



# Preschool Annual Performance Report (APR) Reference Guide

Tennessee Department of Education | January 2026

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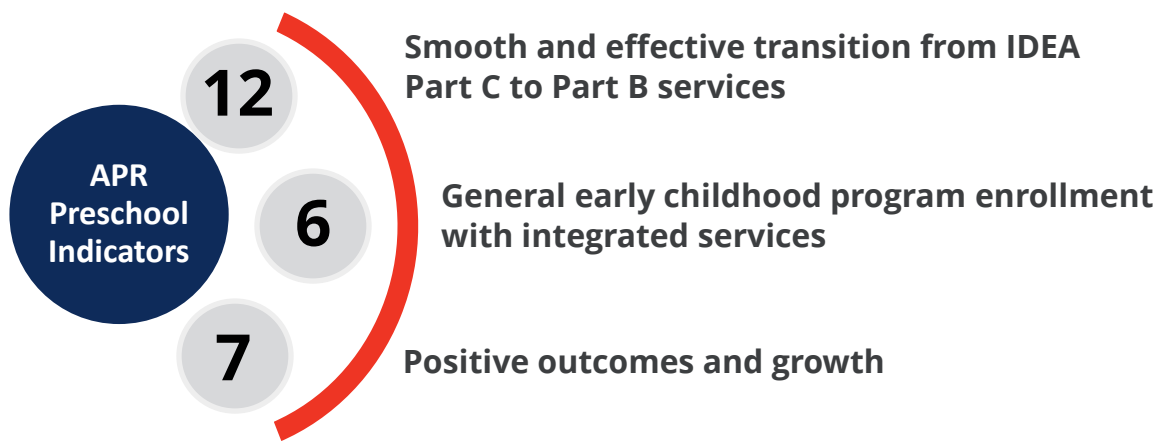
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# Overview

Part B of The Individuals with Disabilities Education Act (IDEA) requires that eligible children with disabilities ages 3 through 21 are provided a free appropriate public education (FAPE) and that they receive special education and related services in their least restrictive environment (LRE).<sup>1</sup> Section 619 of IDEA Part B provides *supplemental* grant funds for preschool children with disabilities (ages 3 through 5). Local educational agencies (LEA) are required to comply with all federal and state special education laws and State Board of Education (SBE) rules. The department is responsible for monitoring LEAs to ensure IDEA laws and SBE rules are executed and taking corrective action when an LEA is noncompliant or does not provide evidence of adhering to those laws and rules. This document provides guidance for the preschool APR indicators in the sequence that they are experienced by children and families: Indicator 12 (early childhood transition), Indicator 6 (preschool environments), and Indicator 7 (preschool outcomes).

**Figure 1**  
Preschool APR Indicator Goals



## **Early Childhood Transition (ECT)**

The IDEA requires the early identification and timely transition of children with disabilities who are referred from IDEA Part C (early intervention services) to IDEA Part B (school system services).<sup>2</sup> The Office of Special Education Programs (OSEP) expects all states to ensure that LEAs develop and follow written ECT procedures ensuring that children referred from IDEA Part C prior to age three, who are eligible for IDEA Part B, have an IEP developed and implemented or other allowable transition resolution by their third birthday.

<sup>1</sup> See 20 U.S.C. § 1412.

<sup>2</sup> See 34 C.F.R § 300.124 and 34 C.F.R. § 303.209.

LEAs must collaborate with Tennessee Early Intervention System (TEIS) to participate in transition planning conferences and ensure all eligible children with disabilities experience a smooth and effective transition from Part C early intervention services to Part B early childhood (EC) special education programs.

## **Preschool Environments**

IDEA regulations for least restrictive environment require that children ages three through 21 with disabilities are educated, to the maximum extent appropriate with non-disabled peers. This means that public agencies must ensure that preschool children with disabilities, including children who attend public, private, or other childcare facilities, are educated with nondisabled children. IDEA further requires that separate classes, separate schools, or other removal of children with disabilities from the general education environment occurs only if the nature or severity of the disability is such that education in the general education classroom, even with supplementary aids and services, would not be appropriate for the child.<sup>3</sup>

*IDEA language sets the expectation that most preschool children with disabilities will be included in general early childhood programs where they receive individualized and appropriate services and support to meet high expectations.*

IDEA language sets the expectation that most preschool children with disabilities will be included in general early childhood programs where they receive individualized and appropriate services and support to meet high expectations.

## **Preschool Outcomes**

High-quality general early childhood programs include children with disabilities and promote their acquisition and use of knowledge and skills, use of appropriate behaviors to meet their needs, and development of positive social emotional skills.<sup>4</sup> OSEP requires states to report data that measure child progress achieved while receiving special education and related services in preschool to monitor the state's performance in providing a free appropriate public education (FAPE).<sup>5</sup>

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<sup>3</sup> See C.F.R. § 300.114(a)(2).

<sup>4</sup> For additional information see U.S. Department of Health and Human Services, & U.S. Department of Education (2023). [Policy Statement on Inclusion of Children with Disabilities in Early Childhood Programs](#).

<sup>5</sup> See 20 U.S.C. § 1416a3A.

# APR Indicator 12

Indicator 12 determines compliance for a child’s transition from IDEA Part C to IDEA Part B. It measures the percentage of children referred by IDEA Part C prior to age three, who are found eligible for IDEA Part B services, and who have an individualized education program (IEP) developed and implemented by their third birthday.

Indicator 12 is a *compliance* indicator with a 100% target, and an expectation that states will ensure LEAs follow procedures and meet timelines for all children who are referred from Part C to Part B services. Under IDEA Part C, early intervention services end on a child’s third birthday unless a state, such as Tennessee, has an extended service option. Early childhood special education (ECSE) services cannot begin until the child has been determined to be eligible for Part B. LEAs must ensure a timely transition from Part C to Part B services for all eligible children.

*Indicator 12 is a compliance indicator with a 100% target.*

Appropriate early childhood transition procedures provide a seamless transition for children and families as they leave TEIS to ensure timely access to the programs, supports, and services needed for a child to receive a free appropriate public education (FAPE).<sup>6</sup>

## Definitions

**Early Childhood Transition** refers to the events and process for eligible children moving from Part C early intervention services to Part B, school system preschool services.

**TEIS Extended Option** is available for children who are eligible for IDEA Part B services, and families may choose to continue with TEIS early intervention services until their child reaches school age (i.e., the start of the school year after a child’s fifth birthday).

**Tennessee Early Intervention System (TEIS)** is the IDEA Part C program that provides early intervention services to Tennessee children (birth to 3 years old) who have developmental delays or disabilities. Services are provided at no cost to families.

**Tennessee Early Intervention Data System (TEIDS)** is the data system managed by TEIS that is used to collect, store, and track data for children who are receiving early intervention services.

## TEIS Notification

In Tennessee, all children served by TEIS are considered *potentially eligible* for Part B services, and with parent/guardian consent, TEIS district offices email a monthly notification file to special education

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<sup>6</sup> For additional information see U.S. Department of Education Office of Special Education and Rehabilitative Services (2023). [Early Childhood Transition Questions and Answers](#).

supervisors (or designees) in each LEA. The TEIS notification is the first event in the child's early childhood transition process. It is intended to allow the LEA ample time to complete the eligibility determination within required IDEA timelines.

The notification spreadsheet includes children who are 27 months or older and who are currently receiving TEIS services. All children on the monthly notification list are officially *referred* to the LEA on the date the LEA receives the list from TEIS. An LEA also will be notified by TEIS if there are no children referred in the current month.<sup>7</sup>

Using contact information provided by TEIS, the LEA must acknowledge each referral by providing the parent with the [Notice of Procedural Safeguards](#) and an introductory letter welcoming the family to the LEA. The LEA should maintain documentation of these actions as this constitutes the LEA's acknowledgement of an initial referral for IDEA Part B services. Many LEAs elect to use the TEIS-provided notification spreadsheet to document their response to the referral. If a child is zoned for a different LEA, the special education supervisor should contact TEIS, and TEIS will send the referral to the correct LEA. Maintain documentation that TEIS has been notified of the out-of-zone referral.

