

Are Your Present Levels of Performance (PLOPs) a Flop?

Key points:

- Proper present levels of performance statements are detailed, data-driven, unique
- Data provides objective view for parents, results in goals straightforward for teachers to implement
- Update present-level statement any time IEP is amended

Add personality with data, specific needs

It's tempting to rush past present levels of performance statements and dig into the meat of an IEP -- the goals and benchmarks. Yet glossing over PLOPs can make the rest of the IEP more difficult to craft, and poorly written ones can drive a wedge between parents and districts.

In a recent due process case in Illinois, a district was ordered to reimburse parents for private school fees after a hearing officer found that a PLOP statement was too general, was not based on objective data or evaluations, and didn't provide a baseline for setting goals and measuring progress. *City of Chicago Sch. Dist. 299*, [52 IDELR 177](#) (SEA IL 2009).

Proper PLOPs are detailed, data-driven and unique to each student's needs and also include targeted, measurable skills, said Kay Davis, special education director for the [City of St. Charles \(Mo.\) R6 School District](#).

With a well-written present-level statement, your teams will find that the rest of the IEP nearly writes itself, because key data is at their fingertips, some critical analysis work is already completed, and the child's needs are apparent, she said.

Polish your present-level statements with these tips:

- **Encourage input.** Special education teachers carry the weight of IEPs, but general education teachers should provide substantial input on the child's performance in relation to grade-level expectations. Also talk to parents; art, music and physical education teachers; media specialists; related service providers; and other school staff. A complete present-level snapshot leads to accurate goals. Engage students by asking their opinion of their draft IEP. Once the IEP is in place, make time to check in with the student on a regular basis regarding IEP goals and progress. This approach naturally leads students toward self-advocacy and providing their own input on performance levels, Davis said.

- **Let data drive decisions.** When a child's present performance level is shrouded in anecdotal comments, it can give parents the impression that their child is not liked and doesn't do anything well. Data provide an objective view. The Education Department encourages districts to include results from classroom tests and assignments as well as individual reevaluation and eligibility tests. Comments based on an error analysis of a student's test responses are often helpful to include, Davis added. Data-driven PLOPs are more likely to lead to data-driven goals, which are more straightforward for teachers to implement and measure.

- **Make sure goals reflect PLOPs.** The ideal IEP form would allow a present-level statement immediately followed by the goal and benchmarks that match that particular need. Although many IEP formats don't allow for this, be sure your teams go back and check to make sure that for every goal in the IEP, there is a corresponding remark in the PLOP that gives data and explains where the student stands on that skill.

- **Create a performance paper trail.** Anytime the IEP changes, you need to update the child's present-level statement, Davis said. She learned this the hard way during a due process hearing in a former district. An attorney asked her how the team decided what to change in a student's IEP. Confidently, she explained how the team discussed the student's progress and made a data-driven decision. The attorney then asked why the child's present-level statement was exactly the same on a previous and more recent IEP if the child's needs had changed and goals were modified. Davis said she couldn't give an answer. "We had the discussion at the meeting but it wasn't on paper," she said. "When you get to the hearing, [an undocumented discussion] doesn't matter."

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