This policy brief examines issues associated with accurately collecting and reporting placement data for students with disabilities. It notes that existing federal reporting requirements under the Individuals with Disabilities Education Act and traditional state data systems may actually impede the collection of accurate data regarding the educational programming provided students with disabilities included in general education classrooms. Four major reporting constraints are identified: (1) articulation of state and local management information systems and the use of the data form to extract data for other purposes, such as district funding; (2) the state and federal forms (and categories) used to collect student placement information; (3) the ability to capture both the placement and the intensity of services delivered to students with disabilities in the general education classroom; and (4) how data are reported and disseminated. Positive developments and continuing barriers to accurate reporting are examined, including state and local management information systems, issues of definition and data exclusion, concerns about reporting intensity and quality of services, and difficulties in reporting and disseminating results. An appendix defines basic terms. (Contains 15 references.) (DB)
Providing Accurate Placement Data on Students with Disabilities in General Education Settings

By Virginia Roach, Ann Halvorsen, Lucille Zeph, Matthew Giugno, and Michael Caruso

Since 1987, the Office of Special Education Programs (OSEP) at the U.S. Department of Education has funded a series of Statewide Systems Change Grants to state departments of education and universities. One of the main purposes of these five-year grants has been to support “projects that enhance the capacity of States to significantly increase the number of children with severe disabilities the State serves in general education settings, alongside children of the same age without disabilities” (Smith, 1997; Smith & Hawkins, 1992; U.S. Department of Education, 1993, p. E-4.

To date 26 states have received funds to undertake Statewide Systems Change projects. The Statewide Systems Change priority is designed to encourage large-scale adoption of effective educational practices across state systems and to increase the movement of students with disabilities from segregated to integrated to inclusive school campuses. These projects were designed to facilitate reform in general education through programmatic and policy changes at all levels of the system—classroom, school, district, and state. The required evaluation plans must measure “the movement of children and youth with severe disabilities in the State from segregated settings” to regular school settings, alongside their same-aged nondisabled peers (U.S. Department of Education, 1993, pp. E-5-6).

While these and other state- and federally-sponsored efforts have substantially increased the number of students with disabilities being placed in general education classrooms, student placement data from the states do not necessarily reflect this movement. From discussions with state data managers and Statewide Systems Change Project staff, it appears that federal reporting requirements, as well as traditional state data systems, may impede the ability of local program staff to accurately portray the educational programming of students with disabilities included in general education classrooms. For example, local data managers may be filling out data forms for the purposes of state financial reimbursement rather than federal child count data.
Student placement data, as reported in OSEP's 17th Annual Report to Congress on the Implementation of IDEA, are used to evaluate the effectiveness of state and federal efforts to support inclusion. Federal and state officials employ such data when making decisions regarding future support of inclusive education programs. Student placement data are also used by practitioners, researchers, and families to judge developments in the provision of special education and the extent to which students are receiving education in the least restrictive environment (Danielson & Bellamy, 1989; Davis, 1992). Given the variety of uses for the Annual Report data, it is important to ensure that these data are accurate. Yet reporting constraints may impede the ability to report data accurately.

Reporting constraints center on four related themes:

1. articulation of state and local management information systems and the use of the data form to extract data for other purposes, such as district funding;

2. the state and federal forms (and categories) used to collect student placement information;

3. the ability to capture both the placement and the intensity of services delivered to students with disabilities in the general education classroom; and

4. how data are reported and disseminated.

This article provides a brief overview of the issues associated with accurately collecting and reporting student placement data by the states.

**Background**

Part B of the Individuals with Disabilities Education Act (IDEA) and its implementing regulations require that to the maximum extent appropriate, children with disabilities, "including children in public or private institutions and other care facilities," be educated with children who are not classified as having a disability. In addition, special classes, separate schooling, or other removal of children with disabilities from the regular educational environment should occur only when the nature and severity of the disability is such that education in general education classes cannot be achieved satisfactorily with the use of supplementary aids and services (U.S. Department of Education, 1995, p. 13).

To determine the extent to which states are implementing the law, OSEP collects data from the fifty states, the District of Columbia, and U.S. territories on the number of those students with disabilities served in each of six educational environments: regular class (often referred to as the general education classroom), resource room, separate class, public or private separate school, public or private residential facility, and homebound/hospital placement. The data are collected in two ways: by age group for students aged 3 through 21, and by primary disability classification for students aged 6 through 21.