## ***Transition Planning Conference***

A transition planning conference (TPC) (i.e., transition meeting) is held to determine next steps for any child served by TEIS who is potentially eligible to transition from Part C to Part B. It is designed to inform parents of available programs and services that may be accessed after a child is three years old. With the approval of the family, TEIS must convene a TPC among the lead agency (i.e., TEIS), the family, and the LEA, not fewer than 90 days before the child's third birthday, and at the discretion of all parties, not more than 9 months before the child's third birthday. The TEIS service coordinator schedules and leads the meeting and will provide an interpreter as needed. This meeting is critical to ensure a timely and successful transition<sup>8</sup> and is summarized in [Transition Planning Conferences for TEIS](#).



### **TPC – LEA Requirements:**

A LEA representative must participate in the TPC to complete the following responsibilities:

- Provide a copy of the *Notice of Procedural Safeguards* with an explanation of these rights,
- Provide an overview of the LEA's preschool special education program options and services,
- Explain the Part B eligibility and Individualized Education Program (IEP) processes (note: eligibility and IEP decisions cannot be made at the TPC),

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<sup>7</sup> See 34 C.F.R. § 303.209(b)(1).

<sup>8</sup> See 34 C.F.R. § 303.209(c)(1).

- Discuss next steps with the child’s parent/guardian, and
- Establish a means of effective communication and collaboration with the family.

If a LEA has received a notification for a child but has *not* received a request to attend a TPC, the LEA must ensure they meet their Child Find responsibility following this initial referral. The LEA must document that the *Notice of Procedural Safeguards* and introductory letter have been sent to the parent upon notification and that the LEA has consulted with TEIS and made one of the following determinations:

*If an LEA has received a notification for a child but has **not** received a request to attend a TPC, the LEA must ensure they meet their Child Find responsibility...*

- Child is no longer active with TEIS, or
- Parent has elected to not transition to the LEA, and TEIS has held a non-LEA transition planning meeting.

## Late Referrals

A late referral describes a child whose *initial referral to TEIS* is less than 90 days before the child’s third birthday. Children who are late referrals to TEIS will be included in the late referral category for Indicator 12 reporting and the LEA will *not* be considered out of compliance if an IEP is not implemented by the third birthday, provided the LEA has made reasonable efforts to timely complete the eligibility process. For a child’s late referral to TEIS, OSEP gives guidance that LEAs complete the transition by the third birthday or as close to the third birthday as possible. In the case of a late referral to TEIS, the LEA should:

- Receive the late referral from TEIS,
- Participate in a TPC if requested (e.g., 45–90-day late referral),
- Contact TEIS for information on a Part C evaluation and/or Individualized Family Service Plan (IFSP),
- Proceed with eligibility determination, and
- Report as a “late referral” for Indicator 12 purposes.

## Late TPCs

TEIS has met the Part C requirement if a TPC is completed by 90 days before a child’s third birthday. However, if a parent has consented to a TPC, the meeting must be provided even if it is held late. This may include a child who was a late referral to TEIS. The LEA must respond to these requests and should:

- Meet with TEIS and the parent as soon as possible,
- Consider alternative methods to hold the meeting (e.g., virtual meeting),
- Document in TN PULSE the reason for the late TPC,
- Proceed with eligibility and IEP implementation following the 60-day (eligibility) and 30-day (IEP implementation) timelines, and

- Continue to document all attempts to communicate with the parent.

If a TPC is late for a non-parent reason (e.g., inclement weather, staff illness) a transition will be considered untimely if the IEP is not developed and implemented by an eligible child's third birthday, and the LEA will have a finding of noncompliance for Indicator 12.

## **After the TPC**

Immediately following the TPC, the LEA should generate a state ID and assign the child to the Special Education Service School while they are evaluated for a disability and special education services. This will give the LEA the ability to generate needed documents (e.g., meeting invitation, parental consent, eligibility documents, PWN) and begin a contact log in TN PULSE without needing to enroll a child through the student information system (SIS).

If TEIS has included all required information in their data system, a child's TEIDS record will merge with the child's TN PULSE record:

- On the 5<sup>th</sup> of each month after a TPC has been held from the 16<sup>th</sup> day through the end of the previous month, and
- On the 20<sup>th</sup> day of each month after a TPC has been held from the 1<sup>st</sup>-15<sup>th</sup> of the current month.

TDOE will identify children in the TEIDS import file with missing state IDs and follow up with the respective LEA. The LEA will have three (3) business days to generate the state ID.

If a child's TEIDS record does not merge after the import dates, the LEA should confirm that the state ID was generated following the TPC. If the state ID was generated and the file did not merge, the LEA should submit a Zendesk ticket. Failure of the TEIDS record to import is not an acceptable reason for missing the third birthday timeline requirement.



## ***TEIS Extended Services Option***

The TEIS Extended Services Option allows a child with current Part C eligibility to continue receiving early intervention services through an Individualized Family Service Plan (IFSP) beyond age three, *if the child has been determined eligible for IDEA Part B*. If this option is chosen, early intervention services may continue until the beginning of the school year following the child's fifth birthday.

At the child's TPC, the Part C service coordinator will review the TEIS Extended Option and its requirements with the family. After the TPC, the LEA proceeds to conduct a comprehensive evaluation and convene a Part B eligibility determination meeting. It is highly recommended that the LEA invite a TEIS representative (i.e., service coordinator) to the Part B eligibility determination meeting. If a child is determined to be eligible for Part B, the LEA will review Part B information with the family, explaining the possible services and supports available under Part B. If a TEIS representative is present, the meeting may also serve as the TEIS Extended Services Option decision meeting. The purpose of the decision meeting is for TEIS to review the possible services and supports under Part C so the family may make an informed choice. At the decision meeting the service coordinator provides the family with the TEIS Extended Option Services Decision Form with the following options:

*It is highly recommended that the LEA invite a TEIS representative to the Part B eligibility determination meeting.*

- accept the TEIS Extended Services Option,
- decline the TEIS Extended Services Option and proceed with the development and implementation of an IEP with the LEA,
- decline both programs, *or*
- exercise the right to a 10-calendar day consideration period before signing the decision form.

If a TEIS representative does not attend the Part B eligibility meeting, the LEA will notify TEIS of the eligibility determination, and a separate TEIS Extended Services Option decision meeting will be held. TEIS will send the decision form to the LEA once it is signed.

While giving the parent time to decide which option is best for their child, the LEA should proceed by scheduling a tentative IEP meeting to ensure meeting Indicator 12 requirements by the child's third birthday. The LEA will need to develop and implement an IEP if the parent decides to move forward with the LEA for Part B services *or* if the parent fails to sign the TEIS decision form within ten calendar days.



If the parent elects TEIS Extended Services Option, the LEA should complete the following steps:

- Maintain Part B eligibility of a child receiving Part C services through the extended option.
- Upload the TEIS Extended Services Option Decision Form to the child's TN PULSE record.
- Send the family a prior written notice (PWN) documenting the TEIS Extended Services Option decision.
- Inactivate the child's record as "Parent elected Part C Extended Services Option."

When a parent has declined the TEIS Extended Services Option, the child is no longer eligible for extended early intervention services. Further Information can be found in [TEIS Extended Option General FAQ](#) and [Mandatory Exits from TEIS Extended Option](#).

