



*Freda Reid, President*  
*Mary Alice Myers, President-Elect*  
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Ms, Shan Goff  
Bureau Chief, Florida

January 18, 2002

Dear Shan,

The Florida Association of School Psychologists appreciates the opportunity to provide input in regard to the issue of timelines for initial evaluations for Exceptional Student Education. We are in support of each student's right to a timely evaluation. Furthermore, we sincerely hope our input will be helpful in carefully defining the way in which timelines may be implemented.

Student Support Teams (Child Study Teams, Intervention Assistance Teams, etc.) across the state of Florida work diligently to address teacher concerns. These teams collaborate to accurately define academic and behavior problems at the screening level, determine why the problems are occurring, identify targeted interventions and provide intervention support to classroom teachers. Such team intervention may result in outcomes such as successful ongoing support in the regular classroom, eligibility under Section 504, development of an Academic Improvement Plan, referral to alternative education or referral to Exceptional Student Education.

In cases in which a disability is suspected, team activities are documented as pre-referral requirements including appropriate sensory screenings, interventions, observations and parent conferences relevant to the referral concern. After careful consideration and collection of pre-referral data, the team obtains informed consent for evaluation. This is the point at which any imposed timeline should most logically begin. Subsequently, an evaluation is completed, evaluation results are interpreted, results are reported and an eligibility staffing occurs. The timeline would logically end on the date of the eligibility staffing. Specific draft language is suggested below:

"Subsequent to completion of mandated pre-referral activities, districts will request parental consent for initial evaluation. The elapsed time between date of receipt of parental consent by the LEA and date of eligibility determination for Exceptional Student Education services shall not exceed 90 school days."

School days are suggested rather than calendar days in order to realistically address staff availability in meeting this Department of Education expectation. Staff and students are typically not available across holidays, spring break and summer break. Indeed, equity concerns would be expected with the use of calendar days as more privileged students might access a more timely evaluation simply due to the fact that their parent is more capable of transporting them to testing or staffing appointments during such school breaks. However, we fully agree that the use of school days as a measure should be prudent and suggest the following language:

"Although every effort will be made to meet the aforementioned timeline, there may be some factors outside of the control of the LEA that will impact this process (e.g., student absenteeism). In such cases deviations from this timeline should be documented by the LEA."

In conclusion, the Florida Association of School Psychologists recognizes the need for district accountability in regard to evaluation timelines. We are in steadfast support of improved student-to-school psychologist ratios to effectively meet such timelines. In order to be most effective, however, we support the move to a more comprehensive service delivery system in Florida in which there is less emphasis on traditional assessment and a more appropriate focus on effective problem-solving, team collaboration, functional academic assessment (e.g., curriculum-based measurement), functional behavior assessment, targeted academic/behavioral intervention, and data-based progress monitoring.

A move in this direction is in alignment with the new expectations of IDEA '97 and the updated standards of the National Association of School Psychologists. More importantly, we believe such a move would result in more positive outcomes for the students and families of Florida.

Sincerely,

William J. Donelson, Ed.S., NCSP  
FASP Administration & Supervision Chair  
Director of Student Services, St. Lucie County Schools

For Lori Glassman, FASP President

Cc: FASP Board