

Compliance with PL94-142 Mandates: Implications for Rural Teacher Training Programs

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This study examines the aspects of Public Law 94-142 that proved both least and most problematic for rural special education cooperatives. Compliance was measured through a self-developed questionnaire based on the manuals used by The Federal Office of Special Education and Rehabilitation Services. The sample was obtained by writing to each State Department of Education in Federal Education Regions IV and V. One hundred and fifty-seven cooperatives serving primarily rural areas were identified. One hundred and thirty-five (86%) completed questionnaires were returned. Rural cooperatives experience the least difficulty complying with mandates related to parental rights, student assessments, and the Individual Education Plan (IEP). The greatest difficulty is experienced complying with issues related to personnel knowledge regarding special education, timeliness, and parental attendance at IEP meetings. The lack of knowledge regarding special education has implications for rural teacher training programs. Because the majority of handicapped children are mainstreamed, both preservice and inservice training programs must include information regarding special education laws and procedures and place greater emphasis on educating the handicapped child in the regular classroom.

The passage of PL94-142, The Education For All Handicapped Children Act (1975), brought a new awareness of the difficulties associated with providing special education services in rural areas. Sher [10] divided the problems into two categories "*access and equity*." He noted that rural school children have historically lacked access to the services and resources necessary to meet their special education needs. Furthermore, available services tend to be either inappropriate for the child's needs or inferior to the services available in urban areas.

Many barriers to the provision of quality special education programs in rural areas are recognized. These include: funding inadequacies; difficulty recruiting and retaining qualified personnel; underdeveloped services; and transportation difficulties associated with large geographic spaces, sparse population, and geographic barriers [2; 6]. Schrag [9] suggested that the PL94-142 mandates and the consistency with which they are applied may in fact hamper the provision of quality special education services in rural areas. Thus, the effective implementation of PL94-142 in rural areas is a critical challenge to the American educational system.

As early as 1964, the need to develop alternative administrative arrangements for the provision and administration of special education services in rural areas was recognized. At that time, Lord and Isenberg [7] asserted that most rural school districts are too small to provide programs to children that constitute a small proportion of the student body. Jordan [5] also stated that local school districts large in geographic area but small in enrollment are not an appropriate base for administering comprehensive programs. Thus, traditional arrangements for administering schools in sparsely populated areas generally preclude the provision of special education services.

The passage of PL94-142 fostered a burgeoning of cooperative arrangements for the provision and administration of special education programs in rural areas. The reason behind this unprecedented growth was twofold. First, handicapped children could no longer be denied a free appropriate public education. Because the provision of adequate special education services within an individual school district was often unfeasible due to a widely scattered and extremely diverse special education population coupled with limited resources, cooperative arrangements seemed a logical alternative. Second, the requirement that each application for PL94-142 monies be for a minimum of \$7500 fostered collaboration as many small rural school districts were unable individually to generate sufficient allocations to receive these funds.

Despite the lack of research regarding their efficacy, cooperative arrangements have increased greatly in number [3]. Cooperatives exist because they are viewed as a more efficient or effective means of meeting one or more of a school district's goals. Given an increased geographic area and a larger population base, cooperative arrangements are able to provide a greater continuum of services and better meet the needs of low-incidence populations residing in rural areas.

Cooperative arrangements vary on many dimensions. These include: number of school districts served; mode of governance; funding sources; staffing patterns; services rendered; professional personnel employed; and stated goals. Even where uniformity might be expected (i.e. intermediate units operating under the same state mandates) a large amount of variance occurs.

Regional cooperatives are not, however, a panacea for the difficulties inherent in providing special education services to handicapped children residing in rural areas. Cooperative arrangements may produce or exacerbate a

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TABLE 1
Sample Population of Rural Cooperatives

Region IV		Region V	
State	Number of Cooperatives	State	Number of Cooperatives
Alabama	1	Illinois	22
Georgia	14	Indiana	19
Kentucky	15	Michigan	21
Tennessee	1	Minnesota	37
		Ohio	7
		Wisconsin	20
TOTALS	31		126

variety of problems including: transportation difficulties; parental involvement; interpersonal roadblocks; goal displacement; locus of decision making; physical location of the unit; personnel administration; and abrogation of responsibility for handicapped children to the cooperative unit [2; 4; 6].

