

Colorado Department of Education Exceptional Student Services Unit

**Writing quality secondary transition
IEPs that include the required
elements of Indicator 13**



CO L O R A D O
Department of Education

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(Replaces Indicator 13 Compliance & Quality Tips)

What is Indicator 13?

The Individuals with Disabilities Education Act (IDEA) was reauthorized on December 3, 2004, and its provisions became effective on July 1, 2005. In conjunction with the reauthorization, the U.S. Department of Education, through the Office of Special Education Programs (OSEP), required states to develop State Performance Plans (SPPs). Seventeen indicators, on which data are submitted annually in an Annual Performance Report (APR) are included in the SPP. Data for Indicator 13, a compliance indicator for transition plan requirements documented in Individual Education Programs (IEPs), is collected from Administrative Units (AUs) and reported to OSEP by the Colorado Department of Education (CDE).

Indicator 13 as defined by OSEP and used for Colorado's SPP/APR

Percent of youth with IEPs aged 16 and above (aged 15 and above for Colorado reporting*) with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services' needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority.

* **Exceptional Children's Educational Act (ECEA) 4.03:** Exception to 34 CFR § 300.320, the IEP content requirement for transition services begins with the first IEP developed when the child is age 15, but no later than the end of 9th grade, or earlier if deemed appropriate by the IEP Team, and updated annually, thereafter.

Who is the intended audience for this document?

The document is designed for educators who write and review IEPs for students ages 15 – 21 in Colorado.

See Appendix for IDEA and ECEA citations related to Secondary Transition IEPs

Element 1

Appropriate measurable postsecondary goals related to training/education, career/employment, and, where appropriate, independent living skills 34 C.F.R. § 300.320(b)(1)

Guidance and Writing Tips

- Postsecondary goals are what the student will do **after** exiting the public school system. Because students in 18-21 transition programs are still part of the public-school system, postsecondary goals must address what the student will do **after** exiting the 18-21 program.
- Postsecondary goals are required in training/education and career/employment, regardless of the severity of the student's disability.
- If the IEP team determines that a postsecondary goal is not needed for independent living skills, it is best practice to indicate, "Based on assessment data, no goal is needed."
- The postsecondary goals should succinctly state what the student will do and be based on findings from transition assessment conducted with the student.
- Use an active rather than passive voice, e.g., "The student will participate in on the job training," rather than, "Will receive on the job training."

Element 1

Appropriate measurable postsecondary goals related to training/education, career/employment, and, where appropriate, independent living skills 34 C.F.R. § 300.320(b)(1)

Examples

POSTSECONDARY GOALS EDUCATION/TRAINING (required)

- After graduation, Henry will attend the Institute of Animal Technology to become a VetTech.
- After high school, Jackie will participate in on the job training at the Denver International Airport.
- Following exit from the district's 18-21-year-old services, Maria will complete vocational training at the Denver Culinary Institute.
- Following high school, Troy will attend a four-year college for business management.
- Damian will attend a community based vocational program after he exits public education.
- After completing school district services, Cooper will participate in on-the-job training in a job in his community with support from Division of Vocational Rehabilitation (DVR) that utilizes his strengths and matches his interests of a hands-on job that requires attention to detail and repetitive work; such as a materials handler.
- Following exit from 18-21 years transition services, Maxine will train/exercise in her home, with the support from a physical therapist and/or caregiver, to build physical strength and stamina in order to better assist with transfers while in the home and in her community (vehicle transfers).

POSTSECONDARY GOALS CAREER/EMPLOYMENT (required)

- After graduation, Carl will work at a restaurant or other food service business.
- Following graduation, Ashley will volunteer in the community with support of the local Community Centered Board.
- While attending a two-year college, I will work part-time at a pet store. After graduating from a two-year college with my associate degree, I will work full-time as a vet tech.
- Following high school, Paul will work at the local hospital with a job coach.
- After completing school district services, Cooper will work part-time in a job in his community, such as a materials handler, with support from his DVR job coach.
- Following exit from 18-21 year old transition services, Maxine will work in her home by using her direct access switch on a timed setting to turn on the blender to prepare her meal that will be fed to her by her caregiver.