## ***Indicator 12 Data Collection and Reporting***

Indicator 12 measures the percentage of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays. All children referred by Part C are included in category “a” and one of the following transition resolution categories, b-f:

- a. Number of children who have been served in Part C and referred to Part B for Part B eligibility determination
- b. Number of those referred determined to be *not* eligible for Part B and whose eligibility was determined prior to their third birthdays
- c. Number of those found eligible who have an IEP developed and implemented by their third birthdays
- d. Number of children for whom parent refusal to provide consent caused delays in evaluation or initial services or to whom exceptions under 34 CFR § 300.301(d) applied
- e. Number of children determined to be eligible for early intervention services under Part C *less than 90 days before* their third birthdays (i.e., late referrals)
- f. Number of children whose parents chose to continue early intervention (Part C) services beyond the child’s third birthday through a state policy under 34 CFR § 303.211 or similar State option (i.e., TEIS extended option).

The percentage compliant for Indicator 12 is calculated using the following formula:

[(c) divided by (a-b-d-e-f)] times 100.

## **APR Indicator 12 Compliance Determination Process**

Because APR Indicator 12 is a compliance indicator with a target of 100 percent, to determine LEA compliance, the IDEA Data Team must find one of the following timely events recorded in TN PULSE for each child referred by TEIS:

- **Timely IEP (category c):** The IEP has been implemented with a begin date of the child’s third birthday and a PWN.
- **Not Eligible (category b):** A Part B eligibility meeting occurred prior to the child’s third birthday, and the child has been determined not eligible:
  - Child is evaluated and does not meet state standards for a disability.
  - Parent repeatedly fails to produce the child for the initial assessment:

- Keep detailed documentation of contact attempts, missed meetings/assessments, letters sent, and home visits.
  - Hold an eligibility meeting and create an “Eligibility Report – Not Eligible.”
- Child is evaluated and determined to meet the State of Tennessee’s eligibility standards for a disability, but the parent/guardian is declining services:
  - Create an “Eligibility Report – Not Eligible,” and choose the option stating, “This student Is Eligible for Special Education because s/he meets the State of Tennessee’s eligibility standards for... (choose the disability from the dropdown menu),” but the parent/guardian is declining services.”
- Child has been evaluated, and the parents repeatedly do not respond to attempts to hold initial eligibility meeting:
  - Keep detailed documentation of contact attempts, missed meetings, letters sent, and hold the eligibility meeting with team members.
  - Determine with available data if the student did or did not meet eligibility criteria.
  - Complete the appropriate non-eligibility report:
    - Select, *This student Is Eligible for Special Education* because s/he meets the State of Tennessee’s eligibility standards for [disability], but the parent/guardian is declining services; or
    - Select, *This student is Not Eligible for Special Education* because s/he does not meet standards for a disability.
  - Send the parent/guardian a PWN, the signed non-eligibility report, copies of reports and data used to determine eligibility, and the Notice of Procedural Safeguards.

**Note:** Do **not** inactivate the TN PULSE record if the child is not eligible for Part B.

- **Parent Refusal (category d):** An appropriate parent reason has been documented in TN PULSE prior to the third birthday:
  - Parent signs initial consent and later revokes consent for an evaluation. Keep detailed documentation of contacts and upload the parent’s written revocation of consent. Consider using a PWN. The assessment specialist should enter a discontinuation event date in TN PULSE to stop the timeline. **Note:** Do not inactivate the record.
  - Moved, known to be continuing: Maintain documentation of this communicated information and a PWN that an evaluation will not take place. Inactivate the record as “Moved, known to be continuing.”
- **Late Referral (category e):** The child was initially referred to Part C (TEIS) less than 90 days before his/her third birthday.
- **Parent elected Part C TEIS Extended Services (category f):** Prior to the child’s third birthday, the LEA has uploaded to TN PULSE the parent-signed decision form choosing the TEIS extended

option **and** inactivated the child's record. The child's **Part B eligibility is maintained**, and the exit event date is the date the LEA received the decision form.



**UNTIMELY TRANSITION**  
If the TN PULSE record of a child referred by TEIS does not include evidence that an IEP has been implemented (category c) or provide another resolution of the transition (category b, d, e, or f) by the child's third birthday, the transition is considered untimely, and the LEA is out of compliance for Indicator 12.

To process and report Indicator 12 data to United States Department of Education (ED) by February 1 each year, the department's IDEA data team requests TEIDS data from TEIS. The data team merges that data with TN PULSE records for analysis and assigns a preliminary determination (i.e., Timely, Not eligible, Parent refusal, Late referral, TEIS extended, Untimely) for each transition. Preliminary untimely transitions are shared with each LEA. LEAs are required to submit responses with supporting documentation (evidence) for each individual record. The IDEA data team analyzes all responses to assign final compliance determinations.

### **APR Indicator 12 Noncompliance – Corrective Actions**

If a LEA receives a finding of APR Indicator 12 noncompliance, the LEA must complete the following corrective actions by dates determined by the department each year:

- Ensure the resolution of *all* children's records determined to be out of compliance,
- Complete training for *all* personnel involved in the early childhood transition process,
- Develop or revise Early Childhood Transition Procedures (ECTP), and
- Demonstrate Indicator 12 compliance in the current school year (through department data review).

### **APR Indicator 12 Guidance**

The following describes LEA practices that help ensure a smooth transition for children and families:

- Track referrals from the Part C (TEIS) notification through resolution of the transition.
- Attend TPCs as required.
- Obtain written parental consent for evaluation in a manner that supports meeting the transition timelines (i.e., 60-day eligibility, IEP by the third birthday). Consent may be obtained at the TPC.

- Follow up on all referrals and meet Indicator 12 timelines regardless of TEIDS import issues. Failure of the child’s record to import to TN PULSE is not an acceptable reason for not meeting timeline requirements.
- Complete timely evaluations and eligibility determinations. There is no timeline extension available for the Indicator 12 transition requirements. Lack of school enrollment paperwork, a failed hearing screening, and other administrative issues are not acceptable reasons for delaying a child’s transition.
- Review and update the LEA’s early childhood transition procedures annually and provide training annually. Provide sufficient detail in procedures to provide evidence that all early childhood transition requirements are met.
- Implement timelines that promote transition completion by the child’s third birthday. For example, the LEA should ensure that IEP meetings are scheduled enough in advance of the third birthday to allow for school closings (e.g., weather, illness, holidays) or other delays that are not allowable reasons for missing the 3rd birthday.
- Review the [Indicator 12 Early Childhood Transition FAQs](#) for additional guidance.

*There is no timeline extension available for the Indicator 12 transition requirement.*

## APR Indicator 6

APR Indicator 6 reports preschool educational environments and measures the percentage of preschool children, ages three through five, with an IEP who are enrolled in one of the following:

- a general early childhood program and receiving the majority (50% or more) of special education and related services in the general early childhood program;
- a separate special education class, separate school, or residential facility; or
- receive special education and related services at home.

In exercising its monitoring responsibilities, the state educational agency (SEA) must ensure that LEAs have available a continuum of alternative placements for preschool children with disabilities. In addition, LEAs should have in effect policies, procedures, and programs that ensure IEP team decisions related to LRE are being made on an individualized basis and consider placement and services in general early childhood classrooms with non-disabled peers, to the greatest extent possible.<sup>9</sup>

<sup>9</sup> See 20 U.S.C. § 1412(a)(5); 34 C.F.R. § 300.115; and State Board of Education (SBE) Rule 0520-01-09-.09(1)(g)(4).

Although both IDEA APR Indicator 5 and APR Indicator 6 address educational environments, they are measured differently. Indicator 5 data is determined by the percentage of the day a student with an IEP is served inside the general class. *“Percent of the day” does **not** inform Indicator 6 data.* A child’s preschool educational environment is defined by where the child is enrolled *and* where the child receives the special education and related services required by the IEP. Three main questions primarily define a child’s Indicator 6 data:

*A child’s preschool environment is defined by where the child is enrolled **and** where the child receives the special education and related services required by the IEP.*

1. Is the child *enrolled in a LEA or non-LEA setting/classroom* that meets OSEP’s definition of a general early childhood program?
2. Does the child receive 50% or more of his/her special education and related services *within the typical routines and activities in which all children in the general early childhood class participate?*
3. If not enrolled and served in a general early childhood program where does the child receive special education and related services (i.e., special education program, home, or in some other location)?

