Tips from the Special Education Division: Concurrent Services

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Question: What is the best way to represent "concurrent" services on an IEP?

Answer:

IEPs are required to identify the projected start date and the anticipated frequency, location, and duration of the special education, related services, and supplementary aids and services to be provided to the student, or on behalf of the student. (See, WAC 392-172A-03090). Most IEP systems include a summary of services (also referred to as a service matrix) for teams to identify this required information:

- Projected Date(s) for Initiation: When the service will start.

- Duration: When the service will end. In some cases, the duration may be less than an entire school year. The duration, however, should not extend past one year, since the IEP is required to be updated annually.

- Frequency: How long and how often each session of the service will be provided. This information may include the amount of time each day or week, and how many times per week or month.

- Location: Where services will be provided (e.g., general education setting, special education setting). With the federal and state focus on least restricted environment (LRE), it is extremely important to clearly identify the specific location of each service being provided. Without this information, it is difficult – if not impossible – to accurately determine the student's LRE for reporting purposes.

Consider the following example:

Service(s)	Frequency	Location	Start Date	End Date
Specially Designed Instruction				
Reading	60 min/day	General Education	10/25/19	10/25/20
Written Language	50 min/4 times weekly	General Education	10/25/19	10/25/20

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Adaptive	40 min/2 times weekly	Special Education	10/25/19	10/25/20
Behavior	30 min/day	Special Education	10/25/19	10/25/20
Speech Therapy	30 min/1 time weekly	Special Education	10/25/19	10/25/20
Related Services				
Counseling	30 min/1 time weekly	General Education	10/25/19	10/25/20
OT	40 min/2 times monthly	Special Education	10/25/19	10/25/20

Frequency of Services

IEPs must identify the frequency, location, and duration for each individual service area. Refer to number 35 of the Appendix A to Part B of the IDEA, which states: *The amount of services to be provided must be stated in the IEP, so that the level of the agency's commitment of resources will be clear to parents and other IEP team members. The amount of time to be committed to each of the various services to be provided must be (1) appropriate to the specific services, and (2) stated in the IEP in a manner that is clear to all who are involved in both the development and implementation of the IEP.*

Service times should be separated out by service area (e.g., reading, writing, math), rather than lumped into one block of time (e.g., "academics", "pre-academics", etc.). The frequency of services should be clear to the parents and everyone involved in implementing the IEP. Ranges of time or an "as needed" designation are not an adequate explanation of the frequency for an area of service. Identifying a service as a range of time or "as needed" also raises concerns about the provision of specially designed instruction (SDI) to the student, since SDI should be planned and organized, and not provided on an "as-needed" basis.

Some IEPs identify services in the area of "cognitive" skills. If a student is school-aged (i.e., kindergarten through 12th grade), and the present levels and annual goals are separated into sections clearly related to reading, writing, and math skills, then the services should be separated into reading, writing, and math on the service matrix, rather than lumped into one block of time labeled "cognitive." Examples of academic skills could include reading sight words, counting objects, learning letter sounds, writing the student's name, etc. If the goals and present levels are not split into sections related to reading, writing, and math, and are clearly cognitive, rather than academic, in nature, then it may be appropriate to identify the services as "cognitive" on the matrix. Examples of cognitive skills could include learning colors, sorting, following directions, selecting a preferred item, activating a switch, etc.

"Concurrent" Services

Some IEP systems allow a service to be identified as "concurrent." Concurrent services are those services that are occurring simultaneously. Caution should be applied when using the term "concurrent" on a service matrix, because there are very few situations in which this approach

would be appropriate. Here are a few examples where identifying a service as "concurrent" may be appropriate, depending on the unique needs of the student:

- The IEP team has chosen to separate services in the area of reading into "reading fluency" and "reading comprehension" on the service matrix. The team may choose to identify "reading comprehension" as happening concurrently with "reading fluency" because both of these are the same service area – reading. Note: The service matrix is not required to separate a service area, such as reading, into sub-areas (reading fluency, comprehension, etc.) but the IEP team may determine, based on the unique needs of the student, that the matrix should be broken out to a more specific degree.

- Occupational therapy is being provided as a related service, without a separate annual goal. The occupational therapist is assisting with the student's written language goal and is providing the service **at the same time and location** that the student is receiving their SDI for written language.

- A student has a one-to-one paraeducator or interpreter assigned to them as a related service or supplementary aid/service. If the paraeducator or interpreter is not providing instruction (e.g., SDI), then it may be appropriate to identify those services as "concurrent."

Marking a service as "concurrent" in other situations is problematic because it does not clearly identify to the parents and staff implementing the IEP the amount of time to be committed to each of the various services to be provided. In addition, if there are multiple services identified on the matrix and one is marked as "concurrent" it would be difficult or impossible to tell which services are supposed to be served concurrently.