This paper reviews the literature on triennial reevaluation of students with disabilities, discusses the legal requirements of the Education for All Handicapped Children Act of 1975 and the amendments found in the Individuals with Disabilities Education Act, and reports on a study of the triennial review process in Maine. A triennial assessment is legally required of every Maine student receiving special education services. A survey of Maine school districts found that 15 of the 90 respondents indicated that school psychological service providers were not used in either the initial assessment or the triennial review. Districts reported that the special educator was often the prime evaluator. Different views of the purpose of the triennial assessment are compared as are various forms of evaluation, including educationally based assessment versus psychologically based assessment, process oriented assessment, assessment of the Individualized Education Program, and curriculum-based measurement versus norm-based assessment. Guidelines for best practices in conducting the triennial evaluation are offered. These include consideration of the student's age, the need for a vocational or prevocational evaluation, and the nature and severity of the educational disability. School psychologists are urged to improve the linkage between assessment and intervention. (Contains 26 references.) (DB)
Triennial Reevaluation of Special Needs Students: A Review of Best Practices and Other Considerations

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Introduction

Jane Ross-Reynolds (1990) in her chapter, Best Practices in Conducting Reevaluations in Best Practices in School Psychology II, refers to the triennial assessment as the "ugly stepsisters, the perennial bridesmaid in the family of evaluations performed by school psychologists." In the course of the chapter she details what she believes are the rudimentary purposes for the triennial evaluation and advocates that the process may be a vehicle for school psychologists to provide program evaluation and consultation.

In this paper we will review the current (and the distinctly limited) literature on reevaluation, discuss the legal requirements of the Education of All Handicapped Children's Act of 1975 (PL:94-142) and the amendments to PL:94-142 found in the Individuals with Disabilities Education Act of 1990 (PL:101-476). We will also review a unpublished study of the triennial review process in Maine. Comments on the role of school psychologists will be discussed and suggestions on "Best Practices" offered.

Every new school psychologist learns quickly about the triennial reevaluation process. Most of us were introduced to this during our internships yet few, if any of us, ever received formal coursework preparing us for this most banal of activities.

In 1985, the National Association of School Psychologists (NASP) first created an opportunity for the profession to discuss the topic of reevaluation with the publication of Best Practices
in School Psychology (Thomas & Grimes, 1985). In this, Hartshorne and Hart (1985) first discussed some of their ideas regarding the triennial reevaluation process. NASP soon followed this publication with an official position paper (NASP, 1989a; NASP, 1989b) on the topic of reevaluation. In this document and supporting papers, NASP identified the triennial reevaluation as a "critical assessment concern."

Traditionally, most special educators view the triennial reevaluation as tiresome and insignificant (Hartshorne & Hoyt, 1985). It is therefore not surprising to find a significant lack of objective research data on this topic. Only recently have several works have been published detailing the importance of the triennial process and illustrating novel methods and uses.

Hartshorne and Hoyt (1985) note that frequently the third year assessment is merely a repetition of the evaluation used to initially place the student into special education. This phenomena results in part from the various interpretations made by departments of education around the country. A 1986 survey of state school psychology consultants revealed that the majority of triennial reevaluations were too mechanical and did not address program effectiveness (NASP, 1989b). NASP also reported that a number of states had mis-interpreted federal regulations as meaning the identical types of assessment given for the initial assessment had to also be given for reevaluation. The NASP Position Statement on Reevaluation (1989) was therefore an
attempt to openly discuss the procedures used and to enlist school psychologists to take the lead in bringing about change. The number of states (and school psychologists) that responded to this challenge is not known.

Federal rules and regulations (USDHEW, 1977) require the following:

Each state and local educational agency shall insure:
(a) That each handicapped child's individualized education program is reviewed in accordance with 121a.340-121a.349 of Subpart C, and (b) That an evaluation of the child, based on procedures which meet the requirements under 121a.532, is conducted every three years or more frequently if conditions warrant or if the child's parents or teacher request an evaluation (Section 12a.534).

Several authors (Hartshorne & Hoyt, 1985; NASP, 1989b; Ross-Reynolds, 1990) have questioned whether "testing" necessarily needs to be part of the triennial reevaluation. Evaluation generally refers to a systematic process of collecting data. It has been suggested that "testing" may be but one method. Ross-Reynolds (1990) advocates strongly that evaluation must be linked to effective intervention. She states, "...if effective interventions for the child are not the outcome, your evaluation should be regarded as biased and discriminatory." She goes on to
note, "...the quality of our work must ultimately be judged by the effects it produces, not by the elegance of our psychometrics or our terminology (p. 196)."