## **Definitions**

**General early childhood program** is an educational environment that includes *at least* 50% of children *without* IEPs and may include, but is not limited to, public (LEA) general education preschool classrooms, private preschool classrooms, Head Start, Voluntary Pre-K (VPK), licensed group child development centers, licensed childcare, or licensed family group childcare.

**Integrated services** are special education and related services provided in the general education program (e.g., classroom, playground) and delivered (embedded) within the daily routines and activities in which all children in the class participate (e.g., circle time, centers, outdoor time, specials). Integrated services support equal access to instruction and participation in contextually relevant and rich learning experiences within the environment.

**Majority of services** means 50% or more special education and related services are integrated within the general early childhood program (see integrated services definition above).

**Special education classroom** is an educational environment that includes *less than* 50% of children *without* IEPs and may include, but is not limited to, classrooms located in general LEA school buildings, trailers/portables, childcare facilities, outpatient hospital facilities, or other community-based settings.



**Separate school** is a school designed specifically for students with disabilities in either a public or private day school setting.

**Residential facility** is a public or privately operated residential school or residential medical facility where the student resides on an inpatient basis.

### ***Preschool Environment Options***

LRE must always be determined by the IEP team based on the individual child's needs and the requirement to provide FAPE, rather than administrative concerns. Because IDEA's LRE language makes clear "...removal of children with disabilities from the [general] educational environment occurs only if... education in [general education] classes with the use of supplementary aids and services cannot be achieved satisfactorily,"<sup>10</sup> the IEP team should presume enrollment in a general early childhood program with supplementary aids and services before considering a more restrictive alternative.

Even though some programs have eligibility requirements (e.g., VPK, Head Start), and all classrooms have a maximum enrollment, LEAs must always have available general early childhood program and service options such as:

- LEA-administered locally funded, Voluntary Pre-K (VPK) funded, and Title I funded general education preschool classrooms;
- Head Start;
- Private preschool programs approved by the department;<sup>11</sup> and/or
- Department of Human Services (DHS) licensed community-based childcare, group child development centers, and family group childcare.

In addition, throughout the school year, LEAs must maintain each general early childhood classroom enrollment of 50 percent or more children who do not have an IEP.

Consider this scenario: Stratford City Schools begins the school year by enrolling eight children without an IEP and five children with an IEP in their locally funded general preschool classroom. This allows three children with an IEP to join the class throughout the school year. By winter break, those three seats have been filled, and an IEP has been developed for Billy whose LRE is a general early childhood program. Stratford City must locate another general preschool setting for Billy because the current

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<sup>10</sup> See 34 C.F.R. § 300.114(a)(2).

<sup>11</sup> See SBE Chapter 0520-12-01.

classroom cannot enroll an additional child with an IEP. A child's LRE may not be changed to a more restrictive option as an administrative convenience.

**Note:** Although a preschool special education classroom may not always be in operation, the LEA must be prepared to provide, or contract with a private entity to provide, such placement if the IEP team determines a child requires a comprehensive preschool classroom or other more restrictive placement.

[Indicator 6: Preschool LRE Frequently Asked Questions](#) and [Indicator 6: Preschool LRE Inclusive Classroom Models](#) located on the department's webpage provide additional information about LRE requirements and preschool educational environment options.

### ***Community-based (Including Private School) Placement and Services***

IDEA does not prioritize LEA-administered preschool programs over community-based preschool settings, including those in private schools, and does not require services to be provided in a public-school building.<sup>12</sup>

An LEA must make an appropriate offer of FAPE in the child's LRE through an IEP, including in the following situations:

- the LEA does not operate a general early childhood program;
- the child cannot be enrolled in the LEA's existing general preschool program (e.g., due to space or program eligibility limitations); and/or
- the child is already attending a private preschool, licensed childcare or family childcare, or Head Start.

If a Part B eligible preschool age child already attends a community-based general early childhood program, the first option considered for placement and IEP service delivery should be the child's current setting, even if the LEA has an available seat in its own general early childhood program. The IEP team should weigh the potential harmful impacts on the child's sense of belonging, personal-social skills and relationships, and possible learning loss if the child must transition to a different classroom/setting or must travel back and forth between the current preschool program and a separate location for services.<sup>12</sup>

*The first option considered for placement and IEP services should be the child's current setting, even if the LEA has an available seat in its own general early childhood program.*

<sup>12</sup> See pages 9 and 12 of U.S. Department of Health and Human Services, & U.S. Department of Education (2023). [Policy Statement on Inclusion of Children with Disabilities in Early Childhood Programs](#).

If the parent declines the IEP and the child is (or will be) enrolled in a private preschool that meets Tennessee's definition of an elementary school, then the child may be considered "parentally placed" and eligible for equitable services through a service plan.<sup>13</sup> In Tennessee, a private nonprofit or residential school that serves any combination of pre-kindergarten through grade six students meets the "elementary school" definition.<sup>14</sup> The department's [Memo on Serving Students with Disabilities in Preschool](#) provides additional guidance.



### ***Integrated Special Education and Related Services***

To meet IDEA's requirement to serve children with nondisabled peers to the maximum extent appropriate, the IEP team must determine the LRE for each IEP service. Special education and related services for preschool children should be integrated, to the greatest extent possible, within the program's everyday developmental, social, and educational activities in which all children participate.

**Note:** Pulling a child aside within the general early childhood classroom/setting to receive specially designed instruction (SDI) or a therapy session is not considered an integrated service. If the child is enrolled in a non-LEA administered preschool program, the LEA may utilize an itinerant special education teacher and/or related service providers for service provision in the LRE.

IEP teams are encouraged to write goals that can be addressed and measured through the child's meaningful classroom participation with typical peers. Goals may be written with observable skills/behaviors, conditions, and performance criteria that guide teachers, educational assistants, and service providers to work together to address goals through integrated services and support.

*To meet IDEA's requirement to serve children with nondisabled peers to the maximum extent appropriate, the IEP team must determine the LRE for each IEP service.*

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<sup>13</sup> See generally 20 U.S.C. § 1412(a)(10)(A); 34 C.F.R. § 300.130 through 300.114; and U.S. Department of Education Office of Special Education Programs (2022). [Questions and Answers on Serving Children with Disabilities Placed by Their Parents in Private Schools](#).

<sup>14</sup> See Tenn. Code Ann. § 49-6-301.

## **Preschool Endorsement**

The LEA must ensure that the lead teacher is appropriately endorsed for the type of LEA-administered classroom being taught<sup>15</sup>

- a comprehensive preschool classroom that only enrolls children with IEPs; or
- a general early childhood classroom that enrolls 50% or more children without IEPs (i.e., pre-kindergarten P3, P3-4, or P4).

A teacher of a general early childhood class who *also* holds an approved comprehensive preschool endorsement may be responsible for special education services provided to children in his/her class. If the teacher does not hold both endorsements nor holds an approved integrated license, special education services must be provided by an additional educator with an approved preschool special education endorsement. LEAs should refer to the [Tennessee Course Catalog](#) for additional information.

## **IEP Components**

Requirements related to creating IEPs are the same for preschool-age children with disabilities as for older students; however, an IEP for a preschool child includes a LRE justification statement.

### **Prior Written Notice (PWN) and LRE Preschool Justification Statement**

All educational environment decisions, including initial placement, should be documented with sufficient detail in the PWN provided to the parent.<sup>16</sup> In addition, the LRE preschool justification statement must be completed to finalize a preschool child's IEP in TN PULSE. When a child is enrolled in a general education environment with 50% or more of IEP services delivered in that environment, the preschool LRE justification can be completed by stating that information. The IEP services and LRE statements must align with the justification statement.