POSTSECONDARY GOALS INDEPENDENT LIVING SKILLS (where appropriate)

- After graduation, Bill will live at home and independently participate to the maximum extent possible in his daily routines (e.g., feeding, dressing, bathing, etc.).
- After completion of 18-21-year-old services, Jackie will prepare for each day by dressing and feeding herself with assistance.
- After graduation, Barry will live independently in his own home/apartment, schedule appointments, pay his own bills, and access services in his community by using the city bus.
- Following Devon reaching maximum age for services in the secondary school system, he will live semi-independently with a roommate in an assisted living environment and utilize public transportation to access his community.
- After completing school district services, Cooper will live with family members and complete daily living skills as independently as possible, such as making choices about his leisure time activities, doing household chores, preparing small meals and snacks.
- Following exit from 18-21-year-old transition services, Maxine will live at home with her parents and support from her in-home personal care attendant. She will choose what she wants to wear and then lift her arm to assist her home caregiver with dressing.
- N/A- Based on assessment data, June has the skills to live independently and no goal is needed.

Element 2

Postsecondary goals updated annually 34 C.F.R. § 300.320(b)

Guidance and Writing Tips

- The IEP includes postsecondary goals and was reviewed within 12 months of the previous IEP.
- If this is the first IEP developed after the student turned 15, this element is not applicable.
- It is best practice that the Present Level of Academic Achievement and Functional Performance (PLAAFP) includes information related to the student's identified postsecondary goal(s) such as:
 - A summary statement in the PLAAFP describing the student's academic and functional skills and gaps as they relate to the postsecondary goals and any considerations for developing the courses of study, transition services, and annual goals; or
 - A statement that the postsecondary goals were considered, reviewed, and updated based on transition assessment results.

Element 2

Postsecondary goals updated annually 34 C.F.R. § 300.320(b)

Examples

- Based on the assessment analysis, Lisa’s postsecondary goals for attending the community college and working in the childcare field are attainable. She has achieved her annual goals this past year and is on track to meet her graduation requirements. In addition, Lisa has indicated these identified postsecondary goals continue to be her focus for post school plans.
- Based on the academic and career assessments, Tyler’s career choice is attainable and realistic. Tyler will need to continue to build his reading and writing skills and learn to use assistive technology to support written expression. These skills will enable him to experience success in college classes and later as a construction operations manager.
- Results of the most recent assessment data indicate Paul’s health and behavioral needs have increased which has affected his academic and functional performance in the school and community settings. Due to these behavioral and health related needs, Paul’s skill gaps have increased and attainment of the supported employment postsecondary goal of working as a custodian assistant is uncertain. Further assessment will be conducted to determine health and behavior needs in relation to future work environments.
- The most recent CMAS results combined with the district assessment data and curriculum-based measures indicate David, who is a junior, has a four-year gap in his math skills. David wants to attend the School of Mines to study engineering. Transition services and annual goals will address the skill development needed to narrow the gap in math. Related careers in the field of engineering will be explored so David will have other options to consider if his gap in math is not closed prior to high school graduation. David’s postsecondary goals for education/training and career/employment will be revised to state, “David will attend college to study engineering” and “David will work in the field of engineering.”

Element 3

Age appropriate transition assessments 34 C.F.R. § 300.320(b)(1)

Guidance and Writing Tips

- The IEP contains evidence of assessments that provided information on which to base the measurable postsecondary goals.
- Age appropriate means chronological age.
- Each year, the IEP should be based on newly administered or reviewed age appropriate transition assessment. 34 C.F.R. § 300.324 (b)
- Transition assessment could include academic achievement, aptitude, behavior, functional, and interest data. It can also include a review of existing assessments, including state, district, school assessments and classroom data as well as assessment completed by related service providers.
- Transition assessment data can be gathered through a variety of methods, including computer or web-based assessments; paper and pencil tests; structured student and family interviews; observational school, community or work-based assessments (situational or environmental); and curriculum-based measures. Best practice indicates that at least one data source should be a formal assessment.
- It is best practice to include the name of the assessment, the date given or reviewed, the name and title of the person administering or reviewing the assessment, and a summary of the results written so that families understand the results.
- The student's strengths, interests, and preferences must be considered. This information may be obtained through an interview, situational assessment and/or observation. It is not sufficient to interview only the parent(s)/family.
- Viewing all assessment through a transition lens will provide a rich narrative of the student's skills and abilities by considering these questions:
 - o Does the skills assessment match the skills needed to reach the intended postsecondary goals?
 - o Is there a gap between current skills and skills needed to meet postsecondary goals?
 - o How can you and other teachers/adults assist the student in building the skills/knowledge required to close the gap and move toward the postsecondary goals?