Within our schools the responsibility for special education assessments (both initial and triennial) is frequently assumed by school psychologists. Indeed, often school psychologists feel overburdened with the amount of testing they are required to administer. For years the literature has advocated an expansion of the role of the school psychologist. School psychologists typically spend more time in assessment activities than they desire and it has been suggested that role function, and the perceived control over one's role, will lead to greater job satisfaction (Levinson, 1990). Despite this, Hutton, Dubes and Muir (1992) recently reported that school psychologists still spend about half of their time in assessment activities. Past estimates suggest a range of 40% to 60% of the school psychologist's time being devoted to assessment. This feature may be in part due to training effects. Fagan (1990) reports that on average doctoral and specialist level school psychologists each receive equal amounts of training in assessment and intervention. Were we to spend more training time in activities other than assessment, perhaps the these changes would be reflected in how school psychologists spend their work time.

Elliott, Piersel and Galvin (1983) estimated that between 45 to 75 hours of the school psychologists' time was devoted to
doing triennial reevaluations. In their survey of 59 school psychologists in four states, Elliott et al. found the majority performing approximately 100 evaluations per year with 15% being triennials.

The process of evaluating special needs students differs in the state of Maine. Since the mid-1970's Maine has experienced a significant shortage of qualified school psychologists (Brandt, 1989). The cause of this shortage is complex and involves a variety of economic and political factors. In 1988, this author conducted a survey of school districts in Maine to determine the methods used in assessing children after the initial referral and for the triennial reevaluation. The survey also sought to determine who conducted these assessments and the perceived level of helpfulness and satisfaction with the assessment process. Surprisingly, 15 (16.6%) of the 90 respondents reported that school psychological service providers (either school psychologists or school psychological examiners) were not used in either the initial assessment or the triennial review. The survey also indicated that special education teachers were most frequently utilized as evaluators. It was not clear from this data how the quality of assessments in Maine differ from those in other states. Brandt however, notes that "academic achievement tests" were the most commonly evaluation process. Implied in this is the understanding that if school psychologists are not involved in the assessment process, the special education
community will find someone to take their place. Also implied in this is the observation that educators value educationally-based assessment over psychologically-based assessment.

Of greater concern is the purpose and efficacy of the triennial reevaluation and of the assessment process. Hartshorne and Hoyt (1985) consider three possibilities. First, they suggest, the triennial is a means of determining if the student continues to meet the admission standards for entry into special education. Second, the triennial reevaluation may serve as a means of program evaluation. Lastly, the triennial could be used to measure the student's educational needs and compare these with their current learning environment.

NASP (1989b) suggests that the triennial reevaluation may serve as a means of analyzing whether the student's IEP goals have been successfully accomplished.

As noted earlier, Ross-Reynolds (1990) strongly advocates for fundamental change. She describes the IEP as essentially a "contract" between the school system, the parents and the student. As such, she believes the triennial reevaluation is not merely a means of program evaluation but rather "a review of the contract to make sure what is promised is delivered" (Ross-Reynolds, 1990, p. 196). Ross-Reynolds also suggests that the data collected in the triennial review may be used to make systemic change. She suggests that the data collected could be
aggregated and utilized in district-wide reports used to
determine the efficacy of special education programming.

require that tests and other evaluation techniques be validated
for the specific purpose for which they are used. They note that
this is not always followed in practice and suggest five major
purposes for evaluation: Screening and Identification Decisions,
Classification and Placement Decisions, Instructional Planning
Decisions, Pupil Evaluation Decisions, and, Program Evaluation
Decisions. Yet they devote only three brief paragraphs to the
topic of reevaluation.

Other authors challenge school psychologists to re-think
their beliefs about the assessment process. Meyers (1988) mirrors
Ross-Reynolds (1990) in describing the need for a "dramatic
shift" in psychoeducational assessment toward a system that links
assessment to interventions designed to facilitate learning and
adjustment. He further notes that the majority of assessments
emphasize the individual characteristics of the student and
ignore the environment. Wong (1988) also calls for a
"process-oriented approach toward assessment" noting that school
psychologists evaluations rarely provide specific suggestions for
intervention.