The need for research concerning the provision of special education services in rural areas is well recognized [3; 5; 10]. Despite the recognition of need, a dearth of research exists. The meager body of literature that does exist is viewed as: lacking experimental research; lacking sophistication; largely experientially based; failing to provide a comprehensive view of the rural education situation; and limited in its usefulness for policy formation [11]. Thus, the need for continued research in the field of rural special education is evident.

Given the challenge of implementing PL94-142 in rural areas along with the growth of cooperative arrangements, this study is aimed at discovering the aspects of PL94-142 that prove both most and least problematic for rural special education cooperatives. Policy implication resulting from this study will be delineated.

RESEARCH METHODOLOGY

Sample

The United States is divided into ten Federal Education Regions. This study draws its sample from two of them: Region IV comprised of eight Southern States (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee), and Region V comprised of six Midwestern States (Illinois, Indiana, Michigan, Minnesota, Ohio and Wisconsin). These two regions were selected because they include some of the nation's most rural areas.

The survey sample was obtained by writing to the State Department of Education in each of the 14 states in Federal Education Regions IV and V and requesting a listing of special education cooperatives. Through this information it was determined whether cooperative arrangements existed within the state of concern. For the

purposes of this study, a cooperative is defined as any inter-district administrative arrangement that provides specific services to member school districts. Cooperatives range from informal agreements between two or more local school districts to structures imposed by a state education agency with a regulatory or service orientation. Two states, South Carolina and Florida stated that cooperative arrangements did not exist and were eliminated from the sample.

The lists provided by several State Departments of Education (Mississippi, North Carolina, Alabama, Kentucky, and Ohio) failed to indicate whether listings constituted individual school districts or cooperative arrangements. These states were therefore contacted to verify the existence of cooperative arrangements. This procedure led to the elimination of Mississippi and North Carolina from the sample population as their respective State Departments of Education indicated that administrative authority for special education programs rested solely with either an individual school district or a single county school district.

The remaining listings were then examined to determine the cooperatives serving primarily rural areas. For the purposes of this study, a rural cooperative is located in an area with less than 150 inhabitants per square mile or where more than 60% of the county inhabitants live in rural areas as defined and measured by the United States Census Bureau. Cooperatives serving regions located within a Standard Metropolitan Statistical Area are not considered rural.

This process resulted in the identification of 157 rural cooperatives in 10 states (see Table 1). The director of each cooperative was then selected for inclusion in the survey.

Instruments

To collect data regarding compliance with the mandates of PL94-142, a written questionnaire was developed. The total design method [1] was used to guide the format and distribution of the questionnaire and to enhance the response rate. This method specifies that the question-

TABLE 2
Responding Cooperatives

Region IV				Region V			
State	Eligible Respondents	Responses Received	%	State	Eligible Respondents	Responses Received	%
Alabama	1	1	100	Illinois	21	16	76
Georgia	13	12	92	Indiana	19	19	100
Kentucky	12	12	100	Michigan	21	18	86
Tennessee	1	1	100	Minnesota	35	30	86
				Ohio	7	6	86
				Wisconsin	20	14	70
TOTALS	27	26	96		123	103	87

naire be typed in 12 point print and reduced by 79%. The questionnaire is printed in booklet form with the front cover comprised of a title, illustration, necessary instructions and the name and address of the sponsoring agency, and the back cover used to thank respondents for completing the questionnaire and to ask for additional comments. Questions are grouped by content area and response category with the least objectionable and most important questions first and the demographic questions last. Aesthetic considerations are important. Therefore a vertical flow is established with questions typed in lower case and answers, comprised of words rather than numbers, typed in upper case. Transitions to aid in continuity are also specified.

The items for the questionnaire were generated from the manuals used by The Federal Office of Special Education and Rehabilitation Services in monitoring the states for compliance with the mandates of PL94-142. A 4-point response scale was used for each question: always, usually, rarely, and never. Numerical scores assigned to the responses were 1, 2, 3, and 4 respectively. An unanswered question was assigned a value of 0.

To determine content validity, the questionnaire was submitted to an expert panel including various professors of special education, members of county offices of education, and one member of the Federal Office of Education. A pilot test was conducted using a sample of 70 special education administrative units in the Western United States. Based on the results of the pilot study, several questionnaire items were revised.

Factor analysis using a varimax rotation was performed to determine the questionnaire items accounting for the greatest amount of variance. This led to reduction from 53 to 37 items. A reliability assessment using Cronbach's Alpha resulted in a standardized item alpha of .85.