Because children are not required to have certain skills, knowledge, or behaviors (e.g., pre-academics, toileting, verbal communication, following directions) to "earn" enrollment in a general early childhood program, a description of the child's disability (e.g., evaluation data, disability type or severity) or need for a particular service, support, or adaptation, is not, on its own, an adequate LRE justification statement.

*A description of the child's disability... or need for a particular service, support, or adaptation is not, on its own, an adequate LRE justification statement.*

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<sup>15</sup> See SBE Rule 0520-02-02.11.

<sup>16</sup> See SBE Rule 0520-01-09-.16.

If the IEP team decides that an alternative, more restrictive option is required, the LRE preschool justification statement and the PWN should detail three components of the LRE decision:

- 1) the discussion of a general early childhood program placement with services integrated within typical classroom routines and activities *as the first consideration*;
- 2) a description of the supplementary aids and services considered or tried; and
- 3) an explanation of why those supplementary aids and services are not sufficient for the child to receive FAPE in a general early childhood program.

## Transportation

The LEA must ensure IEP teams determine whether special transportation is a required related service for the child to benefit from preschool special education and related services.<sup>17</sup> If special transportation is needed for FAPE, it must be provided even if the preschool program does not provide transportation to nondisabled preschool children.

## Extended School Year (ESY)

The LEA must ensure that ESY services are available as necessary to provide FAPE.<sup>18</sup> IEP teams must consider ESY for each preschool child with a disability regardless of whether the child has attended school yet or started receiving Part B services. For example, a child with a June birthday transitioning from TEIS may require ESY over the summer. Questions the IEP team should discuss when considering ESY services include:

- Is the child showing a marked burst and progress on a skill (e.g., using words, interacting with peers, following directions) which requires support to maintain and prevent significant regression?
- Is the child's physical health or other needs such that continuous intervention is required?
- Will a break from routine or support lead to behavior that is harmful to self or others (e.g., biting, hitting, eloping) or cause regression in behavior such that the child will require a more restrictive LRE?

*A child with a June birthday transitioning from TEIS may require ESY services over the summer.*

The department's [Special Education Manual \(revised 2025\)](#) provides further guidance.

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<sup>17</sup> See 34 C.F.R. § 300.34.

<sup>18</sup> See 34 C.F.R. § 300.106.

## ***Preschool Environments Data Collection***

Use of the [Indicator 6 Decision Tree for Reporting Educational Environments for Preschool Special Education Services](#) supports the IEP team's LRE decision being correctly assigned to one of nine categories:

- A1: Enrolled in a general early childhood program 10 or more hours per week and receiving the majority (50% or more) of special education and related service hours in that program
- A2: Enrolled in a general early childhood program 10 or more hours per week and receiving the majority (50% or more) of special education and related service hours in some other location
- B1: Enrolled in a general early childhood program less than 10 hours per week and receiving the majority (50% or more) of special education and related service hours in that program
- B2: Enrolled in a general early childhood program GECP less than 10 hours per week and receiving the majority (50% or more) of special education and related service hours in some other location
- C1: Enrolled in a special education classroom (NOT attending a general education program)
- C2: Enrolled in a separate school (NOT attending a general education program)
- C3: Attending a residential facility, or inpatient hospitalization
- D1: Receiving the majority of special education and related services in the home (NOT included in any A, B, or C category)
- D2: Receiving the majority of special education and related services at a service provider location or some other location that is not in any other category

Examples of a service provider or other location not included in any other category (D2) include:

- a therapist's classroom or office in a school building (e.g., drop-in services);
- a private clinician's office;
- outpatient hospital facilities; and
- other public locations such as libraries, parks, and Mother's Day Out settings.



The [Indicator 6 LRE Data Collection User Guide](#) details steps to accurately record educational environment information in the student information section of the child's record.

## **LEA APR Indicator 6 Data**

Because IDEA requirements include a clear mandate to educate children and youth with disabilities in settings with typically developing peers to the greatest extent appropriate, OSEP expects all states to:

1. **Increase Indicator 6A:** the percentage of children (3-5 not in kindergarten) who are enrolled in and receiving the majority of their special education and related services in the general early childhood program
2. **Decrease Indicator 6B:** the percentage of preschool children enrolled in a special education program
3. **Decrease Indicator 6C:** the percentage of young children receiving special education and related services in the home

*The end goal is not to meet the target, but to meet the legal requirement to provide FAPE in the LRE for each child with a disability.*

The department sets targets—adjusted each year—and includes data in the annual statewide APR for each Indicator 6 sub-category. However, only 6A data is used when making APR local determinations. The end goal is not to meet the target, but to meet the legal requirement to provide FAPE in the LRE for each child with a disability.

Indicator 6 data is derived from each LEA's December 1 IDEA Child Count report generated in TN PULSE. Table 3 of Section A provides the numbers needed to calculate Indicator 6A, 6B, and 6C. For additional information and directions on how to run the IDEA Child Count report, LEAs may refer to the [APR Local Determinations Process Guide](#) and the [Annual Performance Report Local Determinations Quick Guide](#) located on the department's webpage.

The IDEA Child Count report categorizes preschool environments data by setting where IDEA services are provided (i.e., educational environment) and by preschool age. An analysis of LEA's Indicator 6 data may indicate that serving children in general early childhood programs is not being considered to the maximum extent appropriate. Potential red flags include, but are not limited to:

- low numbers of three-year-olds in the A1 and B1 categories, and high numbers in C1, D1, or D2;
- a sizable number of children in the A2 and B2 categories; and
- a sizable number of children served in the home (D1) or a service provider location (D2).

**Checking APR Indicator 6 Data in the IDEA Child Count Report** located in the TN PULSE resource library provides step by step directions for reviewing preschool educational environments data.

## **Indicator 6 Guidance**

LEAs should ensure they have a preschool LRE policy *and* implement specific written procedures for guiding IEP teams to make LRE decisions for preschool children based on IDEA requirements and each child's individual needs. The *policy* is a deliberate set of principles to guide preschool LRE decisions to achieve the LEA's intended outcomes (e.g., overarching tenets related to preschool LRE and meeting IDEA requirements). The *procedures* are a plan of activities describing step-by-step actions completed for an individual child to ensure the LEA's policy is implemented.

### **Preschool LRE Policy**

Each LEA's preschool LRE policy should include, at a minimum, the following:

- A statement that the LEA ensures children receive FAPE in the LRE as defined by IDEA<sup>19</sup> and the following assurances:
  - IEP teams presume each child being enrolled in and receiving services in a LEA or non-LEA classroom or setting defined as a general early childhood program (i.e., enrollment of 50% or more children without an IEP);
  - IEP teams consider supplementary aids and services needed in the general early childhood program before considering a more restrictive setting;<sup>20</sup>
  - educational environment placement, and service provision decisions are individualized and not based on a child's disability category, the type of special education or related services required, preschool program availability, funding issues, or administrative convenience; and
  - IEP teams have a continuum of alternative placements available if a child requires a more restrictive setting to receive FAPE.<sup>21</sup>
- A statement ensuring a detailed IEP preschool LRE justification is completed and a PWN is provided to the parent that includes a clear description of the IEP team's LRE decision, where and in what manner special education and related services will be provided, and the rationale for the team's decisions.<sup>22</sup>

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<sup>19</sup> See 34 C.F.R. § 300.114(a)(2).

<sup>20</sup> See 34 C.F.R. § 300.42; 34 C.F.R. § 300.320(a)(4).

<sup>21</sup> See 34 C.F.R. § 300.115.

<sup>22</sup> See 34 C.F.R. § 300.320; 34 C.F.R. § 300.503.

## Preschool LRE Procedures

When developing procedures to implement LRE policy some questions to consider include:

- What steps will IEP teams follow to make LRE decisions on an individualized basis?
- If a special education supervisor attends an IEP meeting, what should they hear and see to know procedures to implement the LEA's LRE policy are being followed?
- What action steps will ensure PWNs and IEP LRE justification statements provide written evidence that the established LRE procedures were followed?