Alessi (1988) adds additional substance to the discussion by
citing literature which identifies five broad areas that can lead
to difficulties in children's learning and behavior. First, he
notes that the student may be "misplaced in the curriculum" or the curriculum may contain teaching routines that do not enhance learning. Second, he notes that teachers may not be employing effective teaching or behavior management practices. Third, the school administrators may not be utilizing effective school management practices. Fourth, parents may not be providing the support at home necessary for effective learning. Lastly, he notes that the student may have a physical and/or psychological problem that contributes to the learning problem. Ironically it is this last area that most school psychologists spend their time assessing.

In terms of "best practices", Ross-Reynolds (1990) suggests that the triennial evaluation serve as a means of program evaluation for the IEP. She explains that the review process should include both summative and formative objectives, as well as process and product evaluation. To do this she details four major objectives with specific "questions to address" and "procedures" to employ (Ross-Reynolds, 1990, p. 198-199). Table 1 illustrates Ross-Reynolds' ideas:

Curriculum-based measurement (CBM) is a relative newcomer to the world of school psychology. Its arrival and development have not been without considerable controversy. Briefly, CBM is
considered a type of curriculum-based assessment (CBA) used as a means of making educational decisions based upon a specific curriculum. Shinn, Nolet and Knutson (1990) describes CBM as "a set of standardized and specific measurement procedures that can be used to quantify student performance in reading, spelling, mathematics computation, and written expression (p. 290). Shinn et al. cite the work of Stanley L. Deno, who along with Phyllis Mirkin directed the Minnesota Institute for Learning where the initial research on CBM was conducted. Shinn et al. note that Deno (1989) identified three main assumptions in the CBM decision-making model. Shinn et al. state these as:

1. "A problem is defined as any discrepancy between what is expected and what occurs."

2. "There is a subset of students whose discrepancies between what is expected and what is achieved are so significant that it may be unreasonable for them to achieve in general education unless their program are modified."

3. "Effective problem solving requires that problem solvers generate as many possible plans of action prior to attempting problem solution (Shinn, 1990, p. 291)."
Others have also sounded the alarm calling for a shift away from traditional assessment. As noted earlier, Meyers (1988) calls for assessment techniques that lead directly to intervention strategies. He also calls for more in the way of ecological assessment. He say, "Most assessment techniques that are used frequently by psychologists consider the person's characteristics while ignoring the environment" (Meyers, 1988, p. 123). These authors caution school psychologists to eschew the use of norm-referenced testing, stating that these methods provide no useful information to the person developing the intervention. Indeed the tests typically administered by school psychologists measure learning aptitude and social behavior. Shinn et al. (1990) note that, "Practitioners are almost twice as likely to give either one of the Wechsler scales and the Bender than the most frequently given achievement tests. They are 50% more likely to administer the Draw-A-Person" (p. 287). More recent research suggests that, while school psychologists may still thrive on intelligence testing, more emphasis is being placed on achievement testing. Hutton (1992) recently reported that achievement testing now ranks number one as the most frequently administered category of tests.

Shinn et al. (1990) provide a colorful analogy for their understand of assessment. They describe traditional, norm-referenced testing as being similar to taking a photograph of a cloud formation. "The (single) photo provides no information
about the direction of movement or the velocity of the clouds, nor is it possible to tell from the photo whether the clouds are thickening or dispersing" (p. 294). CBM on the other hand is analogous to a collection of numerous photographs, taken systematically over a period of time. Like the weather satellite pictures seen on television, the photographs, when "put into motion," allow us to view the progress, the path and the forward direction of the cloud formation. In this analogy the IEP is the global map and CBM is the location finder.

Ross-Reynolds (1990) suggests curriculum-based measurement is the assessment methodology of choice when conducting triennial reevaluations. She states as her reasoning for this several factors. First, CBM provides for a continuous measurement system. That it, it provides for a systematized procedure that is present at the development stage, the implementation stage and the evaluation stage of the curriculum. Unlike standardized, published, achievement tests, curriculum-based measures are "more sensitive to specific objectives of the curriculum, are more content-valid and provide a better match between test content and curriculum" (Ross-Reynolds, 1990, p. 202). Inherent in the IEP process is the need to be able to measure small amounts of progress over short period of time. Standardized achievement tests are designed to remain stable (reliable) over time and are, thus incapable of performing this function.
Lut CBM is not without its critics. Bergan (1988) defends the use of norm-referenced testing as a means of providing society with the kind of easy-to-understand, global information useful in measuring school efficacy. In addition it provides parents with a way of comparing their children's performance with others. He cautions that the use of evaluations that focus only on the performance of isolated skills "run the proverbial risk of overlooking the forest for the trees" (Bergan, 1988, p. 137). In this world preoccupied with accountability he notes "...most parents would like some assurance that through school their children will learn to read" (p. 137).