**National Statistics and the Under-Reporting of Inclusive Placement Data**

According to OSEP's 17th Annual Report to Congress, states reported that the proportion of students placed in general education classrooms rose by nearly 10 percent over the last five years. At the same time, states reported that the use of resource rooms decreased and all other placement settings remained essentially stable. Despite these significant changes, many states are widely believed to be under-reporting the number of students served in the general education classroom, particularly those students who would have previously been served in self-contained or special classes for those with significant disabilities.

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1 See Appendix I for the definitions of the six educational placements for students with disabilities.
There are several reasons why state data reports are subject to different interpretations and variability. Some of the reasons relate to how data gathering systems are defined in each state. Many states count those students in separate program placement categories who are actually served in general education classrooms. Such a situation occurs when the state data categories, combined with the category under which a student is labeled, require the local administrator to code the student in the more restrictive setting on the state data form. These students are reported in separate program placement categories because of the presumptions underlying the state’s data reporting system; for example, students labeled mentally retarded can only be coded in a self-contained class placement. The presumption in these data systems is that when an exceptional student is in the general education classroom, no special education services are provided—special education services are delivered only in special education settings. These underlying assumptions, and the data they generate, are then transferred from the state form to the federal form, resulting in data inaccuracies.

Some of the data inaccuracies are related to how the state data forms are completed by local administrators. For many years, data collection and reporting has been widely considered a background activity, intended primarily for the purpose of generating annual reports on the use of federal funds. For some districts, data reports submitted by localities to their state education departments were seen as pro forma, having limited value and usefulness to policymakers and practitioners. As a result, accurately reporting student placement has not been a priority.

In some districts, data inaccuracies are produced because of the perceived link between the data report and special education funding guidelines. In addition to the data collected by the federal government, states collect student placement data for a variety of reasons, including evaluation, funding, and budgeting purposes. Some local administrators under-report the number of students in special education because of the “maintenance of effort” provisions of IDEA. Some administrators will fill out the data form in the manner they hope will bring the greatest special education reimbursement from the state. For example, if a student with significant mental retardation qualifies for special class placement (at a higher rate of reimbursement) but is in a regular inclusive class full time, the student may be coded to a separate class placement on the state form and hence to “separate class” on the federal form. This may be done in order to qualify the student for adequate special education support in the general education class.

Historically, the actual placement of students has not had the same significance that it has had under reform movements such as inclusive and supported education, where the explicit intent of the reform is to have students heretofore in separate classroom settings included in the general education classroom. Hence, placement data itself was not seen as a way to evaluate programmatic goals. Yet federal, state, and local policymakers are increasingly approaching data collection and reporting activities as an essential part of program planning, accountability, evaluation, and policy development. As a result, there has been increased attention to the quality of data provided throughout the system. Federal, state, and local programmatic emphases on inclusion, coupled with a heightened attention to accountability at all levels of the education system, place a particular urgency on the need to accurately reflect the numbers of students that are receiving special education services in inclusive classrooms.

2 Generally, the “maintenance of effort” provisions of IDEA require that a district expend at least the same amount of resources for special education as the previous year, given the same number of students eligible for the program. Administrators who wish to reduce their special education budgets do so by under-reporting the number of students in the district in special education.
Positive Developments and Continuing Barriers to States' Reporting of Students with Disabilities in General Education Class Settings

State and Local Management Information Systems

State automated management information systems (MIS) have become a major focus of attention among policymakers and educators concerned with the quality of student placement data. Several factors are at issue:

- the capacity of the state's MIS;
- the way the state's MIS articulates and interfaces with local systems; and
- the way the various system managers at the state and local levels communicate and interact.

For example, data for the federal government are extracted from state data forms, which in turn were extracted from local district data. How these data sets align impacts the accuracy of federal reports. Those states that have made changes in its data reporting requirements, yet have not provided adequate training and planning time for local districts, create opportunities for the collection of inaccurate data. In such instances, districts attempt to satisfy state data requirements with the data they have gathered, regardless of whether they provide answers to the questions posed by the states.

MIS with limited or inadequate data severely inhibit the value and usefulness of placement information for policymakers, educational planners, and practitioners alike. State and local information systems that have not been established to interface with each other contribute to this problem. Further, the data manager at any level who fails to communicate with other managers may actually be developing a completely separate information system.

At times, subtle changes in data collection techniques can make a significant difference in state data reports. In New York, for example, education officials were concerned that the data they were receiving from district administrators were not in line with the reports they were receiving from practitioners in the field. Local and state officials agreed that the manner in which the state was asking for student placement data was leading local data managers to inaccurately report the general education placement of students receiving special education. As a result, the state altered data reporting instructions. Instead of collecting data according to the amount or specific types of special education services provided to students, the state Education Department revised forms to ask for the percentage of the school day students who were in general education settings, regardless of the types of general and special education services they received. By making this change, the state experienced a sizeable increase in their general education placement data, thus substantially improving the validity of state student placement numbers.