The **Fillable LRE Decision-Making Worksheet for Preschool** is a resource available in the early childhood section of the TN PULSE Resource Library. LEAs may use this worksheet to support IEP teams to appropriately determine and document LRE.

When developing procedures, the LEA may want to include action steps related to the Child Find mandate and TPCs, IEP meetings, child progress monitoring, communication and collaboration with families, as well as program planning, management, and oversight. For example, creating IEP meeting procedures might include the following considerations:

Prior to the IEP team meeting, what procedures will be implemented to:

- provide parents with resources explaining:
  - the definition and benefits of preschool inclusion and integrated services,
  - IDEA's LRE definition and requirements, and
  - what to expect and how to prepare for the IEP team meeting;
- observe the child in settings and situations natural to the child; and
- provide the parent an opportunity to visit the LEA's preschool classrooms.

During the IEP team meeting, what procedures will be followed to:

- involve parents in all aspects of IEP development;
- facilitate understanding and discussion of preschool inclusion and integrated services;
- maximize the contribution of the general education teacher (e.g., to address parents' questions and concerns, describe daily activities, and envision strategies to support the child's classroom participation);
- document present levels and write IEP goals that focus on functional skills and behaviors and promote the child's access to and meaningful participation with typical peers in the developmental, social, and educational activities of the early childhood program;
- start with the presumption of a general early childhood program placement regardless of a child's current abilities, disability category/severity, or the services and supports needed; and



- consider supplementary aids and services to support the child in the general early childhood program before determining a more restrictive alternative placement is required for the child to receive FAPE.

After the IEP team meeting, what procedures will be utilized to:

- create a detailed PWN;
- assist parents with program enrollment as needed;
- partner with parents in supporting their child and engaging in the classroom community;
- support collaboration to provide integrated services in the child’s LEA or non-LEA administered placement to the maximum extent appropriate; and
- ensure and monitor IEP implementation (e.g., assistive technology, transportation, related services, accommodations).

## APR Indicator 7

Indicator 7 measures the percentage of preschool children ages three through five, not in kindergarten, with an IEP who demonstrate improved:

**Outcome A:** Positive social-emotional skills (including social relationships),

**Outcome B:** Acquisition and use of knowledge and skills (including early language/communication and early literacy), and

**Outcome C:** Use of appropriate behaviors to meet their needs.<sup>23</sup>



### Outcome Definitions

Preschool outcomes—previously termed early childhood outcomes (i.e., ECOs)—are defined as follows:<sup>24</sup>

**Outcome A: Positive Social-emotional Skills** refers to social relationships and skills and behaviors for relating with caregivers, attending to other people in a variety of settings, interacting with peers, participating in social games, communicating with others, following social norms, adapting to change in routines, expressing one’s own emotions, and responding to emotions of others.

<sup>23</sup> The preschool outcomes are sometimes referred to as Outcomes 1, 2, and 3.

<sup>24</sup> For additional descriptions of the three outcomes, see Early Childhood Technical Assistance Center (2023). [Breadth of the Three Child Outcomes](#).

**Outcome B: Acquisition and Use of Knowledge and Skills** refer to developing and using cognitive skills and behaviors such as showing an interest in learning, using problem solving, engaging in purposeful play, understanding pre-academics and literacy, understanding questions asked and directions given, and acquiring language to communicate.

**Outcome C: Use of Appropriate Behaviors to Meet Their Needs** refers to skills and behaviors used to get one’s needs met including moving around, manipulating objects/tools to meet needs, eating and drinking with increasing independence, dressing/undressing with increasing independence, diapering/toileting, and washing with increasing independence, communicating needs, and showing safety awareness.

**Functional Skills**

Preschool outcomes consider the integrated nature of early childhood development and learning rather than isolated skills separated into developmental domains. Functional skills are those the child integrates with intent and purpose across family, classroom, and community settings. A skill may be described as functional when it can be understood why the child is using the skill to complete tasks meaningful to the child and to participate in everyday life.<sup>25</sup>

**Table 1.** Isolated Skill vs. Functional Skill

Isolated Skill	Functional Skill
Stand on one foot	Stand on one foot to play hopscotch with friends
Bring hands together at midline	Clap hands to participate in music activities at circle
Stack five blocks	Stack blocks to cooperatively build structures with friends
Climb steps with alternating feet	Climb steps of play structures at the park and school
Turn pages in a book	Turn book pages to “read” to a sibling

**Note.** An isolated or discrete skill can be considered functional when the child’s intent and purpose for using the skill is known.

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<sup>25</sup> For additional guidance and resources see Early Childhood Technical Assistance Center (2022). [Understanding Functional Skills: Background for the COS Process.](#)

Academic skills are functional when they have intent and purpose in a context meaningful for the child. For example, a child may use a combination of social-personal, physical, communication, and cognitive skills to ask and answer “Wh” questions of peers and adults during circle or center time. The outcome is the child’s meaningful participation in preschool learning activities, not a discrete, domain-specific skill (e.g., articulate specific phonemes, follow one-step directions) that may support such participation.

*The outcome is the child’s meaningful participation... not a discrete, domain-specific skill... that may support such participation.*

## ***Ratings Determinations***

Preschool outcomes are determined by a group of individuals who have specific information about a child’s functional skills and behaviors. The team collaborates to assign the outcome rating for a child when entering preschool special education with an initial IEP and when exiting preschool special education services. While there is no defined preschool outcomes team, parents and other caregivers are necessary participants as they can provide context of the child’s skills in settings and situations outside of the school environment. Other recommended participants include assessment specialists and TEIS staff (i.e., for entrance ratings), and general education preschool teachers, special education preschool staff, related service providers, and others who know the child (i.e., for entrance or exit ratings).

A complete IEP team is *not* required to determine preschool outcome ratings; however, the IEP team meeting is an opportune time to determine a child’s outcome ratings.

**Note:** Entrance ratings *must* be completed to finalize an initial IEP for a preschool child.

## ***Child Outcome Summary (COS) Process***

The Child Outcome Summary (COS) process asks participants to determine ratings by considering the child’s level of functioning in each of the three preschool outcome areas, as it compares to skills and behaviors of typically developing same-age peers. For information about age-expected skills and behaviors teams may refer to developmental milestone resources such as the Centers for Disease Control and Prevention’s (CDC) Developmental Milestones, the Tennessee Early Learning Developmental Standards (TN-ELDS), and early childhood assessment and evaluation instruments.<sup>26</sup>

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<sup>26</sup> For additional resources detailing age-expected skills and behaviors see the Early Childhood Technical Assistance Center’s (ECTA) [Child Development Resources](#).

## COS Rating Definitions

**Age-expected (AE)** skills and behaviors are those considered typical for children of a particular chronological age.

**Immediate foundational (IF)** skills and behaviors are seen developmentally just prior to age-expected ones.

**Foundational (F)** skills and behaviors are those that occur early in development and are conceptually mapped to later skills and behaviors and are the foundation for later development.

Refer to Table 2 for an example of age-expected, immediate foundational, and foundational skills across the preschool age range.