Element 3

Age appropriate transition assessments 34 C.F.R. § 300.320(b)(1)

Examples

Assessments and Results for Chris:

- 9/02/19, Independent Living Skills Postsecondary Goal Worksheet, O'Net, informal interview, and review of 09/06/18 BASC administered by Bill Smith, the case manager
- Chris identified he would like to work as a chef. He has helped on jobs involving cooking with his uncle, has his driving permit, has taken a foods class, and regularly does chores at home. He prefers on the job training over a culinary arts program. He struggles to work collaboratively with peers. Chris, under the direction of the case manager, researched various careers in food services on O*NET to determine the skills needed to enter that field after high school. He determined food prep would be a good starting point and learned that establishing and maintaining strong interpersonal relationships is an important requirement for this job.

Assessments and Results for Erin:

- Transition Planning Inventory (TPI) and Life Skills/Career/Transitional Planning Check Sheet administered by transition teacher, John White, 1/16/2020
- Assessments indicate that Erin, a junior, has adequate and age appropriate independent living, career awareness, and community skills. She is interested in a job where she can work with her hands and with tools. She likes working by herself and building things. Cars are her primary interest. She plans to attend a community college for auto tech.

Assessments and Results for Michael:

- Kim Johnson, the life skills teacher, administered the Casey Life Skills Inventory on 2/9/2020 to assess his independent living skills and completed three situational assessments in January 2020, one each in the classroom, cafeteria, and community during transit training.
- These assessments indicate that he can follow multiple step directions, demonstrate safety awareness, and maintain eye contact during interactions with others. He has needs in following directions without prompts, recognizing boundaries, and independently asking for assistance. His life skills teacher has also observed that he typically chooses to work with peers rather than alone.

Element 4

Transition Services 34 C.F.R. § 300.43

Guidance and Writing Tips

- Transition services are a coordinated set of activities focused on improving the academic and functional achievement to facilitate the movement from school to post-school activities.
- Transition services are based on individual student's needs, taking into account the student's strengths, preferences and interests and includes instruction, related services, community experiences, the development of employment and other post-school adult living objectives, and if appropriate, acquisition of daily living skills and provision of a functional vocational evaluation.
- Transition services should include the activities/strategies/steps/actions that the "community of adults" including special/general education teachers, related service providers, counselors, other school personnel, outside agencies, family members, community members, etc., provides to help the student achieve the identified postsecondary goals.
- Transition services should be stated as, "The ____ (e.g., special education teacher, case manager, OT, reading teacher, counselor, parents, etc.) will provide..." and not stated as what the student needs or what the student will do. Identify service providers by title, not name. Avoid the generic "staff" or "team" will provide....
- Transition services should be specific and individualized for the student. What are the unique needs for this student that must be addressed to help reach the identified postsecondary goals? They should not include what every student is also receiving (e.g., access to the counseling center and accommodations).
- If writing services as support, the support should be clearly defined (e.g., support in life skills to include direct instruction in cooking and making purchases).
- One way to help determine appropriate transition services is to read the annual goals. Who will provide what specific service(s) to help the student master the annual goal(s) within one year? (Keep in mind that not all of the activities described under *Transition Services* will have a corresponding annual goal/objective.)
- Transition services may include the facilitation of linkages and/or referrals to adult agencies; however, you may not commit another agency to providing services without the involvement and approval of that agency.
- Following up on and documenting the outcome of transition services can become part of transition assessment for the following year.

Element 4

Transition Services 34 C.F.R. § 300.43

Examples

TRANSITION SERVICES: EDUCATION/TRAINING

- The case manager will assist Brian in researching the eligibility requirements and services provided by the college disability access center.
- Brian's parents will take him to tour the college, including the access center.
- The special education teacher will provide instruction and modeling in how to advocate for his learning needs during class to prepare for college courses.
- The general education teacher will provide direct instruction in reading comprehension and written expression to Marty.
- The case manager will provide Marty with training and support in organization to include daily planner checks and creation of a filing system to track work assignments and completion.