In accordance with the procedures specified by Dillman [1], each questionnaire was assigned an identification number located in the upper right-hand corner of the front page for follow-up purposes. A cover letter and a self-addressed stamped envelope were mailed to each subject. One week after the original mailing a postcard ser-

ving as a thank-you to those who had responded and as a reminder to those who had not was sent. Three weeks after the first mailing, a letter and replacement questionnaire were sent to all non-respondents. At the end of seven weeks, a third and final mailing took place.

Data Analysis

As responses were received, each questionnaire was coded using the numerical values assigned to the response scale (always = 1; usually = 2; rarely = 3; never = 4; no response = 0). The data was then entered for use with the Frequencies program from the Statistical Package for the Social Sciences [8] to determine the individual items that proved both least and most difficult for rural cooperatives regarding compliance with the mandates of PL94-142.

RESULTS

Of the 157 rural cooperative directors surveyed in Federal Education Regions IV and V, 135 (86%) usable responses were received. One person (from Illinois) refused to complete the questionnaire. Another person (from Kentucky) had retired and the position had not been filled. (This information was sent by a person in the agency who had previously completed the questionnaire). Twenty survey recipients failed to return the questionnaire.

Of the 135 completed questionnaires, six respondents (two from Minnesota, one from Illinois, one from Georgia, and two from Kentucky) indicated that they represented individual school districts rather than cooperative arrangements and were eliminated from the data analysis procedures. By states within regions, the sample population of usable responses is displayed in Table 2.

The following items were judged least difficult for rural cooperatives to implement since 75% of the cooperatives surveyed indicated that they always complied with these items.

1. Individual assessments are performed by qualified personnel (98%).

2. Parental permission is obtained prior to assessing a child suspected of having special education needs (93%).
3. Parental approval is obtained prior to placing a student in a special education program (92%).
4. Due process procedures exist to resolve conflicts that arise between the parents and the school district regarding any aspect of the special education placement procedures (88%).
5. IEPs are reviewed on a yearly basis (85%).
6. Special education teachers attend the IEP review meeting (83%).
7. Children are assessed in their native language (83%).
8. Child Find activities are conducted (81%).
9. The IEP contains all the components required by law (80%).
10. The parents of each child referred for special education evaluation receive an explanation of their rights (77%).
11. Evaluations are conducted by a multidisciplinary team (77%).
12. No single procedure is used as sole criterion for placement in a special education program (77%).
13. If parents disagree with the team decision, attempts are made to reconcile differences (75%).

In contrast, the responding cooperatives reportedly always complied with the following items a maximum of 30% of the time. These items therefore appear to pose the most difficulty for rural cooperatives.

1. Regular educators are prepared to handle special education students placed in the regular classroom (6%).
2. Regular educators take responsibility for special education students placed in their classrooms (16%).
3. Teachers who refer students for special education services are given suggestions to help accommodate these students (19%).
4. Assessments are completed within the time limit specified by PL94-142 (20%).
5. Evaluation personnel attend the IEP review meeting (26%).
6. Inservice programs on special education procedures are provided for regular educators (26%).
7. Classroom alternatives are tried before a student is referred for special education services (30%).
8. Special educators know special education laws (28%).
9. Parents attend IEP meetings (30%).

DISCUSSION

The PL94-142 mandates that prove least difficult for the rural cooperatives surveyed can be divided into three major categories; parental rights, assessment issues, and the Individual Education Plan (IEP). Each of these categories will be discussed.

Rural school districts apparently have little difficulty

obtaining parental permission to assess students referred for special education services. Survey respondents also report little difficulty obtaining permission to place students in special education programs. These findings coincide with the findings of a longitudinal study concerning the implementation of PL94-142 conducted by the Stanford Research Institute [12] and may result in part from the preliminary emphasis and institutionalization of PL94-142 procedural requirements as well as the existence of adequate due process procedures. It may also be related to parents' willingness to unquestioningly accept school district decisions. This is not surprising in view of traditional rural values that afford the school and its personnel a highly respected place in the community making it difficult for some parents to question the school's decisions. Furthermore, despite the provision of the law requiring that parents be informed of their rights, parents may not understand these rights. This occurs because parents are often provided a paper listing the rights specified by PL94-142. Moreover, parental permission may be obtained via mail further limiting the opportunity to clarify questions and assure complete understanding of these rights.