**Table 2.** Children write information to examine and convey complex ideas and information clearly (TNELDs PK.W.TTP.2)

Child's Age	Age-expected Skills	Immediate Foundational Skills	Foundational Skills
Three-year-old	<ul style="list-style-type: none"> <li>Scribbles and draws with intentionality</li> </ul>	<ul style="list-style-type: none"> <li>Grasps writing tool in palm to scribble or mark</li> </ul>	<ul style="list-style-type: none"> <li>Begins to show interest and explores writing tools by bringing to mouth</li> </ul>
Four-year-old	<ul style="list-style-type: none"> <li>Recognizes printed name and attempts to print</li> <li>Uses purposeful scribbling</li> </ul>	<ul style="list-style-type: none"> <li>Holds tool in palm of hand using all fingers and scribbles</li> </ul>	<ul style="list-style-type: none"> <li>Holds large writing tool and marks with it, resulting in visual feedback</li> </ul>
Five-year-old	<ul style="list-style-type: none"> <li>With support, use a combination of drawing, dictating, and/or emergent writing to narrate a single event</li> </ul>	<ul style="list-style-type: none"> <li>"Writes" name on paper, letters may or may not be readily identified by others</li> </ul>	<ul style="list-style-type: none"> <li>Draws a circle; imitates a horizontal crayon stroke</li> </ul>

**Note.** This table describes writing skills in preschool children at age three, age four, and age five.

Rather than administering a formal assessment removed from a natural context, teams gather and discuss detailed information about how the child uses skills and behaviors to learn, play, communicate, and explore while participating in everyday preschool, community, and family activities. This information allows the functional purpose and use of skills to be determined and considered within

the relevant outcome area. Although data from a formal assessment or evaluation may be considered, authentic assessments and natural observation from the child's parents, teachers, service providers, and other caregivers should form the basis of determining preschool outcomes ratings.

**Authentic assessment** refers to observations while a child is engaged in the everyday activities of preschool-age children.<sup>27</sup> This allows the child to show genuine strengths and abilities and for adults to consider support that may be needed.



## COS Rating Scale

An outcome rating is determined when a child with an IEP enters a preschool program (entrance rating) and when the child exits preschool special education services (exit rating). The COS process uses the seven-point [Child Outcomes Summary Rating Scale](#) to compare a child's current functional skills and behaviors in each of the three outcome areas to the skills and behaviors of typically developing peers the same age, as follows:

**Rating 7**—Child functions in ways that are *age-expected in all or almost all everyday situations*. No one on the team has concerns about the child's functioning in this outcome area.

**Rating 6**—Child's functioning *generally is considered age-expected*, but there are some significant concerns about the child's functioning. Although age-expected, the child's functioning may border on not keeping pace with age expectations.

**Rating 5**—Child functions using *a mix of skills, with more skills that are age-expected than not age-expected*, across settings and situations. Child's functioning might be described as like that of a slightly younger child.

**Rating 4**—Child *occasionally uses age-expected skills* across settings and situations. More functioning is not age-expected than is age-expected.

**Rating 3**—Child *uses immediate foundational skills most or all the time*. Child does not yet function in ways that would be considered age expected. Functioning might be described as that of a younger child.

**Rating 2**—Child *occasionally uses immediate foundational skills* across settings and situations. Child does not yet function in ways that would be considered age expected. More functioning reflects skills that are immediate foundational than foundational.

**Rating 1**—Child only *uses foundational skills*. Child does not yet function in ways that would be considered age-expected or immediate foundational.

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<sup>27</sup> For additional information see Early Childhood Technical Assistance Center (2017). [DEC Recommended Practices Topic Area: Authentic Child Assessment \(Practitioner Practice Guide: Assessment 3.1\)](#).

## **COS Decision Tree**

The [Child Outcomes Summary \(COS\) Process Decision Tree](#) helps the rating team members use information collected about the child’s functional skills and behaviors to determine the appropriate 1-7 rating. The first question posed is, “Does the child ever function in ways that would be considered age-expected with regard to this outcome?” Simply put, if the child uses any age-expected skill or behavior for that outcome, the team will be considering a rating of 4-7 (right side of the decision tree). The team would then answer the remaining questions on the right side of the decision tree to address the extent and frequency of age-expected skills shown. If, instead, the child does not yet have skills that are considered age-expected, the team would look to a rating of 1-3 and consider the left side of the decision tree and the child’s use of immediate foundational and foundational skills/behaviors.

Because outcome ratings are not based on a checklist or evaluation of discrete skills, it may seem like the determination is simply subjective. However, the COS process asks family members, teachers, service providers, and others familiar with the child’s functioning across different settings to combine information from multiple sources (e.g., authentic assessment, progress monitoring, curriculum- or norm-referenced data) to reach consensus on entrance and exit outcome ratings. If the definition of each rating number is understood and the child’s functional skills are identified and compared to age expectations, the COS process will result in valid outcome ratings.<sup>28</sup>

*If the definition of each rating number is understood and the child’s functional skills are identified and compared to age expectations, the COS process will result in valid outcome ratings.<sup>28</sup>*

## **Preschool Outcomes Entrance Ratings**

The **Child Outcomes Summary (COS) Process Fillable Form** found in TN PULSE’s early childhood resources provides a structure to help ensure each child’s preschool outcomes ratings are valid and supported by evidence. Outcomes ratings are entered in the “preschool” section of the “Student Info” tab in the child’s record.

Entrance ratings are required at initial IEP development for a preschool child ages three to 5 years, 6 months old. The entrance data must be entered into TN PULSE to finalize an IEP. The **Indicator 7 Data Collection Guide** found in the TN PULSE resource library provides detailed instructions for entering preschool outcomes data in a child’s record.

Because a child may not yet have attended preschool, a team may find it challenging to have the

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<sup>28</sup> For additional explanation see Early Childhood Technical Assistance Center (2025). [Frequently Asked Questions About the COS Process: Are COS Ratings Objective?](#)

information necessary to determine a rating and should consider all opportunities to interact with the child and parent(s) prior to developing the IEP to obtain information (e.g., TEIS transition meeting, child screening, eligibility evaluation/observation, parent interview/questionnaire).

Information should be considered from team members who see the child in different settings and situations to have a fuller, and more global, picture of the child's functioning. The team should use the rating definitions and the decision tree to guide the discussion. A parent's expertise about their child and the LEA professional's expertise on child development are used to come to a consensus about the rating to be assigned.



A rating, 1-7, is assigned for each outcome and input to the child's preschool outcomes page. A rationale for the rating assigned is also included. The rationale should incorporate specific information collected as the rating was determined and should describe the child's functional skills in the outcome area. For example, a rating of '4' is between *somewhat* age-expected and *nearly* age-expected and should describe a child who shows occasional age-expected skills and behaviors across settings and situations but has more immediate foundational skills than age-expected skills.

When finalizing the IEP an error message may appear if the child's preschool outcomes data has not been entered with the date the entrance ratings were determined, the rating determined (1-7) in each of the three outcomes, and a rationale for each assigned rating. *Note that a child's entrance ratings remain the same if there is a transfer between LEAs in Tennessee.*

### TN PULSE Outcomes Entrance Reminder Symbols



#### COLLECT ENTRANCE DATA

For a child less than 5 years, 6-months-old **with initial eligibility**, a yellow question mark is a reminder to collect entrance data.



#### ENTRANCE DATA MISSING

For a child less than 5 years, 6-months-old **with an IEP**, a red X is displayed if the entrance data has not been entered.

### ***Preschool Outcomes Exit Ratings***

Preschool Outcomes exit ratings must be determined when a child is *exiting* preschool special education services (e.g., transitioning to kindergarten, no longer eligible, moving from the LEA, parent

withdrawal from special education services). Exit ratings are required when a child has entrance ratings and has had an IEP for *at least six months* (i.e., 183 days). An IEP team meeting is not required to determine exit ratings; however, many recommended participants are available at an IEP meeting. Parents, teachers, service providers, and others with information about the child's functioning, as it compares to age-expected skills, should provide input for appropriately determining exit ratings (1-7) in each of the three outcomes. The rationale supports the selected rating and addresses skills the child has at the date of the exit rating.

In addition to assigning an exit rating, the team also states a child's progress while enrolled in preschool special education. In answering, *Has the child made progress?* a child is compared to the past skills and behaviors of his/her younger self. If the child has gained any new skill or behavior in the outcome area since the entrance rating, the progress question will be answered *yes*, regardless of the exit outcome rating. Most children make progress even if the overall outcome rating number does not increase. For example, to maintain a rating of 4 from entrance to exit, a child must have gained new skills across the time between the two ratings as more is expected of an older child.