TRANSITION SERVICES: CAREER/EMPLOYMENT

- The special education teacher will provide Chris with activities to explore training and employment options as a veterinary technician.
- Cooper's teacher and job coach, with assistance from OT and/or PT regarding meeting physical needs/restraints, will help Cooper develop and maintain appropriate work skills and behaviors required in a part-time job in his community, help him read and follow a daily visual schedule, and provide plenty of instruction and practice for Cooper to make age-appropriate decisions in his home, on the job, and in the community.
- The Case Manager will facilitate a referral to the Division of Vocational Rehabilitation (DVR) to determine necessary and appropriate vocational services as well as service provider options.
- Chris is currently participating in DVR/SWAP services. The SWAP staff will work with Chris to schedule job shadowing opportunities in animal care facilities, as well as assist with applications and resumes, and practice interviewing skills.

TRANSITION SERVICES: INDEPENDENT LIVING SKILLS

- The consumer math teacher will provide direct instruction in real world application of practical math skills, including creating a budget, understanding taxes, balancing a checking account, and determining interest charges on credit cards to prepare for independently living in the community.
- The special education teacher will provide instruction in budgeting and health and safety skills in the home and community.
- The family will work with the special education teacher to create a system in the home where Cecile practices budgeting for outings, cooking meals, using safety precautions, and being aware of strangers.
- Marky's special education teacher, paraprofessional, SLP, and OT will provide specific instruction and learning opportunities across different environments so Marky can learn and master use of his adaptive switches for things such as operating a blender so that he can prepare meals.

TRANSITION SERVICES: RELATED SERVICES

- The physical therapist will work with David on comfortably accessing his environment that may include getting in and out of the vehicle that transports him to and from job sites and community activities.
- The occupational therapist will provide modeling and direct instruction in self-help activities, to include teeth and hair brushing and self-feeding, to help facilitate semi-independent living.
- The school psychologist, as part of the weekly anger management group, will provide Laurie with opportunities to learn and practice conflict resolution, coping strategies for managing frustration and stress, and impulsivity control, to support the student to be successful in the college classroom and the workplace.
- The speech language pathologist will work with Cooper on using his AAC device ("talker") to communicate along with vocalizations and sign language to make choices about what activities he would like to participate in, and requesting other free time activities during his day.

Element 5

Courses of Study 34 C.F.R. § 300.320

Guidance and Writing Tips

- IEP includes documentation of courses of study that will assist the student in reaching the postsecondary goals.
- Simply stating “Will complete graduation requirements.” will not meet compliance.
- The courses of study describe the classes needed by the student to gain the skills needed to close the gaps to reach the identified postsecondary goals. The description may be an individualized list of courses and/or a narrative focusing on specific skills/knowledge to be learned in a class.
- A course of study that exemplifies best practice would include a multi-year description of coursework from the student’s current grade to anticipated exit year.
- A good course of study can stand up to the “stranger test”. Guiding questions: Is this clear and transferable to another school? Can another school build a class schedule based on this information?
- It is common practice to address where the student is in terms of meeting graduation requirements in the PLAAFP as long as the courses of study assist the student in reaching the postsecondary goals.