Compliance with items concerning assessment of students referred for special education services proved remarkably easy for the rural cooperatives surveyed despite reported difficulties recruiting and retaining qualified personnel. It therefore appears that the means of providing adequate special education assessments do exist. One explanation for compliance with issues regarding student assessment is the use of community service personnel or services located at some distance from the local school. While such arrangements may preclude the provision of services on a regular basis, they are sufficient to provide the assessments needed. It is also important to note that student assessments did not occur within the time limit specified by PL94-142. This may result from variations between state and federal timelines. It may also result from the existence of assessment backlogs [12].

Assessing students in their native language did not pose a problem for the rural cooperatives surveyed. As several respondents indicated, this issue had rarely, if ever arisen due to an absence of non-English speaking students.

Child Find activities are also reported frequently by survey respondents. Moreover, in rural communities, people tend to know each other. This makes handicapped children readily identifiable. In addition, due to scarce resources and rural tradition, public agencies tend to work together. This enhances the Child Find process.

Most IEPs reportedly contain all required components. It is not unreasonable to assume that the use of state or regional forms that clearly indicate the required components account for the high degree of compliance noted. In addition, the specificity of the law, the emphasis on procedural requirements, and the state and federal monitoring procedures that regularly occur may also contribute to the ease of compliance.

IEP reviews generally occur on a yearly basis as speci-

fied by law. Within the regions studied, the special education teacher usually attends these meetings. Since a small number of students receive special education services, it is relatively easy for special educators to keep track of student needs and attend the review meetings.

The items that proved most difficult for rural cooperatives in complying with the federal mandates, according to this survey, are: issues related to personnel knowledge regarding special education; the timelines specified by the law (discussed previously); and, parental attendance at IEP meetings.

From the results of this survey, regular educators appear either unwilling or unable to work with handicapped children in the regular classroom. One possible explanation for this phenomenon is the lack of suggestions given to regular educators who have referred students for special education services. Another possible explanation is the lack of inservice education provided to regular educators regarding special education. Write [1981, p. 127] states that "continually pushing inservice training aside seems to pose an impediment to the successful implementation of PL94-142." Moreover, most of the inservice that has been conducted has been procedural in nature rather than applicable to staff problems. Therefore, resistance to mainstreaming persists.

Parental attendance at IEP meetings may be low because of distance factors. Considerable distance from the child's school due to sparse population, school district consolidation, and regional programs coupled with additional commitments (i.e. family, work, etc.) may preclude parental attendance at the scheduled meetings. Although the law does specify that meetings be held at mutually agreeable times, parents may not request an alternate meeting time due to either a lack of knowledge of their legal rights or their willingness to abide by the school's decisions (discussed previously).

POLICY IMPLICATIONS

This survey raises several issues that have implications for both teacher training programs and state legislatures. The implications for each of these agencies will now be discussed.

Teacher Training Programs

This survey indicates that school personnel lack knowledge regarding special education. Thus, both pre-service and inservice training programs for regular educators should include a greater emphasis on the handicapped child in the regular classroom. This training should include a series of courses that encompass:

1. an overview of special education including information concerning a variety of handicapping conditions;
2. the legal mandates and their ramifications for the classroom teacher;
3. practical methods for modifying the classroom to

- accommodate handicapped children; and,
4. practical experiences that enable both current and prospective educators to realistically practice these techniques.

This training should be retroactive (required of all teachers currently in the field as well as those in training). It should also be conducted at the local school district level for practicing teachers to assure applicability and transfer of skills learned.

Not only do regular classroom teachers need additional training, special educators also need additional training. Rural special educators are often responsible for the entire special education program. Current teacher training programs do not prepare the future special educator to assume this role and the accompanying responsibilities. Thus, rural special education training programs should include a series of courses that:

1. familiarize students with all aspects of PL94-142 including its implications for the school;
2. teach administrative skills including policy and program development and implementation, finance, and curriculum development;
3. prepare educators to consult with regular educators regarding the placement of handicapped children including procedures for modifying the classroom environment as well as adapting teaching materials and methodology;
4. provide consultation skills for working with parents, administrators, and other agencies; and,
5. provide assessment skills, including the ability to conduct both formal and informal assessments, understand psychological and other types of assessment reports, and translate assessment data into educational programs.

With this training, special educators should be able to assume the roles and responsibilities demanded of the rural special education teacher.

