinator has sole responsibility to design W.A.'s homebound program. [False. W.A. must be referred to XYZ's IEP team. The IEP team must amend his IEP to meet W.A.'s temporary instructional needs, page 4].

64. XYZ may unilaterally alter W.A.'s IEP, but only for the period he is on homebound instruction. [False. The Mozarts must approve any alteration to the IEP even though it is only temporary, page 4].

65. If W.A. was suspended from school for 10 school days for misconduct and XYZ provided homebound instruction to W.A., XYZ may be reimbursed by the state for provision of that service. [False. Reimbursement for instruction of special education students who have been suspended or expelled is not permitted through the homebound instruction budget, page 4].

66. If W.A. were suspended from school for 10 school days for misconduct and XYZ provided to W.A. at home educational services in his IEP, XYZ must pay for those services through special education funding and or other sources, excluding homebound. [True, page 4].

67. If XYZ's IEP team lawfully modified W.A.'s IEP only for the period of his homebound instruction, it would not be necessary for the IEP team to reconvene at the end of W.A.'s home confinement since the alteration of his IEP was only temporary. [False. The IEP team must again amend W.A.'s IEP in order to return him to the school setting, page 5].

Assume W.A. suffered from an undetected herniated disc following his fall but it has been properly diagnosed after W.A.'s complaints of pain. His doctors have now recommended an additional 10 weeks of

home recovery for W.A. Among the factors XYZ officials should examine in considering the Mozarts' request for an extension of homebound services for W.A. are:

68. Whether there is a medical justification for the extension? [True, page 7].
69. The amount of additional time homebound instruction is anticipated. [True, page 7].
70. What specific steps will be taken to return W.A. to classroom instruction. [True, page 7].
71. What if any changes are necessary in the amount and kind of activity for W.A. during the extended homebound instruction period. [True, page 7].
72. Questions #68 through 71 relate to what in HIG nomenclature is called a "transition plan". [True, page 10].
73. The grades earned by students in homebound instruction must be averaged with other grades earned by the student in the general education program during regular attendance. [True, page 7].
74. The homebound teacher is only responsible for assigning grades to the student during the period of homebound instruction. [True, page 7].
75. Standard units of credit must be awarded to students on homebound instruction for their successful completion of courses when they are the equivalent to those offered in the regular school program and the work is done under the supervision of a licensed teacher. [True, page 3][Note: this question assumes comparability of the requirements imposed on the homebound student as compared to the in-school pupil].
76. Students receiving homebound instruction may earn verified units of credit when the student has successfully completed the requirements and passed the SOL test associated with the course. [True, page 3].
77. When a special education student is suspended or expelled and assigned to a home education program, the school division is entitled to receive reimbursement from the VDOE for the cost of that service in the following fiscal year. [False. Since the student's placement at home was not based on a verified medical condition, reimbursement from the VDOE is not available to the division for homebound instructional services, page 4].
78. If a student was confined to a hospital and the school division made direct payments to the hospital for educational services delivered to one of its students confined to the hospital the school division may receive reimbursement for that service from the VDOE if the student is otherwise qualified to receive homebound instruction under HIG. [False. Third party reimbursement is not permitted. The payments must have been made directly by the school division to a licensed teacher, page 8.].
79. The amount of reimbursement a school division receives for provision of homebound instruction is dependent on a composite index of ability-to-pay. [True, page 8].
80. A school division may not pay a homebound instructor for his/her preparation and travel time. [False. There is no apparent limitation on school divisions to make such payments.].

Answer the questions below with short sentences and be prepared to discuss in class and to provide a rationale for each of your responses.

81. What personnel would you enlist to assist you in development of the HIG program?
82. Who would you enlist to assist you in the drafting of the policy?
83. What qualifications would you establish for the HIG Program Coordinator?
84. What if any contacts would you maintain with the school division superintendent during the process of HIG program development?
85. What, if any, forms would you include in the end product for the HIG program?
86. What, if any, data bases might be pertinent to implementation of the HIG program?
87. What role, if any, would the business manager of the school division have in an HIG program?
88. How would you coordinate HIG implementation with the various school buildings in your school division?
89. What feedback mechanisms, if any, would you employ under your HIG program to ensure effective implementation of the program?
90. What procedures would you employ to ensure timely delivery of HIG services?
91. What role, if any, might a local PTA or similar groups play in development of an HIG program?
92. What role, if any, might the school division physician(s) play in the development of your HIG program?

93. What role in your HIG program would the school divisions IEP team(s) play?
94. What difference, if any, do you see in development of school division policy and administrative regulations as they pertain to HIG?
95. Is there a role for the Virginia State School Board Association in the development of the HIG program?