From this author's perspective the debate is not an either-or situation. Indeed, it is believed that we need to embrace both CBM and more traditional norm-referenced methods. As noted from the outset, the triennial evaluation generally refers to a systematic process of collecting data. It would be foolish if school psychologists were to reject one form of data over the other. Most experts agree, and federal law requires, that multiple methods be used in the assessment of special education children (Gresham, 1983; Sattler, 1988). It is this author's opinion that we do not collect enough data when we engage in the evaluation process.

As noted earlier, Alessi (1988) describes five broad areas from where the source of a student's learning of behavior problem can be derived. Alessi, like others (Meyers, 1988; Shapiro &
Skinner, 1990; Wong, 1988) call for the use of more ecologically based assessment practices (observation, interviews, narrative recordings, assessment of the learning environment) for all evaluations.

Best Practices

The triennial reevaluation, like the initial evaluation, provides an opportunity for broad-based, multi-method, ecologically assessment. The student's progress toward IEP goals should certainly be a part of the triennial but we would be doing the student a disservice if we only reviewed a small portion of his/her experience. It should be noted that federal regulations require the student's IEP to be reviewed and updated every year. This requirement provides a prime opportunity for curriculum based assessment methods to be used. CBM works best with frequent "probes" to determine progress. Therefore schools would be remiss if they waited for three year intervals to collect data.

In conducting the triennial review the school psychologist should consider several factors. First, the age of the student. With young students there is a high variability of function and reliable assessment procedures are difficult to find. Therefore data comparisons should be made with both national norms as well as local (peer) norms. Deficits which may have been initially viewed as "developmental lags" may now appear more clearly discernable. Since early childhood is a period of rapid growth
and learning, accurate assessment and effective interventions are essential.

With older students, triennial reevaluation should include a vocational or pre-vocational component. Recent changes in federal laws amending special education laws, PL 101-476 Individuals with Disabilities Education Act - IDEA, require disabled students to be given access to "transition services" no later than age 16. Transition services are defined as:

"...a coordinated set of activities for a student, designed within an outcome-oriented process, which promotes movement from school to post-school activities including post-secondary education, vocational training, integrated employment (including supported employment), continuing education and adult education, adult services, independent living, or community participation. The coordinated set of activities shall be based upon the individual student's needs, taking into account the student's preferences and interests, and shall include instruction, 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" (Congressional Record, 1990, PL 101-476--October 30, 1990, Sect. 101 (d).)
Levinson and others (Levinson & Capps, 1985; Levinson & McKee, 1990) have urged school psychologists to use the triennial reevaluation as a time to assess student's vocational interests and abilities. Levinson and McKee (1990) note that only 21% of handicapped individuals will become fully employed according to the President's Committee on Employment of the Handicapped. Twenty-six percent will be on welfare and 40% will be underemployed. It is therefore critical that interventions include activities that are designed to increase the student's future potential for employment and productivity. In order to develop appropriate transition planning the school's Pupil Evaluation Team (multi-disciplinary team) needs to collect data. This provides a golden opportunity for school psychologists to expand their role. Levinson and McKee (1990) suggest that a Individualized Transitional Plan (ITP) be developed along with the IEP at least four years prior to the student leaving school.

Another major factor to consider in the triennial reevaluation is the nature and severity of the educational disability. Certain educational handicaps lead logically to certain interventions. For example, the diagnosis a speech and language disability would customarily lead to a recommendation for speech and language therapy. However the majority of disabilities are less clear. Students identified as having a combination of a behavior disorder and specific learning disabilities may require a more complex intervention. Triennial
reevaluations may require additional assessment to aid the Pupil Evaluation Team in designing the most effective intervention. While all educational disabilities have some effect upon some family members, some educational disabilities have a major effect on all family members. Students with behavioral disorders, particularly those with attention deficits and "hyperactive" characteristics clearly fit in this group. Triennial reevaluation provides an opportunity to review the student's program and progress. They therefore create an opportunity for the school to discuss and/or provide additional support and services to the family. Ecologically based assessment is essential to aid in the identification of these related services.