While this survey shows that regular administrators have slightly better knowledge regarding special education than do teachers, most lack an understanding of special education laws and procedures. Since regular administrators often have responsibility for building special education programs, all rural administrative personnel should have training in:

1. special education laws, requirements, and procedures as well as their implications at the building level; and,
2. special education policy development.

Personnel considerations were frequently cited as posing difficulties for rural special education cooperatives. Inability to attract qualified staff was mentioned by many respondents. This is not surprising as Helge [4] reports that 66% of the districts surveyed used emergency credentials to meet special education staffing needs.

Frequent staff turnover also poses problems for rural cooperatives. Helge reports an attrition rate of 30-50%

among new rural special educators. Thus, teacher training institutions must institute programs that train special educators to serve in rural areas. These programs should:

1. actively recruit students from rural areas;
2. familiarize students with rural special education;
3. include extensive rural internships;
4. provide special educators with generalizable, non-categorical skills that will enable them to work with children possessing a variety of handicapping conditions;
5. train students to develop community resources;
6. enable students to serve as their own resources; and,
7. provide follow-up assistance for rural special educators during their first year of teaching.

These types of programs are important because when special educators are trained specifically for service in rural areas, turnover rates diminish [4].

State Legislature

Given the above recommendations for changes in teacher training programs, state licensure requirements should be monitored or reformulated to assure that both regular and special educators have both the skills and knowledge necessary to provide quality programs to handicapped children residing in rural areas. Moreover, given the sparse population base and large distances inherent in rural areas as well as the difficulties recruiting and retaining qualified personnel, it is imperative that states modify their teacher certification procedures to meet the needs of rural areas. Non-categorical certification that allows special educators to work with children having a variety of handicapping conditions has been successfully implemented in several states (i.e., Massachusetts and California). This type of certification is imperative as it allows more children to be served in their home school with a properly trained and certified teacher. Other states (i.e., Wyoming and Wisconsin) have also initiated certification requirements that are responsive to the needs of rural schools.

Another policy issue for state legislatures, funding, arises from respondent comments. Many survey respondents indicated that funding inadequacies led to service delivery problems. This occurs because the very nature of rural areas increases the cost of special education services. This makes current reimbursements for special education programs inadequate to provide a free appropriate public education to handicapped children residing in rural areas.

Respondents also commented concerning a lack of funds to provide services to students with low-incidence handicapping conditions. Programs for this population are expensive because of the student's service needs. Moreover, by definition, these types of handicaps occur infrequently. Hence a rural school district may have but one or two children with a specific condition, further increasing educational costs.

A lack of funds to attract qualified personnel was also

cited as hampering the provision of quality special education programs. Survey respondents commented that the teacher salaries offered by rural school districts are not competitive with their urban counterparts. This makes it difficult to hire the personnel needed to provide quality special education programs.

It is therefore imperative that state legislatures recognize the additional costs inherent in providing special education services in sparsely populated areas. Weighted funding formulas that recognize the additional costs incurred by rural school districts in providing special education services should be implemented [10]. Only then will equity of service be achieved.

CONCLUSIONS

This study surveyed cooperative arrangements to determine the aspects of PL94-142 that prove both least and most problematic in rural areas. It also delineated several policy issues concerning the provision of quality special education programs in rural areas.

First, teacher training institutions need to alter their preparation programs for both regular and special educators. All programs preparing educators to serve in rural areas should include:

1. familiarity with special education laws and procedures;
2. ability to modify the curriculum to accommodate handicapped learners;
3. specialized training concerning education in rural areas; and,
4. generalizable non-categorical special education skills.

Second, teacher certification boards should examine their teaching license requirements. To comply with the law and provide appropriate programs for all handicapped children, every regular educator needs to be familiar with a variety of handicapping conditions. Regular educators must also be able to accommodate the needs of handicapped children within the regular classroom. Moreover, special educators need to be knowledgeable concerning state and federal special education requirements. In addition, states that do not currently have rural and non-categorical special education certification should institute these types of teaching licenses. Only when the above conditions are met will rural school districts be able to hire adequately trained teachers and provide appropriate programs for the handicapped children they serve.

Third, the legislature needs to alter its funding formulas. These formulas need to be sensitive to the increased service costs experienced by rural school districts in the education of handicapped children. Only when adequate funds are available will equity of services be provided to all children throughout the nation.

Finally, additional study is warranted to aid in the development of rural special education policy and the improvement of services to handicapped children residing in rural areas.

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