Other states have focused on state and local planning and communication as a method for enhancing the accuracy of student placement data. States have experienced appreciable improvements in the accuracy of student placement data by focusing on the link between state and local data collection efforts. Efforts in this area include:

- setting goals and target dates for implementing initial and ongoing technical changes to the state’s data system;
- allowing sufficient planning time to modify local data systems to produce reports according to new state forms and procedures; and
- providing local data managers with ample lead time and training to gain a complete understanding of new directions and expectations, particularly during the first and second year of implementing major changes.
Thus, by focusing on the actual management of the data system itself, states have increased the accuracy of local reports and enhanced the articulation between state and local data systems.

**Definitional and Data Exclusion Issues**

To increase the credibility and validity of data results, states typically request that localities align definitions of student placements in a manner consistent with federal guidelines contained in the data collection forms and Data Dictionary used by OSEP. According to OSEP's 17th Annual Report to Congress, officials in Indiana, Minnesota, and New York reported shifts in placement data, which they attribute in part to improved data collection and reporting procedures that more accurately reflect federal guidelines. In California, the number of resource-served students in general education classes increased substantially from 1991-92 to 1992-93. Similarly large decreases in special class placements were also noted. Such changes were due primarily to improved data reporting and collection that better conforms to OSEP data collection requirements.

State education officials in Maine and New York implemented a three-pronged strategy to improve the accuracy of state student placement data. First, they aligned the student placement definitions with federal guidelines. Second, they conducted statewide workshops to re-orient local personnel responsible for filling out the data collection forms. Third, they established an internal task force to plan a process for revising the state’s method of monitoring the schools, including a greater emphasis on technical assistance to help local education agencies eliminate any problems that could lead to inaccurate data. In so doing, states like Maine and New York hope to more accurately reflect actual placement information for students being served in inclusive school settings, while also improving the comparability of their student placement data with that of other states.

Yet even states that are making strides in the reporting of inclusive placement data by aligning the definitions of data categories with the federal guidelines may still be under-reporting the numbers of students with disabilities being served in the general education classroom. In 1997 California added “regular class” to the California Education Code. However, as of early 1997 the California data collection forms did not include data fields for general education class placements. The California data fields for ages 3-21 are: Designated Instruction and Services (DIS); Resource Specialist Program (RSP); Special Day Classes in Public Integrated Facility or Separate Facility (SDC); Nonpublic School, day school, residential in California or out of California (NPS); Public Residential School; Correctional Facility; State Hospital; Developmental Center; Community Project; and Teaching Hospital.

**Intensity and Quality of Services**

With inclusive education becoming more widely implemented, states and localities are seeking ways to report more meaningful information on the children being served in general education classrooms. The overwhelming sentiment among those data managers and project directors familiar with student placement data is that simply reporting the number of students being served in educational settings does not provide a true picture of the intensity or quality of educational services. Yet many local officials assign students to separate placement categories when these students are actually served in inclusive general education classrooms. Officials do so because they believe portrayal of students with disabilities in the general classroom will ultimately lead to a reduction in funding and supports. Moreover, they contend that reporting students with disabilities in general education class placements—devoid of any explanation that those placements usually involve reconfigured classrooms, staffing arrangements, and support services—will eventually lead policymakers to conclude that special education services are no

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3 Many state funding systems presume that the level of intensity of special education equates to the amount of time out of the general education classroom, rather than the amount of service provided to the student. Hence, state reimbursements often increase based on an increase in the number of special education classroom teachers or special education classroom units.
Policymakers and practitioners alike assert that qualitative information is necessary to determine whether children and youth are being either "dumped" or "supported" in the general education classroom. The new vision of inclusive education demands a thorough understanding of the range and quality of services provided. It also requires collecting information on student performance and achievement for all children and youth. For these reasons, state management information systems need to be constituted to analyze qualitative data gathered to provide depth to numerical data. This can be accomplished through targeted information collection strategies for specific purposes using such means as surveys, interviews, and focus groups.

Although routine data collection and qualitative information gathering activities have historically been treated as mutually exclusive by the federal government and many states, the reality is that quality and performance indicators are necessary to determine whether students are being appropriately supported. For instance, a number of states are now providing increased general class placement data that includes accompanying services. In New York State, for example, state education officials have begun to consider student placement data as part of a performance-based approach to assessing programs at the state and local levels.