As noted earlier, in a survey of Maine schools (Brandt, 1989), the special education teacher was most responsible for the assessment of special needs students both in the initial evaluation as well as the triennial review. Brandt also reported that when respondents were asked to qualitatively rank the initial and triennial evaluations in terms of "helpfulness" and "satisfaction" the evaluations conducted by special education staff were rated higher than those conducted by school psychologists or school psychological examiners. This observation likely reinforces the observation that the traditional form of triennial evaluations conducted by school psychologists leave much to be desired. The triennial reevaluation process can provide a valuable opportunity for school psychologist to expand
their roles in schools. Traditional views of assessment need to be revised with an emphasis on customizing the assessment to improve the linkage between assessment and intervention.

It is not clear if the profession has responded, or will respond, to this call for change. Additional research is needed to determine what methods are employed nationally. As it is probable that professional practice (and attitudes) are solidly fixed by the initial training experience in school psychologist preparatory programs. As such, training programs must include discussion of the triennial reevaluation process in their curricula.
TABLE 1
Cutline of Reevaluation Questions and Procedures

<table>
<thead>
<tr>
<th>Questions to Ask</th>
<th>Procedures</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Objective 1: To determine whether the student's program was implemented as intended and needed.</strong></td>
<td></td>
</tr>
<tr>
<td>What were the relevant results of previous evaluations?</td>
<td>Review previous evaluation reports.</td>
</tr>
<tr>
<td>What was the basis for the recommended classification?</td>
<td>Review test scores, observations, interview data and evaluation recommendations.</td>
</tr>
<tr>
<td>What have been the placement goals, objectives and related services?</td>
<td>Review IEP goals and objectives, placement and related services.</td>
</tr>
<tr>
<td>Have there been recommendations or related services or objectives that have not been implemented?</td>
<td>Review file; interview teacher parent and student.</td>
</tr>
<tr>
<td>Have goals and objectives been appropriate?</td>
<td>Determine whether goals and objectives have been sequential, appropriate and consistent.</td>
</tr>
<tr>
<td>Have the method and materials been appropriate?</td>
<td>Note if there has been a variety of methods and materials used.</td>
</tr>
<tr>
<td><strong>Objective 2: To determine how much progress the student has made in the last three years.</strong></td>
<td></td>
</tr>
<tr>
<td>Has the student's progress been measured appropriately?</td>
<td>Review measurement procedures employed and performance standards set. Review records and work samples.</td>
</tr>
<tr>
<td>What changes have the interventions effected? Have there been concurrent changes? Have the changes been in the desired direction?</td>
<td>Use behavioral assessment measures, CBM and norm-referenced measures. Observations and interviews.</td>
</tr>
<tr>
<td>What is the estimate of student progress?</td>
<td>Summary comparison of current performance levels with baseline. Factor in unreliability and regression toward the mean.</td>
</tr>
<tr>
<td>What is an estimate of overall effectiveness?</td>
<td>Data compiled and compared from the other members of the MDT. Areas of convergence are sought. Areas of divergence receive attention and should be addressed in terms of recommendations for program change.</td>
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TABLE 1 (continued)

Objective 3: To determine whether the student's classification and placement are appropriate.

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<tr>
<th>Does the student continue to require special education? Are classification and current placement option appropriate?</th>
<th>Consider exit criteria, need for a less restrictive environment; social validation of outcomes. Consider whether it is necessary for the student to meet the current criteria established for initial classification/placement. If not, compare current performance against criteria established for continuation of classification/placement.</th>
</tr>
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</table>

Objective 4: to determine what changes need to be recommended in the student's program

<table>
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<tr>
<th>Are there curricular areas that need to be added or terminated? Are there any related services that need to be added or terminated?</th>
<th>Consider the age and developmental level of the student, long-range goals and expected levels of achievement. Lower expectations only when student experiences unreasonable levels of continuing failure.</th>
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<tr>
<th>What modifications in materials or instructional techniques can be recommended?</th>
<th>Determine modifiable administrative, teacher and student variables through use of observations, checklists, rating scales, etc.</th>
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<tr>
<th>What baseline measures should be obtained to evaluate outcomes in the future?</th>
<th>Consider using CBM and behavioral assessment techniques, as well as criterion-references and norm-referenced measures.</th>
</tr>
</thead>
</table>

REFERENCES


School Psychologists.


ENDNOTES

1. Current Special Education regulations in Maine state that achievement and intellectual testing, including the Wechsler Scales, are activities which may be provided by teachers and guidance counselors.

2. For more information about CBM and CBA see (Marston, 1988; Tindal, 1988; Shinn, 1990; Rosenfield, 1990).