Element 5

Courses of Study 34 C.F.R. § 300.320

Examples

- During his Junior and Senior years, Joseph will take courses required to meet graduation requirements and prepare for entrance into the Air Force. In addition to the math and science courses he will need for the military, Joseph will take Microsoft Office and Tech Lab classes to learn about basic technology for technological and electronic skills needed in the military. He will take Language Arts classes both years to develop reading and written communication skills for the military as well. Joseph will continue to attend the resource class for study skill strategies and reading skill development. He will take an additional PE class to prepare for the physical demands of the military. Joseph will meet weekly with the speech language pathologist to improve auditory memory skills.
- In order for Harrison to be prepared to meet the entrance requirements for college credit at the Institute of Animal Technology, he will take the following courses in his Sophomore through Senior years:
 - Language arts, PE, algebra, geometry, biology, and chemistry
 - Elements of Reading II for basic reading skills and reading comprehension
 - Transition I and II for self-determination skill development to learn to advocate for his academic needs and better understand his own learning strengths
 - ACE (Alternative Cooperative Education) program his Senior year where he will have an opportunity to gain credit and experience within the veterinarian field by either volunteering or completing an unpaid work experience internship
- In addition to the general education courses needed for graduation, as a Senior, Bonnie will take Business II and a health class that will assist in preparing for her career goal of working in the health care field. She will also receive instruction in organizational strategies and frustration coping skills in the transition class during her Junior and Senior years.
- Throughout his high school career, Darren will receive instruction in a modified curriculum which will include life skills classes that focus on daily living, self-care, basic communication, and basic job readiness.

Element 6

Annual IEP Goals 34 C.F.R. § 300.320

Guidance and Writing Tips

- Postsecondary annual goals must be related to the student’s transition services.
- Postsecondary annual goals state what the student will do or learn **within the next year** that will close an identified skill deficit related to transition services.
- All annual goals must be measurable (300.320(a)(2)(i)).
- Consider the relevancy of the postsecondary annual goal to the student’s transition plan (e.g. “In order to access automotive theory and skills manuals written at the 8.0 GL, Student will answer literal and inferential comprehension questions from nonfiction or technical text with 80% accuracy.” may be more appropriate than “In order to be an auto mechanic, the student will increase oral reading fluency to 100 words correct per minute.”)
- Postsecondary annual goals should focus on skill/strategy development not activity completion.
- Developing postsecondary annual goals requires a thorough understanding of the skills, knowledge, and admission/job requirements for the specific postsecondary goals. The use of on-line resources (e.g., O’NET) will assist with identifying the necessary knowledge base.
- Annual goals should link to an academic standard, but a standard is not, by itself, an annual goal. Refer to: http://www.cde.state.co.us/cdesped/guidance_alps_ieps
- If a related service provider is working with a transition age student, it is best practice that the skills identified in their postsecondary annual IEP goals relate to the student’s postsecondary goals in academics, employment, or independent living.
- All postsecondary annual goals/objectives should be SMART:
 - Strategic and Specific
 - Measurable (may be measurable by objectives)
 - Attainable (use Action words--you should be able to literally see what is happening)
 - Results Driven (Realistic and Relevant)
 - Time Bound

Element 6

Annual IEP Goals 34 C.F.R. § 300.320

Examples

POSTSECONDARY ANNUAL GOAL: EDUCATION/TRAINING

- In preparation for the academic demands of auto mechanics training in a community college, Paul will improve his reading comprehension by answering literal and inferential questions after reading a non-fiction passage at the 8th grade level with 85% accuracy.
- In order to access college level academics, Hal will write using conventional grammar, usage, sentence structure, punctuation, capitalization, and spelling with 80% accuracy based on the district grade level rubric.
- In order to communicate effectively on the job, Frankie will practice self-advocacy skills by discussing his disability, learning characteristics, and needed accommodations with all his general education teachers, without prompting 100% of the time, based on teacher report.

POSTSECONDARY ANNUAL GOAL: CAREER/EMPLOYMENT

- In order to maintain employment after she graduates from high school, Gina will improve her ability to follow through with tasks 90% of the time, to be measured by the following objectives:
 - Independently use a planner to track class work and projects 90% of the time
 - Given a multi-step task, Gina will break down the task into discreet activities and due dates for each activity 90% of the time
 - Sets a reminder and checks off task in the planner when she turns in the work 90% of the time
- Susan will follow two step picture directions using a picture chart 95% of the time in order to participate in a community-based supported employment program.
- In preparation for employment and community activities, Cooper will comfortably access his environment by getting in and out of the vehicle that transports him to and from job sites and community activities 100% of the time, based on Physical Therapist report.

POSTSECONDARY ANNUAL GOAL: INDEPENDENT LIVING SKILLS

- Don will improve his emotional regulation, coping, and problem-solving skills as described in his behavior plan in order to live independently in a college dormitory, by demonstrating the following objectives:
 - Following classroom and school rules 90% of the time without a prompt and 100% with a prompt.
 - Naming personal difficulties and 1-2 ways to appropriately cope with each of these difficulties 9 out of 10 times.