Given the strong sentiment against "unfunded mandates," federal and state education officials need to identify credible alternatives for securing and applying information on the intensity and quality of services provided in the classroom in ways that do not impose an undue burden on localities. At the same time, policymakers need to know that increased inclusive placement data does not necessarily mean that there is less need for special education services. Rather, it usually means that such special services are now being provided in the general education classroom.

Reporting and Disseminating Results

During the last two decades, various changes have been made to the data collection form and instructions that OSEP uses as the basis for publishing its annual reports to Congress. Though states are expected to comply with changes in federal reporting requirements, state regulatory requirements have not always been precisely aligned with federal requirements.

Changes to data collection report forms and procedures result when states and localities have a clear understanding of how the data will be used and disseminated as well as how districts, schools, and programs will benefit from the changes. Education officials, administrators, and teachers who see the information they have provided in a synthesized format are then in a better position to provide insights and observations that can lead to refinements, thereby bolstering and enhancing the meaning of the data.

In Maine and New York, data managers are finding positive results from their active commitment to share data with local districts. These states are exploring several means of disseminating the data to various audiences, such as the broad distribution of special education performance reports. Also, the advent of the Internet and other electronic networks provide excellent opportunities to make data available to a wider range of audiences.

Still, the promise of dissemination can also lead some localities to be more cautious in their reporting, particularly if they believe the information they are asked to provide will result in a reduction in funding for students with disabilities.

Conclusion

States are at very different places in their efforts to accurately report student placement data for national statistics. Several states have shown dramatic improvements, while many others have
not. Scarce public resources, coupled with the complexity of issues surrounding inclusive schooling practices, demand that state and federal projects involved in inclusive education look carefully at the extent to which the placement of included students is being accurately reported.

Three states -- Maine, New York, and California -- have been highlighted in this article. These states have taken steps to improve the accuracy of their student placement data. In addition, two of the states, Maine and New York, have made a firm commitment to providing training and technical assistance to local data managers.

Yet as long as local districts perceive that they will be "rewarded" for supporting inclusion by losing state support for special education, districts are unlikely to revise data reports substantially. States can allay funding-reduction fears by restructuring funding formulas so that funds flow to the district on a pupil weighting, an excess cost, or a flat grant basis, rather than on a unit (either teacher or classroom) basis. In the short term, states can provide districts with "hold-harmless" provisions so they will not risk losing special education funding as they shift to new program delivery models.

In addition to encouraging districts to accurately report the student placement data, states, with the assistance of the federal government, should develop ways to link the placement data with qualitative features of the child's school day. Inclusion is not merely the change in student placement, but also the meaningful provision of necessary special education supports and services within the general education classroom. School boards’ and other stakeholders’ lack of understanding about inclusive educational practices makes them distrustful of decontextualized placement data or sole reliance on data for decision-making. Local special education officials stress that school boards, parents, and community members become suspicious of the need for special education services when officials report that virtually every student in special education is in the general education classroom. At a minimum, special education service delivery should be reported in conjunction with general education placement data. Changes in data reporting must be accompanied by aggressive education of community stakeholders to ensure that data changes are appropriately understood.

The U.S. Department of Education, like its counterparts in state education departments and local school districts, has come under intense public scrutiny to justify public expenditures for educational programs. Ultimately, inclusion initiatives appear to be evaluated by the numbers of students who move from a segregated special education program into a program that is offered in an inclusive environment. Therefore, it is important to disseminate accurate data with respect to student placements and programs as well as cultivate an understanding of why the data reported to Congress are inaccurate. Such actions not only justify the use of federal dollars in support of inclusion but promote continued advocacy of these efforts.
BIBLIOGRAPHY


APPENDIX I

Regular class includes students who receive the majority of their education program in a regular classroom and receive special education and related services outside the regular classroom for less than 21 percent of the school day. It includes children placed in a regular class and receiving special education within the regular class, as well as children placed in a regular class and receiving special education outside the regular class.

Resource room includes students who receive special education and related services outside the regular classroom for at least 21 percent but not more than 60 percent of the school day. This may include students placed in resource rooms with part-time instruction in a regular classroom.

Separate class includes students who receive special education and related services outside the regular classroom for more than 60 percent of the school day. Students may be placed in self-contained special classrooms with part-time instruction in regular classes or placed in self-contained full-time on a regular school campus.

Separate school includes students who receive special education and related services in separate day schools for students with disabilities for more than 50 percent of the school day.

Residential facility includes students who receive education in a public or private residential facility, at a public expense, for more than 50 percent of the school day.

Homebound/hospital environment includes students placed in and receiving special education in hospital or homebound programs.

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