*Most children make progress even if the overall outcome rating number does not increase.*

The progress rationale box should include information for skills gained during preschool. There may be a small number of children with significant disabilities or degenerative conditions who show no gains in skills, and an answer of *no* to the progress question may be appropriate. The progress question must have a response for complete preschool outcomes exit data, and this information is used in calculating the reporting category.

### TN PULSE Outcomes Exit Reminder Symbols

6



#### COLLECT EXIT DATA

The yield symbol appears when a child has entrance data, six months of services, and turns five years, six months old.

6



#### EXIT DATA MISSING

The stop sign appears when a child without exit data turns six years old or exits preschool special education.

## Reporting Indicator 7 Data

States are required to report the progress between the time a child receiving special education and/or related services enters and exits a preschool program. The department sets targets for each year and includes data in the state's APR for each Indicator 7 outcome for each of two summary statements (i.e., six data points):



**Summary Statement 1** – of those preschool children who entered the preschool program below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they turned 6 years of age or exited the program

*Measurement:  $(c+d)/(a+b+c+d)$*

**Summary Statement 2** – percent of preschool children who were functioning within age expectations in each Outcome by the time they turned 6 years of age or exited the program

*Measurement:  $(d+e)/(a+b+c+d+e)$*

Although both summary statements are reported for the state's APR, only summary statement one is included in the LEA's APR Local Determination.

To compute the summary statements, each child's data for each of the three outcomes is first assigned to one of the five progress categories (i.e., a – e in the measurement) as defined in Table 3. To be included in the calculation, the child's Indicator 7 data in TN PULSE must have for each outcome 1) an entrance rating, 2) an exit rating following at least six months (i.e., 183 days) of service, and 3) a determination of progress made between entrance and exit.

It is recommended that LEAs check for complete and accurate preschool outcomes data on a quarterly basis. The **Preschool Outcomes Data Check Template** and **Preschool Outcomes Data Check Template Instructions** available in the TN PULSE early childhood resource library provide detailed information to run an ECO Report and use the template to identify potential data entry errors or missing data.

*It is recommended that LEAs check for complete and accurate preschool outcomes data on a quarterly basis.*

**Table 3.**

Progress Categories for Calculating Preschool Outcomes' Summary Statements

<b>Progress Categories for Preschool Outcomes</b>	
<b>Category a</b>	Percent of preschool children who did not improve functioning
<b>Category b</b>	Percent of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers
<b>Category c</b>	Percent of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it
<b>Category d</b>	Percent of preschool children who improved functioning to reach a level comparable to same-aged peers
<b>Category e</b>	Percent of preschool children who maintained functioning at a level comparable to same-aged peers

**Note.** This table defines the five progress categories used to calculate the two summary statements for each preschool outcome.

### ***Preschool Outcomes Data Analysis***

In reviewing trends in an LEA's preschool outcomes data for markers of rating determination validity, the following assumptions should be considered:

- Because more children experience a mild disability/impact than experience severe impairment, there will be relatively few ratings at the low end of the scale.
- In addition, few children receiving special education services will have entrance outcome ratings indicating the child's skills are age-expected.
- A child's ratings will not vary greatly, because of the interrelated and functional nature of the three outcomes. For example, a rating of 7 for Outcome A (e.g. interacting with peers) and a 4 for Outcome B (e.g., engaging in purposeful play) is unlikely.
- Because growth is usually steady across time, a child's outcome ratings will not show a dramatic increase between entering and exiting the preschool program. A potential red flag would be an entrance rating of 2 (i.e., not yet functioning in ways that would be considered age-expected) and an exit rating of a 5 (i.e., more skills that are age-expected than not age-expected).

## **Indicator 7 Guidance**

Although meeting overall Indicator 7 targets is an important goal, the priority is ensuring positive outcomes and growth for each individual preschool child with an IEP. The following strategies may support LEAs to 1) promote individual child progress in each outcome area, and 2) collect and document valid Indicator 7 data:

- Engage in continuous review and improvement of the classroom environment and instructional practices to ensure a high-quality program that promotes growth and outcomes for all children.
- Plan for the individual needs of each child (e.g., adaptations, embedded learning opportunities, specially designed instruction) and consider IEP goals in relation to the three preschool child outcomes.
- Utilize tiered support (e.g., positive behavioral intervention and support) and other resources to support children's learning and development.
- Implement on-going professional development on a variety of Indicator 7 topics (e.g., functional skills, age expectations, the COS process, data collection requirements). Include follow-up to evaluate the effectiveness and outcomes of professional development efforts.
- Provide opportunities for practice and collaboration to support inter-rater reliability in determining and documenting outcome ratings.
- Support families in understanding preschool outcomes and being full participants in the COS process.
- Encourage use of the ***Child Outcomes Summary (COS) Process Fillable Form*** (found in the TN PULSE resource library).
- Obtain LEA data from the statewide APR Indicator 7 report for trend analysis to identify possible data validity red flags (e.g., look for ratings profiles outside of expected growth).
- Refer to [APR Indicator 7 Preschool Outcomes Frequently Asked Questions](#) for further guidance.



# Additional Preschool Requirements

## ***Preschool Discipline Procedures***

The IDEA requires that LEAs follow policies and procedures to ensure IDEA protections to all students with disabilities related to discipline, including those related to suspension and expulsion, a change of educational environment, manifestation determination, and provision of services beginning with the 11th cumulative day of removal in a school year.<sup>29</sup> The LEA's discipline procedures for students with an IEP, including preschool children (ages 3-5), must specify procedures for functional behavior analyses (FBAs) and behavior intervention plans (BIPs).<sup>30</sup> Data collection and reporting practices related to preschool discipline, including informal removals, should align with those for school-age students with disabilities.

Informal removals include any action taken by school personnel in response to a child's behavior that excludes the child from educational services for all or part of the school day and is not officially coded as a suspension or expulsion. Examples include:

- Encouraging a parent/guardian to pick up their child early or to remove the child from the program,
- Excessive use of time out, and
- Repeated office referrals.

Informal removal of a preschool child with an IEP *must* be counted toward the 10 days and the child must be afforded all legal protections, including those associated with manifestation determination review (MDR) requirements.

*Informal removals include any action taken by school personnel in response to a child's behavior that excludes the child from educational services for all or part of the school day and is not officially coded as a suspension or expulsion.*

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<sup>29</sup> See 34 C.F.R. §§ 300.530-300.536; SBE Rule 0520-01-09-.24; and U.S. Department of Education Office of Special Education Programs (2022). [Questions and Answers: Addressing the Needs of Children with Disabilities and IDEA's Discipline Provisions](#).

<sup>30</sup> For additional information see U.S. Department of Education (2024). [Using Functional Behavioral Assessments to Create Supportive Learning Environments](#).

State law requires LEAs to develop and implement a policy for alternatives to exclusionary discipline practices for pre-K programs.<sup>31</sup> [Tennessee Guidelines and Standards for Alternatives to Exclusionary Discipline in Pre-K](#) and the Department's [Model Policy for Alternatives to Exclusionary Discipline in Pre-K](#) can be found on the department's Early Learning webpage.

*State law requires LEAs to develop and implement a policy for alternatives to exclusionary discipline practices for pre-K programs.*

## Summary

The Tennessee Department of Education must meet federal and state requirements for providing a free appropriate public education for preschool children with disabilities. The department is committed to equipping local education agencies with the information and resources needed to provide children and families with a smooth and effective transition from IDEA Part C to Part B services, general early childhood program enrollment with integrated special education and related services, and positive outcomes and growth through receiving preschool special education services. For further information, contact [TDOE.EarlyLearning@tn.gov](mailto:TDOE.EarlyLearning@tn.gov).

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<sup>31</sup> See Tenn. Code Ann. § 49-6-3024.26.

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