- In order to independently communicate information about himself while in the community, Juan will state his first and last name and phone number with 100% accuracy.
- In order to participate in a supported living setting, Samantha will respond to questions and make choices using alternative communication methods:
 - When given a choice between two activities or objects, Samantha will indicate her preference using eye gaze 90% of the time as measured by progress monitoring.

Element 7

Student was invited to the IEP meeting where transition services are to be discussed. 34 C.F.R § 300.321

Guidance and Writing Tips

- There must be evidence of an invitation to the student.
- Notice of Meeting addressed specifically to student (may be co-addressed with parents), a copy of a separate invitation to the student, or documentation of verbal invitation.
- The inclusion of the student's name on the list of who will be invited on the parental Notice of Meeting does not constitute an invitation to the student.
- A student's signature of attendance on the participants' page of the IEP will not meet this compliance requirement.

Element 8

Prior consent of the parent to invite a representative of any participating agency that is likely to be responsible for providing or paying for transition services. 34 C.F.R. § 300.322

Guidance and Writing Tips

- There must be evidence of parental consent dated prior to IEP meeting invitation date to the agency.
- You must have written consent from parents before you invite an agency representative to attend any IEP meeting. This written consent must be obtained each and every time you invite an outside agency.
- If an agency [e.g., Department of Youth Corrections (DYC), Department of Human Services (DHS), Guardian ad litem (GAL)] has a custodial role with the student, parental consent to invite this agency representative is not required.
- SWAP providers are district/BOCES employees so parental consent is not required for them to be invited to an IEP meeting. However, written parental consent is required to invite the DVR counselor.
- If outside agencies attend a meeting at the invitation of the parents, document the attendance somewhere on the IEP. For example, it could be included in meeting notes or noted on the IEP Participants section, “attended per parent invitation.”

Appendix

IDEA and ECEA Secondary Transition Services IEP Citations

§ 300.1 Purposes

To ensure that all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living.

§ 300.320 Definition of individualized education program

(b) *Transition services*. 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, the IEP must include—

- (1) Appropriate measurable postsecondary goals based upon age appropriate transition assessments related to training, education, employment, and, where appropriate, independent living skills; and
- (2) The transition services (including courses of study) needed to assist the child in reaching those goals.

ECEA 4.03 Individualized education programs (Colorado ECEA Rules)

Exception to 34 CFR § 300.320, the IEP content requirement for transition services begins with the first IEP developed when the child is age 15, but no later than the end of 9th grade, or earlier if deemed appropriate by the IEP Team, and updated annually, thereafter.

§ 300.43 Transition services

(a) *Transition services* means a coordinated set of activities for a child with a disability that—

- (1) Is designed to be within a results oriented process, that is focused on improving the academic and functional achievement of the child with a disability to facilitate the child's movement from school to post-school activities, including postsecondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation;
 - (2) Is based on the individual child's needs, taking into account the child's strengths, preferences, and interests; and includes—
 - (i) instruction;
 - (ii) related services;
 - (iii) community experiences;
 - (iv) the development of employment and other post-school adult living objectives; and
 - (v) if appropriate, acquisition of daily living skills and provision of a functional vocational evaluation.
- (b) *Transition services* for children with disabilities may be special education, if provided as specially designed instruction, or a related service, if required to assist a child with a disability to benefit from special education.

§ 300.321 Transition services participants

The public agency must invite the child with a disability to attend the child's IEP Team meeting if a purpose of the meeting will be the consideration of the postsecondary goals for the child and the transition services needed to assist the child in reaching those goals. With the consent of the parents, the public agency must invite a representative of any participating agency that is likely to be responsible for providing or paying for transition services.

§ 300.322 Parent participation

The notice must indicate that a purpose of the meeting will be the consideration of the postsecondary goals and transition services

§ 300.305 Additional requirements for evaluations and reevaluations

For a child whose eligibility terminates under circumstances described in paragraph (e)(2) of this section [graduation with a regular diploma or aging out] a public agency must provide the child with a summary of the child's academic achievement and functional performance, which shall include recommendations on how to assist the child in meeting the child's postsecondary goals.